City of SANTA BARBARA PLANNING

COMMUNITY DEVELOPMENT DEPARTMENT
630 GARDEN ST. SANTA BARBARA, CA 93101
(805) 564-5578 | SantaBarbaraCA.gov

INITIAL STUDY

PROJECT TITLE: 1 Hot Springs Road

APPLICATION NUMBER: PLN2024-00217

DATE: May 15, 2026

Pursuant to the State of California Public Resources Code and the "Guidelines for Implementation of the California Environmental Quality Act of 1970," as amended to date, this Initial Study/Mitigated Negative Declaration has been prepared for the following project:

PROJECT LOCATION: City of Santa Barbara

PROJECT PROPONENT: City of Santa Barbara Community Development Department

PROJECT DESCRIPTION: The project consists of a 22-unit residential development comprised of two- and three-story townhouses within seven individual buildings with a maximum height of three stories or 39'-2" and is proposed under the City of Santa Barbara's variable density provisions under Title 28 of the Santa Barbara Municipal Code (SBMC) consisting of 5 studios, 5 two-bedroom, and 12 three-bedroom units. Five of the units would be restricted to low-income households. The average unit size is approximately 1,421 square feet and the gross building area is approximately 31,258 square feet. The project includes solar panel array per unit, using 250W panels.

The project includes 50 parking spaces, comprised of 39 spaces within private garages, 1 uncovered parking space to serve the residential units, and 10 uncovered guest parking spaces. Of the parking spaces, 39 would be electric vehicle (EV) capable, and 3 spaces would include EV chargers. All bicycle parking for the development would be provided within the private garages. The project would provide approximately 8,852 square feet of common open yard area, and private open yard for each of the residential units either at on-grade patios or on upper story decks. The project would also include streetlights along the drive areas within the proposed development.

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INTRODUCTION

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations [CCR], §15000 et seq.). This Initial Study has been completed for the project described below because the project is subject to review under CEQA and was determined not to be exempt from the requirement for the preparation of an environmental document. The information, analysis, and conclusions contained in this Initial Study determine whether the project could have significant environmental impacts and if preparation of a Negative Declaration (ND), Mitigated Negative Declaration (MND), or Environmental Impact Report (EIR) is required to further analyze project impacts and significance levels. Additionally, if preparation of an EIR is required, the Initial Study is used to focus the scope of the EIR on the effects determined to be potentially significant. As evaluated in this Initial Study, all environmental impacts would be less than significant or mitigated to a less than significant level. As such, preparation of an EIR is not required.

LEAD AGENCY

City of Santa Barbara
Community Development Department, Planning Division
P.O. Box 1990
Santa Barbara, CA 93102-1990

Contact Person:
Pilar Plummer, Associate Planner
PPlummer@SantaBarbaraCA.gov
(805) 564-5470, ext. 4551

APPLICANT/ PROPERTY OWNER

Applicant: Brian Holland, 1 HSR GP, LLC

Owner: Santa Barbara Cemetery Association

PROJECT ADDRESS/LOCATION

1 Hot Springs Road (APN 017-393-002)

PROJECT DESCRIPTION

See Exhibit A—Project Plans

Project Site

The generally triangular project site is located at 1 Hot Springs Road in Santa Barbara and is currently a vacant lot of approximately 2.4 acres bound on the south by Channel Drive, on the west by East Cabrillo Boulevard, and by the Union Pacific Railroad (UPRR) along the entire north side of the lot.

As part of the Cabrillo Boulevard/UPRR Underpass Replacement Project to widen East Cabrillo Boulevard, the City will acquire approximately ≤ 0.5 acres from the west-portion of the project site. Also, ownership of the small triangular parcel (APN 017-393-003) along Channel Drive that is owned by the City will be transferred to the property owner (Santa Barbara Cemetery Association) and will be incorporated into the project site.

The existing project site includes the Charles Caldwell Park Watering Trough and Fountain at the corner of East Cabrillo Boulevard and Channel Drive. Constructed in 1911-1912, the fountain is a City Landmark. The fountain, anticipated to be repaired by the City as part of the Cabrillo Boulevard project, and the surrounding land area, will likely be transferred to the City. There is also a cellular tower on the project site that is proposed to remain.

Project Components

The project consists of a 22-unit residential development comprised of two- and three-story townhouses within seven individual buildings with a maximum height of three stories or 39'-2" and is proposed under the City of Santa Barbara's variable density provisions under Title 28 of the Santa Barbara Municipal Code (SBMC) consisting of 5 studios, 5 two-bedroom, and 12 three-bedroom units. Five of the units would be restricted to low-income households. The average unit size is approximately 1,421 square feet and the gross building area is approximately 31,258 square feet. The project includes solar panel array per unit, using 250W panels.

The project includes 50 parking spaces, comprised of 39 spaces within private garages, 1 uncovered parking space to serve the residential units, and 10 uncovered guest parking spaces. Of the parking spaces, 39 would be electric vehicle (EV) capable, and 3 spaces would include EV chargers. All bicycle parking for the development would be provided within the private garages. The project would provide approximately 8,852 square feet of common open yard area, and private open yard for each of the residential units either at on-grade patios or on upper story decks. The project would also include streetlights along the drive areas within the proposed development.

There are currently 25 existing trees on site: seven are native oaks and 18 are other non-native trees. Two of the seven native oaks are proposed to be removed, one of which is currently dead. Of the 18 non-native trees, 17 are proposed to be removed. The one non-native to be retained is a sugar gum eucalyptus. The project would provide 199 new trees to be planted on the site.

Offsite improvements proposed within the public right-of-way include construction of curb, gutter, sidewalk, and a driveway entrance along Channel Drive. Each residential unit within the development would be served

by a dedicated private water submeter on the property, and a city master meter would be installed in the public right-of-way to serve the private submeters.

The project would comply with Tier 4 Storm Water Management Program (SWMP) requirements and includes bioretention basins, a trench drain at the driveway entrance from Channel Drive, permeable pavers at all drive and parking areas, roof drains to permeable pavers, and two underground stormtech chambers with a storage capacity of 370 cubic feet (CF) and 1,134 CF.

Demolition/Construction

The project site is currently vacant, with the exception of the fountain and cellular tower that will remain. Estimated grading quantities include roughly 1,700 cubic yards of cut and 1,700 cubic yards of fill. Construction is anticipated to occur over a 24-month period. No pile drivers would be used.

REQUIRED DISCRETIONARY ACTIONS

The following discretionary actions are required for the Project:

- A Setback Modification to allow encroachments into the required front and interior setbacks (SBMC §28.92.110 and 28.21.060).
- A Coastal Development Permit to allow the proposed development in the Non-Appealable Jurisdiction of the City's Coastal Zone (SBMC §28.44.060).
- A Local Coastal Program Amendment to change the coastal land use designation from Parks/Open Space to Medium Density Residential (12 du/ac).
- A Local Coastal Program Amendment for a Coastal Zoning Map Amendment to change the zone from R-1/SD-3 (One-Family Residence/Coastal Overlay) to R-3/SD-3 (Limited Multiple Family Residence/ Coastal Overlay) Zone.
- Project Design Approval and Final Approval of the design by the Historic Landmarks Commission.

OTHER PUBLIC AGENCY APPROVALS REQUIRED

The Project requires California Coastal Commission approval of the Local Coastal Program Amendment.

TRIBAL CONSULTATION

The City of Santa Barbara contacted California Native American tribes traditionally and culturally affiliated with the project site area which occurred on August 28, 2025. Refer to Section 18, *Tribal Cultural Resources*, below, for additional information.

PROPERTY CHARACTERISTICS

SITE INFORMATION			
Assessor's Parcel Number:	017-393-002	Lot Area:	88,524 SF (approx. 2.4 acres)

General Plan/LCP Designation:	Parks/Open Space	Zoning:	R-1/SD-3 (One-Family Residence/Coastal Overlay)
Existing Use:	Cellular Site	Slope:	10%

SURROUNDING LAND USES & ZONING

	Existing Uses	Zoning
North:	P-R/SD-3	Railroad; Highway 101
South:	County	Public Right-of-Way (Channel Dr.); Railroad
East:	County	Public Right-of-Way (Channel Dr.); Cemetery
West:	HRC-2/P-R/SD-3	Public Right-of-Way (E. Cabrillo Blvd); Commercial; Andree Clark Bird Refuge

ENVIRONMENTAL SETTING

EXISTING SITE LAND USES AND CHARACTERISTICS

A Master Environmental Assessment (MEA) report for the project site was generated using the City's online Maps Analysis and Printing System (MAPS) on December 8, 2025. This report provides an overview of existing environmental conditions at the project site. Refer to **Exhibit B—Master Environmental Assessment (MEA) Report**.

As previously described, the project site is currently a vacant lot. The existing project site includes the Charles Caldwell Park Watering Trough and Fountain at the corner of East Cabrillo Boulevard and Channel Drive, which is anticipated to be repaired by the City as part of the Cabrillo Boulevard project, and will likely be transferred to the City. There is also a cellular tower on the project site that is proposed to remain as part of the project.

NEIGHBORING LAND USES AND CHARACTERISTICS

As discussed above, the project site is bound on the south by Channel Drive, on the west by East Cabrillo Boulevard, and by the UPRR along the entire north side of the lot. Beyond Channel Drive to the south is the Santa Barbara Cemetery, across Cabrillo Boulevard to the west is the Andree Clark Bird Refuge and a retail shopping center, and beyond the UPRR to the north is the US-101 freeway. An industrial yard owned by Montecito Sanitary District is located southeast of the project site across Channel Drive.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project. However, mitigation measures have been incorporated, which would reduce potentially significant impacts to a less than significant level, as indicated by the checklist on the following pages.

☐ 1. Aesthetics	☐ 2. Agriculture/Forestry Resources	☐ 3. Air Quality
☒ 4. Biological Resources	☒ 5. Cultural Resources	☐ 6. Energy
☐ 7. Geology & Soils	☐ 8. Greenhouse Gas Emissions	☒ 9. Hazards & Hazardous Materials
☐ 10. Hydrology/Water Quality	☐ 11. Land Use & Planning	☐ 12. Mineral Resources
☒ 13. Noise	☐ 14. Population & Housing	☐ 15. Public Services
☐ 16. Recreation	☐ 17. Transportation	☐ 18. Tribal Cultural Resources
☐ 19. Utilities/Service Systems	☐ 20. Wildfire	☐ 21. Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

☒ I find that although the proposed project **COULD** have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. a **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

☐ I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project **COULD** have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, **NOTHING FURTHER IS REQUIRED**.

PREPARED BY

Preparer's Signature

5/1/2026

Date

Eyestone Environmental on behalf of the City of Santa Barbara

Preparer's Name (printed)

ENVIRONMENTAL CHECKLIST

The following checklist contains questions concerning potential changes to the environment that may result if this project is implemented. The potential level of significance should be indicated as follows:

- **Significant:** Known substantial environmental impact. Further review is needed to determine whether there are feasible mitigation measures and/or alternatives to reduce the impact.
- **Potentially Significant:** Unknown, potentially significant impact that needs further review to determine significance level and whether any impact identified as potentially significant can be mitigated.
- **Less than Significant with Mitigation:** Potentially significant impact that is avoided or reduced to less than significant level with identified feasible mitigation measures.
- **Less than Significant:** Impact that is not substantial or significant.
- **Beneficial Impact**: Impact would improve environmental conditions.
- **No Impact:** Project would not cause this type of impact.

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.

a. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration pursuant to Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

b. Earlier Analyses Used. Identify and state where they are available for review.

c. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

5. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify the significance criteria or threshold, if any, used to evaluate each question; and the mitigation measure identified, if any, to reduce the impact to less than significant.

1. AESTHETICS AND VISUAL RESOURCES

AESTHETICS AND VISUAL RESOURCES Except as provided in Public Resources Code Section 21099* (CEQA provisions for infill projects within a transit priority area), would the project:	**Level of Significance**
a) Have a substantial adverse effect on a scenic vista?	Less than Significant
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than Significant
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant
d) Create a new source of substantial light or glare which would adversely affect surrounding areas or important public day or nighttime views in the area?	Less than Significant

** CEQA California A Public Resources Code §21099(d)(1): "Aesthetic and parking impacts of a residential, mixed-use, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. (2)(A) This subdivision does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies. (B) For the purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources." For the purposes of §21099, "transit priority area" means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in the Transportation Improvement Plan or applicable regional transportation plan. (Transit priority areas are as identified by SBCAG's Transit GIS Storymap.)*

DISCUSSION

Issues: Issues associated with visual resources and aesthetics include the potential blockage or substantial alteration of important public scenic views, project on-site aesthetic character and compatibility with the surrounding area, substantial changes in exterior lighting and shade/shadow, and introduction of substantial new sources of glare.

Impact Evaluation Guidelines: Aesthetic quality, whether a project is visually pleasing or unpleasing, may be perceived and valued differently from one person to the next, and depends in part on the context of the environment in which a project is proposed. The significance of visual changes is assessed qualitatively based on consideration of the proposed physical change and project design within the context of the surrounding visual setting. First, the existing visual setting is reviewed to determine whether important existing visual resources are involved, based on consideration of whether a view contains one or more important visual

resources, has scenic qualities, and is viewed from a heavily used public viewpoint, such as a public gathering area, major public transportation corridor, or area of intensive pedestrian or bicycle use. Under CEQA, the evaluation of a project's potential impacts to scenic views is focused on views from public (as opposed to private) viewpoints and larger community wide views (those things visible to a larger community, as opposed to select individuals). The visual changes associated with the project are then assessed qualitatively to determine whether the project would substantially degrade or obstruct existing important public scenic views or impair the visual context of the Waterfront area or a designated historic resource and whether the visual changes associated would result in individual or cumulative substantial effects associated with important public scenic views, on-site visual aesthetics, or lighting.

Significant visual resources impacts may potentially result from:

1. Substantial obstruction of important public or communitywide scenic views. Public views may be framed (e.g., view corridor), wide angle, or panoramic. Important scenic views include, but is not limited to the Pacific Ocean, Stearn's Wharf, the Harbor, Douglas Family Preserve, Montecito Country Club, Andree Clark Bird Refuge, Bellosguardo, Santa Barbara Zoo, coastal bluffs and shoreline, creeks, estuaries, lagoons, riparian areas, parks and open space, historic structures, sites, and trees important for their visual quality, Channel Islands, Foothills, Riviera, and Santa Ynez Mountains.
2. Substantial damage to scenic resources within a state scenic highway (Highway 154). Impacts to local scenic roads should also be considered. These include Highway 101; Cabrillo Boulevard between U.S. Highway 101 and Castillo Street; Sycamore Canyon Road (144)/Stanwood Drive (Highway 192)/Mission Ridge Road (Highway 192)/Mountain Drive to the Old Mission on Los Olivos Street, or Shoreline Drive from Castillo Street to the end of Shoreline Park.
3. Substantial negative aesthetic effects or incompatibility with surrounding land uses or structures due to project size, massing, scale, density, architecture, signage, or other design features.
4. Substantial degradation of important public or communitywide scenic views or the visual quality of the site through extensive grading and changes in topography, removal of substantial amounts of vegetation and trees visible from public areas without adequate landscaping; or substantial loss of important public open space.
5. Substantial light and/or glare that substantially affects offsite properties and/or sensitive receptors, safe travel, sensitive wildlife, or substantially affects important public views.

EXISTING CONDITIONS AND PROJECT IMPACTS

1. AESTHETICS AND VISUAL RESOURCES

a) Scenic Views

Less Than Significant Impact. According to the City's Master Environmental Assessment (MEA) Report included as Exhibit B of this Initial Study, the project site is not identified as being visually unique, a visual hillside, or a visual shoreline. The project site is, however, located within the eastern portion of the El Pueblo Viejo Landmark District and in the vicinity of the Andree Clark Bird Refuge which are considered scenic resources by the City. Views of mountains and trees are also available in the vicinity. As discussed above, the project site is generally vacant with the exception of the Charles Caldwell Park Watering Trough and Fountain and the cellular tower. Because of elevation changes and surrounding vegetation, views of the project site are generally available from the surrounding streets and the project site cannot be seen at a distance. Views of scenic resources outside of the immediate vicinity such as the Santa Ynez Mountains are only intermittently available from the streets adjacent to the project site as a result of the existing vegetation on-site. Nevertheless, development of the project would alter the existing visual appearance of the project site and would also be seen from the northeast portion of the Andree Clark Bird Refuge. The most visible feature of the project site from this vantage point is the Charles Caldwell Park Watering Trough and Fountain which would be retained as part of the project. While the new buildings associated with the project would be visible from this vantage point as well, as shown in the Project Plans included as Exhibit A of this Initial Study, the proposed buildings have been designed to be compatible with the general aesthetic of the City and would not represent a significant deviation from the building design seen in the vicinity under existing conditions. As noted above, views of scenic resources outside of the immediate vicinity such as the Santa Ynez Mountains are only intermittently available from the streets adjacent to the project site as a result of the existing vegetation on-site. These intermittent views would continue to be available from the surrounding streets as a result of the spacing of the proposed buildings.

With respect to trees, as discussed further below in Section 4, Biological Resources, of this Initial Study, the project site includes 25 trees onsite, including seven California Live Oak trees (*Quercus agrifolia*; one of which is dead) and 18 non-native trees. Five of the seven oaks would be retained while the dead oak and one living oak on the northern property line would be removed (the living oak on the northern property line would conflict with a proposed retaining wall). The majority of the non-native trees would be removed. The landscape plans included as part of Exhibit A of this Initial Study indicate a total of 188 trees would be planted as part of the project, including 3 California Live Oaks.[1] This planting plan is consistent with Coastal Land Use Plan (CLUP) Policy 4.3-13 which requires a minimum 1:1 replacement ratio of trees. Because the

[1] The Arborist Report in Exhibit E states that preliminary landscape plans show 199 trees to be planted. However, the entitlement plan set included as Exhibit A was prepared after the Arborist Report and shows 188 trees to be planted.

on-site oaks would be retained to the extent feasible and the project includes a substantial tree-planting plan, the removal of trees would not result in a significant impact in terms of scenic resources.

Lastly, under existing conditions, the project site does not represent an important public viewing location for scenic views and is not visible from a scenic vista. Public scenic views of the hillsides are primarily attained in the urbanized downtown area of the City through the east-west street corridors. In sum, while the project would include new development on a generally vacant project site, due to the retention of the historic water fountain on-site, retention of intermittent views of the Santa Ynez Mountains from adjacent streets, retention of the majority of oaks on-site and robust tree-planting plan, and an overall design compatible with the City's aesthetic, project impacts to scenic views would be less than significant, and no mitigation measures are required.

b) Scenic Highways and Roadways

Less Than Significant Impact. US-101, located to the north of the project site, is eligible for designation as a state scenic highway; however, it is not currently designated as such. Therefore, the project site is not located near any designated scenic highways or roadways and is not visible from any designated scenic highways or roadways, and the Project would therefore not have the potential to damage any scenic resources within a state scenic highway. Additionally, while the Charles Caldwell Park Watering Trough and Fountain within the project site is a City Landmark and may be considered a scenic resource, this feature is not visible from US-101. Impacts would be less than significant, and no mitigation measures are required.

c) Visual Character and Quality

Less Than Significant Impact. As noted above, the project site is generally vacant with the exception of the Charles Caldwell Park Watering Trough and Fountain and the cellular tower. The fountain is a City landmark. Accordingly, the project would be subject to review and approval by the City's Historic Landmark Commission. No design comments were provided by the Historic Landmark Commission during the concept review phase. In the event the commission makes design recommendations later in the process, the project will comply with any such recommendations. Additionally, the Historic Landmarks Commission must make Compatibility Findings for the design of the project, including compatibility with the architectural character of the City and neighborhood; appropriate size, mass, bulk, height, and scale; and use of open space and landscaping. Therefore, with the incorporation of all recommended design changes by the Historic Landmark Commission, the project design would be consistent with applicable zoning and design guidelines that govern scenic quality and compatibility with the surrounding area. Additionally, the project would be consistent with and would not conflict with the applicable CLUP Policies related to visual character and quality, including 4.2-24 (Revegetation), 4.3-3 (Design Review), 4.3-9 (Minimize Excavation, Grading and Earthwork), 4.3-11 (Landscape Plans Required), 4.3-12 (Screen Parking Facilities), 4.3-13 (Tree Protection and Replacement), and 4.3-25 (Underground Utility Service Connections). Refer to Section 11, Land Use and Planning, below for the full text of these policies and a discussion of the project's consistency with these policies.

