

Appendix G

Errata Memorandum

Final EIR Errata Memorandum

Final Housing Plan Program Environmental Impact Report

SCH No. 2022040209

Purpose

This Errata Memorandum accompanies the Final Environmental Impact Report (Final EIR) prepared for the City of Santa Barbara Housing Plan Program. The purpose of this memorandum is to identify and describe revisions made to the text of the Draft Environmental Impact Report (Draft EIR) in response to public agency and community comments received during the 45-day public review period, which extended from January 30, 2026 through March 17, 2026.

All written and oral comments received on the Draft EIR, as well as the City's responses to those comments, are provided in full in Section 8, Responses to Comment on the Draft EIR, of the Final EIR. The revisions documented in this Errata Memorandum reflect the City's consideration of those comments and include clarifications, corrections, and other modifications to improve the accuracy and completeness of the environmental analysis.

The following list of changes presents specific changes made to the Draft EIR text in response to comments received on the Draft EIR. For each change, the relevant section of the document is identified, the change and reason for the change is described, and the updated language is provided, as applicable. These revisions do not alter the overall conclusions of the environmental analysis presented in the Draft EIR but serve to further clarify and refine the analysis in response to public and agency input.

Executive Summary

Page: ES-2

Subsection: Alternatives

Change:

Deleted: ~~three~~. Replaced with: two.

Reason for Change: Minor Correction

Description of Change: Corrected typographical error.

Page: ES-3

Subsection: Alternative 2 (Additional Housing)

Change:

Added: This alternative provides an analysis of a higher-growth scenario in which housing production exceeds RHNA assumptions. It is intended to illustrate potential environmental effects associated with greater housing capacity.

Reason for Change: Response to Comment 5.2

Description of Change: Provided expanded description in Executive Summary.

Page: ES-3

Subsection: Alternative 2 (Additional Housing)

Change:

Deleted: ~~450~~. Replaced with: 807.

Deleted: ~~8,640~~. Replaced with: 8,808.

Deleted: ~~8~~. Replaced with: 11.

Reason for Change: Minor Corrections

Description of Change: Corrected numbers in Executive Summary to match numbers used Section 6, Alternatives.

Page: ES-3

Subsection: Alternative 2 (Additional Housing)

Change:

Added: and assumes additional policy actions to further increase density

Reason for Change: Clarification

Description of Change: Clarified assumptions.

Page: ES-3

Subsection: Alternative 2 (Additional Housing)

Change:

Added: Compared to the proposed project, this alternative would result in similar types of environmental impacts, but potentially greater in magnitude due to increased development intensity and population growth. While most impacts would be addressed through the same mitigation measures identified for the proposed project, increased growth could contribute to potentially significant and unavoidable cumulative impacts related to air quality and greenhouse gas emissions, depending on regional thresholds and attainment assumptions. At the same time, higher-density development could reduce per-capita vehicle miles traveled. All mitigation measures applicable to the proposed Housing Plan would also apply to this alternative, and future projects would remain subject to site-specific CEQA review as required.

Reason for Change: Response to Comment 5.2

Description of Change: Provided expanded description in Executive Summary.

Page: ES-3

Subsection: Areas of Known Controversy

Change:

Added: and Draft EIR public comment period.

Added: Biological Resources: Potential impacts to sensitive habitat and wildlife connectivity.

Added: Schools: Potential impacts related to school facilities.

Added: Section 4.3, Biological Resources,

Added: Section 4.8, Schools,

Reason for Change: Updated Information

Description of Change: Included additional areas of controversy based on comments received on the Draft EIR.

Page: ES-4

Subsection: Areas of Known Controversy

Change:

Added: Responses to public comments on the Draft EIR and copies of comment letters received are provided in Section 8, Responses to Comments on the Draft EIR.

Reason for Change: Updated Information

Description of Change: Referenced Response to Comments section of the Final EIR.

Page: ES-4

Subsection: Mitigation Monitoring and Reporting Program Summary

Change:

Added: Mitigation Monitoring and Reporting Program Summary

A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Final Housing Plan Program EIR pursuant to Public Resources Code Section 21081.6 and CEQA Guidelines Section 15097. The MMRP includes 13 mitigation measures across five topic areas: Air Quality (1), Biological Resources (4), Cultural and Tribal Cultural Resources (3), Hazards and Hazardous Materials (3), and Noise (3). No mitigation is required for other resource areas determined to have less-than-significant impacts. The Community Development Department is primarily responsible for implementing mitigation measures, which generally entail amendments to the municipal code and application of standard

conditions to individual development projects. Project applicants are responsible for implementing applicable measures as conditions of approval. Compliance is verified through plan check, inspections, reporting, and City recordkeeping. Overall, the MMRP provides a structured framework to ensure that environmental impacts identified in the EIR are effectively reduced to less-than-significant levels through enforceable, monitored mitigation measures implemented over the Housing Plan planning horizon.

Reason for Change: Response to Comment 5.1

Description of Change: Summarized MMRP for the Executive Summary.

Page: ES-6

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Added: of Santa Barbara

Added: California Air Resources Board (

~~Deleted: Tier 3 or higher emission standards or employ CARB-certified Level 3 diesel particulate filters.~~ Replaced with: Tier 4 emission standards, or zero-emission off-road equipment.

~~Deleted: documentation shall be provided by the project applicant to the City stating that Tier 3 equipment is not commercially available with supporting evidence from the contractor.~~ Replaced with: construction contractors shall use equipment meeting CARB Tier 3 standards or higher and shall employ CARB-certified Level 3 diesel particulate filters, or other equivalent emissions control technologies achieving comparable reductions in diesel particulate matter and NOx emissions.

~~Deleted: will be conditioned to.~~ Replaced with: shall.

~~Deleted: Quality Control.~~ Replaced with: CARB

Added: Santa Barbara County Air Pollution Control District.

~~Deleted: If CARB-certified Level 3 diesel particulate filters are utilized, they.~~ Replaced with: All equipment

Reason for Change: Response to Comment 3.2

Description of Change: Updated mitigation measure per APCD recommendation. Updated mitigation measure clarifies requirements and would result in equal or greater emissions reductions.

Page: ES-6

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Deleted: ~~Creeks Division~~. Replaced with: Sustainability and Resilience Department.

Reason for Change: Minor Correction

Description of Change: Updated the responsible City department.

Page: ES-6

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Added: of Santa Barbara. Deleted: ~~guidelines~~. Replaced with: standards. Deleted: ~~City's~~
Deleted: ~~guidelines~~. Replaced with: standards.
Deleted: ~~guidelines~~. Replaced with: standards.
Added: developed in consultation with the California Department of Fish and Wildlife (CDFW). The MEA Guidelines.
Added: riparian vegetation and.
Deleted: ~~and~~.
Added: , and habitat functions associated with riparian corridors.
Deleted: ~~and~~. Added: and avoiding non-native invasive species.
Deleted: ~~and oak woodland~~.
Deleted: ~~;~~ Replaced with: ,
Added: Require projects to ensure no net loss of riparian habitat acreage, connectivity, function, or value through avoidance or onsite restoration, where feasible; and
Require preparation of a Habitat Mitigation and Monitoring Plan for projects with
potentially significant impacts to sensitive habitat, detailing buffer implementation,
restoration/enhancement techniques, performance criteria, and post-construction
monitoring.

Reason for Change: Response to Comment 6.2

Description of Change: Updated mitigation measure per CDFW recommendations. Updated mitigation measure expands performance measures, includes agency coordination, and would result in equal or fewer impacts.

