



Housing Plan Final Program EIR

Final Program Environmental Impact Report

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prepared by

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Executive Summary

The project analyzed in this Program Environmental Impact Report (EIR) is the implementation of the 6th Cycle Housing Element programs (Housing Plan), including potential Municipal Code, general plan, and local coastal program (LCP) amendments, and associated residential development to the year 2035. The 6th Cycle Housing Element was adopted by Santa Barbara City Council on December 12, 2023, and certified by the State Department of Housing and Community Development on February 13, 2024. This section of the Program EIR describes the key characteristics of the project, including Housing Element background, project objectives, and the Housing Plan. The types and extent of development evaluated as part of the project include residential development forecasted under the 6th Cycle Housing Element as well as nonresidential development needed to accommodate anticipated growth to the year 2035.

Project Synopsis

Project Proponent/Lead Agency

The City of Santa Barbara is the project proponent and the lead agency for environmental review of implementation of the 6th Cycle Housing Element programs. The City's Community Development Department, located at 630 Garden Street in the City of Santa Barbara, prepared this Program EIR with the assistance of Rincon Consultants, Inc.

Project Location

The Housing Plan applies to the entire geographic area located within the boundaries of the City of Santa Barbara, which encompasses approximately 19.7 square miles of land area. The regional location of the City is shown in Figure 2-1 in Section 2, *Environmental Setting*. The City's boundaries are shown in Figure 2-2 in Section 2, *Environmental Setting*. However, no housing is proposed in the Airport area under the Housing Plan, and the Airport, along with offshore areas, is largely excluded from the area of analysis in the Program EIR.

Project Description

The City of Santa Barbara's Housing Plan consists of programs included in the 6th Cycle Housing Element and associated amendments to the Municipal Code, General Plan, and Local Coastal Program. The Housing Plan provides the framework for meeting state housing requirements and accommodating the City's Regional Housing Needs Allocation (RHNA).

The proposed project includes:

- Implementation of Housing Plan programs that facilitate housing production, remove governmental constraints, and ensure compliance with state housing laws. These programs include adoption of an Adaptive Reuse Ordinance, preparation of a planning framework for the La Cumbre Plaza Planning Area, amendments to the Average Unit-Size Density (AUD) Incentive Program, adoption of Objective Design and Development Standards, updates to the Accessory Dwelling Unit (ADU) ordinance, and process improvements to streamline permitting.
- Associated amendments to the Municipal Code, General Plan, and Local Coastal Program to maintain consistency with the Housing Element and State law.

For environmental analysis purposes, this EIR assumes a conservative scenario in which up to 8,001 housing units could be permitted and constructed by 2035, along with associated nonresidential development anticipated under cumulative conditions. These updates do not authorize specific development projects but provide the regulatory and policy framework to implement Housing Plan programs.

Project Objectives

The purpose of the Housing Plan is to implement programs that meet the requirements of State law and to carry out the Housing Element's goals as stated in the Executive Summary and in Chapter 5 of the 6th Cycle Housing Element. The California Environmental Quality Act (CEQA) project objectives listed below are built upon the goals as follows:

- Meet the State-mandated 6th Cycle RHNA for the City.
- Locate housing close to jobs, transit, and services.
- Increase production of deed-restricted affordable housing, and housing for special needs households.
- Streamline and increase predictability in the residential development approval process.
- Implement processes and procedures to comply with state housing laws and regulations.
- Facilitate a variety of housing types and equitable housing access in areas that historically excluded diverse housing opportunities.
- Protect historic, cultural, biological, and other environmental resources.
- Provide financial resources and supportive services for members of the community who need housing assistance.
- Maintain and improve the physical condition of existing housing at all affordability levels.
- Promote greater housing stability for tenants.
- Prioritize permanent housing over other uses where possible.

Alternatives

The following two alternatives to the project are evaluated in this EIR. Based on the alternatives analysis, the proposed Housing Plan was determined to be the environmentally superior alternative.

- Alternative 1: No Project
- Alternative 2: Additional Housing

Alternative 1 (No Project) assumes that the Housing Plan programs and associated amendments to the Municipal Code, General Plan, and Local Coastal Program are not adopted or implemented. Existing development standards and policies contained in the City of Santa Barbara General Plan, Zoning Ordinance, and Coastal Land Use Plan would remain in place.

Under this alternative, residential development would continue at the existing growth rate based on historical permitting trends but would not implement Housing Plan programs necessary to meet the City's obligations under state housing law, including planning for the RHNA allocation. Growth was estimated using the City's 2015–2022 permitting data, which shows an average of 230 housing units permitted annually. For the purposes of this analysis, the No Project Alternative assumes this average rate continues through 2035, resulting in approximately 2,760 new housing units.

This alternative would not accomplish most of the project objectives, including increasing housing opportunities and streamlining development processes, but would maintain existing policies and development patterns.

Alternative 2 (Additional Housing) assumes implementation of the Housing Plan with additional measures to increase residential density and accelerate housing production beyond what is analyzed for the proposed project. 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. Under this alternative, housing growth would increase by approximately 807 additional units, resulting in a total of 8,808 residential units by 2035. This includes the City's RHNA allocation plus an 11 percent buffer.

The Additional Housing Alternative accounts for expanded implementation of Housing Plan programs and assumes additional policy actions to further increase density such as HE-1 (Facilitate Conversion of Nonresidential Buildings to Housing), HE-7 (Objective Design Standards), HE-10 (Multi-Unit Housing Program), and HE-12 (Prioritize Deed-Restricted Affordable Housing). It also assumes the City would adopt additional measures to facilitate housing development, including requiring minimum residential densities, increasing density ranges in the AUD Program, increasing density in targeted areas, and revising zoning regulations to round up density calculations.

This alternative would provide the opportunity to increase the percentage of affordable units along with a moderate increase in overall housing supply. However, it would result in greater residential growth than the proposed Housing Plan and could increase associated environmental impacts. 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.

Areas of Known Controversy

During the EIR scoping process and Draft EIR public comment period, the City received agency and public comment regarding the following issue areas:

- **Biological Resources:** Potential impacts to sensitive habitat and wildlife connectivity.
- **Cultural and Tribal Cultural Resources:** Potential impacts to historical resources.
- **Schools:** Potential impacts related to school facilities.
- **Transportation and Circulation:** Potential impacts related to vehicle miles traveled; potential impacts to alternative transportation.
- **Utilities and Service Systems:** Infrastructure capacity.

These issues are addressed throughout the EIR, primarily in Section 4.3, *Biological Resources*, Section 4.4, *Cultural and Tribal Cultural Resources*, Section 4.8, *Schools*, Section 4.9, *Transportation and Circulation* and Section 4.10, *Utilities and Service Systems*. Responses to the Notice of Preparation of a Draft Program EIR and input received at the scoping meeting held by the City are

included in Appendix A. 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*.

Issues Not Studied in Detail in the EIR

Section 4.11, *Effects Found Not to Be Significant*, discusses issues from the environmental checklist that would not result in significant environmental impacts. As described in Section 4.11, there is no substantial evidence that significant impacts would occur to the following issue areas: Agriculture and Forestry Resources, Energy, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, and Wildfire.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

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

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.

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

Impact	Mitigation Measure (s)	Residual Impact
Aesthetics and Visual Resources		
Impact AES-1. The housing plan would not have a substantial adverse effect on a scenic vista. Compliance with existing municipal code standards and General Plan/Coastal Land Use Plan policies would ensure this impact would be less than significant.	None required	Less than significant impact
Impact AES-2. The Housing Plan would not substantially damage scenic resources within a state scenic highway. Compliance with existing design review guidelines, Municipal Code standards, and General Plan/ Coastal Land Use Plan policies would ensure this impact would be less than significant.	None required	Less than significant impact
Impact AES-3. The Housing Plan would not substantially degrade the existing visual character or quality of public views in a manner that would conflict with applicable zoning and other regulations governing scenic quality. Compliance with existing Municipal Code standards and design review procedures would ensure this impact would be less than significant.	None required	Less than significant impact
Impact AES-4. The Housing Plan would not create new sources of substantial light or glare which would adversely affect surrounding areas or important public day or nighttime views in the area. Compliance with existing Municipal Code standards and design review procedures would ensure this impact would be less than significant.	None required	Less than significant impact
Air Quality		
Impact AQ-1. The Housing Plan would not conflict with the 2022 Ozone Plan, and therefore would not promote the release of a cumulatively considerable net increase of a criteria pollutant for which the South Central Coast Air Basin is in non-attainment. This impact would be less than significant.	None required	Less than significant impact

Impact	Mitigation Measure (s)	Residual Impact
Impact AQ-2. Development facilitated by the Housing Plan could result in construction activity that could produce toxic air contaminant emissions in proximity to residential receptors. Mitigation Measure AQ-1 would require large construction projects to use equipment meeting CARB Tier 3 or higher for off-road heavy-duty diesel engines, which results in substantially lower toxic air contaminant emissions than older equipment. Implementation of Mitigation Measure AQ-1 would reduce this potential impact to a less than significant level.	AQ-1 Construction Equipment Exhaust Control Measures. The City of Santa Barbara shall develop and enforce appropriate Municipal Code amendments, or other adopted regulations, to require individual residential projects of three or more units and involving demolition, mass grading, or excavation and trenching phases of longer than two months, to use off-road heavy-duty diesel engines that meet California Air Resources Board (CARB) certified Tier 4 emission standards, or zero-emission off-road equipment, to the extent that this equipment is commercially available. “Commercially available” means the availability of required equipment in geographic proximity to the project site and within a reasonable timeframe relative to critical path construction timing. If Tier 4 equipment is not commercially available, 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. All equipment shall be kept in working order and maintained in operable condition according to manufacturer’s specifications, as applicable. Projects shall comply with all the applicable regulatory requirements, including applicable regulations of the CARB and Santa Barbara County Air Pollution Control District.	Less than significant impact
Impact AQ-3. Future development facilitated by the Housing Plan would not create objectionable odors that could affect a substantial number of people or expose future residents to odors that would produce a public nuisance or hazard. This impact would be less than significant.	None required	Less than significant impact
Biological Resources		
Impact BIO-1. The Housing Plan would accommodate new residential and mixed-use development that may have an adverse effect on habitats used by special-status species. impacts to candidate, sensitive, and special status species would be less than significant with mitigation.	BIO-1 Creek Protections Requirements. The City of Santa Barbara Sustainability and Resilience Department and Community Development Department shall develop creek protections through amendments to the Municipal Code with requirements applicable to new development and substantial redevelopment occurring in proximity to City creeks consistent with State laws. New development and substantial redevelopment in areas adjacent to creeks shall be sited and designed to prevent impacts that would significantly degrade creeks and adjacent habitat. BIO-2 Riparian Vegetation Protection. The City of Santa Barbara shall develop regulatory standards for riparian vegetation protection and amend the Municipal Code with requirements applicable to new development and/or redevelopment within and adjacent to riparian habitat. The regulatory standards will be included in adopted Master Environmental Assessment (MEA) Guidelines for Biological Resources and developed in consultation with the California Department of Fish and Wildlife (CDFW). The MEA	Less than significant impact

Impact	Mitigation Measure (s)	Residual Impact
	Guidelines may also be implemented by appropriate Municipal Code amendments. The regulatory standards will at a minimum: ▪ Avoid the removal of riparian vegetation and mature native trees when feasible, or require alternative or compensatory mitigation when avoidance is not feasible; ▪ Preserve and protect native tree saplings, understory vegetation, and habitat functions associated with riparian corridors; ▪ Provide landscaping compatible with the continuation and enhancement of riparian habitat, consisting of appropriate native species and avoiding non-native invasive species; ▪ Include conditions of approval for habitat restoration of degraded riparian habitat where development and/or redevelopment creates direct or indirect impacts to the affected habitat; ▪ 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. BIO-3 Pre-Construction Bird Surveys, Avoidance, and Notification. The City of Santa Barbara shall develop regulatory standards for nesting birds and amend the Municipal Code to implement requirements to avoid and minimize impacts to nesting birds. The regulatory standards will be included in adopted Master Environmental Assessment (MEA) Guidelines for Biological Resources and developed in consultation with the California Department of Fish and Wildlife (CDFW). The MEA Guidelines may also be implemented by appropriate Municipal Code amendments. The regulatory standards will at a minimum: ▪ Avoid construction activities that could impact nesting birds during the nesting bird season (generally February 1 – August 30); ▪ If avoidance is not feasible, require pre-construction nesting bird surveys and if necessary, monitoring by a qualified biologist; ▪ Establish procedures to protect active nests or avoid impacts if encountered; and ▪ Identify nesting bird protections on project plans.	

Impact	Mitigation Measure (s)	Residual Impact
Impact BIO-2. The Housing Plan could have a substantial adverse effect on riparian habitat, creeks, and sensitive natural communities. Impacts to riparian habitat and sensitive natural communities would be less than significant with mitigation.	BIO-4 Oak Woodland Protection. The City of Santa Barbara shall develop regulatory standards for oak woodland protection and amend the Municipal Code with requirements applicable to new development and/or redevelopment sited within and adjacent to oak woodland habitat. The regulatory standards will be included in adopted Master Environmental Assessment (MEA) Guidelines for Biological Resources and developed in consultation with the California Department of Fish and Wildlife (CDFW). The MEA Guidelines may also be implemented by appropriate Municipal Code amendments. The regulatory standards will at a minimum: ▪ Avoid the removal of mature native trees when feasible, or require alternative or compensatory mitigation when avoidance is not feasible; ▪ Preserve and protect native tree saplings and understory vegetation; ▪ Provide landscaping compatible with the continuation and enhancement of oak woodland, consisting of appropriate native species and avoiding non-native invasive species; and ▪ Include standard conditions of approval for habitat restoration of degraded oak woodland where development and/or redevelopment creates direct or indirect impacts to the affected habitat.	Less than significant impact
Impact BIO-3. Implementation of the Housing Plan would have a potentially substantial adverse effect on Wetlands. Compliance with Federal, State, and City regulations would minimize the direct removal, filling, and hydrological interruption of wetlands. Impacts to State or federally protected wetlands would be less than significant with mitigation.	BIO-1 Creek Protections Requirements. Refer to Impact BIO-1 above.	Less than significant impact
Impact BIO-4. The Housing Plan would be consistent with federal, state, and City regulations developed to minimize impacts to species movement, wildlife corridors, and nursery sites. Impacts to the movement of fish and wildlife species would be less than significant with mitigation.	BIO-1 Creek Protections Requirements. BIO-2 Riparian Vegetation Protection. BIO-3 Pre-Construction Bird Surveys, Avoidance, and Notification. BIO-4 Oak Woodland Protection. Refer to Impact BIO-1 and BIO-2 above.	Less than significant impact
Impact BIO-5. Implementation of the Housing Plan could result in the removal of trees and vegetation. Impacts related to conflicts with City Tree Preservation Ordinance and other Tree Protection Guidelines would be less than significant with mitigation.	BIO-2 Riparian Vegetation Protection. BIO-4 Oak Woodland Protection. Refer to Impact BIO-1 and BIO-2 above.	Less than significant impact

Impact	Mitigation Measure (s)	Residual Impact
Impact BIO-5. Development forecasted in accordance with the Housing Plan would not be located within an area delineated on a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.	None required	Less than significant impact
Cultural and Tribal Resources		
Impact CUL-1. The Housing Plan could result in potentially significant impacts to historical resources that are eligible but not yet designated. Impacts would be less than significant with mitigation.	CUL-1 Historical Resources Protection. The City of Santa Barbara Community Development Department shall amend the Municipal Code as necessary to ensure the protection of eligible historic resources that have not been formally designated. Key provisions include the following: - Identify and Add Historic Resources to the Local Register of Historical Resources. The City Architectural Historian or qualified designee shall identify structures, sites, or features eligible for inclusion on the Local Register of Historical Resources based upon the criteria established for the National Register of Historic Places (36 CFR Part 60), California Register of Historical Resources (PRC 5024.1), and/or the Historic Preservation Ordinance (SBMC 30.157). - Planning Application Requirements. The Community Development Department shall amend the planning application checklist to require a historic resource evaluation for structures over 50 years old. - Application Completeness Requirement. Planning applications shall not be deemed complete and/or approved for demolition permits until compliance with the historic resource evaluation requirements under the Historic Preservation Ordinance SBMC Chapter 30.157 have been demonstrated.	Less than significant impact