Based on the above, impacts to visual character and quality would be less than significant.

d) Lighting and Glare

Less Than Significant Impact. The project site does not currently contain any sources of light or glare. The proposed development of 22 residential units would result in new outdoor lighting typical of a multi-family residential development. Exterior lighting would be subject to compliance with the requirements of SBMC Chapter 22.75, the City's Outdoor Lighting Ordinance. The ordinance provides that exterior lighting be shielded and directed to the ground such that no undue lighting or glare would affect surrounding property occupants, roads, or habitat areas, if applicable. Outdoor lighting would be primarily for access and security purposes, with the hours of operation typically from 8:00 a.m. to 5:00 p.m. In addition, proposed building materials do not include materials with the potential for substantial glare. As such, project impacts on lighting and glare would be less than significant.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

2. AGRICULTURE AND FORESTRY RESOURCES

Agriculture and Forestry Resources Would the project:	**Level of Significance**
a) 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?	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact
c) 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))?	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest land?	No Impact
e) 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?	No Impact

DISCUSSION

Issues: There are no agricultural designated lands or lands under Williamson Act contracts within the City; however, agricultural land exists adjacent to the City boundary. Agriculture and forestry resource issues include land use compatibility with nearby agricultural operations and forested lands, and potential indirect impacts that could result in a loss of agriculture and forestry resources (for example, annexation of lands with agricultural resources). Increased density and intensity of land uses have the potential to affect the productivity of nearby agricultural lands.

Impact Evaluation Guidelines: A significant impact could occur from projects that result in the conversion of lands suitable for agriculture to non-agricultural uses or result in a disruption to surrounding agricultural operations.

EXISTING CONDITIONS AND PROJECT IMPACTS

2. AGRICULTURE AND FORESTRY RESOURCES

a) through e) No Impact. There are no existing agricultural uses or lands zoned for agricultural use within, or in the vicinity of the project site and the project site is not under a Williamson Act contract. The project site is designated as Urban and Built-up Land by the Department of Conservation Farmland Mapping and Monitoring Program and does not contain Important Farmland (Department of Conservation 2020). The project site does not include active farmland, forest land, or protected agricultural soils, and the project would not conflict with zoning for agriculture or forest use or involve other changes in the existing environment which could result in conversion of farmland or forest land to other uses. Therefore, there would be no impact to important agricultural or forestry resources associated with the project.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

No Impact.

3. AIR QUALITY

AIR QUALITY Would the project:	**Level of Significance**
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated in non-attainment under an applicable federal or state ambient air quality standard?	Less than Significant
c) Expose sensitive receptors to substantial pollutants?	Less than Significant
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant

DISCUSSION

Issues: Air quality issues involve pollutant emissions from vehicle exhaust, stationary sources (e.g. gas stations, boilers, diesel generators, dry cleaners, oil and gas processing facilities, etc.), and minor stationary sources called "area sources" (e.g. residential heating and cooling, fireplaces, etc.) that contribute to smog, particulates, nuisance dust associated with grading and construction processes, and nuisance odors. Emissions of harmful air pollutants are of particular concern to sensitive receptors. Sensitive receptors are populations who are more susceptible to the effects of air pollution than the population at large and include children, persons over 65 years of age, athletes, and persons with cardiovascular or chronic respiratory diseases. Land uses typically associated with sensitive receptors include residences, schools, parks, playgrounds, recreation facilities, childcare centers, retirement homes, convalescent homes, hospitals, and health care facilities and clinics.

Smog, or ozone, is formed in the atmosphere through a series of photochemical reactions involving interaction of oxides of nitrogen (NOx) and reactive organic compounds (ROC) (referred to as ozone precursors) with sunlight over a period of several hours. Primary sources of ozone precursors in the South Coast area are vehicle emissions. Sources of particulate matter (PM_{10} and $PM_{2.5}$) include demolition, grading, road dust, agricultural tilling, mineral quarries, and vehicle diesel exhaust.

The City of Santa Barbara is part of the South Central Coast Air Basin. The City is subject to the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). The CAAQS apply to seven pollutants: photochemical ozone (O3), carbon monoxide (CO), sulfur dioxide (SO2), nitrogen dioxide (NO_2), course particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and lead (Pb). There are also established state standards for other criteria pollutants including sulfates, hydrogen sulfide (H_2S), and visibility reducing

particulates. The Santa Barbara County Air Pollution Control District (APCD) provides oversight on compliance with air quality standards and preparation of the County Clean Air Plan (2013) and the Ozone Plan (2022).

Santa Barbara County is currently in attainment of most federal and state standards. The County does not presently meet the state PM_{10} standard and is designated nonattainment-transitional for the state ozone standard. See Table 1 below.

Table 1. County Attainment Status of Federal and State Ambient Air Quality Standards (2025)

Criteria Pollutant	Federal Attainment Status	State Attainment Status
O_3 8-hour	Attainment	**Nonattainment—Transitional**
O_3 1-hour	No standard	Attainment
PM_{10}	Attainment	**Nonattainment**
$PM_{2.5}$	Unclassified	Unclassified
CO	Attainment	Attainment
Pb	Attainment	Attainment
SO_2	Unclassified	Attainment
NO_2	Unclassified	Attainment
S_x	No Standard	Attainment
H_2S	No Standard	Attainment
Vinyl Chloride	No Standard	Unclassified
Visibility Reducing Particulates	No Standard	Attainment

The APCD has analysis and permitting requirements regarding toxic air contaminants (TACs) generated from activities such as gasoline dispensing, dry cleaning, freeways, manufacturing, etc., and may require projects with high TAC emissions to mitigate or redesign features of the project to avoid excessive health risks. The APCD requires submittal of an asbestos notification form for each regulated structure that is proposed to be demolished or renovated. CARB and APCD also recommend 500-foot buffers between Highway 101 and new residential developments or other sensitive receptors to reduce potential health risks associated with traffic-related air pollutant emissions, particularly diesel particulates. Based on analysis in the certified Final Program EIR for the Plan Santa Barbara General Plan Update (2011; herein referred to as the General Plan EIR), the City established an ordinance (SBMC 22.65) that requires design standards for new residential sensitive receptor structures or uses within 250 feet of Highway 101 (excluding minor additions or remodels of existing homes or the construction of one new residential unit on vacant property), that address highway exhaust effects. Certain projects also have the potential to create objectionable odors that could create a substantial nuisance to neighboring residential areas or sensitive receptors and should be evaluated in CEQA documents.

Impact Evaluation Guidelines: A project may create a significant air quality impact associated with criteria air pollutants from the following:

1. Exceeding an APCD pollutant threshold; inconsistency with APCD regulations; or exceeding population forecasts in the adopted County Clean Air Plan (2013) or Ozone Plan (2022).
2. Exposing sensitive receptors, such as children, persons over 65 years of age, or persons with cardiovascular or respiratory conditions, to substantial pollutant concentrations.
3. Placement of sensitive land uses within 250 feet of Highway 101.
4. Substantial unmitigated nuisance dust during earthwork or construction operations.
5. Creation of nuisance odors inconsistent with APCD regulations.

Long-Term (Operational) Air Quality Impact Guidelines*:* The City of Santa Barbara uses the APCD thresholds of significance for evaluating air quality impacts. In accordance with the APCD Environmental Review Guidelines (2015), the APCD does not consider a proposed project to have a significant air quality impact on the environment if operation of the project would:

1. Emit (from all project sources, both stationary and mobile) less than 240 pounds per day for ROC and NOx, and 80 pounds per day for PM_{10};
2. Emit less than 25 pounds per day of ROC or NOx from motor vehicle trips only;
3. Not cause or contribute to a violation of any CAAQS or NAAQS (except ozone);
4. Not exceed the APCD health risks public notification thresholds adopted by the APCD Board of 10 excess cancer cases in a million for cancer risk and a Hazard Index of more than one (1.0) for non-cancer risk); and
5. Be consistent with the adopted federal and state air quality plans applicable to the Santa Barbara Air Basin.

Substantial long-term project emissions could potentially stem from stationary sources which may require permits from the APCD and from motor vehicles associated with the project and from other mobile sources. Examples of stationary emission sources that require permits from APCD include gas stations, automobile repair body shops, diesel generators, boilers and large water heaters, dry cleaners, oil and gas production and processing facilities, and wastewater treatment facilities.

Short-Term (Construction) Impacts Guidelines: Projects involving grading, paving, construction, and landscaping activities may cause localized nuisance dust impacts and increased particulate matter (PM_{10}). Dust-related impacts can be mitigated and less than significant with the application of standard dust control mitigation measures pursuant to APCD rules and regulations (e.g., Rule 345, Control of Fugitive Dust from Construction and Demolition Activities) and City ordinance provisions (SBMC 22.04.020), such as dampening graded areas and soil stockpiles. Exhaust from construction equipment also contributes to air pollution.

Quantitative thresholds of significance are not currently in place for short-term or construction emissions for non-stationary sources because cumulative basin-wide effects are not identified as significant. However, APCD uses a criterion for stationary sources, which is also considered a guideline for evaluating impacts of construction emissions for non-stationary source projects. The criterion states that a project's emissions from construction equipment shall not exceed 25 tons of any pollutant except carbon monoxide within a 12-month period. Standard equipment exhaust mitigation measures are recommended by APCD to be applied to projects.

Cumulative Impacts and Consistency with Clean Air Plan (2013) and Ozone Plan (2022): Consistency with the Clean Air Plan and Ozone Plan means that emissions associated with the project are accounted for within each Plan's emissions growth assumptions, land use and population projections, and that the project is consistent with policies adopted within each plan. If the project-specific impact exceeds the ozone precursor significance threshold, it is also considered to have a considerable contribution to cumulative impacts. If a project would exceed the Clean Air Plan growth projections, then the project's impact may also be considered for whether it represents a considerable contribution to cumulative air quality impacts. The Santa Barbara County Association of Governments and CARB on-road emissions forecasts are used as a basis for vehicle emission forecasting. If a project provides for increased population growth beyond that forecasted in the most recently adopted Clean Air Plan and Ozone Plan, or if the project does not incorporate appropriate air quality mitigation and control measures, or is inconsistent with APCD rules and regulations, then the project may be found inconsistent with the Clean Air Plan and may constitute a significant impact on air quality.

EXISTING CONDITIONS AND PROJECT IMPACTS

3. AIR QUALITY

a) Air Quality Plans

Less Than Significant. A project is non-conforming with an air quality plan if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable APCD rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Direct and indirect emissions associated with the project are accounted for in the 2013 Clean Air Plan and 2022 Ozone emissions growth assumptions for the Air Basin. Appropriate standard conditions related to air quality, including construction dust suppression, would be applied to the project, consistent with Clean Air Plan, Ozone Plan, APCD rules, and City policies and ordinance provisions under SBMC Chapter 22.65 (Standards for Development Near Highway 101), and are identified in Exhibit C of this Initial Study. The project is found consistent with the 2013 Clean Air Plan and 2022 Ozone Plan; therefore, project impacts would be less than significant.

b) Cumulative Impacts

i. Short-Term (Construction) Emissions:

Less Than Significant. Construction of the project could result in emissions of pollutants due to grading, fumes, and vehicle exhaust. Sensitive receptors located approximately 600 feet southeast of the project site

could be affected by dust and particulates during project site grading and vehicle exhaust from construction equipment. The project site is currently vacant and would not include demolition of buildings that may contain lead and asbestos. Grading for the project would be relatively minor at roughly 1,700 cubic yards of cut and 1,700 cubic yards of fill and the construction period is anticipated to last approximately 24 months. Dust control measures are required for the project as standard conditions of approval and are identified in Exhibit C of this Initial Study. Additionally, APCD recommends standard conditions for equipment exhaust to minimize cumulative impacts from construction projects. These are also identified in Exhibit C. Therefore, with incorporation of standard control measures during construction, the project would result in less than significant impacts related to construction emissions.

ii. Long-Term (Operational) Emissions:

Less Than Significant. The project would develop 22 multi-family residential units and would generate trips based on this use that would result in mobile emissions. The project would not include stationary sources requiring permits from APCD. In addition, emissions from area sources (e.g., consumer products, architectural coatings, and natural gas usage) would not result in substantial emissions.

Utilizing the APCD Screening Table contained in the APCD document entitled "CEQA Handbook: A Guide for Preparation of Air Quality Section in Environmental Documents," (October 2025) a residential project proposing fewer than 285 townhouses is expected to be below the APCD thresholds of significance for ozone precursors (ROC and NOx emissions) for operational motor vehicle trips. Total build out of the project site would result in 22 new multi-family residential units which is well below the APCD screening level. The project would also be below the operational thresholds for other criteria pollutants since the project represents less than 10 percent of the APCD Screening Threshold. City staff consulted with the APCD who confirmed this finding (Carly Barham, APCD, correspondence, September 16, 2025). Therefore, the project would have a less than significant effect on long term air quality.

c) Sensitive Receptors

Less Than Significant. Sensitive receptors can be found in areas that contain residences, health care facilities, elder-care facilities, rehabilitation centers, schools, daycare centers, and parks. Air emissions, including TACs have adverse implications for public health, particularly for sensitive receptors. Sensitive receptors are located approximately 600 feet southeast of the project site and could be affected by dust and particulates during project site grading and vehicle exhaust from construction equipment. As discussed above, the project would involve limited grading quantities (i.e., 1,700 cubic yards of cut and 1,700 cubic yards of fill) and dust control measures required for the project as standard conditions of approval are identified in Exhibit C of this Initial Study. Therefore, dust-related impacts to sensitive receptors would be less than significant.

The project includes placement of sensitive land uses within 250 feet of Highway 101. However, the Final Program EIR for the City's General Plan update concluded less than significant impacts related to US-101 and the City established an ordinance (i.e., SBMC 22.65) that requires new design standards for new residential structures or uses within 250 feet of US-101. The project would comply with the requirements of SBMC 22.65 and impacts would be less than significant.

Some projects are more likely than others to emit toxic pollutants, such as projects involving commercial or industrial activities such as oil and gas processing, gasoline dispensing, dry cleaning, electronic and parts manufacturing, medical equipment sterilization, rail yards, diesel generators etc. Since impacts from TACs are often localized near their sources, locating a sensitive use some distance away from the contaminant's source may be adequate to avoid the impact. CARB's Air Quality and Land Use Handbook: A Community Health Perspective (CARB's Handbook) provides common sources of TACs and recommends minimum siting distances from the sources of toxics and sensitive receptors. The project is limited to residential uses and would not include any of the uses identified in CARB's Handbook. Therefore, the project would have a less than significant impact to sensitive land uses.

d) Odors

Less Than Significant. The project site is currently developed with a fountain and cellular tower which do not generate odors. The project is limited to residential uses and would not include land uses involving odors or smoke. The project would not contain features with the potential to emit substantial odorous emissions, from sources such as commercial cooking equipment, combustion or evaporation of fuels, sewer systems, or solvents and surface coatings. Due to the nature of the proposed land use and limited size of the project, project impacts related to odors would be less than significant.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

4. BIOLOGICAL RESOURCES

BIOLOGICAL RESOURCES Would the project:	**Level of Significance**
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less Than Significant
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less Than Significant
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than Significant
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than Significant
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant with Mitigation
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact

DISCUSSION

Issues: Biological resources issues involve the potential for a project to substantially affect biologically important natural vegetation and wildlife, particularly species that are protected as rare, threatened, or endangered by federal or state wildlife agencies, and their habitats.

Impact Evaluation Guidelines: Existing native wildlife and vegetation on a project site are assessed to identify whether they constitute important biological resources, based on the types, amounts, and quality of the resources within the context of the larger ecological community. If important or sensitive biological resources exist, project effects on the resources are qualitatively evaluated to determine whether the project would

substantially affect these important biological resources. Significant biological resource impacts may potentially result from substantial disturbance to important wildlife and vegetation in the following ways:

1. Elimination, substantial reduction or disruption of important natural vegetative communities, wildlife habitat, migration corridors, or habitats supporting sensitive species such as oak woodland, coastal strand, riparian, and wetlands.
2. Substantial effect on a protected plant or animal species listed or otherwise identified or protected as endangered, threatened or rare.
3. Substantial loss or damage to biologically important native trees such as oak or sycamore trees (note that, if applicable, historic or landmark trees are discussed in Section 5, Cultural Resources, and other trees are discussed in Section 1, Aesthetics and Visual Resources).

EXISTING CONDITIONS AND PROJECT IMPACTS

4. BIOLOGICAL RESOURCES

a) Candidate, Special Status, or Rare Species

Less Than Significant Impact. According to the City's MEA Report, no special status species or special wildlife areas have been identified on the project site. Additionally, as discussed further below in sections 4b) and 4c), no sensitive habitat or wetlands are located on the project site. Construction and operation of the proposed project would be contained within the Project site's boundaries and would not impact special status species that may occur in the surrounding area. Additionally, the Project would be required to comply with all policies of the CLUP related to sensitive species and habitat modification. These include Policies 4.1-12 (Alteration and Disturbance of Environmentally Sensitive Habitat Area [ESHAs], Wetlands, and Creeks), 4.1-13 (Mitigation of Impacts to ESHAs, Wetlands, and Creeks), 4.1-15 (ESHA, Wetland, and Creek Habitat Buffers), 4.1-17 (Development within Habitat Buffer Areas), 4.1-19 (Plantings in ESHAs, Wetlands, Creeks, and Habitat Buffers), 4.1-22 (Fencing, Walls, and Barriers), 4.1-23 (Exterior Lighting), 4.1-24 (Habitat Linkages), 4.1-36 (Bird Breeding and Nesting), 4.1-37 (Bird Safe Buildings), and 4.3-13 (Tree Protection and Replacement). The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS), and impacts would be less than significant.

b) Natural Communities

Less Than Significant Impact. According to the City's MEA Report, no coastal zone resources, creek and wetland habitats, or key riparian bird habitat areas are located on the project site and CDFW identifies the

project site's land cover as "Developed, Low Intensity."[2] While oak trees are present on site, based on the data and aerials included in the Arborist Report (Spiewak, January 13, 2025), included as Exhibit E of this Initial Study, the site does not appear to support a contiguous oak woodland or oak canopy cover to meet the definition of "oak woodland" pursuant to Fish and Game Code Section 1361. The majority of onsite trees are non-native species, and the existing six living oak trees are individual specimen trees scattered throughout a large area. As such, the site does not contain oak woodland habitat. Additionally, the Project would be required to comply with all policies of the CLUP that include provisions related to natural communities including 4.1-13 (Mitigation of Impacts to ESHAs, Wetlands, and Creeks), 4.1-15 (ESHA, Wetland, and Creek Habitat Buffers), 4.1-20 (Native Tree Protection), and 4.3-13 (Tree Protection and Replacement). Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, and impacts would be less than significant.

c) Wetlands and Riparian Habitats

Less Than Significant Impact. According to the City's MEA Report, no wetlands or riparian habitats are located on or immediately adjacent to the project site. As such, no direct impacts would occur. The Andrea Clark Bird Refuge is, however, located across Cabrillo Boulevard west of the project site. With respect to indirect impacts, including potential impacts to the bird refuge, because the project will be required to obtain a Construction General Permit with a SWPPP, issued by the SWRCB, the SWPPP would establish erosion and sediment control BMPs for construction activities that would minimize the discharge of pollutants from the project site and, as a result, minimize indirect impacts to wetland and riparian habitats. Therefore, impacts to wetlands and riparian habitats would be less than significant.

d) Wildlife Dispersal and Migration Corridors

Less Than Significant Impact. As noted above, according to the City's MEA Report, no special status species or habitat is located on the project site. Additionally, the project site is not mapped as having any habitat connectivity by the State.[3] Any wildlife moving through the project site would either be avian species or very small mammals or reptiles. Larger wildlife species seeking to pass through the region are likely traveling along riparian habitats of local creeks that are a relatively far distance from the project site. The project site lacks streams, canyons, or similar topography that are commonly used by larger wildlife and that would facilitate wildlife movement. Therefore, the project site does not contribute to or facilitate wildlife movement in the region.