Page: ES-7

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Deleted: guidelines. Replaced with: standards. Deleted: City's.
Deleted: measures. Replaced with: requirements.
Deleted: guidelines. Replaced with: standards.
Added: and developed in consultation with the California Department of Fish and Wildlife (CDFW). The MEA Guidelines.
Deleted: guidelines. Replaced with: standards.
Deleted: September 15. Replaced with: August 30.

Reason for Change: Response to Comment 6.2

Description of Change: Updated mitigation measure to include agency coordination and include consistent dates. Updated mitigation measure would result in equal or fewer impacts.

Page: ES-7

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Added: of Santa Barbara. Deleted: guidelines. Replaced with: standards. Deleted: City's.
Deleted: guidelines. Replaced with: standards.
Deleted: guidelines. Replaced with: standards.
Added: and avoiding non-native invasive species.
Added: and developed in consultation with the California Department of Fish and Wildlife (CDFW). The MEA Guidelines .
Deleted: ordinance. Replaced with: regulatory standards.

Reason for Change: Response to Comment 6.3

Description of Change: Updated mitigation measure to include agency coordination. Updated mitigation measure would result in equal or fewer impacts.

Page: ES-10

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Deleted: ~~to AB 130 Projects~~. Replaced with: Completeness Requirement.

Deleted: ~~Projects processed under California AB 130 (2025)~~. Replaced with: Planning applications.

Reason for Change: Clarification

Description of Change: Expanded and clarified applicability. Updated mitigation measure would result in equal or fewer impacts.

Page: ES-11

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Deleted: ~~Data Recovery Program or other appropriate actions to be determined by a qualified archaeologist~~.

Reason for Change: Minor Correction

Description of Change: Deleted repeat text that was included in error. No change to mitigation measure.

Page: ES-12

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Deleted: ~~guidelines~~. Replaced with: standards

Deleted: ~~City's~~. Added: most current. Deleted: ~~E-1527-13~~. Added: Resources Control. Added: Clean Up Program

Reason for Change: Clarification

Description of Change: Updated for clarity. Updated mitigation measure would result in equal or fewer impacts.

Page: ES-13

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Deleted: ~~guidelines~~. Replaced with: standards

Reason for Change: Minor Correction

Description of Change: Updated mitigation measure would result in equal or fewer impacts.

Page: ES-13

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Deleted: ~~guidelines~~. Replaced with: standards

Added: Santa Barbara County Public Health Department. Added: Department of Conservation Geologic Energy Management Division

Added: The property owner shall be responsible for ensuring all r.

Deleted: ~~shall be~~. Replaced with: are.

Deleted: ~~by the developer and construction contractor.~~

~~If former well facilities and/or oil and gas pipelines are identified, compliance with the procedures and regulations of CalGEM developed pursuant to PRC Section 3208.1 would be required. Remedial plugging operations may be required.~~

Reason for Change: Clarification

Description of Change: Updated mitigation measure to clarify responsible entities. Revised mitigation measure would result in equal or fewer impacts.

Page: ES-15

Subsection: Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Change:

Deleted: ~~Residential development facilitated by the Housing Plan would result in new students entering the City's school districts. However, capacity exists to accommodate the anticipated increase, such that new or physically altered school facilities would not be required.~~ Replaced with: Residential development facilitated by the Housing Plan would result in additional student enrollment across school districts serving the city. Based on available information regarding districtwide facility capacity, enrollment trends, and the incremental nature of development, implementation of the Housing Plan would not result in significant environmental impacts associated with new or physically altered school facilities.

Reason for Change: Response to Comment 5.5

Description of Change: Updated impact statement to better reflect impact discussion.

Introduction

Page: 1-4

Subsection: 1.4, EIR Scope and Content

Change:

Added: Final.
Deleted: ~~seven.~~ Replaced with: eight.
Added: 8. Response to Comments on the Draft EIR. Includes copies of comment letters received on the Draft EIR during the Draft EIR public comment period, and detailed responses to comments.

Reason for Change: Updated Information

Description of Change: Updated to reflect Final EIR phase.

Page: 1-6

Subsection: 1.6, Environmental Review Process

Change:

Deleted: ~~must file~~. Replaced with: filed.

Deleted: ~~must be~~. Replaced with: was.

Deleted: ~~for a period of 45 days~~. Replaced with: between January 30, 2026 and March 17, 2026.

Deleted: ~~will be~~. Replaced with: was.

Deleted: ~~regarding adoption of the EIR~~. Replaced with: to receive public comments on March 12, 2026.

Deleted: ~~will~~. Replaced with: were.

Deleted: ~~will be made accessible~~. Replaced with: were available.

Deleted: ~~<https://santabarbaraca.gov/services/construction-land-development/development-activity/environmental-documents>~~.

Added: Notices of availability of the Draft EIR were sent to interested parties, and responsible and trustee agencies.

Deleted: ~~A~~. Replaced with: The.

Deleted: ~~must include~~. Replaced with: includes.

Deleted: ~~will~~. Replaced with: is.

Reason for Change: Updated Information

Description of Change: Updated to reflect Final EIR phase.

Environmental Setting

Page: 2-6

Subsection: 2.2.2, Legislation Related to Housing and Growth

Change:

Added: The implementation of the Housing Plan occurs within a broader State housing policy framework that includes legislation streamlining housing approvals, limiting local discretion over certain development standards, and modifying requirements related to density, parking, and objective design criteria. These laws may affect the City's ability to regulate aspects of transportation demand, school enrollment distribution, and building form, including size, bulk, and scale. While the City retains authority over objective health, safety, and design standards, certain aspects of project approval and conditioning are governed by State law and may limit local discretion.

Reason for Change: Response to Comment 4.5

Description of Change: Included general acknowledgement of policy limitations due to state law.

Page: 2-9

Subsection: 2.3, Existing Land Uses

Change:

Added: The City's zoning code organizes land uses based on primary residential, commercial, and industrial designations, with accessory uses such as ADUs permitted within the underlying residential category in accordance with applicable regulations.

Reason for Change: Response to Comment 4.18

Description of Change: Clarified structure of base zone districts.

Project Description

Page: 3-14

Subsection: Program HE-14, Evaluate Inclusionary Housing Ordinances

Change:

Deleted: ~~rental IHO was~~. Replaced with: IHOs were. Added: 2004 and

Deleted: ~~12~~. Replaced with: 21 ownership and 13

Deleted: ~~moderate income~~. Replaced with: affordable

Deleted: ~~approved~~. Replaced with: constructed

Deleted: ~~rental housing IHO. It is unknown at this time how the IHO will be amended.~~

Deleted: ~~Strategies that will be studied~~. Replaced with: IHOs. Strategies for the ordinance amendment.

Added: payment. Added: increased in-lieu fee rates and updates to calculation methods,

Deleted: ~~, similar to City of San Diego's Affordable Homes Bonus Program.~~

Reason for Change: Updated Information

Description of Change: Provided updated affordable unit construction numbers and clarified nature of potential ordinance amendments under Program HE-13.