Impact	Mitigation Measure (s)	Residual Impact
Impact CUL-2. Projected development facilitated by the Housing Plan could impact previously undiscovered archaeological and tribal cultural resources. Impacts on archaeological and tribal cultural resources would be less than significant with mitigation.	CUL-2 Archaeological Resources Protection. The City of Santa Barbara Community Development Department shall amend the Municipal Code with requirements applicable to development involving substantial ground disturbance occurring in areas with potential for known or unknown archaeological resources to exist. The amendments to the Municipal Code shall implement and enforce archaeological resource protections requirements. The City shall require development or redevelopment projects that have the potential to impact areas identified as archaeologically sensitive to complete an archaeological resource report. Archaeological resource reports shall identify site-specific measures to avoid or lessen effects in areas of suspected but not known archaeological resources. Measures may include, but are not limited to, archaeological monitoring and implementation procedures in the event of an unanticipated discovery. Where archaeological resources are identified and may be impacted by the project, the City shall require additional testing and evaluation, or other measures to minimize significant impacts, such as site avoidance. If resources are determined to be significant or unique, avoidance of the resource shall be the preferred mitigation. If site avoidance is not possible, appropriate site-specific measures shall be identified. Measures may include, but are not limited to, a Phase III Data Recovery Program or other appropriate actions to be determined by a qualified archaeologist. CUL-3 Tribal Cultural Resources Protection. The City of Santa Barbara Community Development Department shall amend the Municipal Code with requirements applicable to development involving substantial ground disturbance occurring in areas with potential for tribal cultural resources to exist. The amendments to the Municipal Code shall implement and enforce tribal cultural resource protection requirements. Measures may include, but are not limited to, coordination with tribal representatives, Native American monitoring, and implementation procedures in the event of an unanticipated discovery.	Less than significant impact
Impact CUL-3. Ground disturbing activities associated with development forecasted in accordance with the Housing Plan could result in disturbance of human remains. Impacts on human remains would be less than significant.	CUL-2 Archaeological Resources Protection. CUL-3 Tribal Cultural Resources Protection. Refer to Impact CUL-2 above.	Less than significant impact

Impact	Mitigation Measure (s)	Residual Impact
Impact CUL-4. Projected development facilitated by the Housing Plan would be subject to adopted City regulatory requirements developed to minimize impacts to potential tribal cultural resources. Compliance with consultation conducted pursuant to the requirements of AB 52 and the City MEA Guidelines would minimize potential impacts to tribal cultural resources. Impacts on tribal cultural resources would be less than significant with mitigation.	CUL-2 Archaeological Resources Protection. CUL-3 Tribal Cultural Resources Protection. Refer to Impact CUL-2 above.	Less than significant impact
Greenhouse Gas Emissions		
Impact GHG-1. The Housing Plan would be consistent with Connected 2050, the 2022 Scoping Plan, and the City's CAP. Therefore, the Housing Plan's potential impacts on greenhouse gas emissions would be less than significant.	None required	Less than significant impact
Hazards and Hazardous Materials		
Impact HAZ-1. Development facilitated by the Housing Plan could result in the routine transport, use, or disposal of hazardous materials. Compliance with applicable local, State, and federal regulations would minimize the risk of potential exposure of the public to hazardous materials. This impact would be less than significant.		
Impact HAZ-2. Compliance with applicable local, State, and federal regulations would minimize potential hazards from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This impact would be less than significant with mitigation.	HAZ-1 Environmental Site Assessment. The City of Santa Barbara Community Development Department shall develop regulatory guidelines and amend the Municipal Code to implement and enforce the following requirements: The City shall require the preparation of a project-specific Phase I Environmental Site Assessment (ESA) in accordance with the most current American Society for Testing and Materials (ASTM) Standard Practice or the Standards and Practices for All Appropriate Inquiry (AAI) for: - Any site listed on the State Water Resources Control Board data management system (GeoTracker) or included on the Certified Unified Program Agencies (CUPA) program, including an open or closed leaking underground storage tank (LUST) case or other Cortese List site. - Any site located within the City's Potential Contaminated Fill Area that results in any of the following: - Demolition of existing structures;	Less than significant impact

Impact	Mitigation Measure (s)	Residual Impact
	- Changes to an existing foundation; - New foundation; and/or - New stormwater infiltration basins. - Sites that have been exclusively used as single-family land use are excluded from the above requirement, unless otherwise recommended by an environmental oversight agency. In instances where specific Recognized Environmental Conditions (RECs) are identified which may require further sampling, a qualified hazardous materials Environmental Professional with site characterization experience shall prepare a Phase II ESA. If the Phase II ESA reveals RECs, the Environmental Professional shall identify remedial activities controlled by federal, state, and local regulations. HAZ-2 Inadvertent Discovery of Contamination. The City of Santa Barbara Community Development Department shall develop regulatory standards and amend the Municipal Code to implement and enforce the following requirements: In the event that previously unknown or unidentified soil, soil vapor, and/or groundwater contamination could present a threat to human health or the environment is encountered during construction at a development site: - Construction activities in the immediate vicinity of the contamination shall cease immediately. - Following discovery, the contractor shall notify Santa Barbara County Public Health Department, Environmental Health Services or other appropriate federal, state, or local regulatory oversight agency, and the City Environmental Analyst, immediately. - A qualified environmental professional will be required to conduct an investigation to identify risks and describe measures to be taken to protect workers and the public from exposure to potential site hazards. HAZ-3 Inadvertent Discovery of Oil or Gas Well. The City of Santa Barbara Community Development Department shall develop regulatory standards and amend the Municipal Code to implement and enforce the following requirements in the event that any unrecorded oil or gas wells are uncovered during excavation or grading: - Construction activities in the immediate vicinity of the contamination shall cease immediately. - The Santa Barbara County Public Health Department, Environmental Health Services, County Energy, Minerals & Compliance Division, and Department of Conservation Geologic Energy Management Division (CalGEM) shall be notified immediately to determine if remedial action may be required. - The property owner shall be responsible for ensuring all remedial actions recommended by these agencies are implemented.	

Impact	Mitigation Measure (s)	Residual Impact
Impact HAZ-3. Development facilitated by the Housing Plan could occur within 0.25 mile of a school. However, compliance with local, State, and federal regulations related to hazardous materials would minimize the risk of hazardous emissions or exposure to acutely hazardous materials, substances, or waste. This impact would be less than significant.	None required	Less than significant impact
Impact HAZ-4. Development facilitated by the Housing Plan could result in development on Cortese List sites. Impacts related to development on a Cortese List site would be less than significant impact with mitigation.	HAZ-1 Environmental Site Assessment Refer to Impact HAZ-1 above.	Less than significant impact
Impact HAZ-5. Compliance with Local, State and federal regulations would minimize safety hazards as residential development would not occur within an Airport Safety Zone or Airport Noise Contour. This impact would be less than significant.	None required	Less than significant impact
Impact HAZ-6. Development facilitated by the Housing Plan would not result in changes to emergency evacuation routes nor would it substantially increase roadway congestion such that the use of an evacuation route would be hindered. Impacts would be less than significant.	None required	Less than significant impact
Impact HAZ-7. Development facilitated by the Housing Plan that would occur within High Fire Hazard Areas would be required to comply with local and State regulations and would undergo site-specific development review. This impact would be less than significant.	None required	Less than significant impact

Impact	Mitigation Measure (s)	Residual Impact
Noise		
Impact N-1. Construction of residential development forecasted under the Housing Plan may exceed applicable standards. Mitigation Measure N-1 would mandate implementation of a Construction Noise Management Plan for projects with construction activities that could impact sensitive receivers, minimizing construction noise associated with new residential development and resulting in a less than significant impact.	N-1 Construction Noise Management Plan. The City of Santa Barbara Community Development Department shall develop a requirement for a Construction Noise Management Plan (CNMP) through amendments to the Municipal Code. The CNMP shall be implemented during construction within 85 feet of noise-sensitive land uses (e.g., residences, schools, churches, hotels, as well as some park and open space areas) for development and substantial redevelopment projects that have one or more of the following characteristics: Construction of one or more new subterranean levels; - Construction of three or more new housing units (excluding ADUs); - More than 3,000 cubic yards of excavated soils and grading; - The potential for pile driving. CNMPs shall include the following: - Project-specific best management practices (BMPs) in addition to the construction timing limits currently established in Municipal Code Section 9.16.040. BMPs include, but are not limited to, silencers, enclosures, sound barriers, smart back-up alarms, strategic construction staging, and/or placement of restrictions on equipment or construction techniques. Projects that require pile driving shall be subject to the preparation of a construction noise analysis to determine appropriate BMPs. - Identification of haul routes to reduce construction noise effects on sensitive receptors, ensure safety measures are in place, and minimize disruption to the surrounding roadway network. The identified haul route shall be utilized by all haul trucks throughout the duration of construction. - Notification requirements including written notice to all property owners and residents within the project vicinity. - Information and procedures for responding to noise complaints.	Less than significant impact
Impact N-2. Residential development forecasted under the Housing Plan would generate operational noise typical of the urban environment. However, long-term operational noise from residential sources would be required to comply with the City's noise ordinance. Therefore, permanent operational noise increases would be less than significant.	None required	Less than significant impact

Impact	Mitigation Measure (s)	Residual Impact
Impact N-3. Construction of residential development forecasted under the Housing Plan could generate vibration levels that have the potential to damage historic or other old buildings/structures. However, Mitigation Measure N-2 would require planned construction activities to prepare a Vibration Control Plan to reduce/control construction such that vibration levels do not cause damage. This impact would be less than significant with mitigation.	N-2 Vibration Control Plan. The City of Santa Barbara Community Development Department shall develop a requirement for a Vibration Control Plan through amendments to the Municipal Code, which requires projects involving impact pile drivers within 60 feet of a structure to prepare a Vibration Control Plan. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods required to minimize vibration, including, but not limited to: Survey of baseline conditions at potentially affected historic and/or residential structures within a 60-foot radius of the construction site; ▪ Alternative installation methods for pile driving (e.g., pile cushioning, drilled piles, cast-in-place systems) within 60 feet of a building to reduce impacts associated with seating the pile; ▪ Vibration monitoring prior to and during pile driving operations occurring within 60 feet of a building; ▪ Use of rubber-tired equipment rather than metal-tracked equipment; ▪ Avoidance of the use of vibrating equipment when allowed by best engineering practices.	Less than significant impact
Impact N-4. Residential development forecasted under the Housing Plan could be exposed to outdoor noise levels above the City's land use compatibility standards in addition to the 45 dBA Ldn interior noise standard. However, existing City General Plan policies, in combination with the City's project review and permitting process, would reduce potential impacts of future noise on new housing development. This impact would be less than significant with mitigation.	N-3 Noise Study and Site-based Attenuation. The City of Santa Barbara Community Development Department shall update the Master Environmental Assessment Guidelines for Noise and amend the Municipal Code as necessary, with requirements applicable to multi-unit residential development projects within an area with a noise contour potentially exceeding the acceptable noise level for residential uses. A site-specific Noise Study shall be completed for residential development located in areas where noise contours indicate that noise levels are above 65 dBA. The Noise Study shall document the existing noise conditions onsite and recommend attenuation strategies and techniques to reduce interior and exterior living area noise levels to acceptable levels as specified in the Environmental Resources Element Land Use Compatibility Guidelines. ▪ The Noise Study shall be performed by an acoustical engineer. ▪ The noise study shall measure and report the existing ambient Average Day-Night (Ldn or CNEL) noise environment within the project site, including transportation noise sources and any transient or nuisance noise sources. All noise control techniques and recommendations in the report shall be incorporated into the project design to reduce exterior noise to or below 65 dBA and interior noise to or below 45 dBA.	Less than significant impact
Impact N-5. Residential development under the Housing Plan would not occur within an Airport Noise Contour. This impact would be less than significant.	None required	Less than significant impact

Impact	Mitigation Measure (s)	Residual Impact
Schools		
Impact SCH-1. 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. Impacts to schools would be less than significant.	None required	Less than significant impact
Transportation and Circulation		
Impact TRA-1. The Housing Plan would not conflict with the Circulation Element, the Bicycle Master Plan, the Pedestrian Master Plan, SBCAG's 2050 RPT-SCS, or any other applicable program, plan, ordinance, or policy relevant to the transportation system. This impact would be less than significant.	None required	Less than significant impact
Impact TRA-2. Future residential development facilitated by the Housing Plan would be expected to result in project VMT that is less than 15 percent below the existing year average for the SBCAG region. As a result, the Housing Plan would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Therefore, this impact would be less than significant.	None required	Less than significant impact
Impact TRA-3. The Housing Plan does not include development projects that could increase hazards due to design features. Therefore, the Housing Plan would not substantially increase hazards due to a geometric design feature or result in inadequate emergency access, and this impact would be less than significant.	None required	Less than significant impact

Impact	Mitigation Measure (s)	Residual Impact
Utilities and Service Systems		
Impact UTIL-1. Future residential development forecasted in accordance with the Housing Plan may require new utility service infrastructure connections or upsizing of utility mains. Planned housing development is anticipated to occur in developed areas supported by, or adjacent to, existing utility infrastructure. Compliance with applicable City and State regulations, and mitigation measures within this Program EIR would ensure environmental impacts associated with connections to existing utility infrastructure or other utility upgrades would be minimized. Therefore, this impact would be less than significant with mitigation incorporated.	AQ-1 Construction Equipment Exhaust Control Measures. CUL-1 Historical Resources Protection. CUL-2 Archaeological Resources Protection. CUL-3. Tribal Cultural Resources Protection. HAZ-1 Environmental Site Assessment. HAZ-2 Inadvertent Discovery of Contamination. HAZ-3 Inadvertent Discovery of Oil or Gas Well. N-1 Construction Noise Management Plan N-2 Vibration Control Plan. Refer to Impact AQ-2, Impact CUL-1 and -2, Impact HAZ-2, Impact N-1 and -3 above.	Less than significant impact
Impact UTIL-2. Projected development forecasted in accordance with the Housing Plan would increase water demand, but would not exceed the projections of the Enhanced Urban Water Management Plan such that a water shortage would occur. Therefore, this impact would be less than significant.	None required	Less than significant impact
Impact UTIL-3. Projected development forecasted in accordance with the Housing Plan would result in an increase in wastewater generation; however, this increase would not exceed the design capacity of the El Estero Water Resource Center. Therefore, this impact would be less than significant.	None required	Less than significant impact
Impact UTIL-3. New residential development forecasted in accordance with the Housing Plan would not generate solid waste that would exceed the capacity of local infrastructure or otherwise conflict with federal, State, or local solid waste management and reduction statutes or regulation. This impact would be less than significant.	None required	Less than significant impact

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1 Introduction

This document is a Program Environmental Impact Report (Program EIR) for the implementation of the 6th Cycle Housing Element programs (hereafter referred to as the “project” or “Housing Plan”) including potential Municipal Code, General Plan, and Local Coastal Program (LCP) amendments, and associated residential development to the year 2035¹. The Housing Plan is described in detail in Section 3, *Project Description*.

This section discusses (1) the lead agency for the project; (2) the legal basis for preparing a Program EIR; (3) CEQA Tiering and Streamlining; (4) the scope and content of the Program EIR; (5) the lead, responsible, and trustee agencies; and (6) the environmental review process required under the California Environmental Quality Act (CEQA). The existing conditions and environmental setting for the project are described in Section 2, *Environmental Setting*. Relevant background information for the project and Program EIR background are discussed in Section 3, *Project Description*.

1.1 Project Proponent/Lead Agency

The City of Santa Barbara is the project proponent and the lead agency for environmental review of implementation of the 6th Cycle Housing Element programs. The City’s Community Development Department, located at 630 Garden Street in the City of Santa Barbara, prepared this Program EIR with the assistance of Rincon Consultants, Inc.

1.2 Purpose and Legal Authority

This Program EIR has been prepared in accordance with CEQA and the *CEQA Guidelines*. In accordance with Section 15121 (a) of the *CEQA Guidelines* (California Code of Regulations, Title 14, Division 6, Chapter 3), the purpose of an EIR is to:

Inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

This EIR fulfills the requirements for a Program EIR. Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are by necessity more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in Section 15168 of the *CEQA Guidelines*, a Program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a Program EIR provides the City of Santa Barbara (as the lead agency) with the opportunity to consider broad policy alternatives and program-wide mitigation measures, and provides the City with greater flexibility to address environmental issues and/or cumulative impacts on a comprehensive basis. Agencies generally prepare Program EIRs for programs or a series of related actions that are linked geographically; are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

¹ 2035 was chosen for this analysis to account for effects on the environment from program implementation which would be effective later in the 6th Cycle. The Santa Barbara County Association of Governments’ Regional Growth Forecast also includes population projections for 2035 used in this analysis.