Based on the above, no special status wildlife species are expected to occur within the project site. However, the removal of trees and vegetation, as well as other construction activities, have the potential to result in the

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[2] California Department of Fish and Wildlife, BIOS Viewer, NLCD 2021 Land Cover, https://apps.wildlife.ca.gov/bios6/, accessed December 10, 2025.

[3] California Department of Fish and Wildlife, BIOS Viewer, Habitat Connectivity—Ventura County, https://apps.wildlife.ca.gov/bios6/, accessed December 10, 2025.

loss of active nests or disturb nesting birds on and adjacent to the project site. Bird nests with eggs or young of all migratory bird species are protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. Compliance with CLUP Policy 4.1-36 (Bird Breeding and Nesting) and the City's standard conditions of approval for nesting birds would ensure that impacts to nesting birds are less than significant.

e) Local Policies and Ordinances

Less Than Significant Impact with Mitigation. The Arborist Report, included as Exhibit E of this Initial Study, identified a total of 25 trees on the project site, including seven California Live Oak trees (*Quercus agrifolia*; one of which is dead) and 18 non-native trees. The non-native trees include flowering eucalyptus, silver wattle, Monterey cypress, bailey acacia, date palm, Mexican blue palm, cook pine, pittosporum, eugenia, sugar gum eucalyptus, silk oak, and blue gum eucalyptus. The project will comply with the City's Tree Preservation Ordinance (SBMC Chapter 15.24) by identifying all protected trees on the site, including setback trees and any trees shown on approved landscape plans. No protected trees will be removed or significantly altered without first obtaining the required permits and approvals. Where removal is authorized, the project will provide replacement planting and mitigation consistent with ordinance requirements to maintain neighborhood tree canopy and character. Specifically, five of the seven oaks would be retained while the dead oak and one living oak on the northern property line would be removed (the living oak on the northern property line would conflict with a proposed retaining wall). All of the non-native trees except for the sugar gum eucalyptus would be removed. The landscape plans included as part of Exhibit A of this Initial Study indicate a total of 188 trees would be planted as part of the project, including 3 California Live Oaks.[4] This planting plan is consistent with CLUP Policy 4.3-13 which requires a minimum 1:1 replacement ratio of trees. Nevertheless, Mitigation Measure BIO-1 (Oak tree planting) is included in the project to guarantee mitigation of the removed living California Live Oak tree. With implementation of Mitigation Measure BIO-1, impacts would be less than significant.

f) Adopted Conservation Plans

No Impact. No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan is applicable to the City or the project site. As such, the Project would not conflict with the provisions of a Habitat Conservation Plan, Natural Community Plan, or other approved conservation plan, and no impact would occur.

MITIGATION MEASURES

The following mitigation measure is included in the project:

BIO-1: Tree Replacement for Removed Oak Tree: The living California Live Oak (*Quercus agrifolia*) on the northern property line shall be replaced with a 48-inch box minimum of the same species on the project site.

[4] The Arborist Report in Exhibit E states that preliminary landscape plans show 199 trees to be planted. However, the entitlement plan set included as Exhibit A was prepared after the Arborist Report and shows 188 trees to be planted.

The tree planting shall be subject to a 5-year monitoring effort by an International Society of Arboriculture (ISA) Certified Arborist. This monitoring effort would consider growth, health, and condition of the subject trees to evaluate the replacement success. The monitoring effort may result in a recommendation of remedial actions should any of the tree plantings exhibit poor or declining health below the recommended replacement quantities.

Prior to the issuance of the building permit, the planting and monitoring plan shall be submitted to the Community Development Department for review and approval. The plan shall identify the installation site for the replacement tree and include specific measures for protection, management, and monitoring of the tree. The plan shall include annual reporting on the condition of the tree for a period of five years.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

5. CULTURAL RESOURCES

Cultural Resources Would the project:	**Level of Significance**
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA §1 b) 5064.5?	Less than Significant with Mitigation
c) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA §15064.5?	Less than Significant
d) Disturb any human remains, including those interred outside of formal cemeteries?	Less than Significant

DISCUSSION

Issues: Archeological resources are evidence of past cultural occupation, seasonal use, or ephemeral activity reflected in artifacts, food remains, or other evidence that provide insight into past lifestyles and their evolution through time. Prehistoric resources, dating back at least 13,000 years, extend throughout the Santa Barbara Channel, predating European and American colonization. This evidence can be identified on the ground surface and potentially extending several feet below the surface depending upon the nature of cultural deposit, and geomorphological processes including erosion that may bury a location with alluvial sediment.

Historic resources are evidence of the region's cultural shifts from Spanish colonization and Franciscan missions, to subsequent Spanish-Mexican, American settler, and immigrant occupations. The SBMC defines historic resources as structures, sites, cultural landscapes, or features that are designated or eligible for designation as historically significant.

Impact Evaluation Guidelines: Archaeological and historical resource impacts are evaluated based on review of available cultural resource documentation and data gathered from records searches. Existing conditions on a site are assessed to identify whether important or unique resources exist, based on criteria specified in the State CEQA Guidelines §15064.5 and City Master Environmental Assessment Guidelines for Archaeological Resources (April 2025) and Historical Resources (April 2025), summarized as follows:

1. For archaeological resources, there is a high probability the resource:
    a. Contains information needed to answer important scientific research questions and there exists a demonstrable public interest in that information.
    b. Has a special and particular quality such as being the oldest of its type or the best available example of its type.

c. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

2. For archaeological and historic resources, the resource:

   a. Is designated, or meets criteria for inclusion on a national, state, or local landmark or historic resource register. This includes, but is not limited to, the National Register of Historic Places, National Historic Landmarks, California Register of Historical Resources, California Registered Historical Landmarks, City of Santa Barbara Landmarks, and City of Santa Barbara Structures of Merit.
   b. Is determined by the City to be significant, based on substantial evidence.

If important archaeological or historic resources exist on the site, project changes are evaluated to determine whether they would substantially affect these resources. A project could have a significant impact if it may cause a substantial adverse change in the characteristics of a resource that convey its significance or justify its eligibility for inclusion in a national, state, or local register. Impacts may include physically damaging, destroying, relocating, or altering all or part of a resource, altering the characteristics of the surrounding environment that contribute to the resource's significance, neglecting the resource to the extent that it deteriorates or is destroyed, or the incidental discovery of a resource without proper notification and protocols.

EXISTING CONDITIONS AND PROJECT IMPACTS

5. CULTURAL RESOURCES

a) Historical Resources

Less Than Significant with Mitigation. The project site includes the Charles Caldwell Park Watering Trough and Fountain at the corner of East Cabrillo Boulevard and Channel Drive. Constructed in 1911-1912, the fountain is a City Historic Landmark. As discussed in the confidential Phase 1 Archaeological Resources Report (Archaeological Report) which is on file at the City Planning Division, the fountain is located 5 feet below and 20 feet southwest of the existing grade of the nearest proposed structure, Building 3. All development, including landscaping, is proposed outside of the landmark's boundaries and, as such, direct impacts would be less than significant. However, there is the potential for inadvertent ground disturbances during construction if the landmark is not protected during grading activities. Implementation of Mitigation Measure CUL-1 (Temporary Fencing and Erosion Controls), which requires temporary fencing and erosion controls in the vicinity of the fountain, would reduce the potential indirect impact to this City Historic Landmark to a less than significant level.

The records search conducted as part of the Archaeological Report also identified a record of two single-family residents onsite (record number P-040064). These homes were constructed for cemetery personnel in 1903 and 1926 and were demolished in 1980. Various fragments and refuse from these homes were identified in studies conducted in 2001 and 2011, and were determined to be ineligible for listing on the National Register of Historic Places. Therefore, while the refuse is still on site as confirmed by the Archaeological Report's field survey, this

refuse is not considered a historic resource for purposes of CEQA. No other historic resources are located on or near the project site.

b) Archaeological Resources

Less Than Significant. As discussed in the Archaeological Report, the project site is located within the Santa Barbara Channel cultural area. Evidence of cultural activity along the coastline extends over 9,000 years and indicates an increasing level of complexity and technological development through time. Refer to the 2025 Master Environmental Assessment Guidelines for Archaeological Resources for a detailed discussion of the region's archaeological and ethnographic background. The records search conducted as part of the Archaeological Report did not identify any prehistoric archaeological sites on the projects site; however, one resource was identified within 0.25 miles. No prehistoric resources including chipped stone tool flakes or tools, ground stone artifacts, or soil discoloration associated with habitation sites, were identified as part of the field survey. Given the generally good ground surface visibility throughout the project site, including cut slopes providing vertical exposures and extensive rodent burrowing activity, the absence of any concentrations of prehistoric resources and soil discoloration indicates that the potential for previously unidentified prehistoric resources is low. Additionally, while the potential for historic-era archaeological resources exists, because the on-site residences were demolished in 1980 and soil was disturbed to a depth of 4-5 feet below grade as part of this process, any historic-era trash pits were likely destroyed at this time. The project would also comply with CLUP Policies 4.4-1 (Preserve, Protect, and Enhance Cultural Resources), 4.4-2 (Prohibit Disturbing or Destroying Archaeological Resources), 4.4-4 (Paleontological and Archaeological Resource Consideration and Protection), 4.4-5 (Avoid Adverse Impacts to Important Paleontological and Important or Unique Archaeological Resources), 4.4-6 (Native American Consultation Requirement), 4.4-7 (Archaeological Resources Evaluation Requirement), 4.4-8 (In-situ Preservation and Avoidance Preferred), 4.4-9 (Mitigation if In-Situ Preservation or Avoidance is not Feasible), and 4.4-10 (Condition of Approval—Monitoring Requirement) which pertain to the protection of archaeological resources. Refer to Section 11, Land Use and Planning, below for the full text of these policies and a discussion of the Project's consistency with these policies.

Additionally, the City's standard conditions of approval (refer to Exhibit C of this Initial Study) related to the unanticipated discovery of archaeological and tribal cultural resources, the provision of a Worker Environmental Awareness Program (WEAP), and archaeological monitoring establish protocols for avoidance and appropriate measures for avoiding and minimizing impacts in the event archaeological resources are identified. Therefore, with compliance with the City's standard conditions of approval, impacts to archaeological resources would be less than significant.

c) Human Remains

Less Than Significant. There is no evidence that the project site contains any human remains. Standard conditions of approval for the project listed in Exhibit C of this Initial Study include procedures pursuant to State regulations for the unanticipated discovery of human remains. To minimize or avoid potential impacts, if any human remains are discovered, all construction activities would cease, and the Santa Barbara County Coroner would be contacted in accordance with 14 CCR Section 15064.5(e). If the coroner determines that the

human remains are of Native American origin, the Native American Heritage Commission (NAHC) would be notified to determine the Most Likely Descendent (MLD) for the area. The MLD would make recommendations for the arrangements for the human remains per PRC Section 5097.98. Therefore, impacts on human remains would be less than significant.

MITIGATION MEASURES

The following mitigation measures are included in the project:

CUL-1 Temporary Fencing and Erosion Control: Temporary construction chain link fencing shall be placed on the southwestern periphery of Proposed Building 3 along the 29 foot above sea level contour elevation to ensure that project grading does not destabilize slopes above the Charles Caldwell Park Watering Trough and Fountain. Appropriate construction erosion control components shall be placed directly outside of the temporary construction fencing to ensure that any short-term erosion is maintained within the graded areas. Proposed landscaping southwest of adjacent to Building 3 shall include soil stabilization and erosion control to ensure no long-term destabilization of the slopes above the landmark.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

6. ENERGY

ENERGY Would the project:	**Level of Significance**
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	Less than Significant
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than Significant

DISCUSSION

Issues: Issues include the potential for the project to result in impacts on energy conservation and/or consumption. A project may have the potential to cause such impacts if it would result in the inefficient, wasteful, or unnecessary consumption of energy from sources including construction and operational equipment, electricity, natural gas, and transportation fuel supplies and/or resources.

Impact Evaluation Guidelines: A project has the potential to result in a significant impact if it would:

1. Use large amounts of fuel or energy in an unnecessary, wasteful, or inefficient manner;
2. Constrain local or regional energy supplies, affect peak and base periods of electrical or natural gas demand, require or result in the construction of new electrical generation and/or transmission facilities, or necessitate the expansion of existing facilities, the construction of which could cause significant environmental effects; or
3. Conflict with existing energy standards, including standards for energy conservation, in state or local plans.

EXISTING CONDITIONS AND PROJECT IMPACTS

6. ENERGY

a) Energy Conservation and Consumption

b) Renewable Energy Plans

Less Than Significant. The California Title 24 Building Energy Efficiency Standards are designed to ensure new and existing buildings achieve energy efficiency and preserve outdoor and indoor environmental quality. These measures (Title 24, Part 6) are listed in the CCR. The California Energy Commission is responsible for adopting, implementing and updating building energy efficiency. Local city and county enforcement agencies have the authority to verify compliance with applicable building codes, including energy efficiency. The project would

be required to meet the CCR Title 24 energy efficiency standards in effect at the time building plans are submitted for plan check.

The project includes solar panels and EV parking spaces consistent with the General Plan and Climate Action Plan. Because the project is consistent with the General Plan and Climate Action Plan and would be required to meet Title 24 energy efficiency standards, it would not expend substantial energy or wasteful, inefficient, or unnecessary energy, nor conflict with energy plans or policies. Project energy impacts would be less than significant.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

7. GEOLOGY AND SOILS

GEOLOGY AND SOILS Would the project:	**Level of Significance**
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i. 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? (Refer to Division of Mines and Geology Special Publication 42) ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides?	Less than Significant
b) 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, liquefaction, collapse or sea cliff failure?	Less than Significant
c) Be located on expansive soils, as defined Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?	Less than Significant
d) Result in substantial soil erosion or the loss of topsoil?	Less than Significant
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than Significant

DISCUSSION

Issues: Geophysical impacts involve geologic and soil conditions, and their potential to create physical hazards affecting persons or property; or substantial changes to the physical condition of the site. Included are earthquake-related conditions such as fault rupture, ground shaking, liquefaction (a condition in which saturated soil loses shear strength during earthquake shaking), or seismic waves; or unstable soil or slope

conditions, such as landslides, sea cliff retreat, subsidence (the downward shifting of the Earth's surface; can result in sinkholes); and extensive grading or topographic changes.

Erosion is the movement of rocks and soil from the Earth's surface by wind, rain, or running water. Several factors influence erosion, such as topography, the size of soil particles (larger particles are more prone to erosion), and vegetation cover, which prevents erosion. Projects in areas with high erosion potential could reduce natural ground cover, create exposed cut or fill slopes and increase loss of surface soils and downstream sedimentation. Removal of vegetation and increased earthwork would potentially expose soils to erosion.

Expansive soils are typically composed of clays and are characterized by the ability to undergo significant volume change (shrink and swell) because of variation in soil moisture content. Soil moisture content can change due to many factors, including perched groundwater, landscape irrigation, rainfall, and utility leakage.

Soil permeability determines the degree to which soil can accept sewage discharge over a period of time. Permeability is measured by percolation rate. In locations where soil does not have percolation rates adequate to manage the peak daily flow from sewage disposal systems, soil and groundwater contamination could occur.

Unique geologic features are features that are unique to the field of geology and typically embody distinct characteristics of a geological principle, provide important information to the field of geology, and/or are the best example of its kind locally or regionally. Paleontological resources include fossils, which are the preserved remains or traces of animals, plants, and other organisms from prehistoric time (i.e., the period before written records). Fossils and traces of fossils are preserved in sedimentary rock units (formed by the deposition of material at the Earth's surface) and are more likely to be preserved subsurface, where they have not been damaged or destroyed by previous ground disturbance or natural causes, such as erosion by wind or water.

Impact Evaluation Guidelines: Potentially significant geophysical impacts may result from:

1. Exposure of people or structures to risk of loss, injury, or death involving unstable earth conditions due to seismic conditions (such as earthquake faulting, ground shaking, liquefaction, or seismic waves), landslides, or sea cliff retreat.
2. Exposure to or creation of unstable earth conditions due to geologic or soil conditions, such as landslides, settlement, or expansive or collapsible/compressible soils.
3. Substantial erosion of soils.
4. Placement of a septic system in an area with soils not capable of adequately supporting disposal of waste water or where waste water could potentially cause unstable conditions or water quality problems.
5. Loss or damage to a unique geological feature or paleontological resource.

7. GEOLOGY AND SOILS

A Preliminary Geotechnical Investigation (Geotechnical Report) was completed for the project on August 30, 2024 and is included as Exhibit F of this Initial Study. The Geotechnical Report provides subsurface exploration and testing results and recommendations for the project's design. In response to plan check comments by the City, a Geotechnical Investigation Addendum (Geotechnical Addendum) was also prepared for the project on January 7, 2025 which clarifies some of the findings of the Geotechnical Report. The Geotechnical Addendum is included as Exhibit G of this Initial Study. The project would comply with all applicable building codes and would comply with the recommendations of the Geotechnical Report and Geotechnical Addendum.

a) Seismic Hazards

i. Fault Rupture

Less Than Significant Impact. As with most of Southern California, the project site is within a seismically active area where active faults could produce ground shaking. Faults in the project vicinity may have some potential for ground surface rupture during earthquakes of significant magnitude. The City's MEA Report does not identify the project site as being within a fault hazard zone or 200 foot buffer, and based on mapping provided by the California Department of Conservation, the nearest earthquake faults are the Mission Ridge Fault and Mesa Rincon Creek Fault located approximately 1 mile north and south of the project site, respectively.[5] Therefore the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss or injury, associated with rupture of a known fault and impacts would be less than significant.

ii. Ground Shaking and Liquefaction

Less Than Significant Impact. As stated above, the project site is within a seismically active area where active faults could produce ground shaking and the nearest faults are located approximately 1 mile north and south of the project site. According to California Geological Survey maps showing the earthquake shaking potential in California, there is a medium to high intensity of ground shaking and damage potential that could occur from future earthquakes (California Geological Survey 2016). With respect to liquefaction, the MEA Report does not identify the project site as being susceptible to liquefaction and the Geotechnical Report states that the potential for liquefaction is considered low.

As with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the California Building Code. The 2025 California Building Code incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be

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[5] California Department of Conservation, Fault Activity Map of California, https://maps.conservation.ca.gov/cgs/fam/, accessed December 19, 2025.

required to adhere to the seismic safety requirements contained in the City's building code, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. The project would also comply with CLUP Policy 5.1-20 which requires new development to ensure that the development minimizes risks to life and property, assures stability and structural integrity, and neither creates nor contributes significantly to erosion, geologic instability, or destruction of the site or surrounding area over its expected life, factoring in the effects of sea level rise. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Santa Barbara region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. With compliance with regulatory requirements, impacts associated with seismic ground shaking and liquefaction would be less than significant.

iii. Landslides

Less Than Significant Impact. The MEA Report identifies the project site as having a moderate landslide potential; however, the MEA Report does not identify the project site as being located in a slope failures area or as having any slope movement classification. The Geotechnical Addendum notes that the project site has gentle slopes on the south and west sides and that the Older Alluvium onsite is not landslide prone when the terrain is level to gently sloping. The project would also be consistent with CLUP Policy 5.1-21 in that it avoids development on slopes greater than 30 percent (as noted above, the existing site slope is 10 percent). Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced landslide hazards that are greater than the average risk associated with locations in the Santa Barbara region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. With compliance with regulatory requirements, impacts associated with seismically induced landslide hazards would be less than significant.

b) Soil Erosion

Less Than Significant Impact. While the MEA Report identifies the project site as having high erosion potential, the Geotechnical Addendum states that the Older Alluvium onsite is not a highly erodible soil formation and standard drainage requirements dictated by the grading code are all that is needed to prevent erosion. To that end, because the project would disturb more than one acre of soil, a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order 2022-0057-DWQ), issued by the State Water Resources Control Board (SWRCB), would be required prior to the start of construction. The Construction General Permit includes a Stormwater Pollution Prevention Plan (SWPPP) and Monitoring Program Plan, which would establish erosion and sediment control best management practices (BMPs) for construction activities. Typical examples of erosion-related construction BMPs include silt fences, stockpile containment, runoff control devices, and wind erosion controls. These BMPs would be refined as necessary by a qualified SWPPP professional to meet the performance standards in the Construction General Permit. In addition, construction activities would comply with City grading and erosion control standards to minimize erosion.