Aesthetics and Visual Resources

Page: 4.1-2

Subsection: Important Visual Resources and Views

Change:

~~Deleted: Views from downtown Santa Barbara are characterized by foreground views of the urban environment, including buildings, roads, sidewalks, street trees, and parking areas. The downtown streetscape includes a street grid with short blocks and active transportation facilities (sidewalks/bicycle lanes). The architecture, scattered parks, and surface parking lots provide a sense of openness through the downtown area. Views of the Santa Ynez Mountains, hillsides, and the Riviera occur intermittently throughout the downtown urban core, primarily along roadways, intersections, and across larger parking lots and lower buildings. These views are interrupted by taller buildings and street trees. Open spaces, such as Plaza De la Guerra and Alameda Park, provide public mountain views. Surrounding views can also be seen from the upper stories of buildings such as the County Courthouse and on top of parking garages. Notable structures, such as the County Courthouse and Main Post Office, contribute to the visual character of downtown Santa Barbara.~~

Replaced with: Views from downtown Santa Barbara are characterized by foreground views of the urban environment, including buildings, roads, sidewalks, street trees, and parking areas. The downtown streetscape includes a street grid with short blocks and active transportation facilities (sidewalks/bicycle lanes). The architecture, scattered parks, street corridors, and underdeveloped lots contribute to varying degrees of openness through the downtown area. Views of the Santa Ynez Mountains, hillsides, and the Riviera occur intermittently throughout the downtown urban core, primarily along roadways, intersections, and across areas with smaller-scale development. These views are often interrupted by taller buildings and street trees. Open spaces, such as Plaza De la Guerra and Alameda Park, provide public views of the mountains and hillside. Surrounding views can also be seen from the upper stories of buildings such as the County Courthouse; but these do not replace views available from ground-level open space. Notable structures, such as the County Courthouse and Main Post Office, contribute to the visual character of downtown Santa Barbara.

Reason for Change: Response to Comments 4.8 and 5.7

Description of Change: Clarified the nature of visual openness.

Page: 4.1-4

Subsection: d. Light and Glare Conditions

Change:

Added: Although certain lighting improvements may not require discretionary permits or project-level review, applicable Municipal Code standards and City code enforcement procedures to apply to lighting installations that create nuisance conditions or conflict with adopted development standards.

Reason for Change: Response to Comments 4.10 and 5.9

Description of Change: Provided additional information on standards that apply to light and glare.

Page: 4.1-8

Subsection: City of Santa Barbara General Plan

Change:

Added: The potential designation of Shoreline Drive as a scenic route and any associated enhancements remain under separate consideration and are not part of the Housing Plan analyzed in this EIR.

Reason for Change: Response to Comments 4.12 and 5.11

Description of Change: Clarified policy regarding Shoreline Drive.

Page: 4.1-9

Subsection: City Charter

Change:

Deleted: ~~contains~~. Replaced with: establishes.

Added: Application of local height standards and Charter provisions occurs within the context of applicable State law, which may modify or limit local authority over development standards for certain qualifying housing projects.

Reason for Change: Response to Comment 5.12

Description of Change: Included general acknowledgement of policy limitations due to state law.

Page: 4.1-12

Subsection: 4.1.3 Impact Analysis

Change:

Added: Recent state housing legislation has, in some circumstances, reduced the level of discretionary review available to local agencies and may limit the City's ability to apply certain aspects of traditional project-by-project review processes. As a result, some qualifying housing developments may proceed through streamlined approval processes with fewer opportunities for discretionary modifications. Although development would continue to be subject to applicable objective standards and state requirements, future development may not always reflect the same degree of local design discretion historically applied through project review processes. The visual appropriateness of development scale and massing may vary based on individual perceptions; therefore, this Program EIR evaluates aesthetic impacts using CEQA criteria and applicable development standards.

Reason for Change: Response to Comments 4.11 and 5.10

Description of Change: Included acknowledgement of limitations of local design review due to recent state law.

Page: 4.1-15

Subsection: Impact AES-3

Change:

Added: Height standards and limitations are implemented through the City's Zoning Ordinance and applicable objective development standards, which are subject to state housing laws that may limit or preempt certain discretionary height controls in qualifying projects.

Reason for Change: Response to Comment 4.13

Description of Change: Clarified interplay between state requirements and local development regulations.

Page: 4.1-15

Subsection: Impact AES-3

Change:

Added: The City's General Plan includes policies intended to maintain and enhance community character through building design, scale, and neighborhood compatibility. However, implementation of these policies occurs within the context of applicable State laws, which may limit local discretion over certain development standards and approval processes for qualifying housing projects.

Reason for Change: Response to Comment 5.10

Description of Change: Clarified interplay between state requirements and local development regulations.

Air Quality

Page: 4.2-2

Subsection: b. Sources of Air Pollution

Change:

Added: Additionally, the Permitted Facilities Map maintained by the SBCAPCD, identifies existing sources of air emissions regulated by SBCAPCD, such as dry cleaners, diesel engines, and gas stations (SBCAPCD 2026).

Reason for Change: Response to Comment 3.3

Description of Change: Included reference to APCD Permitted Facilities Map.

Page: 4.2-17

Subsection: Impact AQ-2

Change:

Added: During project-level review, the City considers guidance from the California Air Resources Board (CARB), including the Air Quality and Land Use Handbook, when evaluating the siting of sensitive receptors relative to sources of toxic air contaminants. Where appropriate, the City may require project design features, buffers, or other measures to avoid or minimize potential health risks associated with exposure to air pollution.

Reason for Change: Response to Comment 3.4

Description of Change: Included reference to CARB Guidance.

Page: 4.2-17

Subsection: Mitigation Measure AQ-1

Change:

Added: of Santa Barbara

Added: California Air Resources Board (

Deleted: ~~Tier 3 or higher emission standards or employ CARB-certified Level 3 diesel particulate filters.~~ Replaced with: Tier 4 emission standards, or zero-emission off-road equipment.

Deleted: ~~documentation shall be provided by the project applicant to the City stating that Tier 3 equipment is not commercially available with supporting evidence from the contractor.~~ Replaced with: construction contractors shall use equipment meeting CARB Tier 3 standards or higher and shall employ CARB-certified Level 3 diesel particulate filters, or other equivalent emissions control technologies achieving comparable reductions in diesel particulate matter and NOx emissions.

Deleted: ~~will be conditioned to.~~ Replaced with: shall.

Deleted: ~~Quality Control.~~ Replaced with: CARB

Added: Santa Barbara County Air Pollution Control District.

Deleted: ~~If CARB-certified Level 3 diesel particulate filters are utilized, they.~~ Replaced with: All equipment

Reason for Change: Response to Comment 3.2

Description of Change: Updated mitigation measure per APCD recommendation. Updated mitigation measure clarifies requirements and would result in equal or greater emissions reductions.

Biological Resources

Page: 4.3-1

Subsection: 4.3.1 Upland Habitats

Change:

Added: Urban, suburban, and open space areas provide habitat and movement corridors for wildlife that have adapted to human-modified environments.

Reason for Change: Response to Comment 5.4

Description of Change: Added background information on common urban wildlife.

Page: 4.3-7

Subsection: Nearshore Marine

Change:

Added: The health of the nearshore marine environment is monitored through regional and state monitoring programs, including water quality monitoring, watershed management planning, creek monitoring programs, and marine habitat assessments conducted by local, state, and federal agencies. The City participates in watershed protection and stormwater management programs intended to reduce pollutant runoff to coastal waters. Conditions are monitored using a combination of remote sensing data and field surveys; these data sources document changes in habitat extent and condition over time.

Reason for Change: Response to Comments 4.13 and 5.15

Description of Change: Added background information on nearshore marine habitat.