By its nature, a Program EIR considers the broad effects associated with implementing a program and does not, and is not intended to, examine the specific environmental effects associated with specific projects that may be accommodated by the provisions of General or Specific Plans.

Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine what, if any, additional CEQA documentation needs to be prepared. If the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the Program EIR scope and additional environmental documentation may not be required (*CEQA Guidelines* Section 15168[c]). When a lead agency relies on a Program EIR for a subsequent activity, it must incorporate applicable mitigation measures and alternatives developed in the Program EIR into the subsequent activities (*CEQA Guidelines* Section 15168[c][3]). If a subsequent activity would have effects not contemplated or not within the scope of the Program EIR, the lead agency must prepare a new environmental review document such as an Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or a project-level EIR. In this case, the Program EIR serves a valuable purpose as the first-tier environmental review. The *CEQA Guidelines* Section 15168(b) encourage the use of Program EIRs, citing five advantages:

1. Provision of a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR.
2. Focus on cumulative impacts that might be slighted in a case-by-case analysis.
3. Avoidance of continual reconsideration of recurring policy issues.
4. Consideration of broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them.
5. Reduction of paperwork by encouraging the reuse of data (through tiering).

As a wide-ranging environmental document, the Program EIR uses expansive thresholds as compared to the project-level thresholds that might be used for an EIR on a specific development project.

This Program EIR has been prepared to analyze potentially significant environmental impacts associated with future development resulting from implementation of the proposed Housing Plan and address appropriate and feasible mitigation measures or alternatives that would minimize or eliminate these impacts. Additionally, this Program EIR will provide the primary source of environmental information for the City of Santa Barbara to use when considering implementation of the Housing Plan programs.

This Program EIR is intended to provide decision-makers and the public with information that enables intelligent consideration of the environmental consequences of the implementation of the Housing Plan. This Program EIR identifies significant or potentially significant environmental effects where appropriate based on substantial evidence, as well as ways in which those impacts can be reduced to less-than-significant levels, whether through the incorporation of mitigation measures or through the implementation of specific alternatives. In a practical sense, this document functions as a tool for fact-finding, allowing concerned citizens and agency staff an opportunity to collectively review and evaluate baseline conditions and project impacts through a process of full disclosure.

1.3 CEQA Tiering

The Housing Plan would guide actions taken by the City in its review of new development projects and the facilitation of programs within the adopted 6th Cycle Housing Element.

This Program EIR serves as a first-tier environmental document under CEQA. “Tiering” generally refers to using the analysis of a broader environmental document that covers the general impacts of a program or larger-scale project so that subsequent environmental documents for a related individual project can be narrow and focused on unique or unanalyzed issues. CEQA encourages the use of tiering to reduce the time and excessive paperwork involved in the review process by eliminating repetitive analyses of issues addressed in the program EIR (*CEQA Guidelines* Section 15168). In accordance with Section 15183 of the *CEQA Guidelines*, this Program EIR supports second-tier environmental documents for certain qualifying projects that would be implemented to meet the City’s Housing Element goals, such as infill projects consistent with the City’s General Plan, a Specific Plan, and/or zoning.

By nature, the Program EIR considers the broad effects associated with implementing programs in the proposed Housing Plan and does not, and is not intended to, examine the specific environmental effects associated with specific projects that may be accommodated by the provisions of the subject program(s). Many specific projects are not currently defined to the level that would allow for such an analysis at this time. The City, acting as the lead agency, would be able to prepare subsequent environmental documents that incorporate by reference the appropriate information from this Program EIR regarding secondary effects, cumulative impacts, broad alternatives, and other relevant factors. Tiered documents may consist of Initial Studies or focused EIRs that may incorporate by reference portions of the Program EIR from which they are tiered. If the potential environmental effects of subsequent actions are consistent with and adequately addressed by a certified Program EIR, and if the City finds that implementation of the subsequent action would have no new effects and that no new mitigation measures would be required, additional environmental analysis may be unnecessary. Where subsequent environmental review is required, such review would focus on significant effects specific to the project, or its site that have not been considered in this Program EIR.

1.4 EIR Scope and Content

In accordance with the *CEQA Guidelines*, a Notice of Preparation (NOP) of a Draft EIR was circulated to potentially interested parties from April 11, 2022 to May 11, 2022. The NOP, included in Appendix A, indicated that all of the following issues listed in the CEQA Checklist Appendix G would be discussed in the EIR. These include:

- Aesthetics/Visual Resources
- Agriculture/Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology/Soils
- Mineral Resources
- Noise
- Population/Housing
- Public Services and Schools
- Recreation
- Transportation
- Utilities and Service Systems

- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Tribal Cultural Resources
- Wildfire
- Mandatory Findings of Significance
- Other Required CEQA Topics

This Final EIR has been organized into eight sections, which include:

1. **Introduction.** Provides information regarding the applicable agencies involved in the EIR process, the purpose and legal authority governing the EIR, project specific background, information on CEQA tiering, information about the EIR content and format, and the environmental review process.
2. **Environmental Setting.** Provides a description of the existing physical setting and land uses in the city.
3. **Project Description.** Identifies the project components and programs, presents the project objectives, project background, and required discretionary approvals.
4. **Analysis of Environmental Issues.** Describes existing conditions found in the project area and assesses potential environmental impacts that may be generated by implementing the proposed project and cumulative development. Potential impacts are compared to thresholds of significance in order to determine the nature and severity of direct and indirect impacts. Mitigation measures, intended to reduce adverse, significant impacts below threshold levels, are proposed where feasible. Impacts that cannot be eliminated or mitigated to less-than-significant levels are also identified.
5. **Other CEQA Required Discussions.** Identifies the spatial, economic, or population growth impacts that may result from implementation of the proposed project, as well as long-term effects of the project and significant irreversible environmental changes.
6. **Alternatives.** Presents and assesses the potential environmental impacts of three alternatives (including one no project) analyzed in addition to implementation of the project.
7. **References/Preparers.** Lists all published materials, federal, state, and local agencies, and other organizations and individuals consulted during the preparation of this EIR. It also lists the EIR preparers.
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.

The City received seven written responses to the NOP including two responses from state, local, and non-profit agencies and five responses from public commenters. The responses, included in Appendix A, are addressed in the analysis contained in the subsections of Section 4, *Environmental Impact Analysis*. The City held a public scoping meeting for the Program EIR on April 21, 2022 during the City of Santa Barbara Planning Commission hearing. The April 21, 2022 meeting minutes are included in Appendix A.

1.5 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. Agencies applicable to the proposed project are outlined in detail below.

- **Lead Agency:** A lead agency for a project is the agency with principal responsibility for approving or carrying out a project (*CEQA Guidelines* Section 15367). The City of Santa Barbara is the project proponent for the project with primary discretionary authority to determine whether and how to approve the project. The City is therefore also the lead agency under CEQA for preparing and approving environmental review for the project prior to approval (Code of California Regulations Section 15351).
- **Responsible Agencies:** In addition to the City, other public agencies have authority over certain aspects of the project. Under CEQA, those additional agencies with approval authority over aspects of the project are known as responsible agencies (*CEQA Guidelines* Section 15381). The California Coastal Commission (CCC) is a responsible agency for the project. Any project components that would amend the current certified LCP would be subject to CCC review and certification.
- **Trustee Agencies:** Certain State agencies that exercise general management authority over specified resources of the State held in trust for the people of the State are identified under CEQA as trustee agencies when the resources may occur within a project area (*CEQA Guidelines* Section 15386). The State Lands Commission (managing navigable waters), California Department of Fish and Wildlife (CDFW), California Department of Parks and Recreation, and the University of California (properties associated with their Santa Barbara campus) are all trustee agencies overseeing resources held in the public trust that occur within the city, its sphere of influence, and/or the South Coast region of Santa Barbara County.
- **Other Interested Agencies:** There are a number of additional agencies that may be interested in the project and environmental impacts, although they would have no approval authority over adoption of the project. Some agencies may have permit authority over aspects of subsequent future development or public improvements implementing the project. Interested agencies may include the Local Agency Formation Commission ([LAFCO], sphere of influence/annexations); Santa Barbara County Association of Governments ([SBCAG], regional transportation, housing), Santa Barbara County Air Pollution Control District ([APCD], air quality), Santa Barbara County Environmental Health Services (EHS), California Department of Transportation ([Caltrans], highway improvements), Regional Water Quality Control Board (RWQCB), California Native American Heritage Commission ([NAHC], historic, archaeological, and tribal cultural resources), Santa Barbara County Flood Control District ([SBCFCD], flood hazards); local governments including County of Santa Barbara and cities of Goleta and Carpinteria, special districts such as school districts, and other federal and state agencies.

1.6 Environmental Review Process

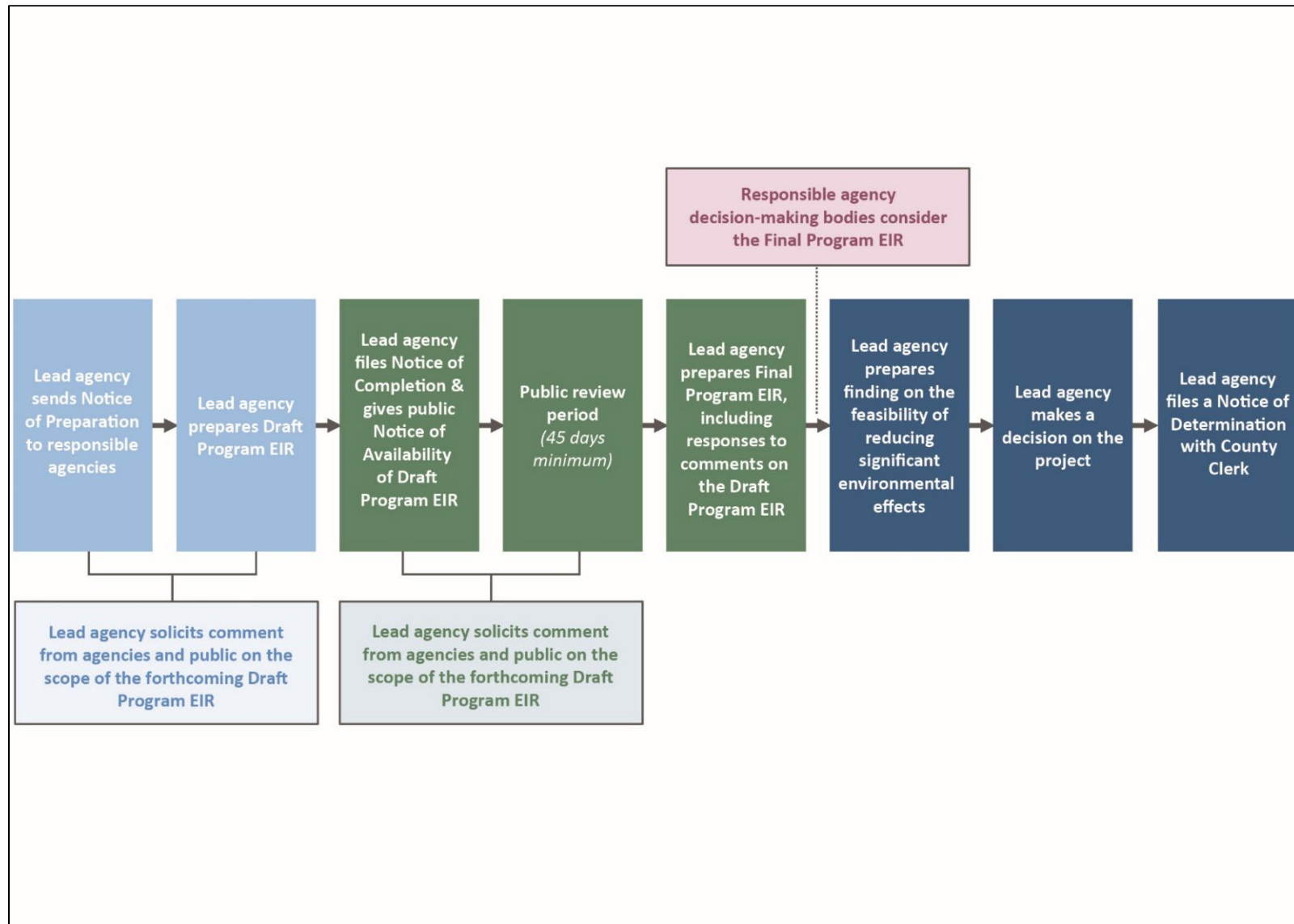
The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation (NOP).** After determining that an EIR is required, the City of Santa Barbara is required to file a NOP soliciting input on the Program EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The City issued a NOP on April 11, 2022, requesting comments on the proposed EIR scope of analysis within 30 days. The NOP is included in Appendix A. Details regarding the EIR public scoping meeting are described in Section 1.4.

2. **Draft EIR Prepared.** The Draft EIR contains: a) table of contents; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion.** The City of Santa Barbara filed a Notice of Completion (NOC) with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The City must place the NOC in the County Clerk's office for a minimum of 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (*CEQA Guidelines* Section 15087). The NOC is filed concurrently with the release of a Draft EIR for public review. Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. In this case, the City gave notice through publication in a newspaper of general circulation. The City solicited input from other agencies and the public and must respond in writing to all comments received (Public Resources Code Sections 21104 and 21253).
4. **Draft EIR Public Review.** The Draft EIR was circulated for public review and comment between January 30, 2026 and March 17, 2026, and one public hearing was held to receive public comments on March 12, 2026. Hard copies of the Draft EIR and other project related information were made publicly available at the City's Community Development Department, located at 630 Garden Street in the City of Santa Barbara. Digital copies were available online at the City's website. Notices of availability of the Draft EIR were sent to interested parties, and responsible and trustee agencies.
5. **Final EIR.** The Final EIR includes: a) the Draft EIR; b) copies of comments received during public review; c) a list of persons and entities commenting; and d) responses to comments. The Final EIR is be accompanied by the required Mitigation Monitoring and Reporting Program.
 - **Mitigation Monitoring Reporting Program.** When the City of Santa Barbara makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects. As a citywide Program EIR associated with implementation of the Housing Element of the City General Plan, mitigation in this EIR is intended to identify programmatic approaches to avoid or reduce potentially significant citywide cumulative impacts as development occurs incrementally. It is intended that monitoring for CEQA mitigation will be coordinated with monitoring established as a part of the General Plan Annual Progress Report monitoring of implementation of Housing Element policies and programs to help assess whether General Plan policies are proving effective toward achieving goals.
6. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the Program EIR, the City of Santa Barbara must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If the City approves the project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the City's decision.

7. **Certification of Final EIR and Project Decision.** Prior to making a decision on a project, the Santa Barbara City Council must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090). The City of Santa Barbara may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
8. **Notice of Determination.** The City of Santa Barbara, as the CEQA lead agency, must file a Notice of Determination (NOD) after deciding to approve the project for which an EIR is prepared (*CEQA Guidelines* Section 15094). The City must file the NOD with the County Clerk and the NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1-1 Program EIR Environmental Review Process



2 Environmental Setting

The following section presents a general overview of the planning areas of the City of Santa Barbara and surrounding region, physical setting, existing land uses, demographics, background, development patterns and growth management policies, and an outline of existing regional and City environmental plans and policies. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

2.1 Location and Physical Setting

2.1.1 Project Area

The City of Santa Barbara is located in the state of California on Santa Barbara County's South Coast; approximately 30 miles north of the City of Ventura and 75 miles south of the City of Santa Maria (Figure 2-1). Generally, the city encompasses approximately 12,636 acres (approximately 19.7 square miles) and extends from the Pacific Ocean on the south generally 3 to 5 miles north into the foothills of the Santa Ynez Mountains. The city's boundaries span approximately five miles from the Coast Village Road commercial corridor adjacent to the unincorporated community of Montecito on the east, to Hope Ranch and eastern Goleta Valley on the west (Figure 2-2). The city limits also include the 970-acre Santa Barbara Airport, located in the Goleta area, approximately four miles west of the city proper. However, no housing is proposed in the Airport area under the Housing Plan, and the Airport, along with offshore areas, is largely excluded from the area of analysis in the Program EIR.