Long-term operation of the project would not result in soil erosion or loss of topsoil as the majority of the project site would be covered by the proposed buildings, paved parking areas, and landscaping. No exposed areas subject to erosion would be created.

Compliance with the Construction General Permit and implementation of the SWPPP would ensure that soil erosion during short-term construction activities would be less than significant.

c) Geologic Hazards

i. Landslides and Liquefaction

Less Than Significant Impact. Refer to discussion of landslides and liquefaction in section 7a. As discussed therein, impacts with regard to landslides and liquefaction would be less than significant.

ii. Lateral Spreading

Less Than Significant Impact. Lateral spreading is a term referring to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement. As discussed above, the Geotechnical Addendum notes that the project site has gentle slopes on the south and west sides and that the Older Alluvium onsite is not landslide prone when the terrain is level to gently sloping. Therefore, potential impacts with respect to lateral spreading would be less than significant.

iii. Subsidence

Less Than Significant Impact. Subsidence occurs when subsurface fluids (e.g., petroleum, groundwater, natural gas) are withdrawn from the ground. As discussed in the Geotechnical Addendum, groundwater was encountered at a depth of 28 feet. No groundwater withdrawal occurs on the project site and because no subterranean levels are proposed, dewatering would not be required during construction or operation of the Project. Further, according to the MEA Report, no oil wells are located within 50 feet of the project site. Thus, impacts with respect to subsidence would be less than significant.

iv. Sea Cliff Retreat

No Impact. The project site is not located near a sea cliff. As such, no impact would occur.

d) Soil Hazards

i. Expansive or Collapsible Soils

Less Than Significant Impact. The MEA Report identifies the project site as having highly expansive soils. However, as stated in the Geotechnical Addendum, no highly expansive soil was discovered during soil exploration. The most clayey soil encountered was tested and found to have a very low potential for expansion. Furthermore, construction of the project would be required to comply with the California Building Code and supplemental requirements of the City Code to address soil stability. Thus, impacts with respect to expansive soils would be less than significant.

e) Septic Systems

No Impact. The project site is currently developed with a fountain and cellular tower and does not have an existing wastewater system. The project would not include the use of any septic tanks or alternative wastewater disposal systems. No impact would occur regarding the adequacy of soils to support a septic and alternative wastewater systems.

f) Unique Geological Features and Paleontological Resources

Less Than Significant Impact. As discussed above, no subterranean levels are proposed. Therefore, the potential to encounter previously unidentified paleontological materials is low. Nevertheless, ground disturbance associated with grading for site leveling and building foundations has the potential to encounter a previously unidentified paleontological resource. The City's standard condition of approval related to the discovery of paleontological resources, which is consistent with the requirements of CLUP Policies 4.4-8 (In-situ Preservation and Avoidance Preferred), 4.4-9 (Mitigation if In-Situ Preservation or Avoidance is not Feasible), and 4.4-11 (Condition of Approval—Discovery of Paleontological Resources), would reduce this impact to a less than significant level. Refer to Section 11, Land Use and Planning, below for the full text of these policies and a discussion of the Project's consistency with these policies.

MITIGATION MEASURES

None

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

8. GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions Would the project:	**Level of Significance**	**Analyzed in Prior Document**
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant	No
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	No

DISCUSSION

Issues: Global climate change refers to accelerated changes occurring in average worldwide weather patterns, measurable by factors such as air and ocean temperatures, wind patterns, storms, and precipitation. Climate change is forecasted to result in increasingly serious effects to human health and safety and the natural environment in coming decades, such as more extreme weather, drought, wildfire, sea level rise effects on flooding and coastal erosion, and impacts on air quality, water quality and supply, habitats and wildlife, and agriculture.

Substantial evidence identifies accelerated climate change due to emissions of carbon dioxide and other heat trapping greenhouse gases (GHGs) from human activities. GHGs include carbon dioxide, methane, and nitrous oxide, as well as other smaller contributions from hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. GHG emissions are typically measured in metric tons (MT) of carbon dioxide equivalents (CO2e) based on global warming potential, which allows for totaling the emissions. Natural processes emit GHGs to regulate the earth's temperature; however, substantial increases in emissions, particularly from fossil fuel combustion for electricity production and vehicle use, have substantially elevated the concentration of these gases in the atmosphere well beyond naturally occurring concentrations.

Carbon dioxide accounts for 83 percent of greenhouse gas emissions within the United States as of 2019. California is a substantial contributor of GHGs, with transportation and industrial uses representing the largest sources (41 and 24 percent, respectively). In Santa Barbara, direct sources of GHG emissions are on-road vehicles, natural gas consumption, and off-road vehicles and equipment. Indirect sources (emissions removed in location or time) are electricity consumption (power generation), landfill decomposition (methane releases), and State Water Project transport (electricity use).

California Assembly Bill 32 (2006 Global Warming Solutions Act) sets a target to reduce statewide GHG emissions to 1990 levels by the year 2020. Senate Bill 375 (2008 Sustainable Communities and Climate Protection Act) requires regional coordination of transportation and land use planning throughout the State to reduce vehicle

GHG emissions. CARB established targets for Santa Barbara County to not exceed 2005 per capita vehicle emissions in the years 2020 and 2035.

The City updated its Climate Action Plan (CAP) in July 2024. The CAP update establishes a goal of achieving a 40 percent reduction in per capita GHG emissions compared to 1990 levels by 2030 (consistent with California Senate Bill [SB] 32) and a goal of achieving carbon neutrality by 2035 (ten years sooner than Assembly Bill [AB] 1279 goal of carbon neutrality by 2045).

Impact Evaluation Guidelines: CEQA Guidelines §15183.5 establishes a framework for developing a qualified GHG emissions reduction plan to cumulatively reduce GHG emissions and allow CEQA lead agencies to analyze and mitigate the effects of plan- and project-level GHG emissions. The City's Climate Action Plan was designed to be consistent with CEQA Guidelines §15183.5 and includes targets that are consistent with or exceed state goals.

In addition to meeting or exceeding State goals, a qualified GHG emissions reduction plan must undergo CEQA review and must be adopted by local decision makers. An Initial Study-Negative Declaration (IS-ND) was prepared for the 2024 CAP Update. With adoption of the CAP Update IS-ND and approval of the CAP Update by City Council, the CAP Update serves as a qualified GHG emissions reduction plan consistent with CEQA Guidelines §15183.5.

Projects that are substantially consistent with the underlying demographic projections (i.e., residents and employees) and land use assumptions used in the CAP Update will be able to tier from the adopted CAP Update IS-ND pursuant to CEQA Guidelines §15183.5. The CAP Update relied on the Santa Barbara County Association of Governments (SBCAG) Connected 2050 projections and the land use assumptions for existing uses and densities allowed by land use designations in the City of Santa Barbara General Plan, including the Land Use Element and any associated amendments current as of 2023, and the 2023-2031 Housing Element. In addition, the assumptions account for the maximum buildout allowed by existing zoning districts, zoning overlays, and municipal code ordinances that increase density on top of the baseline density. To streamline the CEQA GHG emissions analysis process, the City has prepared a CEQA GHG Checklist, included in the City's MEA Guidelines for Greenhouse Gas Emissions Analysis, that can be used in CEQA review documents to confirm that such proposed projects are consistent with the CAP Update GHG emissions reduction strategy.

For projects that exceed the CAP Update's demographic projections and assumptions based on existing land use designations and existing maximum densities allowed by zoning, including zoning ordinances as of 2023 related to housing overlays, multi-unit housing, and accessory dwelling units, a different methodology and assessment utilizing quantitative thresholds of significance would be necessary to evaluate GHG emissions impacts. The City's MEA Guidelines for Greenhouse Gas Emissions Analysis includes guidance on how to utilize quantitative thresholds that were developed for purposes of evaluating the level of significance of GHG emissions impacts and how to quantify a project's GHG emissions for comparison to the applicable threshold of significance.

EXISTING CONDITIONS AND PROJECT IMPACTS

8. GREENHOUSE GAS EMISSIONS

a) Greenhouse Gases

Less Than Significant Impact. Sources of direct carbon dioxide and other GHG emissions that could result from the project include project-related traffic, natural gas use, and landscaping/maintenance equipment. Indirect emissions are associated with power generation for electricity consumption; electricity and travel associated with consumer product production, transport, and use; solid waste disposal/decomposition; and potable water delivery.

Project-generated GHG emissions are estimated at 104 MT CO2e/year, an incremental contribution to citywide emissions generation. As such, the Project would not generate emissions that may have an impact on the environment, and impacts would be less than significant.

b) Greenhouse Gases Report

Less Than Significant Impact. Refer to Exhibit H for the Greenhouse Gas Emissions Technical Memorandum. As shown therein, the project's operational emissions (without amortized construction emissions) were divided by the number of residents (104.11 MT CO2e / 51 persons) resulting in a GHG intensity of 2.04 MT CO2e per resident per year which is below the City's threshold of 2.18 MT CO2e per resident per year, as specified in the 2024 MEA Guidelines for Greenhouse Gases. As the project's GHG emissions are below the applicable quantitative City threshold and it has an initial operation year before 2030, the project would result in a less-than-significant GHG emissions impact and would not result in a cumulatively considerable impact related to GHG emissions and climate change.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

9. HAZARDS AND HAZARDOUS MATERIALS

HAZARDS AND HAZARDOUS MATERIALS Would the project:	**Level of Significance**
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than Significant
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant with Mitigation
e) For a project located within the SBCAG Airport Land Use Compatibility Plan, Airport Influence Area, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less than Significant

DISCUSSION

Issues: Hazardous materials issues involve the potential for public health or safety impacts from exposure of persons or the environment to hazardous materials or risk of accidents involving combustible or toxic substances. Hazards issues include the exposure of people or structures to airport hazards, wildland fires, or other types of hazards.

Impact Evaluation Guidelines: Significant impacts may result from the following:

1. Siting of incompatible projects in close proximity to existing sources of safety risk, such as pipelines, industrial processes, railroads, airports, etc.

2. Exposure of project occupants or construction workers to unremediated soil or groundwater contamination.
3. Exposure of persons or the environment to hazardous substances due to the improper use, storage, transportation, or disposal of hazardous materials.
4. Physical interference with an emergency evacuation or response plan.
5. Expose people or structures to risk of loss, injury or death involving wildland fires.
6. Emergency access is discussed in the Section 17, Transportation. Toxic air contaminants are discussed in Section 3, Air Quality. Wildland fire hazards are discussed in Section 20, Wildfire.

EXISTING CONDITIONS AND PROJECT IMPACTS

9. HAZARDS AND HAZARDOUS MATERIALS

a) Public Health and Safety

Less Than Significant Impact. Construction of the project would likely involve the use of some hazardous materials, such as vehicle fuels, lubricants, greases, and transmission fluids in construction equipment, and paints, coatings, and adhesives in building construction. Operation of the project includes limited storage and use of hazardous materials for residential and commercial uses, which include cleaning and degreasing solvents, fertilizers, pesticides, herbicides, degreasers, paints, cooking oils, chlorinated products, paints, and other materials used for property maintenance. However, these products would only be used and stored in limited quantities and the normal routine use of these products would not result in a significant hazard to residents or workers in the vicinity of the project site. In addition, operation of the proposed residential uses would not result in the production of large amounts of hazardous waste given its use.

The transport, use, and disposal of hazardous materials used or removed during project construction and operation would be conducted in compliance with applicable federal, state, and local laws pertaining to the safe handling, transport, and disposal of hazardous materials. This includes the Federal Resource Conservation and Recovery Act (RCRA), which includes requirements for hazardous solid waste management; the California Department of Toxic Substances Control (DTSC) Environmental Health Standards for the Management of Hazardous Waste (CCR Title 22, Division 4.5), which includes standards for generators and transporters of hazardous waste. Therefore, the project would result in less than significant impacts related to the routine transport, use, or disposal of hazardous materials and the potential release of hazardous materials into the environment.

b) Upset or Accidental Release

Less Than Significant Impact. As previously described, the Project Site is currently vacant except for a cell tower and the Charles Caldwell Park Watering Trough and Fountain. These existing onsite features would remain as part of the Project. Other construction activities could result in the use, storage, transportation, and disposal of limited quantities of hazardous materials and waste during which could result in accidental spills or releases, posing health risks to workers, the public, and the environment. To avoid an impact related to an

accidental release, construction activities would require a Storm Water Pollution Prevention Plan (SWPPP), which is mandated by the NPDES Construction General Permit and enforced by the Central Coast Regional Water Quality Control Board. Implementation of an SWPPP would minimize potential adverse effects to workers, the public, and the environment. Further, as noted above, the use of hazardous materials during project construction and operation would be conducted in compliance with applicable federal, state, and local laws and in accordance with manufacturer specifications. Therefore, the project would result in less than significant impacts related to the upset or accidental release of hazardous materials into the environment.

c) Schools

No Impact. There are no existing or proposed schools within one-quarter mile of the project site. Therefore, the project would have no impact related to hazards affecting schools.

d) Contaminated Sites

Less Than Significant Impact with Mitigation. As discussed in the Phase I Environmental Site Assessment included as Exhibit I of this Initial Study, the project site was not listed in any environmental hazards or hazardous waste cleanup databases. Numerous adjacent or nearby properties were listed; however, based on either the distance from the project site or on the type of listing (e.g., a non-release facility), the majority of the listed nearby properties are not expected to pose an environmental concern to the project site. However, two properties which could have the potential to negatively impact the project site include the Highway 101 Expansion Project and the Shell Service Station. A detailed analysis of the potential impacts to the Project Site from these adjacent properties is provided in the Phase I Environmental Site Assessment and a summary is provided below.

The Highway 101 Expansion Project was listed as a result of detected lead and a cleanup program. The case project area is approximately 10 feet south of US-101, approximately 50 feet north of the project site, and extends from Milpas Street on the east end to Cabrillo/Hot Springs Road on the west end. A site investigation report conducted in October 2000 detected lead in surface soil and at depths up to 1 foot below the surface. However, based on the distance from the project site across the railroad tracks and the soil-only impacts, the Phase I concluded that the likelihood for significant impacts to soil, soil vapor, and/or groundwater beneath the project site from aerially-deposited lead from US-101 are expected to be low.

The Shell Service Station located approximately 400 feet northeast of the project site at 1000 Coast Village Road is listed on numerous databases as the result of a gasoline leak detected in 1998. Evidence of gasoline constituents were detected in both soil and groundwater samples, and 18 groundwater monitoring wells were installed. Hydrocarbons were removed from the site in 2005, 2009, 2012, and 2013. In the 2016 Case Closure Summary, Santa Barbara County Public Health confirmed the completion of the investigation and corrective action for the site. Based on the reviewed information, the case-closed status, and the distance from the project site, the Phase I concludes that the likelihood for significant impacts to soil, soil vapor, and/or groundwater beneath the project site from the Shell Service Station are expected to be low.

Based on the lack of evidence that the project site has been impacted by hazardous materials or petroleum products at concentrations that would be subject to enforcement actions, the Phase I concluded that no further assessment was warranted. However, in its March 2025 letter, Santa Barbara County Environmental Health Services recommended further study, including soil sampling. This soil sampling was completed on November 5, 2025.[6] Gasoline range organics, polycyclic aromatic hydrocarbons, and chlorinated herbicides were not detected above laboratory reporting limits, and while multiple compounds were detected above reporting limits, only two (i.e., arsenic and lead) were detected above environmental screening levels (ESLs) for residential uses. Specifically, arsenic was detected in nine soil samples above the ESL of 0.032 milligrams per kilogram (mg/kg), at a maximum of 24.6 mg/kg, and lead was detected in one soil sample above the ESL of 32 mg/kg at 51.0 mg/kg. Accordingly, Mitigation Measure HAZ-1 (Soil Management Plan) is included in the project and will provide guidance for the handling of contaminated soil encountered during construction. Impacts would be less than significant with mitigation.

e) Airport Hazards

No Impact. The project site is not located within the SBCAG Airport Land Use Compatibility Plan, Airport Influence Area. Therefore, the project would have no impact related to airport safety hazards or noise for people residing or working in the project area.

f) Emergency Evacuation and Response

Less Than Significant Impact. While it is expected that the majority of construction activities for the Project would be confined to the project site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the project site. However, access to the project site and surrounding area during construction of the project would be maintained in accordance with standard conditions for a construction management plan that would be implemented to ensure adequate circulation and emergency access. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan, and impacts during construction would be less than significant.

With regard to operation, the project does not propose the permanent closure of any local public streets. In addition, the project would not install barriers that would impede emergency response within and in the vicinity of the project site. The project would also be expected to provide adequate emergency access and comply with City access requirements during operation. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan during operation of the project. Impacts during operation would be less than significant, and no mitigation measures are required.

g) Wildland Fire

Less Than Significant Impact. The project site is not located within a High Fire Hazard Area per the MEA Report and is not located within a Fire Hazard Severity Zone as mapped by the California Department of Forestry and

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[6] Haro Environmental, Report of Soil Sampling, 1 Hot Springs Road, April 6, 2006.

Fire Protection (CalFire).[7] Further, the project's design and construction would comply with all applicable Santa Barbara Fire Department (SBFD) and Code requirements pertaining to fire safety and vegetation management. Impacts would be less than significant.

MITIGATION MEASURES

The following mitigation measure is included in the project:

HAZ-1 Soil Management Plan: A Soil Management Plan (SMP) shall be developed to outline the regulatory procedures for the handling of soils identified as having arsenic and lead above Environmental Screening Levels for Residential Shallow Soil Exposure and provide guidance if any additional stained or impacted soils are encountered. The SMP shall be reviewed and approved by the Santa Barbara County Public Health Department's Environmental Health Services Site Management Unit prior to the issuance of building permits.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

[7] CalFire, Fire Hazard Severity Zones, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed December 8, 2025.

10. HYDROLOGY AND WATER QUALITY

HYDROLOGY AND WATER QUALITY Would the project:	**Level of Significance**
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality?	Less than Significant
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than Significant
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. result in a substantial erosion or siltation on- or off-site; ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. impede or redirect flood flows?	Less than Significant
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant

DISCUSSION

Issues: Water resources issues include changes in surface drainage, creeks, surface water quality, groundwater quantity and quality, flooding, and inundation.

The City's Storm Water Management Program (SWMP) implements the Federal Clean Water Act's NPDES Phase II regulations and is overseen by the SWRCB and the Central Coast Regional Water Quality Control Board (RWQCB). The SWMP is implemented through City ordinance provisions (SBMC § 22.87). The purpose of the SWMP is to implement and enforce a program designed to reduce the discharge of pollutants to the "maximum extent practicable" to protect water quality. The SWMP addresses discharge of pollutants both during construction and after construction.

The City's floodplain management regulations (SBMC § 22.24) regulate development in identified areas of the City prone to flood, mudslide/mudflow, or flood related erosion. The purpose of the regulations is to promote the public health, safety, and general welfare, and to minimize public and private losses due to flood conditions and to ensure that the owners of buildings within a FEMA Special Flood Hazard Area can obtain flood insurance.