Page: 4.3-8

Subsection: Special Status Species

Change:

Added: In addition to special-status species, the City supports a variety of common urban wildlife species associated with riparian corridors, open space areas, residential neighborhoods, and nearshore habitats. Common urban wildlife observed or expected within the City includes raccoons (*Procyon lotor*), Virginia opossums (*Didelphis virginiana*), coyotes (*Canis latrans*), skunks, bats, and other urban-adapted mammals. Riparian corridors and creek systems also function as important wildlife movement corridors connecting upland habitats to coastal and estuarine environments.

Reason for Change: Response to Comments 5.4, 5.14, and 6.1

Description of Change: Added background information on common urban wildlife.

Page: 4.3-9

Subsection: wildlife Movement Areas

Change:

Deleted: ~~Arroyo Burro, Mission, Cieneguitas, San Roque, Arroyo Honda, Laguna, Lighthouse, and Sycamore Creeks.~~ Added: In the City, riparian systems associated with Arroyo Burro Creek, Arroyo Honda Creek, Mesa Creek, Goleta Slough, Lighthouse Creek, Mission Creek, Laguna Creek, and Sycamore Creek, as well as ephemeral drainages in inland and foothill regions, constitute critical habitat and linkages for these species. In addition to stream corridors, upland habitat areas and open space linkages may serve as important movement corridors, refugia, and foraging habitat for terrestrial wildlife within the urban environment.

Reason for Change: Response to Comment 6.2

Description of Change: Added background information on wildland connectivity and upland habitat linkages.

Page: 4.3-19

Subsection: Impact BIO-1

Change:

Deleted: ~~Environmental~~

Reason for Change: Minor Correction

Description of Change: Deleted repeat work.

Page: 4.3-19

Subsection: Impact BIO-1

Change:

Added: Creeks also protect important wildlife corridors and habitat. Development sited too close to creeks may impact riparian vegetation and canopies that provide shade to creeks, affect aquatic temperatures, and decrease habitat conditions for fish and wildlife, including the state and federally endangered southern steelhead trout. Further, development placed too close to a creek bank can destabilize the channel by removing vegetation, compacting

soils, and altering natural flow patterns, which accelerates bank erosion and disrupts the creek's ability to transport sediment naturally.

Reason for Change: Response to Comment 6.2

Description of Change: Expanded discussion regarding impacts to wildlife linkages.

Page: 4.3-20

Subsection: Impact BIO-1

Change:

Added: Development projects facilitated by implementation of the Housing Plan may be subject to additional review and permitting requirements by resource agencies, including the California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board, U.S. Fish and Wildlife Service, National Marine Fisheries Service, and California Coastal Commission, depending on project location and resource conditions. Activities affecting streams, riparian habitat, or associated resources may require compliance with Fish and Game Code Section 1600 et seq. (Lake and Streambed Alteration Program). Projects with the potential to affect special-status species may also require consultation, avoidance measures, or authorizations pursuant to the California Endangered Species Act and other applicable regulations. Added: continue to

Reason for Change: Response to Comment 6.2

Description of Change: Expanded discussion regarding jurisdictional agency review and permitting.

Page: 4.3-20

Subsection: Mitigation Measure BIO-1

Change:

Deleted: ~~Creeks Division~~. Replaced with: Sustainability and Resilience Department.

Reason for Change: Minor Correction

Description of Change: Updated the responsible City department.

Page: 4.3-20

Subsection: Mitigation Measure BIO-2

Change:

Added: of Santa Barbara. Deleted: guidelines. Replaced with: standards. Deleted: City's
Deleted: guidelines. Replaced with: standards.
Deleted: guidelines. Replaced with: standards.
Added: developed in consultation with the California Department of Fish and Wildlife
(CDFW). The MEA Guidelines.
Added: riparian vegetation and.
Deleted: and.
Added: , and habitat functions associated with riparian corridors.
Deleted: and. Added: and avoiding non-native invasive species.
Deleted: and oak woodland.
Deleted: ; Replaced with: .
Added: Require projects to ensure no net loss of riparian habitat acreage, connectivity,
function, or value through avoidance or onsite restoration, where feasible; and
Require preparation of a Habitat Mitigation and Monitoring Plan for projects with
potentially significant impacts to sensitive habitat, detailing buffer implementation,
restoration/enhancement techniques, performance criteria, and post-construction
monitoring.

Reason for Change: Response to Comment 6.2

Description of Change: Updated mitigation measure per CDFW recommendations. Updated mitigation measure expands performance measures, includes agency coordination, and would result in equal or fewer impacts.

Page: 4.3-20

Subsection: Mitigation Measure BIO-3

Change:

Deleted: guidelines. Replaced with: standards. Deleted: City's.
Deleted: measures. Replaced with: requirements.
Deleted: guidelines. Replaced with: standards.
Added: and developed in consultation with the California Department of Fish and Wildlife
(CDFW). The MEA Guidelines.

Deleted: guidelines. Replaced with: standards.
Deleted: September 15. Replaced with: August 30.

Reason for Change: Response to Comment 6.2

Description of Change: Updated mitigation measure to include agency coordination and include consistent dates. Updated mitigation measure would result in equal or fewer impacts.

Page: 4.3-23

Subsection: Mitigation Measure BIO-4

Change:

Added: of Santa Barbara. Deleted: guidelines. Replaced with: standards. Deleted: City's.
Deleted: guidelines. Replaced with: standards.
Deleted: guidelines. Replaced with: standards.
Added: and avoiding non-native invasive species.
Added: and developed in consultation with the California Department of Fish and Wildlife (CDFW). The MEA Guidelines.
Deleted: ordinance. Replaced with: regulatory standards.

Reason for Change: Response to Comment 6.3

Description of Change: Updated mitigation measure to include agency coordination. Updated mitigation measure would result in equal or fewer impacts.

Page: 4.3-25

Subsection: Impact BIO-4

Change:

Deleted: generally result in. Replaced with: primarily facilitate.
Added: Parcels containing known significant biological resources were excluded from the 6th Cycle Housing Element Suitable Sites Inventory and most future development facilitated by the Housing Plan is anticipated to occur within urbanized and previously developed site (see Figure 4.3-2). However, because development under Housing Plan may also occur on residentially zoned parcels outside of the Suitable Sites Inventory, the EIR analysis conservatively assumes development could occur on parcels containing biological resources.

Deleted: ~~Due to~~. Replaced with: While.
Added: limits. Deleted: ~~is limited. Nonetheless.~~

Reason for Change: Response to Comment 6.2

Description of Change: Expanded discussion regarding impacts to wildlife linkages. Included reference to new figure requested by CDFW.

Page: 4.3-26

Subsection: Figure 4.3-2, Suitable Sites and Habitat Connectivity Analysis

Change:

Added new full page Figure 4.3-2 showing Regional Housing Need Allocation Suitable Sites within the city in relation to wildlife corridors containing riparian, wetland, and upland habitat

Reason for Change: Response to Comment 6.2

Description of Change: Added new figure as requested by CDFW.

Cultural and Tribal Cultural Resources

Page: 4.4-16

Subsection: Mitigation Measure CUL-1

Change:

Deleted: ~~to AB 130 Projects~~. Replaced with: Completeness Requirement.
Deleted: ~~Projects processed under California AB 130 (2025)~~. Replaced with: Planning applications.

Reason for Change: Clarification

Description of Change: Expanded and clarified applicability. Updated mitigation measure would result in equal or fewer impacts.