2.1.2 Land Use Setting

The majority of private land in the city is developed and remaining vacant land consists of scattered smaller parcels throughout the city, with a few larger vacant properties located in the foothills, Las Positas Valley, and the North La Cumbre areas. Many of these vacant properties have constraints such as steep slopes, sensitive habitat, limited access, and location within a high fire hazard zone. There are also hundreds of parcels throughout the city with additional development potential under General Plan land use and Zoning designations. These parcels include older, often single-story commercial or industrial buildings, larger public and private parking lots, and single-unit residences located on larger parcels designated for commercial or multiple-unit development. An example with existing development potential includes La Cumbre Plaza on upper State Street, for which the City has identified in the 6th Cycle Housing Element and Land Use Element as an area suitable for redevelopment and revitalization.

The city's sphere of influence is the area adopted by the City and designated through the Local Agency Formation Commission (LAFCO) to represent potential ultimate city limits, or areas that have the potential to be eventually annexed to the city. The unincorporated sphere of influence is generally coterminous with existing city limits on the east, and includes unincorporated lands on the north and west, particularly the communities of Mission Canyon and Hope Ranch, and commercial and residential areas along the west end of Upper State Street and Modoc Road. Unincorporated parcels also exist inside of the city boundary, along north La Cumbre Road and within the Las Positas Valley. The City follows applicable State laws, LAFCO direction, property owner wishes, as to whether or not to process annexations.

Figure 2-1 Regional Location



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Additional data provided by the County of Santa Barbara, 2021.

- City of Santa Barbara
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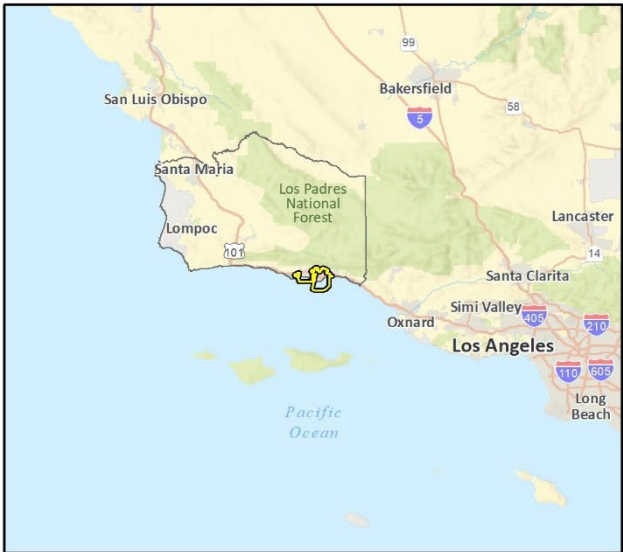


Fig. 1 Regional Location

Figure 2-2 City of Santa Barbara, Sphere of Influence, and Coastal Zone Boundary

Imagery provided by ESRI and its licensors © 2021.
 Additional data provided by the County of Santa Barbara, 2021.

Note: The portion of the City's limits that extend into the Pacific Ocean have been omitted from this figure for legibility. Please refer to Figure 2-1 for the full extent.

2.1.3 Environmental Conditions

Physical conditions existing within the city generally include the following:

- The city is situated on a coastal plain and the lower foothills of the east-west trending Santa Ynez Mountain Range. Seismicity is typical of Southern California, with a number of smaller faults present within and near the city.
- The coastline is several miles long, with beaches that abut both low lying areas in the Waterfront area and coastal bluffs along the Mesa.
- The city is located in the South Central Coast Air Basin, which is located in central and southern California, bordered by Los Angeles County to the south and Monterey County to the north.
- Significant areas of open space and associated biological communities exist along beaches and within watersheds and estuaries, including the Las Positas Valley, multiple creeks, estuaries, and the foothills.
- High fire hazard zones extend down from the foothills and in coastal areas around Campanil Hill and the Mesa.
- The city contains sites of importance to the Chumash people, and numerous historic resources from the late eighteenth century through the twentieth century.
- The transportation system is comprised of the U.S. Highway (101), a few State Routes, and a well-connected series of arterial streets; the majority of area roads and intersections operate at a high level of service with some notable exceptions.
- The noise environment is dominated by vehicle noise from U.S. Highway 101, other roadways, and the Union Pacific Railroad.
- The City obtains water through a water supply portfolio consisting of water from Lake Cachuma, Gibraltar Reservoir, Devil's Canyon Diversion, Mission Tunnel Infiltration, the State Water Project, supplemental water, groundwater, and recycled water.
- The utility system consists of a potable water distribution system and wastewater collection system which conveys water to El Estero Water Resource Center. The city is provided natural gas and electrical power by the Southern California Gas Company and the Southern California Edison Company, respectively. Solid waste collection services are provided by MarBorg Industries.
- Numerous underground storage tanks and contamination cleanup sites are located in Santa Barbara and primarily concentrated in the downtown region.

Detailed descriptions of the environmental setting for each environmental issue area analyzed in this area can be found in Section 4, *Environmental Impact Analysis*.

2.2 State and Regional Planning Setting

2.2.1 State and Regional Planning

The city is located within several planning areas that attempt to limit cumulative impacts to resources by coordinating the planning efforts and related public services to distinct municipalities. As a result, the impacts of programs and policies in Santa Barbara must be considered within the regional context of these planning areas. These planning areas include:

- **State of California:** Through the Governor’s Office of Land Use and Climate Innovation (formerly the Office of Planning and Research), and the Attorney General, the State provides guidance and direction pertaining to long-time CEQA issues as well as emerging CEQA issues of State importance such as climate change and energy consumption. The California Coastal Commission oversees the Coastal Act of California, certifies the City of Santa Barbara’s Local Coastal Plan and amendments to the plan, and retains appeal authority of certain development permits occurring within the State Coastal Zone. The California Department of Housing and Community Development (HCD) administers programs that provide grants and loans, creates rental and homeownership opportunities, monitors affordable developments that use HCD funding, implements standards for housing construction, assists California’s regions to determine their housing needs, and reviews each city or county’s Housing Element to determine whether or not their housing plan complies with state law, and produces California’s statewide housing assessment and California’s consolidated plan.
- **Tri-County:** Santa Barbara County Office of Emergency Services coordinates with adjoining offices of emergency services in Ventura and San Luis Obispo Counties. The Tri-County Coordinators meet and discuss regional preparedness several times throughout the year. The City of Santa Barbara is located in the South Central Coast Air Basin (Basin) and is under the jurisdiction of the Santa Barbara County Air Pollution Control District (SBCAPCD) a regional agency that implements the Clean Air Act. The Basin includes the entire area of San Luis Obispo, Santa Barbara, and Ventura Counties.
- **Coastal Zone:** In addition to the California Coastal Commission’s oversight role for development of the City’s coastal zoned lands, the Beach Erosion Authority for Clean Oceans and Nourishment (BEACON) provides multi-jurisdictional coordination efforts in the maintenance, protection, and enhancement of the beaches within Santa Barbara and Ventura Counties. BEACON tests many sand management and engineering strategies for shore protection and makes determinations about the success of each strategy. The City’s Coastal Land Use Plan was updated in 2019 to set in place interim development review policies to address the issue of sea-level rise and in February 2021, the City adopted a Sea-Level Rise Adaptation Plan which identifies areas of the City vulnerable to sea-level rise and recommends potential actions for adaptation.
- **South Coast:** The Metropolitan Transit District (MTD) provides bus services from Carpinteria to Goleta, UCSB and Isla Vista, with connecting services to outlying regions. MTD is a main form of daily commuter mass transit.
- **Santa Barbara County Association of Governments (SBCAG):** A regional planning agency comprised of Santa Barbara County and all eight incorporated cities within the county. SBCAG distributes local, state, and federal transportation funds and acts as a forum for addressing regional and multijurisdictional issues. SBCAG is responsible for preparing a Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) every four years which determines the needs of the transportation system and prioritizes proposed transportation projects. The RTP/SCS has a preferred scenario that includes a future land use pattern for the region and identifies policies, programs, actions, and a plan of projects intended to meet regional transportation needs and policy goals, including a regional greenhouse gas emission target for passenger vehicles for 2035 and climate goal for 2050. State law requires the City’s Housing Element to be updated in coordination with SBCAG’s RTP/SCS at least every eight years. SBCAG receives a regional determination from the State Department of Housing and Community Development which states the minimum number of housing units the SBCAG region is required to plan for over the eight-year Housing Element period. SBCAG is responsible for

allocating a portion of the projected housing needs to each jurisdiction in the SBCAG region. The portion of projected housing needs for an individual jurisdiction is known as its Regional Housing Needs Allocation (RHNA).

- **Local Agency Formation Commission (LAFCO):** The Commission is a State-created commission responsible for working closely with citizens, the County, cities and special districts within the County on a variety of issues concerning jurisdictional change. LAFCO's statutory purposes include the discouragement of urban sprawl and the encouragement of orderly governmental boundaries based upon local circumstances and conditions.
- **County of Santa Barbara:** The County of Santa Barbara provides agency services and facilities for City residents including: the County Flood Control District and Water Agency for management of surface flooding and drainage improvements, County Assessor's Office relating to tax property tax assessments and collections, and County Solid Waste Division for disposal of solid waste at both the Tajiguas landfill and the County Transfer Station. Additionally, coordinated planning efforts occur between the City and County within the City sphere of influence, located within the unincorporated regions of the County.

2.2.2 Legislation Related to Housing and Growth

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. The following provides background information on State and local legislation related to housing and growth management applicable to the Housing Plan:

- **Senate Bill 9 (SB 9):**
SB 9 (2021) allows a proposed housing development containing two residential units within a single-family residential zone to be considered ministerially, without discretionary review or hearing, if the proposed development meets certain requirements. SB 9 also requires a local agency to ministerially approve an urban lot split in a single-family residential zone if it meets certain requirements, including a minimum lot size of 1,200 square feet. In both cases, the City may apply objective zoning, subdivision, and design standards. On December 14, 2021, the City Council adopted Municipal Code amendments to implement SB 9. In 2022, the Coastal Commission certified the amendments in the Coastal Zone for SB 9.
- **Senate Bill 35 (SB 35):**
SB 35 (2017) requires jurisdictions that have failed to approve housing projects sufficient to meet their State-mandated RHNA to provide a streamlined, ministerial entitlement process for housing developments that incorporate affordable housing. Under SB 35, review and approval of proposed projects must be based on objective zoning, subdivision, and design review standards. In 2021, the City Council adopted Title 30 amendments and design standards for SB 35 projects.

- **Senate Bill 330 (SB 330):**

SB 330 (2019), the “Housing Crisis Act,” allows a housing developer to submit a preliminary application with a specific subset of information on the proposed housing development before providing the full amount of information required by the local government. Submittal of the preliminary application secures the applicable development standards and fees adopted at the time of application submittal. The project is considered vested, and all fees and standards are frozen unless the project changes substantially (by 20 percent or more of the residential unit count or square footage) or the applicant fails to timely submit a complete application. After an application is deemed complete, the local agency cannot deny the project or approve it at a lower density if the project is consistent with objective standards.

- **By-Right Approval:**

By-right processing with no discretionary approval is required on sites identified in the 6th Cycle Housing Element to accommodate the Regional Housing Needs Allocation (RHNA) if they were also identified, but not yet developed for housing in the previous 4th and 5th cycles, and at least 20 percent of the proposed units are affordable.

- **Senate Bill 166 (SB 166):**

SB 166 (2017) requires jurisdictions to accommodate their share of RHNA throughout the planning period. If a jurisdiction approves a housing development project on a site identified in the Housing Element inventory with fewer units than shown in the Housing Element, it must make findings that the remaining sites have sufficient capacity or identify and make available sufficient sites to accommodate the remaining unmet RHNA.

- **Housing Accountability Act:**

Passed in 1982 and strengthened over time with amendments, the Housing Accountability Act establishes the state’s overarching policy that a local government cannot deny, reduce the density of, or make infeasible housing development projects, emergency shelters, or farmworker housing that are consistent with objective standards unless the City can make written findings that a specific, adverse health or public safety impact exists that cannot otherwise be mitigated.

- **Assembly Bill 2011 (AB 2011):**

AB 2011 (2022) creates a streamlined approval process for qualifying affordable housing projects located in commercial zones. It allows residential development on properties previously designated for office, retail, and parking uses without requiring discretionary approval, as long as projects meet affordability and labor standards. This bill aims to increase housing supply by repurposing underutilized commercial properties.

- **Senate Bill 6 (SB 6):**

SB 6 (2022) allows housing developments in areas zoned for office, retail, or parking uses, provided they comply with objective zoning and environmental requirements. Unlike AB 2011, SB 6 does not provide a streamlined approval process but expands the potential for housing development in commercial zones.

- **Assembly Bill 2097 (AB 2097):**

AB 2097 (2022) prohibits cities from requiring minimum parking requirements for residential and commercial developments located near public transit. This law aims to reduce costs associated with parking mandates, promote transit-oriented development, and encourage more affordable housing options.

- **Senate Bill 423 (SB 423):**

SB 423 (2023) extends and expands the provisions of SB 35, making the streamlined, ministerial approval process available for a broader range of housing developments, including those in the coastal zone. The bill enhances the ability to meet RHNA goals by ensuring that housing production remains a priority in high-demand areas.

- **Assembly Bill 2334 (AB 2334):**

AB 2334 (2022) modifies the state density bonus law to further incentivize affordable housing production by providing greater density bonuses and parking reductions for projects that include a higher proportion of affordable units. This bill supports increased housing supply by making density bonus provisions more flexible and attractive for developers.

- **Variable Density Ordinance:**

The City's Variable Density Ordinance applies in residential zones (R-M and R-MH), commercial and office zones (C-R, C-G, and O-R), manufacturing zones (M-C), as well as coastal-oriented zones that allow residential (CO-HV and CO-CAR). Variable Density provisions allow for potentially more units on a building site based on a prescribed set of ratios for number of bedrooms per lot area, rather than the more traditional residential units per lot area.

- **Average Unit Size Density (AUD) Incentive Program:**

The City's AUD Program is an ongoing program that was adopted in 2013 to facilitate the construction of housing units by allowing increased density that could not be achieved through existing development standards and by providing incentives to develop multi-unit housing. The AUD Program applies to both mixed-use and residential-only development.

- **Design Review:**

The City has three design review boards: the Architectural Board of Review (ABR), Historic Landmarks Commission (HLC), and Single Family Design Board (SFDB). ABR and HLC are established by the City Charter. The design review boards ensure that high standards of design are maintained in development and construction in the city. ABR reviews and approves commercial, industrial, and multi-unit residential projects outside of El Pueblo Viejo Landmark District and other landmark districts. HLC reviews and approves development within EL Pueblo Viejo Landmark District and other historic districts, and designates properties that have historic value. SFDB reviews and approves single unit residential projects.

- **Accessory Dwelling Unit (ADU) Ordinance:**

In 2017 and periodically thereafter, the State legislature amended Government Code §65852.2 and added Government Code §65852.22 to ease development standards and facilitate the construction of ADUs. In 2018, the City adopted an ADU Ordinance, which has been periodically amended to be in compliance with State law.

- **Objective Design and Development Standards (ODDS):**

The City of Santa Barbara adopted Objective Design and Development Standards (ODDS) in February 2025 to provide clear, predictable guidelines for housing development. These standards apply to projects that qualify for streamlined, ministerial approval under State housing laws, ensuring high-quality design while complying with objective zoning, subdivision, and design standards. ODDS facilitate efficient approval processes while maintaining community character and architectural integrity.

- **Adaptive Reuse Ordinance:**

The City of Santa Barbara adopted the Adaptive Reuse Ordinance in November 2025 to facilitate the conversion of nonresidential buildings to housing.

2.3 Existing Land Uses

The City's Land Use Element contains goals, policies, and implementation actions related to the topics of Land Use, Growth Management, Community Design, and Neighborhoods. The downtown land use "grid" pattern, which features a major commercial corridor running north/south (more or less) surrounded by mixed use and residential neighborhoods between the ocean and the mountains, remains the dominant pattern today. Santa Barbara is largely a built-out city, with well-established neighborhoods and relatively few vacant parcels. The City has encouraged infill and redevelopment of existing commercial parcels, with a market driven emphasis on mixed residential and commercial projects.

The purpose of land use designations is to identify the planned land uses and residential densities within the city. These designations, when combined with specific locations on the General Plan map, summarize the community's vision for the physical development of the city. Santa Barbara's land use and transportation patterns have historically evolved in a sustainable manner with the highest residential densities at the center of the city adjacent to commercial and transit, with concentric rings of lesser and lesser densities.

Residential uses dominate the city and extend from the Mesa shoreline to the Cielito neighborhood high in the foothills. Residential uses range from one acre or larger estate lots in the foothills to predominantly single-unit homes in San Roque, the Mesa, Upper Eastside, and Las Positas Valley, to a mix of apartments, condominiums, duplex and single-unit homes on the Eastside and Westside. The higher density, multi-family neighborhoods adjacent to the commercial districts, followed by the medium density, duplex neighborhoods, followed by the single unit neighborhoods, followed by the hillsides, open space and ocean.