Impact Evaluation Guidelines: A significant impact would result from:

1. Substantial discharge of sediment or pollutants into surface water or groundwater, or otherwise degrading water quality, including temperature, dissolved oxygen, or turbidity.
2. Substantially changing the amount of surface water in any water body or the quantity of groundwater recharge.
3. Substantially changing the drainage pattern or creating a substantially increased amount or rate of surface water runoff that would exceed the capacity of existing or planned drainage and storm water systems.
4. Altering drainage patterns or affecting creeks in a way that would cause substantial erosion, siltation, on- or off-site flooding, or impacts to sensitive biological resources. See also Section 4, Biological Resources.
5. Locating development within floodway or 100-year flood hazard area; substantially altering the course or flow of flood waters or otherwise exacerbating flood hazard to persons or property.

EXISTING CONDITIONS AND PROJECT IMPACTS

10. HYDROLOGY AND WATER QUALITY

a) Water Quality

Less Than Significant Impact. During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Further, as discussed above in section 7b of this Initial Study, because the project would disturb more than one acre of soil, a Construction General Permit (Order 2022-0057-DWQ), issued by the SWRCB, would be required prior to the start of construction. The Construction General Permit includes a SWPPP and Monitoring Program Plan, which would establish erosion and sediment control BMPs for construction activities. Typical examples of erosion-related construction BMPs include silt fences, stockpile containment, runoff control devices, and wind erosion controls. These BMPs would be refined as necessary by a qualified SWPPP professional to meet the performance standards in the Construction General Permit. These BMPs would also be effective at protecting water quality from constituents

of concern. The project would also comply with CLUP Policies 4.2-1 (Enforcement of Water Quality Laws), 4.4-2 (Cooperate to Promote BMPs), 4.2-10 (Storm Water Management Program Requirements), 4.2-22 (Storm Water Management), and 4.2-23 (Minimize Water Quality Impacts During Construction) which are intended to reduce stormwater flows and their associated pollutants. The project would implement Tier 4 requirements of the City Storm Water Management Program, which would minimize impacts to water quality. Refer to Section 11, Land Use and Planning, below for the full text of these policies and a discussion of the project's consistency with these policies. Impacts during construction would be less than significant.

Operational activities which could affect groundwater quality include accidental hazardous material spills. No underground storage tanks are proposed by the project. Therefore, operation of the project would not include the use or storage of hazardous materials beyond those typically associated with household uses such as cleaning products, paints, and maintenance of landscaping. Compliance with all applicable existing regulations at the project site regarding the handling and potentially required cleanup of hazardous materials would prevent the project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Operational impacts would be less than significant.

b) Groundwater Recharge

Less Than Significant Impact. As discussed in the Preliminary Drainage Analysis and Storm Water Compliance Report (Drainage Report) prepared for the project and included as Exhibit J of this Initial Study, the project site is approximately 11.6 percent impervious under existing conditions and would be 27.6 percent impervious with the project. However, as the project is located in a highly urbanized area, any change in groundwater recharge due to the overall net change in impervious area would be minimal in the context of the regional groundwater basin. Further, as discussed in the Drainage Report, stormwater BMPs would be implemented as part of the Project and could include bioretention, permeable pavers, and sidewalks tributary to vegetation which would reduce the overall impact to groundwater recharge. Overall, impacts would be less than significant.

c) Drainage, Stormwater Runoff, and Creeks

Less Than Significant Impact. The City and State require that onsite capture, retention, and treatment of storm water be incorporated into the design of the project. Pursuant to the City's SWMP and the NPDES Construction General Permit for Storm Water Discharges, the City requires that any increase in stormwater runoff (based on a 25-year storm event) be retained onsite and that projects be designed to capture and treat the calculated amount of runoff from the project site for a one-inch storm event, over a 24-hour period. The project is designed to capture and treat runoff prior to discharging into the public drainage system. The Drainage Report included as Exhibit J of this Initial Study, summarized herein and incorporated by reference indicates that the peak runoff flow rate has been accounted for in the design of the project. Specifically, as shown therein, the BMP design volume is 4,565 cubic feet and the project would provide a volume of 7,463 cubic feet. As such, the proposed storm water management plan complies with the City's SWMP requirements. The project would also be subject to Coastal Land Use Plan policies related to hydrology and water quality,

including Policy 4.2-1 Enforcement of Water Quality Laws, Policy 4.2-2 Cooperate to Promote BMPs, Policy 4.2-10 Storm Water Management Program Requirements, Policy 4.2-22 Storm Water Management, and Policy 4.2-23 Minimize Water Quality Impacts During Construction. Refer to Section 11, Land Use and Planning, above for the full text of these policies. The project is also subject to standard conditions of approval, building codes, and federal and state regulatory programs that have been established to minimize impacts to water quality resulting from construction operations. Therefore, impacts associated with drainage, stormwater runoff, and creeks would be less than significant.

d) Inundation

Less Than Significant. The project site is not located in a flood hazard zone or in an area prone to regular flooding and is not in a tsunami or seiche zone. The inundation potential would not change following project occupancy, nor would the project substantially alter the course or flow of flood waters. Therefore, impacts related to pollutant release due to inundation would be less than significant.

e) Conflict with Applicable Plans

Less Than Significant Impact. Refer to the discussion above in section 10a and 10c. Based on the above, the Project would not conflict with an appliable water quality plan or groundwater management plan. As such, impacts would be less than significant.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant

11. LAND USE AND PLANNING

LAND USE AND PLANNING Would the project:	**Level of Significance**
a) Physically divide an established community?	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental impact?	Less than Significant

DISCUSSION

Issues: Certain land uses have the potential to result in incompatibility with existing surrounding land uses or activities. Typically, development applications for General Plan Amendments, Rezones, Conditional Use Permits, Performance Standard Permits, and certain modifications have the greatest potential to result in land use compatibility issues. Incompatibility can result from a proposed project's generation of noise, odor, safety hazards, traffic, visual effects, or other environmental impacts.

Impact Evaluation Guidelines: Significant impacts may result from a project that would create a physical barrier that would substantially impact circulation within an established neighborhood. Significant impacts may result from a project where an inconsistency with the General Plan, SBMC, or Coastal Land Use Plan (if applicable) would result in an adverse environmental effect. Analysis should focus on regulations, standards, and policies that relate to avoiding or mitigating environmental impacts, and an assessment of whether any inconsistency with these standards creates a significant physical impact on the environment.

EXISTING CONDITIONS AND PROJECT IMPACTS

11. LAND USE AND PLANNING

a) Physically Divide a Community

No Impact. The project site is currently vacant with the exception of a fountain and cellular tower and is located between Channel Drive and the UPRR which runs parallel to US-101 in the vicinity of the project site. The project site does not serve as a connection to any surrounding uses. In addition, implementation of the Project would not result in the placement of any permanent barriers or modifications to the surrounding circulation system such that access to the surrounding uses would be impeded or changed. Therefore, the project would not physically divide an established community, and no impact would occur.

b) Conflict with a Plan or Policy that would Avoid or Mitigate an Environmental Impact

Less Than Significant. The following provides an initial discussion of potential project consistency or inconsistency with applicable plans and policies.

i. City of Santa Barbara General Plan

As discussed above, the project site's General Plan/Coastal Land Use Plan designation is Parks/Open Space and the project is requesting a Local Coastal Program Amendment to Medium Density Residential (12 du/ac). While the project site is largely undeveloped, it is not used as parkland and, as analyzed throughout this Initial Study, development of the project would not result in significant and unavoidable impacts on the environment. Therefore, the project would not result in a land use incompatibility that could generate an effect on the environment.

The City's General Plan contains statements, goals, and policies concerning biological resources, cultural resources, energy, noise, water quality, and stormwater management which apply to the project and include the following:

- **Policy HR1. Protect Historic and Archaeological Resources.** Protect the heritages of the City by preserving and enhancing historic resources and archaeological resources.
- **Policy HR2. Ensure respectful and compatible development.** Seek to ensure that all development within the City respects rather than detracts from individual historic and archaeological resources as well as the neighborhood and overall historical character of the city. Assure compatibility of development, respect for the historical context of historical resources, and consideration of sustainable design alternatives where compatible.
- **Policy HR3. Discourage Demolition.** Develop effective measures to discourage and curtail the demolition of historic resources.
- **Policy ER5. Energy Efficiency and Conservation.** As part of the City's strategy for addressing climate change, minimizing pollution of air and water, depleting nonrenewable resources and insulated from volatility of fossil fuel prices, dependence on energy derived from fossil fuels shall be reduced through increased efficiency, conservation, and conversion to renewable energy sources when practicable and financially warranted.
- **Policy ER11. Native and Other Trees and Landscaping.** Protect and maintain native and other urban trees, and landscaped spaces, and promote the use of native or Mediterranean drought-tolerant species in landscaping to save energy and water, incorporate habitat, and provide shade.
- **Policy ER12. Wildlife, Coastal and Native Plant Habitat Protection and Enhancement.** Protect, maintain, and to the extent reasonably possible, expand the City's remaining diverse native plant and wildlife habitats, including ocean, wetland, coastal, creek, foothill, and urban-adapted habitats.
- **Policy ER19. Creek Resources and Water Quality.** Encourage development and infrastructure that is consistent with City policies and programs for comprehensive watershed planning, creeks restoration, water quality protection, open space enhancement, storm water management, and public creek and water awareness programs.

- **Policy ER20. Storm Water Management Policies.** The City's Storm Water policies standards and other requirements for low impact development to reduce storm water run-off, volumes, rates, and water pollutants are hereby incorporated into the General Plan Environmental Resources Element.
- **Policy ER31. Noise Policies for New Residential Uses.** Take into consideration the surrounding existing and future legal land uses in establishing exterior noise policies for new residential uses.

Regulatory compliance and implementation of Mitigation Measures BIO-1 (Tree Replacement for Removed Oak Tree), CUL-1 (Temporary Fencing and Erosion Control), NOI-4 (Noise Barrier), and NOI-5 (Exterior Wall Construction) would ensure that there would be no significant environmental impacts due to a conflict with the above policies. Detailed discussions that address impacts and mitigation, if applicable, are provided in the following Sections: Aesthetics, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, and Noise.

The project would also support the following policies in the General Plan's Housing Element through the provision of 22 new multi-family housing units on the project site, including five restricted to low-income households:

- **Policy H2. Housing Opportunities.** Promote equal housing opportunities for all segments of the community, with special emphasis given to extremely low, very low, low, moderate, middle income and special needs households.
- **Policy H10. New Housing.** Given limited remaining land resources, the City shall encourage the development of housing on vacant infill sites and the redevelopment of opportunity sites both in residential zones and as part of mixed-use development in commercial zones.
- **Policy H11. Promote Affordable Units.** The production of affordable housing units shall be the highest priority and the City will encourage all opportunities to construct new housing units that are affordable to extremely low, very low, low, moderate and middle income owners and renters.

Overall, based on the above, the project would not result in a land use incompatibility that could generate an effect on the environment.

ii. City of Santa Barbara Coastal Land Use Plan

The project site is located within the East Beach component area of the Coastal Zone and is currently zoned R-1 and has a land use designation of Parks/Open Space. The project is requesting a Local Coastal Program Amendment for a Coastal Zoning Map Amendment to change the zone to R-3 and a Local Coastal Program Amendment to Medium Density Residential (12 du/ac) to permit the proposed multi-family residential uses. Upon approval of the requested entitlements, the project would be consistent with the Coastal Land Use Plan and would not result in a land use incompatibility that could generate an effect on the environment.

The following Coastal Zone policies concerning aesthetics, biological resources, cultural resources, geology and soils, hydrology and water quality, land use, transportation, and tribal cultural resources apply to the project:

- **Policy 2.1-16. Siting of New Development.** As outlined in Coastal Act Section 30250(a), new and substantially redeveloped residential, commercial, or industrial development, except as otherwise provided in the Coastal LUP, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.
- **Policy 3.1-7. Encourage Sustainable Transportation.** Encourage use of sustainable transportation (i.e., pedestrian, bicycle, and transit) to the shoreline, along the coast and throughout the Coastal Zone.
- **Policy 3.1-29. Off-Street Parking for New Development and Substantial Redevelopment.**

  A. Parking standards in the Zoning Ordinance are designed to ensure sufficient off-street parking is provided for new development and substantial redevelopment so as to avoid significant adverse impacts to public access to the shoreline and coastal recreation areas. Off-street parking for new development and substantial redevelopment, therefore, shall be consistent with the Zoning Ordinance.

  B. Zoning modifications to allow reduced off-street parking in the West Beach, Lower State, and East Beach Component Areas shall only be approved if a project specific evaluation of parking demand shows that the reduced parking will provide for the anticipated parking demand generated by the development. In determining parking demand, the following may be considered: proximity to transit facilities; mix of uses in the immediate area; offsite parking agreements; and provisions of a transportation demand management plan where it is demonstrated that the plan's measures will sufficiently reduce the demand for parking.
- **Policy 4.2-1. Enforcement of Water Quality Laws.** Support and encourage the enforcement of all rules and regulations enacted for the purposes of protecting and restoring water quality, preserving and protecting freshwater and marine resources, maintaining sustainable populations of freshwater and marine organisms, and maintaining the quality of the freshwater and marine environment for the protection of human health.
- **Policy 4.2-2. Cooperate to Promote BMPs.** Cooperate with local, state, and federal governmental agencies to implement Best Management Practices (BMPs) that promote infiltration of runoff from roads, highways, and other development activities and minimize urban runoff flows and transport of pollutants into creeks and other coastal waters.
- **Policy 4.2-10. Storm Water Management Program Requirements.** The City's Storm Water Management Program shall, at a minimum, be consistent with the following requirements for development. Where there is a conflict between these policies and other applicable standards in effect, such as NPDES Storm Water permits, the requirements that on balance are most protective of coastal resources shall be applied.

A. Plan, site, and design development to minimize the transport of pollutants in runoff from the development into coastal waters.

B. Plan, site, and design development to minimize post-development changes in the site's runoff flow regime (i.e., volume, flow rate, timing, and duration), to preserve the pre-development hydrologic balance and prevent adverse changes in the hydrology of coastal waters (i.e., hydromodification).

C. Address runoff management early in site design planning and alternatives analysis, integrating existing site characteristics that affect runoff (such as topography, drainage patterns, vegetation, soil conditions, natural hydrologic features, and infiltration conditions) in the design of strategies that minimize post-development changes in the runoff flow regime, control pollutant sources, and, where necessary, remove pollutants.

D. Give precedence to a Low Impact Development (LID) approach to stormwater management in all development. LID emphasizes preventive Site Design strategies integrated with small-scale, distributed BMPs to reduce polluted runoff and replicate the natural hydrologic balance onsite through infiltration, evapotranspiration, harvesting for later use, detention, or retention of stormwater close to the source.

E. Plan site, and design development to protect and, where feasible, restore hydrologic features such as stream corridors, drainage swales, topographical depressions, groundwater recharge areas, floodplains, and wetlands.

F. Plan, site, and design development to preserve or enhance noninvasive vegetation to achieve water quality benefits such as transpiration, interception of rainfall, pollutant uptake, shading of waterways to maintain water temperature, and erosion control.

G. Plan, site, and design development to maintain or enhance on-site infiltration of runoff, where appropriate and feasible, to reduce runoff and recharge groundwater.

H. Plan, site, and design development to minimize the installation of impervious surfaces, especially directly connected impervious areas, and, where feasible, increase the area of pervious surfaces in redevelopment, to reduce runoff.

I. Use pollutant Source Control Best Management Practices (BMPs), which can be structural features or operational actions, in all development with 500 square feet of new or redeveloped impervious area, to minimize the transport of pollutants in runoff from the development.

J. In areas in or adjacent to an Environmentally Sensitive Habitat Area (ESHA), plan, site, and design development to protect the ESHA from any significant disruption of habitat values resulting from the discharge of stormwater or dry weather runoff flows.

K. Avoid construction of new stormwater outfalls, and direct stormwater to existing facilities with appropriate treatment and filtration, where feasible. Where new outfalls cannot be avoided, plan, site, and design outfalls to minimize adverse impacts to coastal resources from outfall discharges.

L. Implement appropriate protocols to manage BMPs (including installation and removal, ongoing operation, maintenance, inspection, and staff training) in all development, to protect coastal water resources for the life of the development.

M. Minimize water quality impacts during construction by minimizing erosion and runoff, minimizing the discharge of sediment and other pollutants resulting from construction activities, and minimizing land disturbance and soil compaction.

N. For all Tier 3 project categories identified in the City's Storm Water Management Program Guidance Manual (dated July 2013, or any amendment to or re-issuance thereof), including non-residential development, mixed use development, residential development in the Hillside Design District with 500 square feet or more of new or replaced impervious area, residential development with greater than 4,000 square feet of new or replaced impervious area, parking lots of 10 or more spaces, and public works projects, the following additional requirements shall apply. The level of detail provided to address these requirements shall be commensurate with the type and scale of the project, and the potential for adverse water quality or hydrologic impacts to coastal waters.

   i. Conduct a polluted runoff and hydrologic site characterization by a qualified licensed professional, early in the development planning and design stage, and document the expected effectiveness of the proposed BMPs.

   ii. If a proposed development will not reduce the site's net total impervious surface area, implement a Runoff Volume Reduction BMP (or suite of BMPs) sized to retain on-site the larger of the following two volumes from the entire project site:

      a. The runoff volume generated by the 1-inch, 24-hour design storm.

      b. The difference between the pre- and post-development runoff volume produced by the 25-year 24-hour designed storm.

   iii. If a proposed development will not reduce the site's net total impervious surface area, implement a Peak Runoff Discharge Rate BMP (or suite of BMPs) to prevent the post-development peak runoff discharge rate from the site from exceeding the pre-development rate for the 2-, 5-, 10-, and 25-year 24-hour storm events, from the entire project site.

   iv. Implement a Water Quality Treatment BMP (or suite of BMPs) sized to infiltrate, retain, or treat, at a minimum, the runoff produced by the 1-inch, 24-hour design storm for volume-based BMPs, or a constant rainfall intensity of 0.25 inch/hour for four hours for flow-based BMPs, from the entire project site.

   v. Use an LID approach to stormwater management that gives priority to preventive Site Design strategies to minimize post-development changes in the site's stormwater flow regime, supplemented by structural BMPs to retain on-site (by means of infiltration, evapotranspiration, or harvesting for later use), at a minimum, the runoff produced by the 1-inch, 24-hour design storm, to the extent appropriate and feasible.

vi. Conduct an alternatives analysis to demonstrate that there are no appropriate and feasible alternative project designs that would substantially improve runoff retention, if a proposed development will not retain on-site the runoff produced by the 1-inch, 24-hour design storm using an LID approach.

vii. The runoff Volume Reduction requirement and the Water Quality Treatment requirement are not additive, and may be met simultaneously in many cases. A Water Quality Treatment BMP (or suite of BMPs) shall be implemented to remove pollutants of concern from any portion of the runoff produced by the 1-inch, 24-hour design storm that will not be retained on-site, or if additional pollutant removal is necessary to protect coastal waters.

- **Policy 4.2-22. Storm Water Management.** All development shall be planned, sited, and designed to protect the water quality and hydrology of coastal waters in accordance with the requirements of the City's Storm Water Management Program, approved by the Central Coast Regional Water Quality Control Board under California's statewide National Pollutant Discharge Elimination System (NPDES) Phase II Small Municipal Separate Storm Sewer System (MS4) Storm Water Permit (Order No. 2013-0001 DWQ, effective July 1, 2013, or any amendment to or re-issuance thereof).
- **Policy 4.2-23. Minimize Water Quality Impacts During Construction.** Minimize water quality impacts during construction by:

  A. Minimizing the project footprint, including area required for road access and required fire protection for the proposed development;

  B. Minimizing land disturbance activities of construction (e.g., clearing, grading, and cut-and-fill), especially in erosive areas (including steep slopes, unstable areas, and erosive soils);

  C. Phasing grading activities;

  D. Preventing unnecessary soil compaction;

  E. Implementing an erosion and sediment control plan that includes BMPs to stabilize soil and prevent pollution through erosion prevention techniques and sediment control measures;

  F. Implementing BMPs to minimize the discharge of other pollutants resulting from construction activities (such as paints, solvents, vehicle fluids, asphalt and cement compounds, preservatives from treated wood, trash, and debris) into runoff or coastal waters; and

  G. Monitoring land disturbance activities to ensure conformance to approved plans.

- **Policy 4.2-24. Revegetation.** Areas disturbed by development activity shall, to the extent feasible, be revegetated prior to the rainy season (November 1- April 15).
- **Policy 4.3-3. Design Review.** Development in the Coastal Zone shall be reviewed by the Architectural Board of Review, Historic Landmarks Commission, or Single Family Design Board in accordance with established rules and procedures, as applicable. If any of the rules, procedures, or actions of these

design review boards/commissions conflict with the policies of the Coastal LUP, the policies of the Coastal LUP shall take precedence.