Page: 4.4-17

Subsection: Mitigation Measure CUL-2

Change:

Deleted: ~~Data Recovery Program or other appropriate actions to be determined by a qualified archaeologist.~~

Reason for Change: Minor Correction

Description of Change: Deleted repeat text that was included in error. No change to mitigation measure.

Hazards and Hazardous Materials

Page: 4.6-25

Subsection: Mitigation Measure HAZ-1

Change:

Deleted: ~~guidelines~~. Replaced with: standards
Deleted: ~~City's~~. Added: most current. Deleted: ~~E-1527-13~~. Added: Resources Control. Added: Clean Up Program

Reason for Change: Clarification

Description of Change: Updated for clarity. Updated mitigation measure would result in equal or fewer impacts.

Page: 4.6-26

Subsection: Mitigation Measure HAZ-2

Change:

Deleted: ~~guidelines~~. Replaced with: standards

Reason for Change: Minor Correction

Description of Change: Updated mitigation measure would result in equal or fewer impacts.

Page: 4.6-26

Subsection: Mitigation Measure HAZ-3

Change:

Deleted: guidelines. Replaced with: standards

Added: Santa Barbara County Public Health Department. Added: Department of Conservation Geologic Energy Management Division

Added: The property owner shall be responsible for ensuring all r.

Deleted: shall be. Replaced with: are.

Deleted: by the developer and construction contractor.

~~If former well facilities and/or oil and gas pipelines are identified, compliance with the procedures and regulations of CalGEM developed pursuant to PRC Section 3208.1 would be required. Remedial plugging operations may be required.~~

Reason for Change: Clarification

Description of Change: Updated mitigation measure to clarify responsible entities. Revised mitigation measure would result in equal or fewer impacts.

Noise

Page: 4.7-10

Subsection: Table 4.7-2, Land Use Compatibility Standards

Change:

Deleted: Golf. Replaced with: Golf.

Reason for Change: Response to Comment 5.29

Description of Change: Corrected typographical error.

Schools

Page: 4.8-1

Subsection: 4.8.1 Environmental Setting

Change:

Added: Environmental

Reason for Change: Minor Correction

Description of Change: Missing word.

Page: 4.8-1

Subsection: Hope Elementary School District

Change:

Deleted: ~~100~~. Replaced with: 183.

Added: (Anne Hubbard, Ed. D., Superintendent, Hope Elementary School District, February 10, 2026) .

Reason for Change: Response to Comment 2.1

Description of Change: Updated numbers based on new information provided in public comment.

Page: 4.8-2

Subsection: Current Enrollment

Change:

Added: in Table 4.8-1.

Deleted: ~~878~~. Replaced with: 870.

Reason for Change: Response to Comment 2.1

Description of Change: Updated numbers based on new information provided in public comment.

Page: 4.8-2

Subsection: Table 4.8-1, City of Santa Barbara 2022-2023 Student Enrollment

Change:

Deleted: ~~878~~. Replaced with: 870.

Deleted: ~~15,326~~. Replaced with: 15,318.

Added: Anne Hubbard, Ed. D., Superintendent, Hope Elementary School District 2026.

Reason for Change: Response to Comment 2.1

Description of Change: Updated numbers based on new information provided in public comment.

Page: 4.8-2

Subsection: Current Enrollment

Change:

Deleted: ~~4.8-1~~. Replaced with: 4.8-2.

Reason for Change: Minor Correction

Description of Change: Corrected typographical error.

Page: 4.8-2

Subsection: Current Enrollment

Change:

Deleted: ~~12~~. Replaced with: 9.4.

Deleted: ~~2021-2022~~. Replaced with: 2025-2026.

Deleted: ~~16.5~~. Replaced with: 13.1.

Deleted: ~~836~~. Replaced with: 870.

Deleted: ~~CDE 2023a~~. Replaced with: Anne Hubbard, Ed. D., Superintendent, Hope Elementary School District, February 10, 2026.

Reason for Change: Response to Comment 2.2

Description of Change: Updated numbers based on new information provided in public comment.

Page: 4.8-2

Subsection: Current Enrollment

Change:

Deleted: ~~Districts~~. Replaced with: SBUSD.

Added: SBUSD.

Deleted: ~~retain~~. Replaced with: retains.

Added: Basic Aid districts, including HESD, typically restrict interdistrict transfers except for limited circumstances, such as children of district employees.

Reason for Change: Response to Comments 2.3, 5.17, and 5.18

Description of Change: Updated numbers based on new information provided in public comment.

Page: 4.8-3

Subsection: Table 4.8-2, City of Santa Barbara 2022-2023 Student Enrollment

Change:

Deleted: ~~1,187~~. Replaced with: 1,001.

Added: *

Deleted: ~~Hope Elementary School District 2024~~. Replaced with: .

*Analysis relies on Hope Elementary School District reported enrollment of 870 for 2025-2026.

Reason for Change: Response to Comment 2.2

Description of Change: Updated numbers based on new information provided in public comment.

Page: 4.8-6

Subsection: Senate Bill 50

Change:

Added: and is deemed full and complete mitigation for impacts to school facilities under CEQA. These fees are designed to contribute toward the cost of accommodating new students generate from development but are not intended to fund the full cost of school facility construction or modernization.

School districts also rely on a variety of funding sources for capital improvements, including state bond programs (when available), local general obligation bonds approved by voters, and district capital reserve funds. The adequacy and availability of these funding sources vary over time and are outside the control of the Housing Plan.

Reason for Change: Response to Comment 2.4

Description of Change: Expanded discussion on school facilities mitigation under CEQA.

Page: 4.8-8

Subsection: Impact SCH-1

Change:

Deleted: ~~Residential development facilitated by the Housing Plan would result in new students entering the City's school districts. However, capacity exists to accommodate the anticipated increase, such that new or physically altered school facilities would not be required.~~

Replaced with: Residential development facilitated by the Housing Plan would result in additional student enrollment across school districts serving the city. Based on available information regarding districtwide facility capacity, enrollment trends, and the incremental nature of development, implementation of the Housing Plan would not result in significant environmental impacts associated with new or physically altered school facilities.

Reason for Change: Response to Comment 5.5

Description of Change: Updated impact statement to better reflect impact discussion.

Page: 4.8-8

Subsection: Impact SCH-1

Change:

Added: Potential housing sites on the Suitable Sites Inventory within the La Cumbre Plaza Planning Area and surrounding neighborhood could contribute to future student enrollment within the Hope Elementary School District attendance area, depending on the timing, scale, housing types, occupancy patterns, and attendance boundaries applicable at the time development occurs.

Reason for Change: Response to Comment 5.16

Description of Change: Provided contextual information about potential sources of future student generation.

Page: 4.8-9

Subsection: Impact SCH-1

Change:

Deleted: ~~districts have the ability to adjust enrollment boundaries, recommend inter school district transfers, or other district actions that would balance enrollment between school facilities and districts in accordance with Santa Barbara School Board policies.~~ Replaced with: school districts may manage enrollment and facility utilization through attendance boundary adjustments and transfers among schools within the same district, where appropriate. While limited interdistrict transfer opportunities may exist in certain circumstances and subject to district-specific policies, capacity management generally occurs within individual school districts. However, the analysis does not assume broad reliance on interdistrict student transfers to accommodate future enrollment growth.

Reason for Change: Response to Comment 4.15

Description of Change: Clarified information about interdistrict transfers.