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. The distribution of land by General Plan land use designations reflects: the predominance of Single Unit residential areas (51 percent); Medium to High Density Residential (16 percent); Parks and Open Space (15 percent); Commercial and Office¹ (9 percent); Institutional including public schools (9 percent); and Industrial (1 percent)². A breakdown of the distribution of land by General Plan land use designation is presented in Figure 2-3. The City's coastal and inland land use maps are depicted Figure 2-4 and Figure 2-5.

¹ Multi-unit residences are permitted in areas of Santa Barbara designated for Commercial and Office land use.

² Multi-unit, two-unit, and single-unit residential are permitted in areas designated for Industrial use that are zoned Manufacturing Commercial.

2.4 Circulation and Transportation Network

Santa Barbara’s transportation system consists of roads, public transportation, bike and pedestrian facilities, parking, and City and regional programs that support and guide the use and development of these facilities, including programs to manage transportation demand. Congestion on most city streets is usually limited to the morning and/or evening peak commute periods at locations near freeway interchanges. Mid-day congestion on some local arterials (e.g., Upper State Street) and more significant regional congestion on U.S. Highway 101 also occur. Peak congestion periods in some locations have been lengthening. The automobile is currently the primary mode of travel for most trips to, through, and within the city of Santa Barbara and the surrounding region, and this is expected to remain true for the foreseeable future. However, public transit use is high for the size of the city, and a relatively large number of commuters also either walk or bike to work.

Santa Barbara contains two transit priority areas, defined by Section 21099(7) to mean “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 a Transportation Improvement Program or applicable regional transportation plan.” These transit priority areas are located at the MTD Transit Center at 1020 Chapala Street and the Santa Barbara Amtrak Station at 209 State Street and cover the Lower State neighborhood and portions of the downtown area. A large portion of Santa Barbara is also within ¼ mile of a High Quality Transit Corridor, as referenced by the SBCAG Regional Transportation Plan/ Sustainable Communities Strategy.

Figure 2-3 Distribution of General Plan Land Use Designations

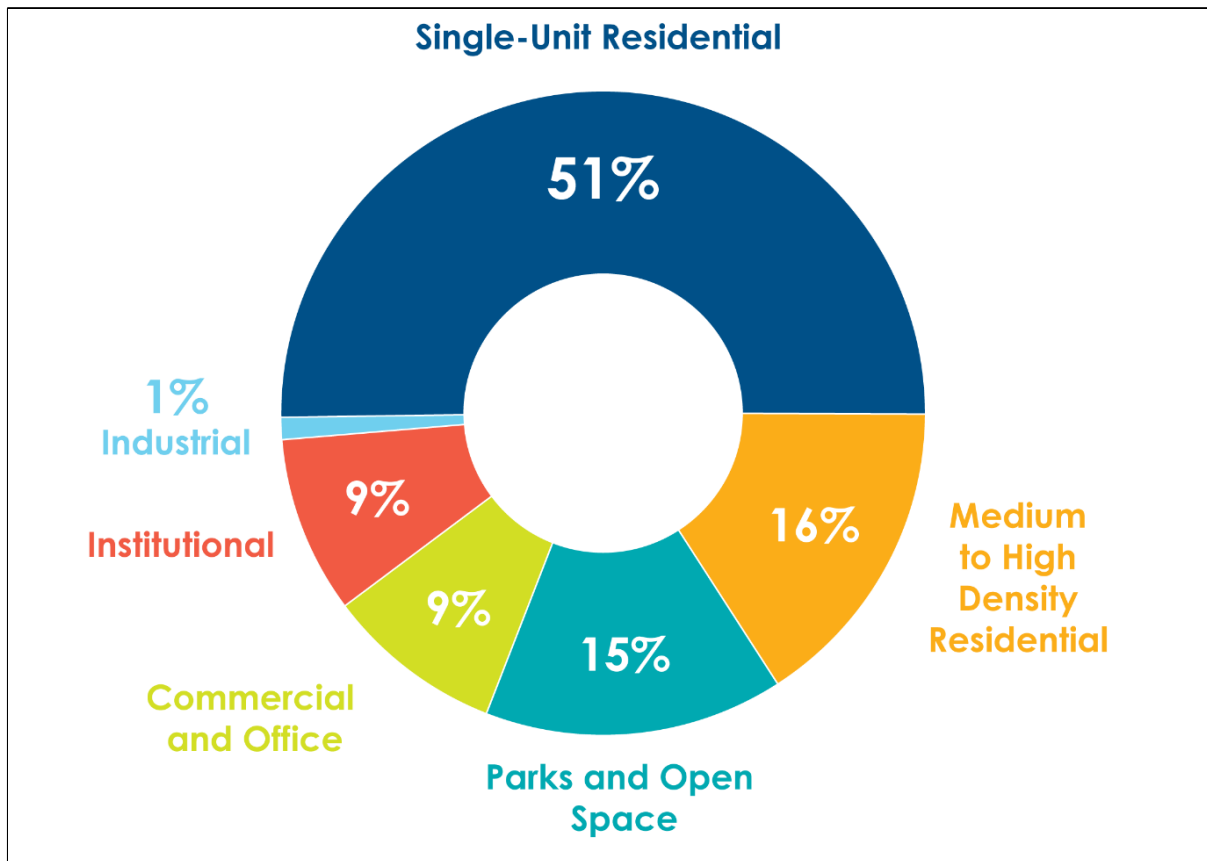


Figure 2-4 City of Santa Barbara Coastal Land Use Map

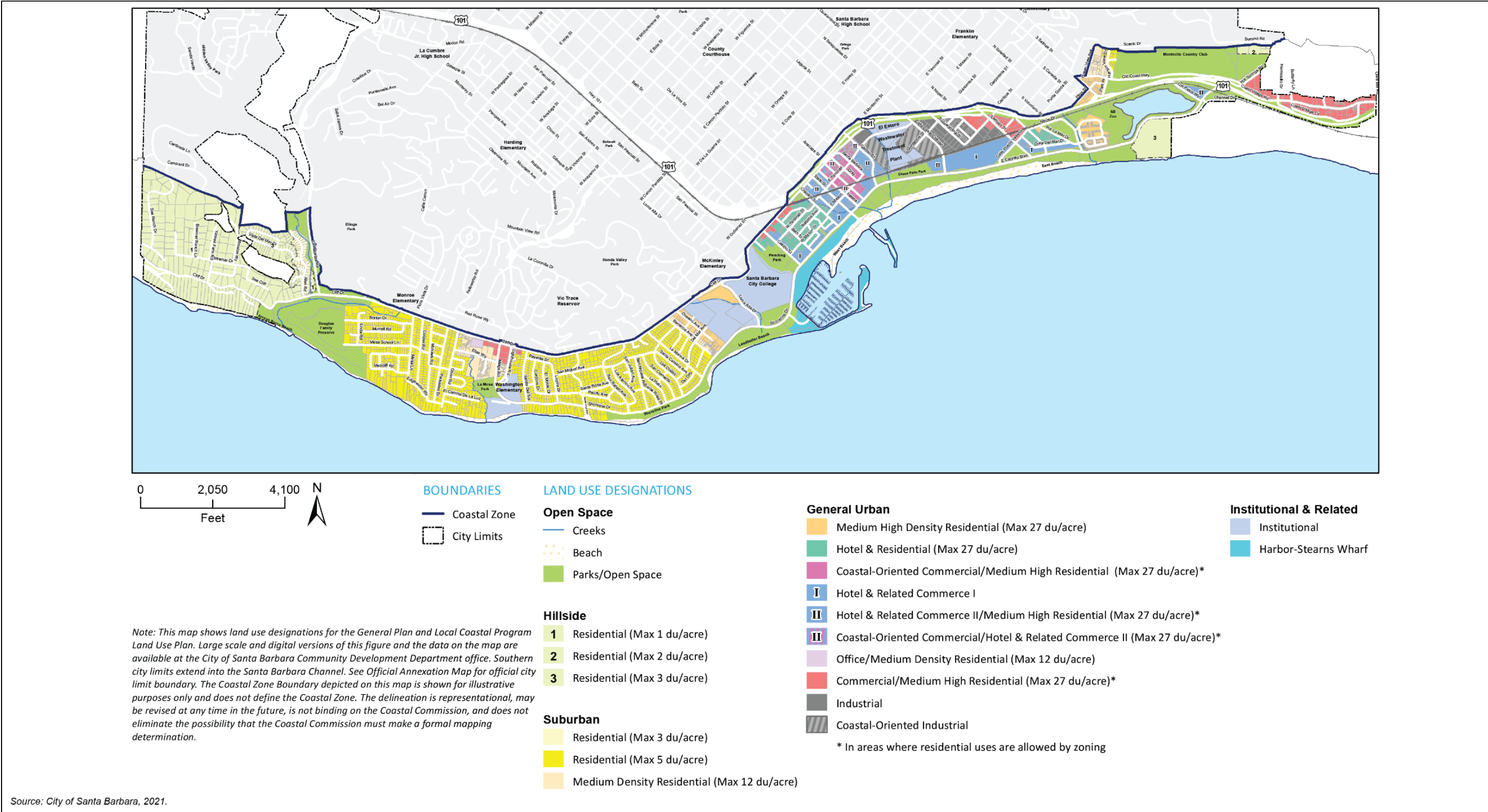
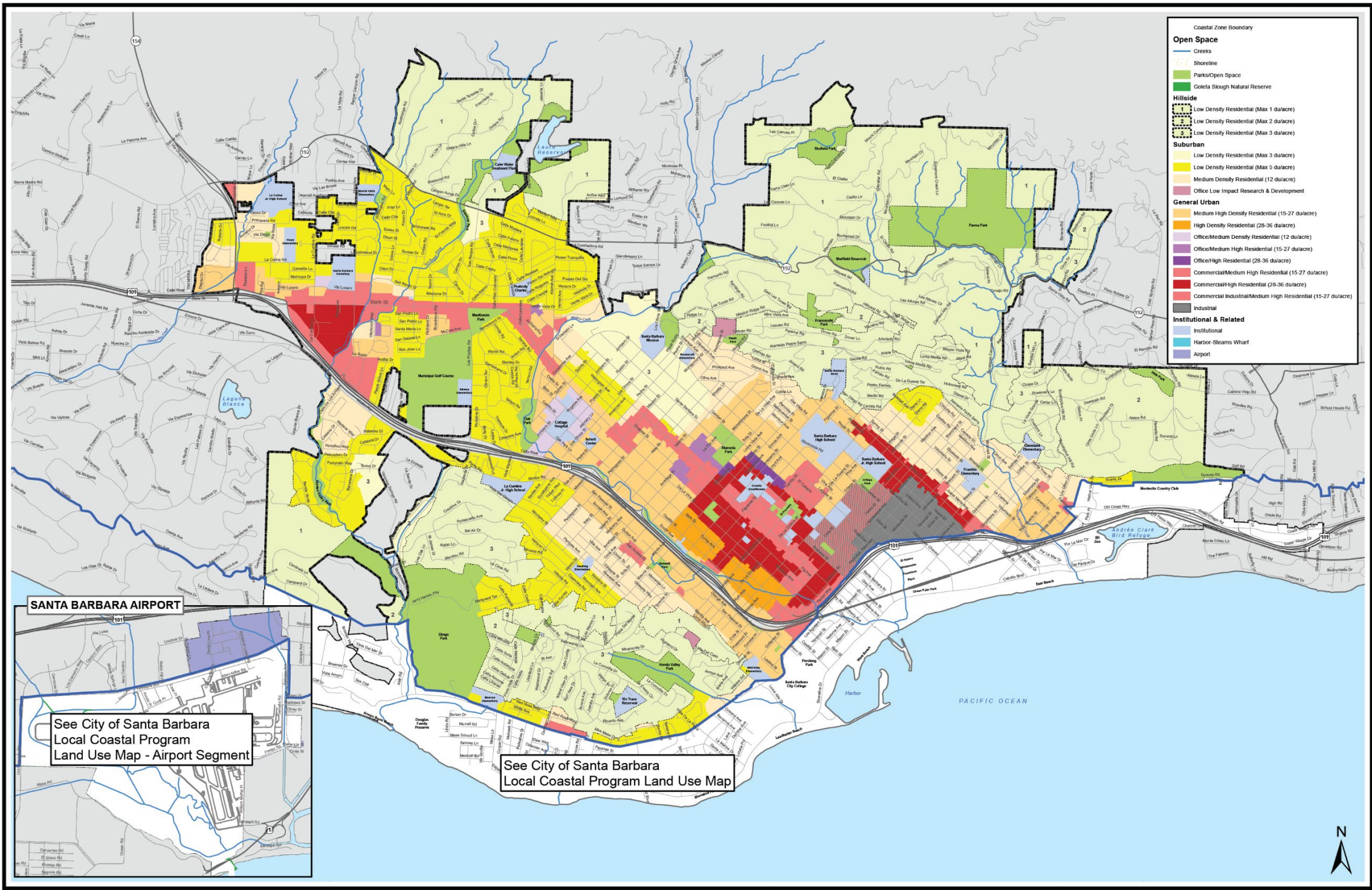


Figure 2-5 City of Santa Barbara Inland Land Use Map



Source: City of Santa Barbara, 2021.

2.5 Demographics

Major demographic characteristics of the City are noted below. Please refer to Section 4.11, *Effects Found Not to Be Significant*, for additional information relative to population and housing estimates and growth forecasts in the City.

- With over 86,000 residents, the Santa Barbara is the second largest city in Santa Barbara county and has the largest population on the county's South Coast.
- As a result of its robust job market and status as a tourist destination, the city receives a significant influx of daytime workers and visitors which can increase the daytime population.
- The median age within the city is approximately 39 years, compared to the county median of 33.8 years.
- Between 2015-2019, approximately 19 percent of city residents were less than 18 years old and approximately 19 percent were senior citizens over 65 years old.
- Between 2015-2019, approximately 56 percent of the City's population were considered white with no other race identified in their heritage. The largest ethnic minority was the Hispanic community with just over 37 percent of the population. Seven percent of the City's population belongs to another racial/ethnic minority group (United States Census Bureau 2019a).
- The largest job sectors in the City include educational services, health care, and social assistance, and the largest employers include Cottage Hospital, the County of Santa Barbara, Santa Barbara City College (SBCC), and the Santa Barbara School District.
- Between 2015-2019, the total employment within the City was estimated at 51,075 residents.
- Between 2015-2019, the unemployment rate was 2.8 percent, which is considerably lower than the County (3.9 percent), State (4.1 percent), and national (3.5 percent) averages (Census Bureau 2019b).
- Between 2015-2019, the City had a total of 39,932 housing units. This consisted of 18,894 one-unit detached residences, 2,843 one-unit attached residences, 2,452 two-unit residences, 3,143 three-to-four-unit residences, 3,803 five-to-nine-unit residences, 3,287 10-to-19-unit residences, 5,096 residences with 20 or more units, and 324 mobile homes.
- Between 2015-2019, 2,599 housing units, approximately 6.5 percent of total housing units, were vacant in the City. Of these vacant units, 386 were for rent, 218 were for rent but not occupied, 98 were for sale, 66 were sold but not occupied, 1,067 were for seasonal use, and 764 were classified as other vacancies.

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3 Project Description

The project analyzed in this Program Environmental Impact Report (EIR) is the implementation of the 6th Cycle Housing Element programs (Housing Plan), including potential Municipal Code, general plan, and local coastal program (LCP) amendments, and associated residential development to the year 2035¹. The 6th Cycle Housing Element was adopted by Santa Barbara City Council on December 12, 2023, and certified by the State Department of Housing and Community Development on February 13, 2024. This section of the Program EIR describes the key characteristics of the project, including Housing Element background, project objectives, and the Housing Plan. The types and extent of development evaluated as part of the project include residential development forecasted under the 6th Cycle Housing Element as well as nonresidential development needed to accommodate anticipated growth to the year 2035.

3.1 6th Cycle Housing Element Background

Since 1969, the State of California has required that cities and counties adequately plan to meet the housing needs of everyone in the community through preparing a Housing Element as one of the required elements of the General Plan. The Housing Element provides the City of Santa Barbara's goals, policies, actions, and objectives for housing in the community, particularly the availability, affordability, and adequacy of housing.