- **Policy 4.3-9. Minimize Excavation, Grading and Earthwork.** Minimize alteration of natural landforms to ensure that development is subordinate to surrounding natural features such as drainage courses, prominent slopes and hillsides, and bluffs. Site and design new development and substantial redevelopment to minimize grading and the use of retaining walls, and, where appropriate, step buildings to conform to site topography.
- **Policy 4.3-11. Landscape Plans Required.** Applications for new development and substantial redevelopment shall be required to have an approved landscape plan prepared by a licensed design professional that demonstrates that the landscaping associated with the new development or substantial redevelopment is visually compatible with the character of the area and minimizes impacts to visual and scenic resources. As a condition of the permit, the applicant shall be required to implement and fulfill all obligations of the landscape plan for the life of the development. The following standards shall apply:
    - Ensure vegetation choices are appropriate for environmental conditions, including but not limited to, exposure, soil, and water needs. Unless otherwise specified in Policies 4.1-17 or 5.1-38, within and near areas of natural vegetation and natural habitats, require drought-tolerant plant species, except where inappropriate for the given habitat type (e.g., creek beds and wetlands), that blend with the existing natural vegetation and natural habitats on the site. Within High Fire Hazard Areas, plant species should be fire retardant. The use of any plant species listed as problematic, a noxious weed, or invasive by the California Native Plant Society, the California Exotic Pest Plant Council, the State of California, or the federal government shall be avoided unless necessary for habitat restoration of a sensitive species (e.g., Monarch Butterfly).
    - Landscaping shall be designed to avoid obstructing or limiting public view impacts for the life of the development. Plant materials shall be chosen to avoid impacts at their maximum growth potential. The property owner shall maintain new plant materials to avoid their inadvertently intruding into the protected viewshed.
    - Landscaping and irrigation shall be planned with consideration for water conservation through use of water-wise plant species; water-efficient irrigation systems, including using microspray, drip irrigation, and mulching; and designing irrigation to eliminate runoff.
    - Enforce City regulations that require maintenance of the trees, plants, irrigation systems, and other improvements shown on an approved landscape plan.
- **Policy 4.3-12. Screen Parking Facilities.** Parking facilities shall be planted with landscape screening where visible from a public viewing area to the maximum extent feasible while maintaining public scenic views.
- **Policy 4.3-13. Tree Protection and Replacement.**

A. Trees qualifying as ESHA shall be fully protected as required by the Biological Resources protection policies (Policy 4.1-1 et seq.).

B. For non-ESHA trees:

i. Development shall be sited and designed to preserve and protect, to the extent feasible, mature trees (trees four inches in diameter or greater at four feet six inches above grade in height) and trees important to the visual quality of the property;

ii. Mature or visually important trees should be integrated into the project design rather than removed or impacted through encroachment into the root zones; and

iii. Where the removal of mature or visually important trees cannot be avoided through the implementation of project alternatives or where development encroachments into the root zone result in the loss or worsened health of the trees, the removed tree(s) shall be replaced on a minimum 1:1 basis. This standard can also be increased up to 10:1 depending on the type of tree removed, lot size, and size and expected survival rate of replacement trees.

- **Policy 4.3-25. Underground Utility Service Connections.** All new development and substantial redevelopment in the Coastal Zone shall underground on-site service connection for utilities (the utility service equipment serving an individual parcel) consistent with the resource protection policies and provisions of the LCP unless it results in an unreasonable hardship or undergrounding is infeasible.
- **Policy 4.4-1. Preserve, Protect, and Enhance Cultural Resources.** Protect the heritage of the City by preserving, protecting, and enhancing the City's pre-historic and historic past, which includes, but it is not limited to, important or unique pre-historic and historic archaeological artifacts, objects, and/or sites, and important paleontological resources and sites.
- **Policy 4.4-2. Prohibit Disturbing or Destroying Archeological Resources.** Unauthorized collecting of artifacts or other activities that have the potential to destroy or disturb archaeological resources shall be prohibited.
- **Policy 4.4-4. Paleontological and Archaeological Resource Consideration and Protection.** Potential damage to paleontological and archaeological resources shall be considered when making land-use decisions. Project alternatives and conditions offering the most protection feasible to important paleontological or important or unique archaeological resources shall be implemented.
- **Policy 4.4-5. Avoid Adverse Impacts to Important Paleontological and Important or Unique Archaeological Resources.** Development shall be sited and designed to avoid adverse impacts to important paleontological and important or unique archaeological resources to the maximum extent feasible. If there is no feasible alternative that can avoid impacts to important paleontological or important or unique archaeological resources, then the alternative that would result in the least adverse impacts to important paleontological and important or unique archaeological resources that would not result in additional adverse impacts to other coastal resources shall be required. Impacts to

important or unique archaeological or important paleontological resources that cannot be avoided through siting and design alternatives shall be mitigated.

- **Policy 4.4-6. Native American Consultation Requirement.** The City shall consult with Native American tribal groups and individuals approved by the Native American Heritage Commission for the area prior to amending or adopting its General Plan or any specific plan, or amending the Coastal LUP, when designating any land as open space, when development may adversely impact Native American archaeological and/or cultural resources, during preparation of any mitigation plan to address adverse impacts to Native American archaeological and/or cultural resources, and prior to release of a negative declaration, mitigated negative declaration, or environmental impact report prepared for the project.
- **Policy 4.4-7. Archaeological Resources Evaluation Requirement.** Development proposed in any area known or suspected to contain archaeological resources, or identified as archaeologically sensitive on the City of Santa Barbara's Archaeological Resources Sensitivity Map, shall be evaluated to identify the potential for important or unique archaeological resources at the site and whether the proposed development may potentially have adverse impacts on those resources if present at the site.
- **Policy 4.4-8. In-situ Preservation and Avoidance Preferred.** In-situ preservation and avoidance is the preferred manner of preserving and protecting important or unique archaeological resources. Where in-situ preservation and avoidance is not feasible, partial or total recovery of important or unique archaeological resources shall be undertaken. Examples of methods to accomplish in-situ preservation and/or avoidance include, but are not limited to:

    A. Siting and designing structures to avoid important or unique archeological resources;

    B. Planning construction to prevent contact with important or unique archaeological deposits;

    C. Planning parks, green space, or other open space to preserve important or unique archaeological sites;

    D. "Capping" or covering important or unique archaeological sites with a layer of soil before building tennis courts, parking lots, or similar facilities. Capping may be used where:

        i. The soils to be covered will not suffer serious compaction;

        ii. The cover materials are not chemically active;

        iii. The site is one in which the natural processes of deterioration have been or can be effectively arrested; and

        iv. The site has been recorded.

        Although the placement of fill on top of an archaeological site may reduce direct impacts of construction, indirect impacts will possibly result from the loss of access to the site for research purposes and scarification and compaction of soils. To mitigate these impacts, a sample of the cultural resource shall be excavated and appropriately curated for research purposes; and

E. Deeding important or unique archaeological sites into permanent conservation easements held for the benefit of the public.

- **Policy 4.4-9. Mitigation if In-Situ Preservation or Avoidance is not Feasible.** Where development will or is likely to adversely impact any important or unique archaeological resources and it is not feasible to avoid or preserve resources in-situ, mitigation measures that are sensitive to the cultural beliefs of the affected population(s) and would result in the least significant adverse impacts to resources shall be required and implemented as conditions of the Coastal Development Permit.

  If total or partial recovery through excavation is the only feasible mitigation measure, a Data Recovery Plan specifying how the archaeological excavation will be carried out and a requirement for a Data Recovery Report summarizing the results of the archaeological excavation(s) shall be prepared by a City-Qualified Archaeologist (Registered Professional) in consultation with the City's Environmental Analyst, the City's Archaeological Resources Advisor at the UCSB Department of Anthropology, and as appropriate, Native American tribal groups or individuals approved by the Native American Heritage Commission for the area, and a City-Qualified Barbareño Chumash Monitor. The Data Recovery Plan shall be reviewed and approved by the City's Historic Landmarks Commission, and implemented as a condition of the Coastal Development Permit.

  The Data Recovery Plan shall include, but not be limited to, the following:

  A. The nature and purpose of the Data Recovery Plan; dates of the fieldwork; names, titles, and qualifications of personnel involved; and the nature of any permits or permission obtained;

  B. The level of excavation needed;

  C. The analytical protocols for the data;

  D. Detailed notes, photographs, and drawings of all excavations and soil samples; and

  E. The location of where archaeological resources will be curated.

  The Data Recovery Report shall be submitted to the City following the archaeological excavation detailing the implementation of the Data Recovery Plan and recovery measures that were performed, including the integrity of the site deposits and any other information, as necessary. The Data Recovery Report shall be reviewed by the City's Environmental Analyst, the City's Archaeological Resources Advisor at the UCSB Department of Anthropology, and as appropriate, Native American tribal groups or individuals approved by the Native American Heritage Commission for the area and a City-Qualified Barbareño Chumash Monitor, and accepted by the Historic Landmarks Commission prior to issuance of a building permit for the development.

- **Policy 4.4-10. Condition of Approval—Monitoring Requirement.** When recommended by a City-Qualified Archaeologist (Registered Professional) due to a likelihood of uncovering or otherwise disturbing unknown subsurface archaeological resources, the following mitigation measures shall be a condition of approval of the Coastal Development Permit:

A. Onsite monitoring by a City-Qualified Archaeologist and as appropriate, a City-Qualified Barbareño Chumash Site Monitor of all grading, excavation, trenching, vegetation or paving removal, ground clearance, and site preparation that involves earthmoving operations;

B. All contractors and construction personnel shall be alerted to the possibility of uncovering unanticipated subsurface archaeological features or artifacts associated with past human occupation of the parcel; and

C. If archaeological resources are encountered or suspected, work shall immediately be halted or redirected to an area with no known archaeological resources, and the City's Environmental Analyst shall be notified. The City's Environmental Analyst shall evaluate the nature, extent, and importance of any discoveries or suspected archaeological resources based upon input from the City's Archaeological Resources Advisor at the UCSB Department of Anthropology, Native American tribal groups or individuals approved by the Native American Heritage Commission for the area, a City-Qualified Archaeologist (Registered Professional), and/or a City-Qualified Barbareño Chumash Site Monitor, as appropriate. If archaeological resources are determined to be important or unique, the City's Environmental Analyst shall require a City-Qualified Archaeologist (Registered Professional) to prepare a mitigation plan (which may include but is not limited to a Data Recovery Plan and a Data Recovery Report) and, if feasible, redirect grading and/or excavation activities to an area with no archaeological resources until such time as adequate mitigation measures are implemented to protect or preserve the identified important or unique archaeological resources. The City's Environmental Analyst shall determine whether the development or mitigation measures require a new or amended Coastal Development Permit. Activities that may adversely impact these resources shall not resume without written authorization from the City's Environmental Analyst that construction may proceed.

   If a discovery consists of possible human remains, all work in the area shall be immediately halted, and the Santa Barbara County Coroner shall be contacted. A Barbareño Chumash representative from the most current City-Qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. The City's Environmental Analyst shall determine whether the development or mitigation measures require a new or amended Coastal Development Permit. Activities that may adversely impact these resources shall not resume without written authorization.

- **Policy 4.4-11. Condition of Approval—Discovery of Paleontological Resources.** When development is proposed in any area known or suspected to contain paleontological resources, the following mitigation measures shall be a condition of approval of the Coastal Development Permit:

- If paleontological resources are discovered in the course of construction, including earth-moving activities or other ground disturbances, the following shall occur:

  A. All activity that could damage or destroy these resources shall be immediately halted;

B. A Registered Professional Paleontologist shall examine the site and provide an evaluation of the nature and importance of the resources;

C. Mitigation measures shall be implemented to address the impacts of the construction on the resources following the guidance of Policy 4.4-8 In-Situ Preservation and Avoidance Preferred and Policy 4.4-9 Mitigation if In-Situ Preservation or Avoidance is not Feasible;

D. The City's Environmental Analyst assigned to the project shall determine whether the construction or mitigation measures require additional environmental review and/or a new or amended Coastal Development Permit; and

E. The City shall notify the Coastal Commission staff that important paleontological resources were discovered during construction.

Activities that may adversely impact these resources shall not resume without written authorization from the Environmental Analyst assigned to the project that construction may proceed.

- **Policy 5.1-20. Avoid or Minimize the Effects of High Geologic Hazards.** New development and substantial redevelopment in areas of potential fault rupture, groundshaking, liquefaction, tsunami, seiche, slope failure, landslide, soil erosion, expansive soils, radon, or high groundwater shall be sited, designed, constructed, and operated (including adherence to recommendations contained in any site specific geologic evaluation required) to ensure that the development minimizes risks to life and property, assures stability and structural integrity, and neither creates nor contributes significantly to erosion, geologic instability, or destruction of the site or surrounding area over its expected life, factoring in the effects of sea level rise.
- **Policy 5.1-21. Avoid Development on Slopes Greater than 30%.** Avoid, and where avoidance is not feasible, minimize development that involves grading on any slopes greater than 30%.

Regulatory compliance and implementation of Mitigation Measures BIO-1 (Tree Replacement for Removed Oak Tree) and CUL-1 (Temporary Fencing and Erosion Control) would ensure that there would be no significant environmental impacts due to a conflict with the above policies. Detailed discussions that address impacts and mitigation, if applicable, are provided in the following Sections: Aesthetics, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Land Use, Transportation, and Tribal Cultural Resources.

iii. Ordinance Provisions

The project would comply with applicable SBMC provisions for development, including zoning requirements, development permitting procedures, grading, building, and landscape design, lighting, energy efficiency, provision of public improvements and utilities, construction provisions, storm water management, fire code provisions, and noise ordinance.

As discussed above, the project site is currently zoned R-1 and the project is requesting a Local Coastal Program Amendment for a Coastal Zoning Map Amendment to change the zone to R-3 to permit the proposed multi-family residential uses. These uses are substantially similar to existing uses surrounding the project site, specifically the residential uses to the southeast, and the rezone would not result in a land use incompatibility that would generate an effect on the environment.

MITIGATION MEASURES

Regulatory compliance and implementation of Mitigation Measures BIO-1 Tree Replacement for Removed Oak Tree), CUL-1 (Temporary Fencing and Erosion Control), NOI-4 (Noise Barrier), and NOI-5 (Exterior Wall Construction) would ensure that there would be no significant environmental impacts due to a conflict with the above policies. Detailed discussions that address impacts and mitigation, if applicable, are provided in the following Sections: Aesthetics, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Land Use, Noise, Transportation, and Tribal Cultural Resources.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

12. MINERAL RESOURCES

MINERAL RESOURCES Would the project:	**Level of Significance**
a) 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?	No Impact
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No Impact

DISCUSSION

Issues: A mineral is a naturally occurring chemical element or compound formed from inorganic processes (not biological in origin). Minerals include metals, rock, sand, petroleum products, and geothermal resources. The City has no active aggregate operations within its jurisdiction, and no quarry or mine operations are pending reactivation or initiation.

Impact Evaluation Guidelines: A significant impact could occur from projects that result in the loss of known mineral resources, or loss of mineral resource recovery sites including quarries and petroleum extraction sites.

EXISTING CONDITIONS AND PROJECT IMPACTS

12. MINERAL RESOURCES

a) Loss of Known Mineral Resource

b) Mineral Resource Recovery Site

No Impact. The project site contains no known important or protected mineral resources. The project site is located within a highly urbanized area of the City and the potential for mineral resources to occur onsite is low. Therefore, the project would not result in the loss of availability of a mineral resource or a mineral resource recovery site and no impact would occur.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

No Impact.

13. NOISE

NOISE Would the project result in:	**Level of Significance**
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant with Mitigation
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant with Mitigation
c) For a project located within the vicinity of a private airstrip or the SBCAG Airport Land Use Plan/Airport Influence Area, would the project expose people residing or working in the project area to excessive noise levels?	No Impact

DISCUSSION

Issues: Noise issues are associated with siting of a noise-generating land use next to existing noise-sensitive land uses, and/or short-term construction-related noise. Similarly construction techniques such as pile driving and blasting and land uses such as the railroad can present issues of groundborne vibration. If groundborne vibration is excessive, it can impact the integrity of structures and can affect sensitive land uses.

The primary source of ambient noise in the City is vehicle traffic noise. The City MEA Noise Contour Map identifies average ambient noise levels within the City.

Ambient noise levels are determined as averaged 24-hour weighted levels, using the Day-Night Noise Level (L_{dn}) or Community Noise Equivalence Level (CNEL) measurement scales. The L_{dn} averages the varying sound levels occurring over the 24-hour day and gives a 10 decibel (dB) penalty to noises occurring between the hours of 10:00 p.m. and 7:00 a.m. to take into account the greater annoyance of intrusive noise levels during nighttime hours. Since L_{dn} is a 24-hour average noise level, an area could have sporadic loud noise levels above 60 dBA which average out over the 24-hour period. CNEL is similar to L_{dn} but includes a separate 5 dB(A) penalty for noise occurring between the hours of 7:00 p.m. and 10:00 p.m. CNEL and L_{dn} values usually agree with one another within 1 dB(A). The Equivalent Noise Level (L_{eq}) is a single noise level, which, if held constant during the measurement time period, would represent the same total energy as a fluctuating noise level. L_{eq} values are commonly expressed for periods of one hour, but longer or shorter time periods may be specified. In general, a change in noise level of less than three decibels is not audible. A doubling of the distance from a noise source will generally equate to a change in decibel level of six decibels.

Guidance for appropriate long-term background noise levels for various land uses are established in the City General Plan Noise Element Land Use Compatibility Guidelines. Building codes also establish maximum average ambient noise levels for the interiors of structures.

High construction noise levels occur with the use of heavy equipment such as pile drivers, scrapers, rollers, graders, trenchers and large trucks for demolition, grading, and construction. Equipment noise levels can vary substantially through a construction period, and depend on the type of equipment, number of pieces operating, and equipment maintenance. Construction equipment may generate noise levels of more than 80 or 90 dBA at a distance of 50 feet, and the shorter impulsive noises from other construction equipment (such as pile drivers and drills) can be even higher, up to and exceeding 100 dBA at a distance of 50 feet. Noise during construction is generally intermittent and sporadic, and after completion of the initial demolition, grading and site preparation activities, tends to be quieter.

The Noise Ordinance (SBMC § 9.16) governs short-term or periodic noise, such as construction noise, operation of motorized equipment or amplified sound, or other sources of nuisance noise. The ordinance establishes limitations on hours of construction and motorized equipment operations, and provides criteria for defining nuisance noise in general.

Aircraft traffic also creates intermittent higher noise levels and is a major source for noise in the communities surrounding the Santa Barbara Airport. The Airport is located outside of the continuous boundary of the City, and areas affected by aircraft noise include several neighborhoods within the City of Goleta, UCSB, and unincorporated areas of the County. The Santa Barbara Airport's Noise Compatibility Program and the Airport Land Use Plan provide noise abatement procedures and policies for the airport to minimize noise; guidelines for placement of noise sensitive land uses near the airport, and mitigation measures to prevent impacts to residential areas from airport noise.

Impact Evaluation Guidelines: A significant noise impact may result from:

- **Project Noise Generation:** Substantial noise and/or vibration from project operations (such as stationary mechanical equipment) or grading and construction activities (such as the use of pile drivers) in close proximity to noise-sensitive receptors for an extensive duration. Exposure to noise levels of 100 dBA for longer than 15 minutes, or 85 dBA for more than 8 hours, has the potential to result in harmful health effects. A vibration study is required for projects that will use pile drivers.
- **Ambient Noise Levels:** Siting of a project such that persons would be subject to long-term ambient noise levels in excess of the Noise Element land use compatibility guidelines as follows. The guidelines include maximum interior and exterior noise levels.