Page: 4.8-9

Subsection: Impact SCH-1

Change:

Deleted: ~~ability to balance~~. Replaced with: available.

Deleted: ~~between~~. Replaced with: capacity in.

Added: across the city.

Reason for Change: Response to Comment 5.17

Description of Change: Clarified information about enrollment capacity.

Page: 4.8-9

Subsection: Impact SCH-1

Change:

Added: Operational considerations such as staffing ratios, programmatic space allocation, or demand for support services, may affect districts and specific school sites; however, they do not constitute physical environmental impacts under CEQA unless they necessitate construction of new or expanded school facilities.

Reason for Change: Response to Comment 2.5

Description of Change: Clarified distinction between operational considerations and physical facility impacts.

Page: 4.8-9

Subsection: Impact SCH-1

Change:

Deleted: ~~for potential impacts associated with the future development of individual residential projects~~. Added: under CEQA for the purpose of mitigating physical environmental impacts related to the need for new or physically altered school facilities. Developer fees are intended to provide proportional funding assistance toward accommodating growth but are not expected to fully fund all capital improvements that may be needed by school districts. While individual school districts may experience localized enrollment changes over time, the City's authority to require additional school facility mitigation through CEQA is limited by the State regulatory framework.

Added: Because of existing citywide school facility capacity, ongoing trends of declining or

stabilized enrollment, the incremental nature of projected student generation, and the requirement for payment of statutory school developer fees, i.

Deleted: †

Added: While localized enrollment constraints may occur at specific schools or within individual districts, these conditions do not constitute a significant impact under CEQA.

Reason for Change: Response to Comment 2.4

Description of Change: Expanded discussion regarding developer school fees and CEQA mitigation.

Transportation and Circulation

Page: 4.9-1

Subsection: a. Transportation Overview

Change:

Added: From a traffic safety perspective, concentrating development in the Downtown leads to shorter travel distances, reducing overall exposure to roadway risks. Fewer long distance commutes reduce congestion and lower collision risk. Shorter travel distances make walking, biking, and transit more viable and safer. Reducing dependence on major arterials lowers exposure to corridors with higher severe injury rates.

Reason for Change: Updated Information

Description of Change: Expanded discussion on transportation overview for context.

Page: 4.9-8

Subsection: c. Public Transit

Change:

Added: Routes and service levels are subject to periodic adjustments based on operational needs and service planning.

Reason for Change: Response to Comments 4.16 and 5.24

Description of Change: Clarification regarding public transit routes.

Page: 4.9-8

Subsection: Utility Users Tax

Change:

Added: Remaining revenues may support other City programs and services as determined through future budget decisions.

Reason for Change: Response to Comments 4.16 and 5.25

Description of Change: Provided additional information about utility users tax.

Page: 4.9-9

Subsection: Measure A

Change:

Added: Urban, suburban, and open space areas provide habitat and movement corridors for wildlife that have adapted to human-modified environments.

~~Deleted: The City uses funds generated by Measure A for a variety of transportation projects including pedestrian and bicycle facilities, support for local transit, local road improvements, and local street and sidewalk infill and maintenance programs. Measure A funds are used exclusively on transportation projects and programs (including staffing for roadway maintenance) specifically authorized in the voter approved Measure A Investment Plan. The Santa Barbara County Association of Governments (SBCAG) oversees the distribution of Measure A funds and is responsible for completing regional transportation projects. SBCAG allocates Measure A funds to the City's Streets Capital Program for local transportation projects within the City.~~ Replaced with: Measure A is a 30-year sales tax measure estimated to provide approximately \$1 billion of local sales tax revenues for transportation projects in Santa Barbara County. Measure A contains a strategic spending plan that includes both regional and local programs and projects, funded by monthly population-based allocations to each local agency. The Measure A Ordinance contains a requirement for the City to hold an annual public hearing and submit a Five-Year Measure A Local Program of Projects to the administrating agency, Santa Barbara County Association of Governments (SBCAG). Costs of street construction and maintenance activities continue to increase and are expected to increase more than the anticipated future Measure A revenues. This forecast will support fewer construction and maintenance activities.

Reason for Change: Clarification

Description of Change: Description updated for Clarification.

Page: 4.9-9

Subsection: Measure C

Change:

Added: It is anticipated that there will be less local Measure C funds available for street maintenance due to competing City priorities. In a reduced funding Measure C street maintenance scenario, priority will be placed on arterial and collector streets that carry the majority of traffic. Maintenance on local streets and alleys will be increasingly deferred.

Reason for Change: Updated Information

Description of Change: Provided updated information regarding budget forecast.

Page: 4.9-10

Subsection: Grants

Change:

Deleted: ~~2024-2028~~. Replaced with: 2026-2030.

Deleted: ~~May 2025~~. Replaced with: June 2026.

Deleted: ~~construction anticipated in 2025~~. Replaced with: completed in 2026.

Added: recently completed. Added: (construction anticipated in 2027). Added: recently completed. Deleted: ~~constructed~~. Replaced with: construction. Deleted: ~~2025~~. Replaced with: 2027.

Deleted: ~~July 2024~~. Replaced with: June 2026. Added: final

Deleted: ~~under construction or in final design and headed to construction. Caltrans/SBCAG are actively seeking funding to fund the final freeway segment that is between Sycamore Creek and Cabrillo Interchange. If funding is received construction completion is anticipated in 2028~~. Replaced with: and under construction. Construction is anticipated to be completed by 2028 with additional landscaping through 2030.

Reason for Change: Updated Information

Description of Change: Updated status of grant projects with current information.

Page: 4.9-13

Subsection: Assembly Bill 32 (AB 32) and Senate Bill 375 (SB 375)

Change:

Added: In April 2025, SBCAG collaborated with the San Luis Obispo Council of Governments (SLOCOG) to develop a white paper that highlights issues with the law and recommends several improvements. Currently, SBCAG is evaluating SB 375 reform and the effort is part of SBCAG's state legislative platform.

Reason for Change: Updated Information

Description of Change: Expanded discussion for context.

Page: 4.9-14

Subsection: Assembly Bill 2097 (AB 2097)

Change:

Added: (see Figure 4.9-5)

Reason for Change: Response to Comment 5.26

Description of Change: Added new figure reference.

Page: 4.9-14

Subsection: Assembly Bill 2097 (AB 2097)

Change:

Deleted: ~~Over time, providing less parking in the AB 2097 qualifying areas will continue to decrease traffic congestion downtown, thereby reducing greenhouse gas emissions and building a healthier community. There are many policies in the City's General Plan and 2024 Climate Action Plan that relate to reducing greenhouse gas emissions.~~ Replaced with: The AB 2097 qualifying areas are also in the Downtown Growth Management Area, which is already the city's lowest VMT area of the City. Reduced or no parking encourages more transit use, more walking and biking, more car-sharing and ride-hailing, and reduced car ownership. As discussed earlier, concentrating development in the Downtown Growth Management Area is also safer from a traffic safety perspective.

Reason for Change: Response to Comments 4.9 and 5.26

Description of Change: Provided additional information regarding the relationship between parking availability and travel behavior.

Page: 4.9-15

Subsection: Assembly Bill 2097 (AB 2097)

Change:

Added new full page Figure 4.9-5 showing the AB 209 Transit Priority Areas in relation to the Santa Barbara Central Business District.

Reason for Change: Response to Comments 4.9 and 5.26

Description of Change: Provided additional information regarding the relationship between parking availability and travel behavior.