The Housing Element requires periodic updates per State law. The City's first Housing Element was adopted in 1979. Subsequent housing element laws require the City's Housing Element to be updated in coordination with Santa Barbara County Association of Governments (SBCAG) every other Regional Transportation Plan update (i.e., at least every eight years). Housing Element planning periods are referred to as "cycles." The current Housing Element is the 6th cycle, for the period from 2023-2031.

The 6th Cycle Housing Element establishes goals, policies, and actions to further the goal of meeting the existing and projected housing needs of all household income levels of the community, and provides evidence of the City's ability to accommodate the Regional Housing Needs Allocation (RHNA) through the year 2031, as established by the Santa Barbara County Association of Governments (SBCAG).

In accordance with State law (Government Code Sections 65580 – 65588), the 6th Cycle Housing Element includes the following:

- An assessment of the City's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations.
- An analysis of resources and constraints related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs as well as restricted financing availability.
- Identification of the City's quantified objectives for the 2023-2031 RHNA and inventory of sites determined to be suitable for housing.

¹ 2035 was chosen for this analysis to account for effects on the environment from program which would be effective later in the 6th Cycle. The Santa Barbara County Association of Governments' Regional Growth Forecast also includes population projections for 2035 used in this analysis.

- Identification of opportunities for energy conservation in residential development.
- Review of the prior 5th Cycle Housing Element to identify progress and evaluate the effectiveness of previous policies and programs.
- A housing plan to address the City's identified housing needs, including housing goals, policies, and programs.

A notable addition in the 6th Cycle Housing Element is the need to affirmatively further fair housing as a required objective for local housing elements statewide. The concept of furthering fair housing comes from the Federal Fair Housing Act. It means that the City must take actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination. Appendix B of the Housing Element includes the assessment of fair housing.

3.1.1 Regional Housing Needs Allocation

SBCAG received a regional determination of 24,856 housing units from the State Department of Housing and Community Development (HCD), and each local jurisdiction within the County was allocated a portion of the projected housing need through the RHNA process. The City's RHNA represents the minimum number of housing units that the City is required to plan for within the eight-year Housing Element planning period. The Housing Element must address the City's fair share of the regional housing need and specific state statutory requirements and should reflect the vision and priorities of the local community.

New housing units may occur anywhere in the city where residential uses are allowed, with current densities across the city ranging from one dwelling unit per acre (du/ac) in the residential single unit zone (RS-1A) up to 63 du/ac for projects using the Priority Housing Overlay under the Average Unit-size Density (AUD) Incentive Program. The 6th Cycle Housing Element continues to encourage the creation of the higher density housing projects near transit and within easy walking and biking distance to commercial services and activity centers; as well as prioritize affordable housing availability for all residents, tailored to the unique demographics of the community. The RHNA allocation informs planning and development to support the evolving housing needs of Santa Barbara residents.

As shown in Table 3-1, Santa Barbara's RHNA for the 2023-2031 planning period is 8,001 units, which is distributed among four income categories (HCD 2020).

Table 3-1 City of Santa Barbara RHNA

Income Category	RHNA
Very Low	2,147
Low	1,381
Moderate	1,441
Above Moderate	3,032
Total	8,001

3.1.2 Suitable Sites Inventory

Government Code Section 65583(a)(3) requires that housing elements contain a parcel-specific inventory of appropriately zoned, available, and suitable sites that meet the City's housing need for designated income levels. The purpose of the inventory is to identify land suitable for housing development and determine whether the City's residential development potential is adequate to meet the City's share of projected regional housing needs. The Suitable Sites Inventory demonstrates that the City has sufficient land inventory and zoning capacity to accommodate the City's assigned share of regional housing need within existing General Plan and zoning capacities. Chapter 4 of the Housing Element includes a description of how the inventory was prepared and Appendix G includes a spreadsheet of the sites suitable to accommodate housing.

The Housing Element is required to identify sites to accommodate the RHNA by income level, or identify any rezoning to accommodate any shortfall. Sites identified to accommodate lower income units must meet certain criteria for lower income housing, including minimum densities. Lower income includes both the very low- and low-income categories in RHNA. The "No Net Loss" Law (Government Code Section 65863) requires maintenance of sufficient sites to meet the RHNA for all income levels throughout the planning period. During the eight-year planning period, if sites are developed with nonresidential use or developed with a lower number of units at each income level, the City must demonstrate that there are adequate remaining sites in the inventory to accommodate the remaining RHNA by income level. If the City finds there is insufficient remaining capacity at any income level, additional sites would need to be added to the inventory or rezoning would be necessary.

For this reason, HCD recommends local jurisdictions provide a sufficient buffer beyond that required by the RHNA to accommodate realistic production rates of affordable housing units and ensure that adequate site capacity exists throughout the eight-year planning period. The 6th Cycle Housing Element includes a buffer of approximately 807 units (average 11 percent across all income categories) as recommended by HCD to ensure sufficient capacity will be available throughout the planning period.² The sites inventory demonstrates suitable capacity to accommodate the RHNA plus the buffer.

3.2 Project Objectives

The purpose of the Housing Plan is to implement programs that meet the requirements of State law and to carry out the Housing Element's goals as stated in the Executive Summary and in Chapter 5 of the 6th Cycle Housing Element. The CEQA project objectives listed below are built upon the goals as follows:

- Meet the State-mandated 6th Cycle RHNA for the City.
- Locate housing close to jobs, transit, and services.
- Increase production of deed-restricted affordable housing, and housing for special needs households.
- Streamline and increase predictability in the residential development approval process.
- Implement processes and procedures to comply with state housing laws and regulations.
- Facilitate a variety of housing types and equitable housing access in areas that historically excluded diverse housing opportunities.

² The buffer calculation does not include sites on the Suitable Sites Inventory. The 6th Cycle Housing Element (December 2023) cites a buffer of approximately 1,113 units (average 14 percent across all income categories).

- Protect historic, cultural, biological, and other environmental resources.
- Provide financial resources and supportive services for members of the community who need housing assistance.
- Maintain and improve the physical condition of existing housing at all affordability levels.
- Promote greater housing stability for tenants.
- Prioritize permanent housing over other uses where possible.

3.3 Project Location

The Housing Plan applies to the entire geographic area located within the boundaries of the City of Santa Barbara, which encompasses approximately 19.7 square miles of land area. The regional location of the City is shown in Figure 2-1 in Section 2, *Environmental Setting*. The City's boundaries are shown in Figure 2-2 in Section 2, *Environmental Setting*. However, no housing is proposed in the Airport area under the Housing Plan, and the Airport, along with offshore areas, is largely excluded from the area of analysis in the Program EIR.

3.4 Residential Growth Assumptions

The RHNA described in Section 3.1.1. is the State-mandated target for the number of residential units the City needs to plan for in the Housing Element; however, the RHNA is not a prediction of building permits, construction, or housing activity. The City is responsible for demonstrating that suitable sites are available and zoned to meet this need. The City's Suitable Sites Inventory described in Section 3.1.2 shows that the RHNA of 8,001 units can be accommodated with existing zoning.

State law acknowledges that total housing needs identified through the RHNA process may exceed available resources and the community's ability to satisfy this need. Therefore, the quantified objectives described in Chapter 4, Housing Resources, of the 6th Cycle Housing Element, estimates 3,346 housing units by income category that are likely to be built, rehabilitated, or conserved/preserved over the 6th cycle planning period. However, for the purpose of analysis in this Program EIR, the 2035 growth analysis is based on the RHNA target of 8,001 units as a conservative maximum number of housing units anticipated to be permitted and constructed up to 2035. Because some of the units receiving building permits anticipated under the 6th Cycle Housing Element will be constructed beyond 2031, this residential growth analysis extends several years past the eight-year Housing Element planning period, through 2035.³

The residential growth assumptions include units anticipated across a range of categories, including pending applications at the time the Housing Element inventory was submitted to the State (January, 2024), multi-unit development, accessory dwelling units (ADUs), infill development on Housing Authority sites, as well as specific development locations that are proposed to accommodate a large number of units (e.g., La Cumbre Plaza Planning Area). The Suitable Sites Inventory did not include parcels with a development potential of less than ten net new units, parcels with known environmental or other constraints, or City-owned parcels.

³ Changes to the Housing Element and associated programs could occur after 2031 as part of the 7th Cycle Housing Element. However, these changes are currently unknown. This EIR assumes that housing units permitted under programs included in the 6th Cycle Housing Element will continue to be constructed through 2035.

Based on a review of existing development requirements, pending projects, and growth trends within the City General Plan buildout projections, it is also estimated that up to 525,000 square feet of cumulative net new nonresidential development would occur during this period through 2035. This includes the loss of 252,000 square feet of commercial development within the La Cumbre Plaza Planning Area. Anticipated nonresidential development is not considered a direct result of the Housing Plan; however, it is discussed in this Program EIR as part of the cumulative conditions (also refer to Section 4, *Environmental Impact Analysis*).

3.5 Housing Plan

The Housing Plan is a component of the Housing Element that lays out the goals, policies, and programs needed to meet the housing needs of current and future City residents. The Housing Plan is informed by current housing conditions and the demographics and technical assessments conducted throughout the 6th Cycle Housing Element, including the housing needs assessment, governmental and non-governmental constraints assessment, and input from community members, local stakeholders, and advocacy groups.

Housing Plan Programs

Housing Plan Programs are the core of the project, translating 6th Cycle Housing Element goals and policies into actions. These programs, shown in Table 3-2, include on-going programs, procedural adjustments, Municipal Code amendments, and other actions that implement the housing policies to achieve housing goals. Programs with the potential to create direct or indirect environmental impacts are described in more detail after Table 3-2. Programs marked with an asterisk in Table 3-2 have no potential to create physical environmental impacts and are not described in more detail below.

Table 3-2 Programs Included in the 6th Cycle Housing Element

No.	Program Title	Summary
HE-1*	Facilitate Conversion of Nonresidential Buildings to Housing	Develop and adopt an adaptive reuse ordinance and prepare outreach materials, forms, and applications.
HE-2	La Cumbre Plaza Planning Area	Prepare and adopt a planning document for the La Cumbre Plaza site to facilitate full residential development.
HE-3**	Amend the Zoning Ordinance for Special Needs Housing	Amend the zoning ordinance to 1) clarify permit requirements for Community Care Facilities, Residential Facilities for the Elderly, and Hospices; 2) allow low barrier navigation centers in mixed-use and nonresidential zones; 3) categorize agriculture as an accessory use where allowed by zoning; and 4) amend parking standards for emergency shelters in compliance with state law.
HE-4	Use-By-Right Permitting	Ensure sites identified for housing in the 4th (vacant) and 5th (vacant and nonvacant) cycles allow use-by-right approval when 20 percent or more of the units are affordable to very low- and low-income households.
HE-5	Process Improvements	Implement some of the process improvements identified in the Novak Report and Government Constraints Analysis in phases: Phase 1 for single unit residential; Phase 2 for multi-unit and mixed-use residential.
HE-6**	Facilitate Production of Accessory Dwelling Units (ADUs)	Evaluate and update the ADU ordinance; develop pre-approved plans; conduct outreach and develop guidance; and implement a pilot program for deed-restricted or housing choice voucher ADUs.

No.	Program Title	Summary
HE-7*	Objective Design Standards	Adopt a new Title in the Municipal Code to implement Objective Design and Development Standards for multi-unit and mixed-use residential and amend the zoning ordinance to outline objective design review process and findings.
HE-8	Innovative Housing Types	Conduct outreach and update the zoning ordinance to facilitate more innovative housing types.
HE-9	Resource Protection and Development Certainty	Adopt Municipal Code amendments and Master Environment Assessment procedures to protect resources and streamline development approval.
HE-10	Multi-Unit Housing Program	Amend the Average Unit-Size Density (AUD) Incentive Program ordinance to further facilitate multi-unit housing.
HE-11	Livable Neighborhoods	Promote and preserve Rental Housing Mediation Program, complete the State Street Master Plan, complete pedestrian and bikeway projects in underserved locations, support CDBG funding for projects in low- and moderate-income areas, and facilitate electrification of housing stock. Target 1-2 improvements per year.
HE-12	Prioritize Deed-Restricted Affordable Housing	Conduct a feasibility study, develop strategies, and amend the zoning ordinance to increase deed-restricted units, incentivize affordable housing on small sites and promote consolidation of small lots, consider local preference policy, and implement water and sewer preference policy.
HE-13	Evaluate Inclusionary Housing Ordinances	Conduct a feasibility study and update the inclusionary housing ordinances per the results of the study.
HE-14	City Land Registry	Evaluate all City-owned land for affordable housing potential and prioritize city-owned sites for housing.
HE-15**	Track Housing Production	Track and report progress on pending projects and projects on sites identified in the suitable sites inventory to ensure no net loss provisions are met. Conduct ADU surveys every two years to validate ADU production assumptions.
HE-16**	Create Affordable Housing Funds	Adopt an ordinance creating a Local Housing Trust Fund and Housing Opportunities, Preservation, and Equity (HOPE) funds.
HE-17**	Support Rental Housing Mediation Program	Ensure the Rental Housing Mediation Program continues to support the needs of residents.
HE-18**	Right of First Refusal Purchase Program	Study a right of first refusal purchase program for residential buildings not already included in government-assisted programs.
HE-19**	Short-Term Rental Framework and Ordinance	Improve short-term rental enforcement, develop a framework for short-term rental ordinance, and adopt a short-term rental ordinance.
HE-20	Evaluate Hotel Zones	Monitor hotel development trends, review zones that allow both hotels and residential use, and amend the zoning ordinance to prioritize residential development over hotels in targeted areas. Study fractional ownership trends and amend the zoning ordinance if necessary to protect long term housing stock.
HE-21**	Residential Units Conversion Ordinance	Monitor conversion trends, evaluate existing conversion ordinance, and amend the ordinance to ensure no net loss of affordable units.
HE-22**	Affirmatively Further Fair Housing Program and Opportunities	Continue to promote fair housing services and educate the public, support affordable and special needs housing, reduce constraints.
HE-23**	Monitor and Preserve Existing Affordable Housing	Continue to maintain inventory of affordable housing subject to deed-restrictions, work with property owners to extend affordability covenants, and ensure state noticing requirements are met and tenants are provided information for properties scheduled for conversion.

No.	Program Title	Summary
HE-24**	Fund Home Rehabilitation and Provide Technical Assistance	Continue to provide CDBG and HOME grants and loans to rehabilitate affordable multi-unit projects and technical assistance for residents reviewing and permitting housing rehabilitation projects.
HE-25**	Fund Home Improvements and Repairs	Continue to provide home repair and equipment grants to income-qualified households in existing naturally affordable homes.
HE-26**	Renters Rights Information	Amend the Municipal Code to ensure landlords provide renters' rights information with their lease and conduct outreach to ensure compliance.
HE-27**	Housing Resources for the Public	Continue to provide information, resources, and referrals for housing issues and affordable housing availability.
HE-28**	Housing Supply and Affordability Education Campaign	Prepare an awareness campaign to bolster community support for housing.
HE-29**	Joint Legislative Platform	Work with other jurisdictions and advocate for State legislation to provide funds and programs to address South Coast housing needs.
HE-30**	Affordable Student, Staff, and Faculty Housing	Work with UCSB, SBCC, and the City of Goleta to discuss housing options and advocate for state legislation for funding and student housing support.
HE-31**	Secure Permanent Affordable Housing Funding	Study and propose measures to secure permanent source(s) of funding for affordable housing and renter protections. Conduct a nexus and feasibility study for potential housing impact mitigation fee linked to nonresidential development.
HE-32**	Support Affordable Housing Funding Legislation	Continue to support state and federal legislation and voter initiatives that create funding sources for affordable housing.

* Notice of Exemption has been prepared for this program

** Programs with no potential to create physical environmental impacts

Summary of Selected Housing Programs for the Program EIR

Full details of all the housing programs are found in Chapter 5, Housing Plan, of the 6th Cycle Housing Element. This Program EIR addresses programs that have the potential to create direct or indirect environmental impacts, such as those that may amend the zoning ordinance to facilitate increased residential development. These select housing programs for the Program EIR are summarized below.