    1. Interior noise levels are of primary importance for residences due to the health concerns associated with continued exposure to high interior noises. Projects not meeting interior noise levels would have significant noise impacts.

    2. For exterior noise levels, there are two levels of noise:

a. "Clearly unacceptable" exterior levels are those levels above which it would be prohibitive, even with mitigation, to achieve the maximum interior noise levels, and the outdoor environment would be intolerable for the assigned use. Projects exceeding the maximum "clearly unacceptable" noise levels would have significant noise impacts.

b. "Normally unacceptable" noise levels are those levels which it is clear that with standard construction techniques maximum interior noise levels will be met and there will be little interference with the land use. Projects below the maximum "normally unacceptable" noise levels would have less than significant noise impacts.

3. Projects with exterior noise levels exceeding the "normally acceptable" level and below the maximum "clearly unacceptable" level are evaluated on a case by case basis to identify mitigation to achieve the "normally acceptable" exterior levels to the extent feasible and to determine the level of significance of the noise exposure.

4. The following are the maximum interior and exterior noise levels for common land uses in the City:

   a. Commercial (retail, restaurant, etc.) and Office (personal, business, professional): Normally acceptable maximum exterior ambient noise level of 75 dBA L_{dn}; clearly unacceptable maximum exterior noise level of 80 dBA L_{dn}; maximum interior noise level of 50 dBA L_{dn}.

   b. Residential: Normally acceptable maximum exterior ambient noise level of 60 dBA L_{dn} in single family zones and 65 dBA L_{dn} in non-residential or multi-family residential zones); clearly unacceptable maximum exterior noise level of 75 dBA L_{dn}; maximum interior noise level of 45 dBA L_{dn}.

- **Aircraft Noise:** Project site location near the Airport that would result in excessive noise exposure for project residents or employees.

EXISTING CONDITIONS AND PROJECT IMPACTS

13. NOISE

a) Increased Noise

i. Temporary Construction Noise

Less Than Significant. Project construction would result in an increase in temporary noise levels on the project site associated with construction equipment, general construction activity, and vehicle trips. However, the nearest noise sensitive receptors are located approximately 650 feet from the project site. Nevertheless, the project would comply with the City's Noise Ordinance (SBMC 9.16) which governs short-term or periodic noise, such as construction noise, operation of motorized equipment or amplified sound, or other sources of nuisance noise. The ordinance establishes limitations on hours of construction and motorized equipment operations, and provides criteria for defining nuisance noise in general. The project would also comply with the standard conditions of approval for construction noise shown in Exhibit C which include notification to property owners, businesses, and residents within 300 feet of the project area at least 20 days prior to commencement of

construction; construction hours which are restricted to Monday through Friday between the hours of 7:00 a.m. and 5:00 p.m., and Saturdays between the hours of 9:00 a.m. and 4:00 p.m., excluding holidays; the use of construction equipment professionally maintained and fitted with standard manufacturers' muffler and silencing devices; and temporary sound barriers that result in noise attenuation of 5-10 dB at the property lines. Overall, with compliance with standard conditions of approval related to construction noise, impacts related to construction noise would be less than significant.

ii. Long-Term Operational Noise

Less Than Significant Impact with Mitigation. The Acoustics Report included as Exhibit K of this Initial Study evaluated operational impacts associated with outdoor areas and traffic. With respect to outdoor areas, as shown in the floor plans, some units have more than one outdoor activity area such as a rooftop deck or terrace; however, each unit has one dedicated private outdoor living space on the 1st or 2nd floor that must comply with the Noise Element requirement of 65 dBA or less for outdoor spaces. Levels at all specified outdoor living spaces are well-shielded from highway noise and will comply, assuming all terrace guardrail walls and parapets are a minimum of 42 inches tall. All guardrails/parapet walls must be of solid construction to maintain efficacy as noise barriers and comply with the noise element. The Acoustics Report also evaluated a potential outdoor activity area at the eastern corner of the project site. Exterior noise levels in this area are CNEC 70-72 dBA. Mitigation Measure NOI-4 (Noise Barrier) which requires an 8-foot minimum sound wall that provides 6-8 dBA noise reduction would reduce this impact to a less than significant level.

With respect to traffic noise, the future CNEL/DNL sound pressure level across the project site may increase approximately 1 dB above existing sound levels, assuming that continued future combustion-engine traffic growth of 1 percent per year for the roads shall continue. All residential units are expected to comply with a 20-year buildout.

The Acoustics Report also evaluated the impacts of the existing noise environment on the future residents of the project. As discussed therein, as a result of the railroad tracks and US-101, interior noise levels on the northern portion of the project would not comply with the California Noise Insulation Standards requirement of 45 dBA CNEL or less for habitable spaces. Mitigation Measure NOI-5 (Exterior Wall Construction) requires additional sound insulation for exterior walls of the north, east, and west elevations of the 2nd and 3rd floors of Units 14 through 22 in Buildings 4 through 7. Implementation of this mitigation measure would reduce this impact to a less than significant level.

b) Vibration Levels

Less Than Significant Impact with Mitigation. With respect to construction vibration, as discussed in detail in the Vibration Report included as Exhibit L of this Initial Study, some project equipment may produce vibration levels that should be evaluated for their potential impact on sensitive receptors. Construction equipment used at the project site is expected to include bulldozers, vibratory rollers, and loaded trucks. Construction methods that generate significant vibration such as blasting, pile driving, and crack-and-seat operations are not proposed as part of the Project. The nearest sensitive receptor to project construction is the Charles Caldwell Park Watering Trough and Fountain located on the project site. Constructed in 1911-1912, the fountain is a City

Landmark, and, because of its age, the fountain is more susceptible to damage from construction vibration than newer structures. Impacts to the fountain would be avoided by maintaining an appropriate buffer distance from the fountain based on the equipment type. These distances are provided in Table 5 of the Vibration Report and Mitigation Measure NOI-1 provided below requires these distances be maintained. With implementation of Mitigation Measure NOI-1, impacts to the fountain would be less than significant.

The nearest off-site receptor locations evaluated for vibration impacts are located at the Santa Barbara Cemetery located approximately 70 feet south of the project site. Based on vibration levels published by the Federal Transit Administration and provided in Table 4 of the Vibration Report, the vibratory roller, which has the highest level of vibration among typical construction equipment, would have a peak particle velocity (PPV) of 0.045 inches per second, which is well below the criteria for building damage or human annoyance due to transient vibration sources. However, if the vibratory roller operates continuously along the south perimeter of the project site, the resulting vibration may be distinctly perceptible by people in the north side of the cemetery. Mitigation Measure NOI-2, which requires a 5-foot mandatory setback from the southern property line if a vibratory roller is to be used continuously would reduce this impact to a less than significant level. An additional mitigation measure requiring construction phasing (i.e., Mitigation Measure NOI-3) is also provided to reduce vibration impacts. Overall, impacts would be less than significant with implementation of mitigation.

c) Aircraft Noise

No Impact. The project is not located within the vicinity of the Santa Barbara Airport or any private airstrip. No impact would occur.

MITIGATION MEASURES

The following mitigation measures are included in the project:

- **NOI-1 Limit Continuous Vibration Near the Historic Fountain:** All vibrating equipment shall maintain a minimum distance from the fountain within the project site as specified in Table 5 of the Vibration Report prepared for the project and included as Exhibit L of the Initial Study.
- **NOI-2 Limit Continuous Vibration Near South Property Line:** If operated continuously, the vibratory roller shall not operate within 5 feet of the southern property line.
- **NOI-3 Phasing:** Earthmoving and any ground-impacting operations shall be phased so as to not occur at the same time.
- **NOI-4 Noise Barrier:** In the event an outdoor activity area is developed in the eastern corner of the project site, a solidly constructed noise barrier at least 8 feet in height shall be constructed. The noise barrier shall provide a minimum of 6 to 8 dBA noise reduction.
- **NOI-5 Exterior Wall Construction:** Exterior wall assemblies of the north, east, and west elevations of the 2nd and 3rd floors of Units 14 through 22 in Buildings 4 through 7 shall have the interior layer of drywall isolated from the framing with resilient sound isolation clips with a minimum sound

transmission class [STC] of 63 and an outdoor-indoor transmission class rating (OITC) of 46 and glazing shall have a minimum STC of 36 and OITC of 29.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

14. POPULATION AND HOUSING

POPULATION AND HOUSING Would the project:	**Level of Significance**
a) 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)?	Less than Significant
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact

DISCUSSION

Issues: Population and housing issues include induced population growth that would strain environmental resources within the City or require new infrastructure or development, the construction of which could result in environmental impacts. The loss of housing units would displace populations and increase demand for housing within the City.

Impact Evaluation Guidelines: A potentially significant population and housing impact may occur if:

1. Growth inducement, such as provision of substantial population or employment growth or creation of substantial housing demand; development in an undeveloped area, or extension/expansion of major infrastructure that could support additional future growth.
2. Loss of a substantial number of people or housing units, especially loss of lower cost housing.

EXISTING CONDITIONS AND PROJECT IMPACTS

14. POPULATION AND HOUSING

a) Growth Inducing Impacts

Less Than Significant. The project would not involve a substantial increase in major public facilities such as extension of water or sewer lines or roads that would facilitate other growth in the area. The project would not involve substantial employment growth that would increase population or housing demand. While the project includes 22 new residential units, growth-inducing impacts would be less than significant because the project site is in an urbanized area with existing services and infrastructure. While the project would include lateral connections to the water and wastewater system, and connections to the existing electricity and natural gas main lines adjacent to the project site, the project site would be able to be served by the City's infrastructure. In addition, the provision of new housing as part of the Project would help meet the demand for housing in the City.

b) Housing Displacement

No Impact. The project site does not include any existing residential uses and would not displace any people or housing. Therefore, it would have no impact related to displacement.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

15. PUBLIC SERVICES

PUBLIC SERVICES Would the project:	**Level of Significance**
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: b) Fire protection? c) Police protection? d) Schools? e) Parks? f) Other public facilities?	Less than Significant

DISCUSSION

Issues: This section evaluates project effects on fire and police protection services, schools, parks, and other public facilities.

Facilities and Services: The General Plan EIR concluded that under existing conditions as well as the projected planned development and all studied alternatives, all public services (i.e., police, fire, library, public facilities, governmental facilities, electrical power, natural gas, and communications) could accommodate the potential additional growth until 2030. The General Plan EIR also determined that growth in the City under the General Plan would not result in a considerable contribution to cumulative impacts on public services on the South Coast.

Schools: None of the school districts in the South Coast have been designated "overcrowded" as defined by California State law. Per California Government Code Section 66000, the City collects development impact fees from new development to offset the cost of providing school services/additional infrastructure to accommodate new students generated by the development.

Parks: The General Plan EIR concluded that potential impacts related to parks associated with ongoing growth would be addressed by existing City policies and budget process which provide for funding of public services and developing sustainable neighborhood plans.

Impact Evaluation Guidelines: The following may be identified as significant public services and facilities impacts:

1. Creation of a substantial need for increased police department, fire department, public facility maintenance, or government services staff or equipment.
2. Generation of substantial numbers of students exceeding public school capacity where schools have been designated as overcrowded.

EXISTING CONDITIONS AND PROJECT IMPACTS

15. PUBLIC SERVICES

a)–f)

Less Than Significant. The project site is currently a primarily vacant site with a limited demand on public services. The project would introduce a new residential population to the project site which would generate a demand for public services. However, the project site is located in an urban area where all public services are already available. In addition, the City's General Plan EIR determined that the City's public services would have capacity to serve growth projected for the City through 2030. Additionally, the recently released Draft Housing Plan Program EIR evaluated regional growth through 2035 and concluded that the City's public services would have the capacity to serve growth projected in the Housing Plan.[8] The project also would be required to comply with all City requirements regarding the provision of adequate services for the proposed residential uses, such as compliance with the City's Fire Code and the provision of sprinkler systems in new buildings. As it relates to parks, the project site is located near several large open spaces, beaches, and parks including, but not limited to, Butterfly Beach and East Beach Park, that can accommodate the small population generated by the Project. The Project also includes approximately 8,852 square feet of common open yard area, and private open yard for each of the residential units either at on-grade patios or on upper story decks which would help to reduce the demand on parks. With respect to schools, the project site is served by the Santa Barbara Unified School District (SBUSD) for elementary and high school, which is not designated as overcrowded as defined by the State of California. Additionally, SBUSD enrollment declined by approximately 12 percent between the 2011-2012 school year and 2023-2024 school year, and is expected to decline by another 9 percent by the 2029-2030 school year such that SBUSD would have adequate capacity to absorb students generated by the Project.[9] Additionally, school impact fees would be applied to the project as required in accordance with State law. Therefore, impacts to fire protection, police protection, schools, library services, City buildings and facilities are anticipated to be less than significant.

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[8] City of Santa Barbara, Housing Plan Program EIR, Chapter 4.11, Effects Found Not to be Significant, pages 4.11-15 through 4.11-17.

[9] City of Santa Barbara, Housing Plan Program EIR, Chapter 4.8, Schools, pages 4.8-2 and 4.8-5.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

16. RECREATION

RECREATION Would the project:	**Level of Significance**
a) 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?	Less than Significant
b) Include new recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than Significant

DISCUSSION

Issues: Recreational issues are associated with increased demand for recreational facilities or loss of or impacts to existing recreational facilities or parks.

Impact Evaluation Guidelines: Recreation impacts may be significant if the project would result in:

1. Increase in demand for park and recreation facilities in an area underserved by existing public park and recreation facilities leading to substantial physical deterioration of existing facilities.
2. Substantial loss or interference with existing park space or other public recreational facilities such as hiking, cycling, or horse trails.
3. Substantial adverse physical impacts associated with the construction or expansion of recreational facilities.

EXISTING CONDITIONS AND PROJECT IMPACTS

16. RECREATION

a) Existing Recreational Facilities

Less Than Significant Impact. The nearest parks to the project site operated by the City are Old Coast Park and East Beach Park. While the introduction of a residential population on the project site may increase the use of these and other City park and recreational facilities, the potential increase in demand would not lead to the substantial physical deterioration of these existing facilities as the demand for City park facilities would be partially offset by the provision of on-site residential amenities as discussed below in section 16b above. Therefore, impacts would be less than significant.

b) New Recreational Facilities

Less Than Significant Impact. The project will provide bicycle parking, approximately 8,852 square feet of common open yard area, and private open yards for each of the residential units either at on-grade patios or on upper story decks. No public recreational facilities are proposed. Impacts would be less than significant.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

17. TRANSPORTATION

TRANSPORTATION Would the project:	**Level of Significance**
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less than Significant
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b) (Criteria for Analyzing Transportation Impacts)?	Less than Significant
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant
d) Result in inadequate emergency access?	Less than Significant

DISCUSSION

Issues: Transportation issues include vehicle miles traveled (VMT), access, circulation, and safety. Vehicle, bicycle and pedestrian, and mass transit modes of transportation are all considered, as well as emergency vehicle access.

The City General Plan Circulation Element contains policies addressing circulation, vehicle traffic, and alternative mode travel in the City. Alternative mode policies are also contained in other adopted City planning documents, including the Nonresidential Growth Management Program, Pedestrian Master Plan, Bicycle Master Plan, Upper State Street Plan, as well as regional transportation plans.

Impact Evaluation Guidelines: State legislation Senate Bill (SB) 743 revises the approach for analyzing transportation impacts of projects under CEQA. The legislation identifies the use of VMT or similar approaches as the most appropriate measure for determining transportation impacts, shifting away from the level of service analysis that evaluated a project's impacts on traffic conditions on nearby roadways and intersections. The change to VMT is meant to focus development in urban centers where vehicle trips are shorter or where other modes of transportation are supported to encourage land use and transportation planning decisions that reduce and minimize VMT, which is GHG emissions generator.

The State provides screening criteria to quickly identify projects not expected to result in transportation impacts under the VMT methodology which are summarized in the City's MEA Guidelines for Transportation Analysis. Consistent with State CEQA Guidelines §15064.3, projects in areas that are already well served by a major transit stop are presumed to have less than significant transportation impacts. A major transit stop is defined in the State CEQA Guidelines as a site containing an existing rail transit station, a ferry terminal served

by either a bus or rail transit service, or the intersection of two or more major bus routes with frequencies of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Projects located within a high quality transit corridor as identified by SBCAG are presumed to have less than significant VMT impacts. Projects that would generate less than 110 vehicle trips per day are presumed to be less than significant, as well as infill development projects with 100 percent affordable units. Transit and active transportation projects are also presumed to have a less than significant impact on VMT.

In accordance with the MEA Guidelines for Transportation Analysis, the following thresholds apply:

Vehicle Miles Traveled

1. ***For Land Development Projects:*** A project's impact shall be considered less than significant if the Base Year With Project scenario project VMT (per capita, per employee or per service population as appropriate) is below the Existing/Base Year (2020) citywide average VMT.
2. ***For Land Use Plans:*** A project's impact shall be considered less than significant if the Future Year With Project VMT/Service Population (or per Capita if residential-only) of the project area is below 15% below the Base Year (2020) SBCAG region average VMT/Service Pop (or per Capita).
3. ***For Transportation Roadway Projects:*** A project's impact shall be considered less than significant if the Base Year With Project scenario link-based VMT is below Existing/Base year scenario link-based VMT (for a defined study area that shall be confirmed with the City). Thus, the link-based method for VMT calculation should be used for this evaluation.

Circulation and Traffic Safety

1. Create or substantially increase potential hazards due to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) or that supports uses that would be incompatible with the proposed project.
2. Diminish or reduce effectiveness, adequacy, or safety of pedestrian, bicycle, or public transit circulation.
3. Result in inadequate emergency access on-site or to nearby uses.
4. Conflict with regional and local plans, policies, or ordinances regarding the circulation system, including pedestrian, bicycle, and public transportation.

EXISTING CONDITIONS AND PROJECT IMPACTS

17. TRANSPORTATION

a) Bicycle/Roadway/Pedestrian/Public Transit

Less Than Significant Impact. There is one transit stop located at the retail shopping center across Cabrillo Boulevard to the west which serves Santa Barbara MTD Lines 14 and 20. Line 14 runs between the Transit Center and North Jameson/Sheffield with 30 minute headways on weekdays and Line 20 runs between the Transit Center and Via Real/Mark with 30 minute headways during the weekday A.M. and P.M. peak hours, and 60 minute

headways in the middle of the day. A dedicated bicycle lane and sidewalks are provided on Cabrillo Boulevard west of the project site. There are no bicycle facilities or sidewalks on Channel Drive. The project includes bicycle parking and a sidewalk along its Channel Drive frontage. The proposed pedestrian improvements, including the sidewalk along Channel Drive, would be Americans with Disabilities Act compliant. The project would also comply with CLUP Policies 3.1-7 (Encourage Sustainable Transportation) and 3.1-29 (Off-Street Parking for New Development and Substantial Redevelopment) which are related to the City's transportation network. Refer to Section 11, Land Use and Planning, above for the full text of these policies. The Project would also be consistent with the applicable goals and policies of the Pedestrian Master Plan including, but not limited to, Policy 1.1 (expanding the sidewalk network), Policy 1.2 (improving pedestrian safety at intersections), and Policy 1.9 (improving access for those with disabilities, children, and the elderly). Lastly, project construction would be coordinated with the Los Patos Underpass Removal Project and Highway 101 Widening Plan in order to ensure safe pedestrian and bicycle access throughout construction. Project impacts associated with pedestrian, roadway, bicycle, or public transit facilities would be less than significant because the project would be in compliance with and would not conflict with all applicable guidelines and requirements to improve the property frontage and access to safely accommodate vehicle, transit, bicycle, and pedestrian circulation.

b) Vehicle Miles Traveled

Less Than Significant Impact. The City's Master Environmental Assessment Guidelines for Transportation Analysis (MEA Transportation Guidelines) outlines procedures for evaluating transportation impacts in the City. As part of this, screening criteria are provided to determine if further study is required including small projects, projects located within ½ mile of an existing major transit stop or ¼ mile of an existing High Quality Transit Corridor, neighborhood serving retail, affordable housing, and accessory building or accessory dwelling units. The project qualifies as a small project because it generates 250 or fewer daily net vehicle trips on an average weekday. Specifically, based on the trip generation rates provided in Table A-1 of the MEA Transportation Guidelines, the 22 multi-family residential units would generate approximately 148 trips. Therefore, impacts related to VMT would be less than significant.

c) and d) Safety Hazards/Emergency Access

i. Short-Term Construction Access and Circulation

Less Than Significant Impact. Standard construction-related conditions of approval included in Exhibit C would be applied to the project, including restrictions on the hours permitted for construction trips outside of peak traffic hours, approval of routes for construction traffic, and designation of specific construction staging and parking areas that would not substantially increase hazards during construction or conflict with emergency access to or around the project site. Therefore, project impacts associated with traffic hazards and emergency access during project construction would be less than significant.

ii. Operational Access and Circulation

Less Than Significant Impact. The project has been reviewed and found to comply with applicable standards and requirements by the City's Public Works, Engineering and Transportation Divisions, and Fire Department.