Added new full page Figure 4.3-2 showing Regional Housing Need Allocation Suitable Sites within the city in relation to wildlife corridors containing riparian, wetland, and upland habitat

Reason for Change: Response to Comment 6.2

Description of Change: Added new figure as requested by CDFW.

Page: 4.9-16

Subsection: c. Local Regulations

Change:

Deleted: ~~2021~~. Replaced with: 2025.

Reason for Change: Updated Information

Description of Change: Updated year to match current available plan year.

Page: 4.9-18

Subsection: Safe Streets for All Action Plan

Change:

Added: summer/fall. Added: The Draft Plan is currently available at SantaBarbaraCA.gov/SafeStreets.

Reason for Change: Updated Information

Description of Change: Provided current information about the plan status.

Page: 4.9-19

Subsection: Impact TRA-1

Change:

Added: , and will put a higher demand on the City's roadway network.
~~Deleted: is anticipated as properties in those areas add new residential units. New residential development will also result in increased demand to enhance the existing sidewalk network by providing wider sidewalks and pedestrian amenities, as well as increased demand for bicycle infrastructure for all ages and abilities.~~ Replaced with: is needed as properties redevelop, such as wider sidewalks and bike infrastructure for all ages and abilities, as well as roadway safety enhancements. Implementation of state housing laws may reduce or eliminate the City's ability to require off-street parking for certain residential development projects. Although parking availability is not considered a significant environmental impact under CEQA, implementation of Housing Plan programs could incrementally increase on-street parking demand in the Downtown area for service/delivery vehicles and ride hailing. In the short-term until travel behaviors change, it is anticipated that there will be continued friction between on-street parking storage for private vehicles, and need for widened sidewalks and installation of higher-level bicycle infrastructure (protected bike lanes).

Reason for Change: Response to Comment 4.9

Description of Change: Clarified that development could result in changes in parking demand patterns; however, these changes would not result in significant environmental impacts under CEQA.

Page: 4.9-19

Subsection: Impact TRA-1

Change:

Added: 2026 Safe Streets for All Action Plan.

Reason for Change: Updated Information

Description of Change: Included new plan that is recently adopted.

Page: 4.9-20

Subsection: Impact TRA-1

Change:

Deleted: ~~and~~ Added: and 2026 Safe Streets for All Action Plan.

Deleted: ~~beginning in fall 2024.~~ Replaced with: that began in fall 2024.

Added: , and Safe Streets for All Action Plan.

Reason for Change: Updated Information

Description of Change: Included new plan that is recently adopted.

Page: 4.9-21

Subsection: Impact TRA-1

Change:

Added: and 2024 Regional Travel Patterns Report.

From SBCAG's 2024 Regional Travel Patterns Report, approximately 48,300 daily vehicle trips began in the City of Santa Barbara. Of those trips, 66 percent are destined within the City of Santa Barbara. Approximately 56,600 daily vehicle trips ended in the City of Santa Barbara with 43.7 percent of those trips being outside of the City of Santa Barbara. 59.7 percent of the work commutes are within 4 miles, making them ideal for walking, biking, and transit. The main issue is that 6.5 percent of the work commutes originating from the City of Santa Barbara and 14.6 percent of work commutes destined for the City of Santa Barbara exceed 32 miles. The longer commutes contribute to excessive VMT and greenhouse gas emissions, that local, regional, and state policies are working to address.

Added: The 2050 RTP–SCS includes strategies to reduce regional vehicle miles traveled through increased housing opportunities near job centers, multimodal access, and infill development. The Housing Plan concentrates the majority of the new housing units in the

Downtown Development Area, putting residents closer to major employment centers, and along high transit corridors. Thus, the Housing Plan meets the general objectives of the RTP–SCS.

Reason for Change: Response to Comment 1.2

Description of Change: Expanded discussion regarding regional commuting patterns.

Page: 4.9-22

Subsection: Consistency with Regional Housing Needs Allocation

Change:

~~Deleted: 's consistency with SBCAG's RHNA allocation plan, including the City's RHNA allocation for the 2023–2031 planning period of 8,001 units, is consistent with the development pattern of the 2050 RTP–SCS.~~ Replaced with: is consistent with the SBCAG RHNA plan in that it identifies adequate sites, zoning capacity, and programs to accommodate the City's assigned housing needs across all income categories. While actual housing production, particularly for moderate-income units, has been limited to date, RHNA consistency for purposes of this analysis is based on planning capacity rather than realized development outcomes. Added: , and Safe Streets for All Action Plan.

Reason for Change: Response to Comment 1.1

Description of Change: Clarified meaning of RHNA consistency.

Page: 4.9-24

Subsection: Impact TRA-3

Change:

Added: Although recent State laws may limit local discretion over development standards for qualifying residential projects, such as parking requirements, the City retains authority to apply applicable objective health and safety, circulation, and engineering standards intended to avoid hazardous transportation conditions.

Reason for Change: Response to Comment 5.6

Description of Change: Provided acknowledgement that State law may affect certain development standards.

Utilities and Services Systems

Page: 4.10-5

Subsection: e. Solid Waste Management

Change:

Added: While the Tajiguas Landfill is currently anticipated to reach capacity in 2036, regional solid waste planning efforts are ongoing and include strategies to expand diversion programs, extend landfill capacity, and identify future disposal options to ensure long-term solid waste management needs are met beyond the current planning horizon.

Reason for Change: Response to Comment 4.17

Description of Change: Provided additional context on Tajiguas Landfill.

Effects Found Not to be Significant

Page: 4.11-9

Subsection: 4.11.4 Hydrology and Water Quality

Change:

Deleted: ~~substantially alter existing drainage patterns or contribute substantial runoff water, or.~~

Deleted: ~~of a site or area.~~

Added: Also refer to Section 4.3, Biological Resources for further discussion related to impacts to creek resources.

Reason for Change: Clarification

Description of Change: Added reference to another chapter of the EIR.

Alternatives

Page: 6-9

Subsection: 6.3.1 Description

Change:

Added: In addition to representing a higher-density development scenario relative to the proposed Housing Plan, the Additional Housing Alternative provides an analytical framework for evaluating conditions in which housing production within the City exceeds the RHNA allocation of 8,001 units. While the Housing Plan programs are designed to accommodate the suitable sites inventory and RHNA allocation, actual buildout may vary due to State housing laws, market conditions, and site-specific development proposals. As such, this alternative provides an informative comparison for decision-makers, outlining the potential environmental trade-offs associated with additional housing growth above the RHNA allocation.

Reason for Change: Response to Comment 4.4

Description of Change: Expanded discussion of Alternative 2.

Page: 6-9

Subsection: 6.3.2 Impact Analysis

Change:

Added: As a higher-growth scenario, the Additional Housing Alternative would increase in the overall amount of construction, intensity of development, and population generated, relative to the Housing Plan. Environmental impacts under this alternative would be similar in type to those identified for the proposed Housing Plan; however, they may be incrementally greater in magnitude. For most issue areas, the degree to which impacts are more severe would depend on the location, density, and design of future development projects.

Increased development under this alternative could cumulatively result in significant and unavoidable impacts in cases where residential growth exceeds the growth assumptions embedded in regional air quality attainment plans and greenhouse gas reduction strategies. This may conflict with the region's ability to achieve air quality standards and greenhouse gas emissions reduction targets. At the same time, the higher-density development pattern under this alternative could provide potentially lower per capita vehicle miles traveled. The mitigation measures identified for the proposed Housing Plan are largely performance-based and tied to applicable regulatory standards. Therefore, they would also apply to development projects under the Additional Housing Alternative. These mitigation measures are designed to address impacts at the project level and are not tied to a fixed cap on residential units. Furthermore, individual projects under this alternative would continue to be subject to further environmental review as required by CEQA, at the time specific development projects are proposed.