Program HE-1 Facilitate Conversion of Nonresidential Buildings to Housing

City policies encourage a mix of land uses, particularly in the downtown, and support mixed-use developments to promote active living and reduce the need for automobile parking. The Zoning Ordinance currently allows a change in use of existing nonresidential buildings to residential uses in mixed-use zones where commercial and residential uses are allowed. The current regulations allow existing buildings be altered to create additional residential units, provided that all zoning standards are met. However, applying current standards to older buildings can often be a barrier to repurposing it for a new residential use. Program HE-1 was implemented in 2025 with an amendment to the Zoning Ordinance to reduce development standards to incentivize adaptive reuse of existing nonresidential buildings where multi-unit residential is allowed. Adaptive reuse projects using the adaptive reuse ordinance (Section 30.185.045, Adaptive Reuse Projects) must meet the following criteria:

- An existing, nonresidential building must be converting (in part or in whole) to create one or more new housing units;
- The project must be located in a zone that allows multi-unit residential use;
- Building must have a final inspection or certificate of occupancy issued at least five years prior to application submittal; and
- Additions outside the existing building envelope are limited (exceptions allowed for amenities and code compliance).

Adaptive reuse projects receive the following incentives, which are outlined before for the purposes of environmental review.

- **Unlimited Density.** The adaptive reuse ordinance allows eligible projects to exceed the maximum densities within the program area (highest citywide is 63 du/ac). This incentivizes developers to use the ordinance and support the development of more units within existing building envelopes. The conversion of existing nonresidential buildings to housing would be limited in density not by a maximum density value but by the existing building envelope. There are no changes to the height limitations allowed under the existing zoning.
- **Reduced Required Open Yard.** The adaptive reuse ordinance eliminates the open yard requirement.
- **Potential Reduced Required Parking.** The adaptive reuse ordinance reduces parking requirements for automobiles while maintaining current bicycle parking requirements.

Foreseeable parameters for the purposes of environment review are outlined below.

- **Additions outside the Building Envelope.** The current adaptive reuse ordinance limits an adaptive reuse project to reuse of the existing building volume. Additions outside the existing building envelope are restricted to specific allowances and square footage. Possible expansions to the adaptive reuse ordinance could include larger additions or additions that allow residential units within them.
- **Unit size requirements.** Unit size requirements could be revised in future ordinance amendments, especially in correlation with Housing Element Programs HE-8: Innovative Housing Types, HE-10: Multi-Unit Housing Program, and HE-13: Evaluate Inclusionary Housing Ordinances.

It is anticipated that approximately 20 adaptive reuse projects would be completed by 2035; however, the number of potential new units associated with any individual adaptive reuse project is speculative.

Program HE-2 La Cumbre Plaza Planning Area

The La Cumbre Plaza Planning Area includes properties within the 31-acre shopping center roughly bound by State Street to the north, South Hope Avenue to the west, Calle Real to the south, and South La Cumbre Road to the east. The La Cumbre Plaza Planning Area is identified in the 6th Cycle Housing Element as a suitable site for residential development that would allow for up to approximately 2,000 housing units with consideration of density bonus, a large portion of the City's anticipated housing needs through 2035. Existing commercial retail space is anticipated to be demolished within the La Cumbre Plaza Planning Area, resulting in the reduction of approximately 250,000 square feet of commercial-retail development. The La Cumbre Plaza Planning Area is within

the AUD Program Priority Housing Overlay (37-63 units/acre). Rezoning is not needed to meet the number of units assumed in the suitable sites inventory.

Program HE-2 would provide a framework that would facilitate full residential development potential of the Planning Area. The La Cumbre Plaza Planning Area is served by transit and has unique challenges with respect to topography and habitat resources. Considerations for development of this Planning Area include, but would not necessarily be limited to, effects on Arroyo Burro Creek, provision of new public open space, multi-modal circulation improvements, affordable housing, impacts to schools, and increased height limits. Future projects proposed on sites within the La Cumbre Plaza Planning Area would require site-specific environmental review.

Program HE-4 Use-By-Right Permitting

The City is required to ensure sites identified for housing in the Suitable Sites Inventory from the 4th and 5th Cycle Housing Elements that are not yet developed with housing are allowed use-by-right approval when 20 percent or more of the units are affordable for very low- and low-income households. "Use-by-right" approval means that a proposed housing project is not subject to a conditional use permit, other discretionary review or approval, or environmental review under CEQA, but instead would be reviewed through a ministerial building permit process. Ministerial approval substantially limits the City's discretion to require project changes except to meet objective criteria, such as objective zoning, building and safety, and design standards.

There are 211 sites not yet developed with housing with a total capacity of 3,313 units, that could request ministerial approval per this program.

Program HE-5 Process Improvements

Since 2020, the City has been implementing discretionary and ministerial permit process improvements recommended by the Novak Consulting Group, Inc., (Novak Report 2020) guided by the City Council Land Development Team (LDT) Oversight Subcommittee. In addition to the Novak Report, Chapter 3 of the 6th Cycle Housing Element's Governmental Constraints analysis identified City processes that potentially constrain housing projects, including multiple concept reviews and appealable actions. Through the City's LDT Oversight Subcommittee, the City will further study and implement process improvements recommended by the Novak Report or identified in Governmental Constraints analysis, including Municipal Code amendments to streamline the design review process. Reasonably foreseeable parameters for the purpose of environmental review include:

- **Ordinance Amendments** to reduce design review triggers and eliminate mandatory pre-application/concept review. Study and implement further amendments to the Municipal Code and other regulations to streamline the design review process and reduce or eliminate process steps, such as reducing the number of appealable actions for projects that require design review approval or providing a path for administrative approval of certain projects.
- **Visual Aids** to create visual examples of acceptable "pre-approved" designs.

The process improvements identified above should result in fewer barriers and less time and cost for developers of residential projects, but it is speculative to determine how many new residential units would be facilitated by the process improvements.

Program HE-7 Objective Design Standards

In 2021, the City adopted Objective Design Standards for Streamlined Housing Projects specifically for projects that qualify for streamlined review under Senate Bill (SB) 35 (passed in 2017). As a follow up to the SB 35 Design Standards, Program HE-7 directs the City to develop city-wide Objective Design and Development Standards (ODDS) for multi-unit housing development projects. In February 2025, the ODDS were adopted as a new Title 25 of the Santa Barbara Municipal Code, effectively implementing Program HE-7. The ODDS provide alternatives to conventional zoning regulations to accommodate infill development in existing neighborhoods and apply to all areas of the City that are zoned for two or more units. This program is envisioned as an opt-in alternative for developers who are seeking a more streamlined objective design review alternative to the City's subjective design review process.

The adopted Title 25 would not completely replace existing zoning standards or other applicable objective standards in the Municipal Code. For many development standards (e.g., height, upper-story stepbacks, open yard), the ODDS are equivalent to existing Title 30 zoning standards and projects allowed under the ODDS are consistent with densities in the General Plan.

Program HE-8 Innovative Housing Types

The Housing Needs Assessment within the 6th Cycle Housing Element and demographic changes indicate a need for a variety of housing types to suit special needs households and different household compositions, changes in circumstances or incomes, and existing and future household needs. The City will conduct outreach for input on housing trends that incentivize and facilitate innovative housing types, such as small units (single room occupancy/efficiency/micro units), multi-generational housing, universal designed housing (i.e., safe and accessible for everyone), live-work units, small and large family day care homes, shared housing, cooperative housing, and temporary housing (for use when the primary unit is destroyed or damaged). Reasonably foreseeable parameters for the purpose of environmental review include Zoning Ordinance amendments to facilitate and increase the production of innovative housing types, but it is speculative to determine how many innovative housing types would be constructed due to potential Zoning Ordinance amendments.

Program HE-9 Resource Protection and Development Certainty

The City needs to plan for housing that protects unique ecological and cultural resources, responds to the climate crisis, and provides certainty for developers of parcels with constraints. With the 2019 comprehensive update to the Coastal Land Use Plan (LUP), the City established clear coastal resource protection policies and regulations for development in the Coastal Zone. Conversely, development on constrained parcels in the inland areas of the city often require technical studies and case-by-case evaluation of impacts to resources, adding costs and time to project entitlement. While these studies are essential for project safety and environmental quality, resource protection could be more efficiently addressed through cumulative area-wide analyses that cover multiple potential projects at one time, such as establishing measurable inland creek setback standards to protect public health and safety and riparian habitat. This would reduce the need for site-specific technical studies and streamline the environmental review process for projects, while ensuring the protection of environmental resources.

To facilitate residential development citywide and provide better development certainty, this program would amend the Municipal Code and update the Master Environmental Assessment (MEA) and MEA procedures, as applicable, to implement General Plan resource protection policies

and establish clear, measurable standards and procedures for cultural, biological, and other resource protection needs as well as measures to protect public health and safety. This program would reduce environmental impacts associated with ministerial review of accessory dwelling units (ADUs), use-by-right approval, and other housing projects only subject to objective standards per state law. This program also would provide more certainty for discretionary projects by establishing measurable standards and procedures for projects on sites with environmental and cultural resources.

Program HE-10 Multi-Unit Housing Program

The City's Average Unit-Size Density (AUD) Incentive Program is an ongoing program that was adopted in 2013 to facilitate the construction of smaller housing units by allowing increased density and other development incentives. The AUD Program applies mainly within the city center and commercial areas for mixed-use and residential-only development. In addition to densities of up to 63 du/ac, the AUD Program includes reduced parking, setback, and open yard requirements. The AUD Program currently consists of three density tiers based on the General Plan land use designation as shown in Table 3-3: Medium-High, High Density, and the Priority Housing Overlay.

Table 3-3 AUD Program Density Tiers

Maximums	Medium High Density	High Density	Priority Housing Overlay
Average Unit Size (sf)	904-1,450	970-1,245	811-970
Density (du/ac)	15-27	28-36	37 - 63

In 2023, the City analyzed 10 years of AUD Program implementation and produced an AUD Progress Report summarizing how well the AUD Program met its original objectives. This report was discussed at multiple public hearings and direction was provided by City decision-makers to explore additional amendments to the program. In December 2023, the AUD Program was amended to change from a trial period with an expiration date into the City's permanent multi-unit housing program. Program HE-10 includes Zoning Ordinance and General Plan amendments to further amend aspects of the AUD Program or other non-AUD standards to continue to facilitate housing production for households of all income levels. Implementation of this program is linked to Program HE-8 described above and HE-12 described below.

Reasonably foreseeable parameters for the purposes of environment review are outlined below.

- **Amendments to the AUD Map.** Potential changes to where the AUD Program densities apply may include changing areas of the City where the Medium-High, High and Priority Housing Overlay applies. Note that the City cannot lower the density of sites identified in the Suitable Sites Inventory without making findings that the remaining sites can accommodate RHNA by each income category or identifying alternative sites with higher densities.
- **Amendments to Community Benefit Housing/Priority Housing Designations.** Community Benefit Housing provides development incentives for affordable housing, transitional/supportive housing, and priority housing. Priority housing is further defined as employer-sponsored housing, limited-equity housing, and rental housing. The incentives allow up to 63 du/ac within the Priority Housing Overlay and the ability to request a maximum building height of 60 feet in three nonresidential zones. Based on direction provided by the City Council, the program may refine which housing projects are considered a "Community Benefit" and eligible for the incentives. Ultimately, it is the goal of the City to incentivize deed-restricted affordable housing above and beyond market-rate housing. Strategies for accomplishing this will

be studied in Program HE-12 and Program HE-13, and once those affordable-housing incentives are implemented, further refinements to the AUD Program and the definition of “Community Benefit” can be considered.

- **Provide Flexibility and Increase Production.** The Planning Commission recommended future program changes such as round up density calculations, provide more flexible unit sizes, reduce parking requirements, revise the open yard requirement, and allow ownership units. Other options to address affordability, such as changing the inclusionary housing requirement and the City’s density bonus program, will be addressed in Program HE-12 and Program HE-13, described below. Recommendations to increase production include:

- 1) **Changing the Base Density in the Two-Unit Residential Zone (R-2).** The R-2 zone was not included in the City’s Average Unit-Size Density (AUD) Incentive Program and has seen relatively little development in recent years. Unlike the City’s other multi-unit and mixed-use zones, which allow two dwelling units on lots of at least 5,000 square feet, the R-2 zone requires a minimum lot size of 6,000 square feet for two units. This potential change would set the base density for all zones that allow housing development projects of two or more units to the same R-M base density standard as shown in Table 3-4 below to facilitate more units in the R-2 zone on parcels with a minimum lot size of 5,000 square feet.

For a baseline estimate of how many new units this may create, in the 10 years of the City’s Average Unit Size Density (AUD) program, only 13 housing projects were developed on lots between 5,000 and 5,999 square feet.

Table 3-4 Proposed Base Density Standard

Lot Size	
Less than 5,000 sq. ft. Net Lot Area	1 unit
5,000 to 6,999 sq. ft. Net Lot Area	2 units
7,000 and more sq. ft. Net Lot Area	3 units, or 12 dwelling units/acre, whichever is greater

- 2) **Increased Density Downtown.** This potential change would further concentrate new residential density in the city’s downtown area by removing density maximums for new residential and mixed-use housing projects and replacing it with density limited by the building envelope. No further changes are being considered at this time to the building envelope zoning standards, such as setbacks or height.

Program HE-11 Livable Neighborhoods

This program, as facilitated by the 2024–2028 Capital Improvement Program, includes investment in public infrastructure and facilities in historically underserved neighborhoods. The program prioritizes equity and livability in Project Study Areas (PSAs) comprised of neighborhoods containing higher concentrations of lower-income and racial/ethnic minority residents, such as Oak Park, Westside, West Downtown, Lower West, West Beach, Laguna, Lower East, Milpas, and the Eastside. Key strategies include:

- **Rental Housing Mediation Program.** This program offers mediation services to landlords, tenants, roommates, and neighbors citywide to promote housing stability.
- **State Street Master Plan.** This long-term design plan for State Street will revitalize the downtown corridor.

- **Infrastructure Maintenance and Rehabilitation.** This strategy prioritizes pedestrian, bike, and active transportation projects to improve safety and connectivity in the City’s PSA’s.
- **Public facilities, Parks and Neighborhood Improvements.** This program prioritizes public facility and park improvements eligible to receive Community Development Block Grants in low- and moderate income areas.
- **Electrification of Housing Stock.** This program provides incentives to facilitate building electrification in high-need areas to reduce energy costs and improve health outcomes.

The program aligns with adopted plans including the Pedestrian and Bicycle Master Plan, Vision Zero, MTD’s Transit Plan, and Climate Action Plan.

Program HE-12 Prioritize Deed-Restricted Affordable Housing

This program is linked to Program HE-10 with a focus to prioritize and encourage development of new deed-restricted affordable housing for extremely low-, very low-, low-, and moderate-income households in targeted areas of the city, particularly downtown and areas where transit is readily available. The program includes a feasibility study, incentives for projects on smaller sites (less than half an acre), consideration of a local preference policy, and implementation of water and sewer priority policy. This program will be more fully developed upon implementation, but absent specific changes, reasonably foreseeable parameters for the purposes of environment review are outlined below.

- **Study and Implement Zoning Ordinance Amendments.** The feasibility study will inform strategies to encourage and incentivize more deed-restricted affordable housing to exceed the percentage that otherwise would be required under inclusionary housing, local and state density bonus, or other state laws. Zoning ordinance amendments may include allowing higher densities, affordable income level flexibility, increased allowable height in targeted areas (up to the City’s Charter height limit); lower or no parking requirements; and reduced setbacks and open yard. Changes to the inclusionary housing ordinance will be studied but implemented separately under Program HE-13.
- **Small Sites Incentives.** The City will consider additional incentives for projects with affordable units on small sites (less than half an acre) including promoting lot consolidation, bonus density, graduated and higher densities, and concessions and modifications to development standards. The Suitable Sites Inventory identifies 175 available sites smaller than one half acre. Approximately 87 percent of all parcels zoned to allow housing in the city are less than one-half acre in size.

Approximately 859 lower income units are estimated to be permitted through the planning period.

Program HE-13 Evaluate Inclusionary Housing Ordinances

The City has an inclusionary housing ordinance (IHO) for certain types of 1) ownership housing (since 2004) and 2) rental housing (since 2019) to provide affordable units as part of housing development projects with options to pay an in-lieu fee in some cases. The program proposes to conduct a feasibility study to determine if the inclusionary requirement or in-lieu fee should be adjusted to produce a greater percentage of deed-restricted affordable housing units or in-lieu fee funds for affordable housing. The City will also review and amend the IHOs for consistency with “No Net Loss” law to ensure that any existing deed-restricted affordable units of other “Protected Units” proposed to be demolished as part of a new housing project are replaced in addition to the required

inclusionary units. Amendments to the IHOs will be proposed in accordance with the results of the feasibility study. Since the IHOs were approved in 2004 and 2019, approximately 21 ownership and 13 deed-restricted affordable units have been constructed and approximately 70 are pending in accordance with the IHOs. Strategies for the ordinance amendment include allowing a greater in-lieu fee payment instead of constructing an affordable unit, increased in-lieu fee rates and updates to calculation methods, and allowing a density bonus for additional deed-restricted affordable units.