It does not include geometric design features that would substantially increase hazards. Further, the project site is in an urbanized area and there are no incompatible uses that would result in a vehicle mix that could increase hazards. Therefore, project impacts associated with traffic hazards and emergency access during project operation would be less than significant.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

18. TRIBAL CULTURAL RESOURCES

TRIBAL CULTURAL RESOURCES Would the project:	**Level of Significance**
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with important cultural value to a California Native American tribe, and that is: i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1.1(k), or ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Less than Significant

DISCUSSION

Issues: Tribal cultural resources are defined in PRC Section 21074.1 and the City's MEA Guidelines for Tribal Cultural Resources as:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    a. Included or determined to be eligible for inclusion in the California Register of Historical Resources; or
    b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

The City's MEA Guidelines for Tribal Cultural Resources include an assessment process to help identify, evaluate, and address potential impacts of proposed projects on tribal cultural resources. The assessment is also intended to ensure that tribes are consulted and have the opportunity to protect and manage cultural resources important to the local Chumash community.

Impact Evaluation Guidelines: Tribal cultural resource impacts are evaluated based on review of available cultural resource documentation, data gathered from records searches, and consultation with tribal representatives. The traditional knowledge tribal representatives possess enables them to identify places of religious and cultural significance to their tribes, based on traditional knowledge, traditional cultural knowledge or indigenous knowledge, or traditional ecological knowledge, relative to sites, features, places, cultural landscapes, sacred places, and objects with cultural value to the tribe.

If a tribal cultural resource is present or if unknown resources have the potential to exist within a project site, the following significance thresholds from Appendix G of the CEQA Guidelines apply:

1. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value a California Native American tribe, and that is:

    a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

    b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

EXISTING CONDITIONS AND PROJECT IMPACTS

18. TRIBAL CULTURAL RESOURCES

a) Tribal Consultation

Less Than Significant. The project site is undeveloped with the exception of a fountain and cellular tower and does not contain any known tribal cultural resources. The City provided an opportunity for Native American tribal consultation regarding the potential effects of the project on tribal cultural resources to tribes that had requested notification by the City on CEQA projects, in compliance with Assembly Bill 52 and consistent with CLUP Policy 4.4-6 (Native American Consultation Requirement). The City of Santa Barbara mailed letters to California Native American tribes traditionally and culturally affiliated with the project area which occurred on August 14, 2025 and City staff met with officials from the Barbareño Band of Chumash Indians on August 28, 2025. In addition to the initiation of Native American consultation, the City submitted a request for review of the Native American Heritage Commission's (NAHC) Sacred Lands Inventory File. As a result of consultation, recommendations for the archaeological Report were updated, including the addition of the WEAP which will be included as a condition of approval. The standard conditions of approval for the project listed in Exhibit C of this Initial Study include procedures pursuant to State regulations for the unanticipated discovery of tribal cultural resources and the specific requirements of the WEAP. Therefore, impacts on tribal cultural resources would be less than significant.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

19. UTILITIES AND SERVICE SYSTEMS

UTILITIES AND SERVICE SYSTEMS Would the project:	**Level of Significance**
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	Less than Significant
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less than Significant
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than Significant
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than Significant

DISCUSSION

Issues: This section evaluates project effects on utilities and service systems, including water and sewer service, storm water drainage, electricity, natural gas, telecommunications, and solid waste disposal.

Water

The City of Santa Barbara's water supply comes primarily from the following sources, with the actual share of each determined by availability and level of customer demand: Lake Cachuma and Tecolote Tunnel; Gibraltar Reservoir, Devils Canyon and Mission Tunnel; groundwater; State Water Project Table A allotment; desalination; and recycled water. Conservation and efficiency improvements are projected to contribute to the supply by offsetting demand that would otherwise have to be supplied by additional sources. The Long Term Water Supply Plan (LTWSP) for the planning period 2020-2050 outlines a strategy to use the above sources to meet the City's projected system demand (potable plus recycled water) of up to 15,160 acre-feet per year (AFY), plus a 10 percent safety margin. The LTWSP concludes that the City's water supply is adequate to meet current and projected demands through at least 2045, even under drought conditions, provided ongoing management and conservation efforts continue.

Sewer

The maximum capacity of the El Estero Water Resource Center is 11 million gallons per day (MGD), with current average daily flows in 2020 of 6 MGD. In 2011, the City certified a citywide Program FEIR for the Plan Santa Barbara General Plan Update. This FEIR concluded that the increased wastewater flows to El Estero Wastewater Water Resource Center are enough to accommodate the growth planned through 2030 for the City. The FEIR also concluded that the increased wastewater flows into the City's collection systems would not substantially contribute to current problems of offsite inflow and infiltration of wastewater flows from the City's system.

Solid Waste

Most of the waste generated in the City is transported on a daily basis to seven landfills located around the County. The County of Santa Barbara, which operates the landfills, has developed impact significance thresholds related to the impacts of development on remaining landfill capacity. These thresholds are utilized by the City to analyze solid waste impacts. The County thresholds are based on the projected average solid waste generation for Santa Barbara County from 1990-2005. The County assumes a 1.2 percent annual increase (approximately 4,000 tons per year) in solid waste generation over the 15-year period. The County's threshold for project specific impacts to the solid waste system is 196 tons per year (this figure represents 5% of the expected average annual increase in solid waste generation [4,000 tons per year]) for project operations. Source reduction, recycling, and composting can reduce a project's waste stream by as much as 50 percent. If a proposed project generates 196 or more tons per year after reduction and recycling efforts, impacts would be considered significant and unavoidable. Proposed projects with a project specific impact as identified above (196 tons per year or more) would also be considered cumulatively significant, as the project specific threshold of significance is based on a cumulative growth scenario. However, as landfill space is already extremely limited, any increase in solid waste of 1% or more of the expected average annual increase in solid waste generation (4,000 tons per year), which equates to 40 tons per year, is considered adverse significant cumulative impact.

The County of Santa Barbara adopted revised solid waste generation thresholds and guidelines in October 2008. According to the County's thresholds of significance, any construction, demolition, or remodeling project of a commercial, industrial, or residential development that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on solid waste generation. The County's 350 ton threshold has not been formally adopted by the City; however, it provides a useful method for calculating and analyzing construction waste generated by a project.

Impact Evaluation Guidelines:

The following may be identified as significant utilities and service systems impacts:

1. Inadequate water, sewage disposal, or utility facilities or capacity to serve the project.
2. Substantial increase in solid waste disposal to area sanitary landfills that would result in a disproportional use of remaining landfill capacity.

19. UTILITIES AND SERVICE SYSTEMS

a)–c)

The project site is currently developed with a fountain and cellular tower. While the fountain uses water, existing water demand and wastewater generation for the project site is conservatively assumed to be 0 acre feet per year (AFY). Aside from the cellular tower, there is no telecommunications infrastructure on the project site. Refer to Section 6, Energy, and Section 10, Hydrology and Water Quality, above for a discussion of impacts related to energy and stormwater, respectively.

Water

Less Than Significant Impact. As shown in the Annual Water Demand Calculation included as Exhibit M of this Initial Study, the water demand for the project is estimated to be 3.3 AFY based on the multi-family residential demand rate of 0.15 AFY per dwelling unit. This increase in use would not significantly impact the City's water supply as the project is within the anticipated growth for the City projected in the certified General Plan EIR (2011) and in the City's Enhanced Urban Water Management Plan (2021) which projects the City will have adequate supply to meet its demand throughout the 30-year planning period. Therefore, the City's long-term water supply and existing water treatment and distribution facilities would adequately serve the project. The impact on the City's water supply, treatment, and distribution facilities due to the potential increase in demand from the project would be less than significant.

Wastewater

Less Than Significant Impact. The City's wastewater treatment plant, El Estero Water Resource Center has a design capacity of 11 MGD and an average flow of 6.0 MGD.[10] Conservatively assuming 100 percent of annual water demand would enter the City's sewer system, the sewer demand for the project would be 3.3 AFY or 0.003 MGD. Therefore the projected wastewater generation would be well within the current capacity of the City's wastewater treatment plant, and with respect to future growth, as previously discussed, the project is within the anticipated growth for the City projected in the certified General Plan EIR (2011) and the Housing Plan Program EIR (2026). Therefore, the City's existing wastewater treatment facilities and distribution system would adequately serve the project. As such, the impact on the City's wastewater treatment facilities and distribution system due to the potential increase in demand from the project would be less than significant.

Telecommunications

Less Than Significant Impact. The existing cellular tower on the project site would be retained as part of the project. Installation of new telecommunications infrastructure for the project would be limited to on-site telecommunications distribution and potentially minor off site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services

[10] City of Santa Barbara, 2020 Enhanced Urban Water Management Plan, 2021, pages 7 and 8.

to the existing telecommunications lines would be coordinated with service providers and the City as applicable. As such, the project would not require or result in the relocation or construction of new or expanded telecommunications facilities, and impacts would be less than significant.

d) Solid Waste Capacity

The project site is currently developed with a fountain and cellular tower and does not generate any solid waste.

Construction

Less Than Significant. As discussed above, the County's 350 ton threshold has not been formally adopted by the City; however, it provides a useful method for calculating and analyzing construction waste generated by a project. Based on construction waste generation rates published by the USEPA, project construction is estimated to generate approximately 68 tons of solid waste prior to diversion.[11] Total short term solid waste would be reduced to approximately 17 tons after implementation of the City's Construction and Demolition Ordinance (SBMC Ch. 7.18) requirement to divert 75 percent of total construction waste. As the project would generate less than 350 tons of construction debris, solid waste impacts during construction would be less than significant.

Operation

Less Than Significant. As discussed above, any increase in solid waste of 1 percent or more of the expected average annual increase in solid waste generation (4,000 tons per year), which equates to 40 tons per year, is considered an adverse significant cumulative impact. Based on residential waste generation rates published by CalRecycle and conservatively using the highest published generation rate (i.e., 12.23 pounds per household per day), the project would generate approximately 49 tons of solid waste per year prior to diversion.[12] Accounting for the 50 percent waste diversion mandated by AB 939 and AB 341 which requires multi-family dwellings with five or more units to recycle, the project waste generation would be approximately 25 tons per year. This figure is conservative because the County's ReSource Center converts commercial and residential waste into resources by recovering recyclable materials, transforming organics into landscape nutrients, and creating renewable energy in the process, bringing the region's diversion rate above 85 percent.[13] Therefore, when accounting for regulatory compliance, the project would generate less than 40 tons of solid waste per year and impacts would be less than significant.

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[11] U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3.

[12] CalRecycle, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/Waste Characterization/General/Rates, accessed December 9, 2025.

[13] County of Santa Barbara Public Works, ReSource Center, https://www.countyofsb.org/1298/ReSource-Center, accessed December 9, 2025.

e) Reduction Goals and Regulations

Less Than Significant. The project site is currently developed with a fountain and cellular tower and does not generate any solid waste. The project would be required to comply with applicable federal, state, and local statutes and regulations related to solid waste. Specifically, as discussed above, during construction the project would comply with the City's Construction and Demolition Ordinance (SBMC Ch. 7.18) requirement to divert 75 percent of total construction waste. During operation the Project would comply with AB 939 and AB 341 which require waste diversion and recycling. Because the project would comply with all applicable reduction goals and regulations, impacts would be less than significant.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

20. WILDFIRE

WILDFIRE If the project is located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Level of Significance**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than Significant
b) 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?	Less than Significant
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel break, 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?	Less than Significant
d) 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?	Less than Significant

DISCUSSION

Issues: Wildfire issues include exposure of persons and structures to wildfire, air pollutants, and post-wildfire slope instability. Structural losses or damage from wildfires often result from inappropriate siting of development within or adjacent high fire hazard areas, the use of inappropriate construction materials or landscaping, and presence of biofuel mass. Recent wildfire events in California indicate that wildfire behavior is changing, and the duration and frequency of wildfire events are increasing. The 2017 Thomas Fire in Santa Barbara and Ventura Counties was the largest wildfire in California history and burned over 250,000 acres. This ultimately led to the subsequent debris flow event in January 2018, which gravely impacted the Montecito community.

CalFire defines fire hazard severity zones based on the presence of biofuel mass, climate, topography, assets at risk (high population centers), and an agency's ability to provide fire protection services to an area. The City contains state responsibility lands within the Very High Fire Hazard Severity Zone (VHFHSZ) within the Santa Barbara foothills. In addition, the City has also designated areas within the City as high fire hazard severity zones within the Community Wildfire Protection Plan (CWPP).

Impact Evaluation Guidelines:

A significant impact would result from:

1. Siting of development in a very high fire hazard severity zone or beyond adequate emergency response time, with inadequate access, infrastructure, or water pressure, or otherwise in a manner that creates or exacerbates a fire hazard.
2. Impairment or conflict with the Community Wildfire Protection Plan or other emergency response plan.
3. Exposing people or structures to post-fire slope instability, flooding, landslides, mud or debris flows.

EXISTING CONDITIONS AND PROJECT IMPACTS

20. WILDFIRE

a)–c)

Less Than Significant. There are no project characteristics that would contribute to wildfire risk or impair an adopted emergency response plan. Further, as discussed above in Section 9g), the project site is not located within a High Fire Hazard Area per the MEA Report and is not located within a Fire Hazard Severity Zone as mapped by CalFire.[14] Lastly, the project's design and construction would comply with all applicable SBFD and Code requirements pertaining to fire safety and vegetation management. Therefore, impacts would be less than significant.

d) Post-Wildfire Slope Instability

Less Than Significant. While the project site is located in an area of moderate landslide potential per the MEA Report, the MEA Report does not identify any historical slope failures or slope movement. Further, the project site is not located in an area that has experienced a recent burn or located in an area that has the potential for downstream flooding. Impacts would be less than significant.

MITIGATION MEASURES

None.

Refer to Exhibit C for standard conditions of approval applicable to the project.

RESIDUAL IMPACTS

Less than significant.

[14] CalFire, Fire Hazard Severity Zones, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed December 8, 2025.

21. MANDATORY FINDINGS OF SIGNIFICANCE

MANDATORY FINDINGS OF SIGNIFICANCE	Response
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	No
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	No
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	No

EXISTING CONDITIONS AND PROJECT IMPACTS

a) Biological and Cultural Resources

As discussed in Section 4, Biological Resources, above, the project, with the implementation of the identified mitigation with regard to tree replacement, would not reduce the habitat of a fish or wildlife species, cause a fish or wildfire population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section 5, Cultural Resources, and Section 18, Tribal Cultural Resources, the project would not eliminate or impact important prehistoric, historic, or tribal cultural resources with the implementation of the identified mitigation.

b) Cumulative Impacts

Sections 1 through 20 of this Initial Study consider potential cumulative impacts to environmental resources resulting from the project and related projects in the vicinity including widening of the US-101, the Los Patos Underpass Project, and projects included in the Housing Plan EIR. As discussed in these sections, the project, with the implementation of any identified mitigation, would not have a considerable contribution to cumulative impacts, and would not result in any significant, cumulative impacts on the environment.

c) Other Environmental Effects

As discussed in Sections 1 through 20 of this Initial Study, no significant effects on humans (direct or indirect) would occur as a result of the project. All potentially significant impacts related biological resources, cultural resources, geology and soils, and hazards and hazardous materials can be mitigated to a less than significant level.

MITIGATION MONITORING AND REPORTING PROGRAM

A draft Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the project in compliance with Public Resources Code § 21081.6. The draft MMRP is attached as Exhibit D.

EXHIBITS

A. Project Plans
B. Master Environmental Assessment Report
C. Standard Conditions Applicable to Project
D. Mitigation Monitoring and Reporting Program
E. Arborist Report
F. Geotechnical Report
G. Geotechnical Addendum
H. Greenhouse Gas Emissions Technical Memorandum
I. Phase I Environmental Site Assessment
J. Drainage Report
K. Acoustics Report
L. Vibration Report
M. Annual Water Demand Calculation

REFERENCES

The following sources used in the preparation of this Initial Study are located at the Community Development Department, Planning Division, 630 Garden Street, Santa Barbara and are available for review upon request.

PROJECT SPECIFIC SOURCES

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California Department of Conservation. Fault Activity Map of California, https://maps.conservation.ca.gov/cgs/fam/.

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U.S. Environmental Protection Agency. Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3.

GENERAL SOURCES

1. CALFIRE Fire Hazard Severity Zone Maps [Link to map.]
2. California Building Code as adopted by City [Link to document]
3. California Emissions Estimator Model (CalEEMod) [Link to document]
4. California Environmental Quality Act (CEQA) Statute & Guidelines [Link to document]
5. Caltrans, List of Eligible and Officially Designated State Scenic Highways [Link to list]
6. Climate Action Plan and Negative Declaration, City of Santa Barbara (2024) [Link to documents]
7. Clean Air Plan, Santa Barbara County Air Pollution Control District (2013) [Link to document]
8. Community Wildfire Protection Plan, City of Santa Barbara (2021) [Link to document]
9. Cortese List Data Resources website, California Environmental Protection Agency [Link to list]
10. Enhanced Urban Water Management Plan (2021) [Link to document]
11. Enhanced Urban Water Management Plan, City of Santa Barbara (2020) [Link to plan]
12. Envirostor website, California Department of Toxic Substances Control [Link to website]
13. Erosion/Sediment Control Program, City of Santa Barbara (2012) [Link to document]

14. Important Farmlands Map, California Department of Conservation Farmland Mapping and Monitoring Program (2020) [Link to interactive map and to download static map]
15. General Plan and General Plan Map, City of Santa Barbara [Link to plan website]
16. General Plan Certified Final Environmental Impact Report (2011) and Addenda, City of Santa Barbara [Link to plan website]
17. Geotracker website, State Water Resources Control Board [Link to website]
18. Institute of Traffic Engineers Trip Generation Manual [Link to document]
19. Local Coastal Plan (Main or Airport), City of Santa Barbara [Link to document]
20. Long Term Water Supply Plan (2021) [Link to document, see Appendix C, p. 139 of EUWMP]
21. Master Environmental Assessment (MEA) Guidelines Maps, City of Santa Barbara [Link to guidelines]
22. Ozone Plan, Santa Barbara County Air Pollution Control District (2022) [Link to document]
23. Santa Barbara Airport Land Use Compatibility Plan, Santa Barbara County Association of Governments (2023) [Link to plan]
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27. Technical Advisory on Evaluating Transportation Impacts in CEQA, Office of Planning and Research (2018) [Link to document]
28. Regional Data Platform for Transit and Land Use, Santa Barbara County Association of Governments (2025) [Link to website]
29. Water Demand Factors Update Technical Memorandum (2021) [Link to report]
30. Zoning Ordinance & Zoning Map, City of Santa Barbara [Link to document]
31. 2020 Enhanced Urban Water Management Plan, City of Santa Barbara (2021) [Link to document]