Reason for Change: Response to Comment 4.4

Description of Change: Expanded discussion of Alternative 2.

Page: 6-10

Subsection: a. Aesthetics and Visual Resources

Change:

Added: Santa Barbara

Added: However, it is important to acknowledge that recent and evolving State housing laws substantially constrain local governments' authority to regulate certain aspects of residential development, including the extent to which a local agency may impose standards that would reduce allowable building envelopes, or constrain feasible project design. As a result, while the City retains design review authority, its ability to require reductions in building size, bulk, height, or scale may be more limited than in the past.

Deleted: ~~However~~, i. Replaced with: I.

Added: consistent with State housing mandates.

Deleted: ~~to~~. Replaced with: that could.

Added: While these changes would represent a more pronounced shift in visual character compared to the Housing Plan, the combination of City design review process and applicable Municipal Code standards, and State-mandated housing implementation requirements would continue to guide development toward context-sensitive design where feasible.

Reason for Change: Response to Comment 4.4

Description of Change: Expanded discussion of Alternative 2.

Page: 6-10

Subsection: b. Air Quality

Change:

Added: The 2050 Regional Growth Forecast forms the basis for regional air quality planning assumptions, including those used in the 2022 Ozone Plan. Accordingly, the level of growth associated with the Additional Housing Alternative would represent development that exceeds the growth projections anticipated and planned for in regional air quality attainment strategies. Because the Additional Housing Alternative would introduce a level of population and housing growth that is not accounted for in the 2022 Ozone Plan, the

resulting emissions of ozone precursors such as reactive organic gases (ROG) and nitrogen oxides (NOx), would likewise not be fully incorporated into the emissions inventories and control strategies relied upon to demonstrate attainment.

Reason for Change: Response to Comment 4.4

Description of Change: Expanded discussion of Alternative 2.

Page: 6-11

Subsection: b. Air Quality

Change:

Added: While the nature of the impact (i.e., increased emissions associated with population growth) is similar to that identified for the Housing Plan, the magnitude and policy inconsistency associated with unplanned growth under the Additional Housing Alternative results in a comparatively greater impact.

Added: In this context, the significant and unavoidable impact is not necessarily caused by the absolute increase in emissions, but rather, is triggered by the unplanned growth that falls outside the assumptions used in regional air quality planning.

Reason for Change: Response to Comment 4.4

Description of Change: Expanded discussion of Alternative 2.

Page: 6-11

Subsection: b. Air Quality

Change:

Deleted: ~~3 or higher~~. Replaced with: 4.

Added: as feasible.

Reason for Change: Response to Comment 3.2

Description of Change: Updated mitigation measure per APCD recommendation. Updated mitigation measure would result in equal or greater emissions reductions.

Page: 6-12

Subsection: e. Greenhouse Gas Emissions

Change:

~~Deleted: There is greater potential that Housing Plan programs facilitated by the Additional Housing Alternative could conflict with the City's Climate Action Plan if the growth exceeds the projections within the Climate Action Plan.~~ Added: In some cases, higher development densities could facilitate more intensive land use patterns than previously anticipated in the City's adopted land use framework. While higher-density development can provide certain efficiency benefits on a per capita basis such as reduced per-unit energy consumption and potentially lower vehicle miles traveled compared to lower-density alternatives, the overall increase in housing production would still result in higher total emissions at the Citywide scale.

Because the Additional Housing Alternative assumes a level of growth that exceeds the projections used in the City's Climate Action Plan (CAP), there is greater potential for inconsistency between projected emissions under this alternative and the emissions reduction strategies and targets identified in the CAP. The CAP is based on assumptions regarding population growth, land use densities, and transportation patterns that align with adopted regional planning forecasts. To the extent that actual development under this alternative exceeds those assumptions, the ability of existing CAP measures to fully offset resulting emissions would be reduced. This would represent a potential conflict with the City's Climate Action Plan in the context of unanticipated or unprogrammed growth beyond CAP assumptions

Reason for Change: Response to Comment 4.4

Description of Change: Expanded discussion of Alternative 2.

Page: 6-13

Subsection: h. Schools

Change:

~~Deleted: which.~~ Added: and would therefore generate a greater number of students within the City's school districts. This alternative.

Added: more.

~~Deleted: greater than the number of students.~~

~~Deleted: generated.~~

Added: The incremental increase in student generation could place additional enrollment pressure on school districts serving the City, including smaller community-funded districts such as Hope School District. As noted in comments received from the Hope School District,

these districts operate within constrained interdistrict transfer policies and generally rely on capital project planning and operational changes to accommodate enrollment changes. While these operational considerations are relevant to district planning, CEQA analysis of school impacts focuses on whether a project would result in the need for new or physically altered school facilities that could cause a significant physical environmental impact. Although the Additional Housing Alternative would generate a more students than the Housing Plan, the analysis of citywide capacity across multiple districts indicates that existing school facilities, when considered systemwide, are able to accommodate projected enrollment growth. To the extent that localized constraints occur at individual school sites or within specific districts, such conditions are addressed through district-level planning and are not assumed to result in the construction of new or expanded school facilities as a direct environmental consequence of the Housing Plan or alternatives.

Reason for Change: Response to Comment 4.4

Description of Change: Expanded discussion of Alternative 2.

Page: 6-14

Subsection: h. Schools

Change:

Deleted: ~~The addition of 2,809 students.~~ Replaced with: While the Additional Housing Alternative.

Deleted: ~~has the potential to exceed the physical capacities of school facilities in Santa Barbara. Therefore, the Additional Housing Alternative would have greater impacts on schools than the Housing Plan. N.~~ Replaced with: which would increase operational strain on some districts, n.

Deleted: ~~which, pursuant to Senate Bill 50, would reduce potential impacts associated with the future development of individual residential projects to a less than significant level.~~

Replaced with: . Pursuant to Senate Bill 50 and California Government Code Section 65995 et seq., payment of these fees is deemed full and complete mitigation for school facility impacts under CEQA. These fees provide a proportional funding contribution toward school facility needs generated by new residential development.

Reason for Change: Response to Comment 2.4

Description of Change: Expanded discussion on school facilities mitigation under CEQA.

Page: 6-15

Subsection: 6.4 Environmentally Superior Alternative

Change:

Deleted: ~~However, t~~

Added: As a higher-growth scenario, Additional Housing Alternative would result in an increase in the overall intensity of development relative to the proposed project. Environmental impacts under this alternative would be similar in type to those identified for the proposed Housing Plan but may be greater in magnitude due to the construction of additional residential units and associated population growth. The degree to which impacts increase would depend on the location, density, and design of future development projects. However, the analysis of Alternative 2 provides a reasonable upper-bound assessment of these potential effects at the program level.

Reason for Change: Response to Comment 4.4

Description of Change: Expanded discussion of Alternative 2.

References

Page: 7-3

Subsection: Air Quality

Change:

Added: . 2026. Permitted Facilities Map.
https://map.ourair.org/?fn=10422&ct=annual_reps (accessed June 2026).

Reason for Change: Response to Comment 3.3

Description of Change: Included reference to APCD Permitted Facilities Map.