Program HE-14 City Land Registry

The City will evaluate City-owned land (not including lands dedicated to parks and recreation purposes) including parking lots, to determine future needs and if the publicly-owned site could be donated, leased, or sold at a reduced price to develop affordable housing. Following the evaluation, the City will conduct ongoing outreach with affordable housing developers to gauge interest in the City-owned sites, develop partnerships with for-profit and non-profit developers to more efficiently produce the subsidies for affordable units, and prioritize sites for future development. Sites identified in this evaluation will be considered for inclusion in future Suitable Sites Inventories.

Program HE-20 Evaluate Hotel Zones

The City's Zoning Ordinance allows both hotel and multi-unit residential and mixed-use in approximately 9.3 percent of the city. In recent years, several projects initially proposed as multi-unit residential uses changed into hotel use, and a number of adaptive reuse projects have been converting commercial space to hotel/short-term rental uses, rather than residential. This has led to concern that the City's available sites for infill housing are not prioritized for multi-unit housing over hotel use. The City will monitor trends, review the zones that allow both hotels and residential use, and amend the Zoning Ordinance to prioritize residential uses over hotels by either requiring a conditional use permit for hotels, rezoning areas to reduce the conversion of residential uses to hotels, or other means as developed upon program implementation. It is anticipated that these changes would make it more likely that sites identified for housing will be developed for housing.

3.6 Required Discretionary Approvals

The City will use this Program EIR to evaluate the potential environmental impacts that could result from implementing the Housing Plan and accommodating residential growth anticipated to the year 2035 and implement mitigation measures that would address those impacts. Following recommendations from the Planning Commission to approve the Program EIR, the Santa Barbara City Council would need to certify the Final Program EIR and take the following subsequent discretionary actions:

- Adopt Housing Plan-related amendments to the Municipal Code, General Plan, Local Coastal Program, Master Environmental Assessment Guidelines, and other documents.

4 Environmental Impact Analysis

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

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

Approach to Environmental Impact Analysis

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

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

Following each environmental impact discussion is a list of mitigation measures, if required, and the residual effects or level of significance remaining after implementation of measures. In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed below under *Approach for Cumulative Analysis*.

Baseline and Cumulative Project Setting

Program EIR Baseline

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

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

Approach for Direct Impact Analysis

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

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

Approach for Cumulative Analysis

CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable, or which can compound or increase other environmental impacts.” Section 15130 of the CEQA Guidelines requires that an EIR evaluate environmental impacts that are individually limited but cumulatively considerable. These impacts can result from the proposed project alone, or together with other projects. The CEQA Guidelines, Section 15355 state:

The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

A cumulative impact of concern under CEQA occurs when the net result of combined individual impacts compounds or increases other overall environmental impacts (CEQA Guidelines, Section 15355). In other words, cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. CEQA does not require an analysis of incremental effects that are not cumulatively considerable nor is there a requirement to discuss impacts which do not result in part from the project evaluated in this Program EIR.

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

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

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

Table 4-1 Cumulative Residential Development Projects

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

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

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

* Indicates Builder's Remedy projects.

4.1 Aesthetics and Visual Resources

This section describes current visual conditions in and around the City of Santa Barbara and evaluates potential aesthetic and visual resource impacts associated with implementation of the Housing Plan, including impacts to scenic vistas, scenic resources, visual character and quality, and light and glare.

4.1.1 Environmental Setting

a. Existing Visual Conditions

As described in Section 2, *Environmental Setting*, the City of Santa Barbara is located on Santa Barbara County's South Coast, and the city limits extend into the Pacific Ocean. The majority of Santa Barbara is developed, with the densest development and largest buildings located within the City's downtown area. The primary arterial roadways in the city include U.S. Highway 101 (U.S. 101), U.S. Highway 192 (U.S. 192), and State Route 154 (SR 154). Views south of U.S. 101 include beaches, coastal bluffs, and the Mesa. North of U.S. 101, the downtown cityscape and the Santa Ynez Mountains and surrounding foothills, with single-unit residential development scattered in the Riviera on the lower elevations, provide a backdrop for the city. East of the City limits, Santa Barbara abuts the wooded, semi-rural community of Montecito, while to the west, suburban residential, commercial, and agricultural uses comprise Hope Ranch and the Goleta Valley. The city-owned and operated Santa Barbara Airport is located in the Goleta Valley, approximately eight miles west of the city proper. Most of the beaches and undeveloped coastal land along the southern edge of Santa Barbara and the foothills within northern Santa Barbara are designated as open space.

b. Scenic Resources

Scenic resources are important visual assets that form community identity. Scenic resources can be natural or man-made features such as trees, rock formations, historic buildings, and public art.

Important Visual Resources and Views

The City's Program Environmental Impact Report for the General Plan Update (General Plan EIR) identifies ridgelines and foothills; ocean, beach and harbor; and substantial open space areas as Important Visual Resources (City of Santa Barbara 2010). Surrounding steep hillsides, peaks, and rocky outcrops of the Santa Ynez Mountains contribute to the scenic quality of the city. Parks located in the foothills, such as Parma and Skofield Parks, support miles of scenic trails and provide views of the Pacific Ocean and City (City of Santa Barbara 2010). Three creek systems, Sycamore, Mission, and Arroyo Burro, provide natural corridors that contrast with existing urban development. Large groves of mature sycamore and oak trees along Sycamore and Mission Creeks provide contrast with developed areas of the City, and woodlands along Arroyo Burro Creek are important natural features in the San Roque, Hitchcock, and Hidden Valley neighborhoods. In addition, the City contains approximately 35,000 street trees, more than 9,000 public trees in developed parks and landscaped areas of public facilities, and around 30,000 trees within City-managed open spaces (City of Santa Barbara 2022a). These trees soften the appearance of buildings, roads, and parking lots which provide visual contrast to building masses in addition to pleasant scenery for residents, employees, and tourists. The City's tree inventory contains 456 different varieties of trees (City of Santa Barbara 2014). These include specimen trees which are identified by the City's Parks and Recreation Commission to be of high value because of their type, size, and/or age.

Santa Barbara's shoreline extends approximately seven miles from Montecito on the east to Hope Ranch on the west and includes beaches, some with existing residential and commercial developments. Public beaches and waterfront and blufftop parks allow for public access to the area's natural scenery, including wide, sandy beaches and steep coastal bluffs. The waterfront provides panoramic ocean and mountain views and the line of palm trees within Chase Palm Park contributes to the scenic character of the area.

Sweeping views of the city are available within certain neighborhoods and on certain public streets that are elevated within the foothills. The Riviera and Eucalyptus Hill neighborhoods, and the north side of the Mesa and TV Hill, offer views of the city, Pacific Ocean, and surrounding hillsides. Roads located within the foothills, such as Alameda Padre Serra and Mountain Drive, provide views of downtown and the Pacific Ocean.

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.

Scenic Highways

California's Scenic Highway Program designates scenic highways with the intention of protecting these corridors from change that would diminish the aesthetic value of adjacent lands. California Department of Transportation (Caltrans) defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Suitability for designations as a State scenic highway is based on the vividness, intactness, and unity of their view corridors, as described in Caltrans' Scenic Highway Guidelines (Caltrans 2008). A highway is designated as an eligible scenic highway when Caltrans determines that the roadway corridor qualifies for official status. An eligible scenic highway becomes officially designated when the local governing body applies to Caltrans for scenic highway approval, adopts a Corridor Protection Program (CPP), and receives notification that the highway has been officially designated (Caltrans 2018). According to the Caltrans California State Scenic Highway System Map, there is one officially designated scenic highway (SR 154) and one eligible scenic highway (U.S. 101) in the city (Caltrans 2018).

The City's General Plan Circulation Element contains the Scenic Highways Element which provides planning, design, and maintenance standards for roads within the city including Cabrillo Boulevard, and Sycamore Canyon Road. The Local Coastal Program identifies the segment of U.S. 101 within the Coastal Zone (from Mission Creek to Olive Mill Road) as providing a distinct visual gateway to the city with its landscaping, views of the mountains and ocean, and unique highway structures (City of Santa Barbara 2019). In addition, the Local Coastal Program recognizes Cabrillo Boulevard and Shoreline Drive for their visual qualities such the ability to view the Santa Barbara Channel and shoreline (City of Santa Barbara 2019).

c. Visual Character

The character-defining features of Santa Barbara vary within the City, generally dependent on building density, height, massing, location of buildings on a lot, lot size, architectural style, exterior colors and materials, and year in which the structures were built. Descriptions of areas that contribute to the visual character of Santa Barbara are provided below.

Downtown and El Pueblo Viejo Landmark District

The California Adobe, Monterey Revival, and Spanish Colonial Revival architectural styles are central to the visual character of the downtown and El Pueblo Viejo Landmark District. Traditional Mission-style architecture with low-lying, whitewashed stucco structures with outdoor courtyards, patios and arcade-styled arched passageways dominate the El Pueblo Viejo Landmark District. Downtown building heights are primarily two and three stories. The downtown area includes wide sidewalks, open courtyards with fountains and public seating, public art, and the absence of blank vertical facades. A substantial variety of mature street trees are also present within the downtown area which provide unique scenery.

Upper State Street Corridor

Upper State Street is a four-lane commercial corridor from Calle Crespis to U.S. 101 that is characterized by one to two story buildings, including banks, offices, and a regional shopping center. The south side of the street is characterized by a linear strip of shopping plazas with off-street parking between the sidewalk and buildings, two larger neighborhood shopping centers, and a regional mall. The north side of the street supports small individual shops built to the sidewalk, transitioning to two and three-story office and hotel uses to the northwest, and residential areas beyond. A substantial number of mature street trees are present along the corridor.

Haley and Gutierrez Street Corridors

Haley and Gutierrez Streets are east to west oriented one-way arterials that run for two miles from U.S. 101 to Milpas Street. These areas are characterized by one to two story buildings, with larger structures near the intersection with Chapala Street. Medium-density residential, light industrial, and service commercial uses are distributed throughout these streets. Sidewalks are generally five to eight feet wide and street trees are intermittent, with aboveground utility lines that run along the streets.

Milpas Street

Milpas Street is a four-lane commercial corridor that extends for 1.5 miles from the Santa Barbara Bowl to U.S. 101, and south to East Beach. The northern end of the corridor currently contains residential development northwest of Canon Perdido. The rest of the corridor supports one to two story, street-oriented businesses built to the sidewalk, and a couple of larger shopping areas with surface parking lots in front. Milpas Street contains intermittent street trees and supports pedestrian traffic from residents living in the surrounding neighborhoods accessing the areas shops and businesses. South of U.S. 101, Milpas Street passes through light industrial areas, the Cabrillo Ball Park, and ends at the ocean front hotel zone of East Beach.

Coast Village Road

Coast Village Road is located between Hot Springs and Olive Mill roads and is surrounded by the unincorporated community of Montecito. Buildings are generally one to two stories with a limited

number of three-story structures, including the historic Coast Village Inn. Coast Village Road contains intermittent street trees and has several multi-unit condominium and apartment complexes two to three stories tall on the north side with an unincorporated single-unit residential neighborhood beyond.

Residential Neighborhoods

As described in Section 2.2.2 of Chapter 2, *Environmental Setting*, Santa Barbara's 32 residential neighborhoods are generally organized into three neighborhood planning areas. Described fully in the *Environmental Setting*, these three planning areas are listed as follows:

- **Hillside Low Density Neighborhoods.** Includes the neighborhoods of Cielito, Foothill, Riviera, Eucalyptus Hill, Lower Riviera, Campanil, Bel Air, and Alta Mesa.
- **Low and Medium Density Neighborhoods.** Includes the neighborhoods of Hope, San Roque, East San Roque, Hidden Valley, Hitchcock, Samarkand, Eastside, Westside, Upper East, East Mesa, West Mesa, and Coast Village.
- **Medium and High Density Neighborhoods.** Includes the neighborhoods of Lower West, West Beach, East Beach, Lower East, Milpas, Oak Park, Laguna, West Downtown, Upper State, Waterfront, Downtown, and Lower State.

d. Light and Glare Conditions

Light and glare from indoor and/or outdoor uses can reduce visibility of the night sky, create potential hazards to drivers, and be a nuisance to residential areas. The City has typical light conditions found in developed areas (e.g., roadway lighting, commercial parking lot and building lighting, residential buildings, headlights from motor vehicles, decorative landscape lighting, lighted signs, and streetlights). Neighborhoods in the hillside, San Roque, and areas of the Mesa have minimized night lighting, providing views of the night sky. The most substantial nighttime illumination is generated by streetlights and commercial centers such as La Cumbre Plaza. Other sources of nighttime light include the State Street corridor and surrounding downtown, the Earl Warren Showgrounds, and sports fields/parks with nighttime lighting.

Sources of daytime glare include direct beam sunlight and reflections from building materials, paving materials, glass, and other shiny reflective surfaces. The primary source of mobile nighttime glare is generated from motor vehicle headlights. Spanish Colonial Revival architecture with deep window recesses, as well as wood and other non-reflective surfaces are largely present in the City's downtown area which minimizes glare. In addition, the City's Outdoor Lighting Ordinance reduces nuisance lighting by requiring outdoor lighting within and adjacent to residential zones to be designed, installed, and operated compatible with the ambient lighting of the neighborhood in which it is located (City of Santa Barbara 2022b; City of Santa Barbara 2010). 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.

4.1.2 Regulatory Setting

a. Federal Regulations

No current federal regulations address the environmental conditions surrounding the aesthetics or visual resources in the City.

b. State Regulations

California Coastal Act and California Coastal Commission

The California Coastal Act of 1976 (Public Resources Code Section 30000) and the California Coastal Commission, the State's coastal protection and planning agency, were established by voter initiative to plan for and regulate new development, and to create policies to protect public access to and along the shoreline. Section 30251, Scenic and Visual Qualities, of the Coastal Act mandates that scenic and visual qualities of coastal areas be considered and protected as resources of public importance. Pursuant to the Coastal Act, permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas designated in the Department of Parks and Recreation California Coastline Preservation and Recreation Plan (CCPRP) and by local government shall be subordinate to the character of its setting.

California Scenic Highway Program

Recognizing the value of scenic areas and view from roads in such areas, the State Legislature established the California Scenic Highway Program in 1963 (Streets and Highways Code Sections 260 et seq). This legislation preserves and protects scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. Under this program, a number of State Routes have been designated as eligible for inclusion as scenic routes. Once the local jurisdiction through which the highway passes have established a Corridor Protection Program (CPP) and the Departmental Transportation Advisory Committee recommends designation of the highway, the State may officially designate it as a scenic route. Scenic highways must have an approved CPP and remain in compliance to maintain scenic highway status. Interstate highways, State Routes, and county roads may be designated as scenic under the program.

California Public Resources Code Section 21099

California Public Resources Code Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site and within a transit priority area shall not be considered significant impacts on the environment. A transit priority area is defined by Section 21099(7) to mean "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 a Transportation Improvement Program or applicable regional transportation plan". Section 21099(2)(A) states that the subdivision created by Section 21099(d)(1) 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. Section 21099(B) states that aesthetic impacts do not include impacts on historical or cultural resources for the subdivision created by Section 21099(d)(1).

The lower State Street, downtown, most of west downtown and portions of surrounding neighborhoods are within two transit priority areas: the MTD Transit Center at 1020 Chapala Street and the Santa Barbara Amtrak Station at 209 State Street. Transit priority areas in Santa Barbara are shown in Figure 4.1-1.

Figure 4.1-1 Transit Priority Areas



c. Local Policies and Regulations

City of Santa Barbara General Plan

The City's General Plan contains several goals and policies related to aesthetics and visual resources within the Land Use Element, Circulation Element, and Environmental Resources Element.

The Land Use Element (2011) guides the physical and socioeconomic character of the City through environmental protection, nonresidential growth management, community design, and neighborhoods. The Land Use Element's goal related to aesthetics and visual resources is to protect and enhance the community's character with appropriately sized and scaled buildings, a walkable town, useable and well-located open space, and abundant, sustainable landscaping. Land Use Element policy LG12 aims to strengthen and enhance design and development review standards and process to enhance community character, promote affordable housing, and strive towards community sustainability principles. Possible implementation actions include preparing design overlay areas for specific areas of the City (LG12.1); developing building size, bulk, and scale standards, including floor area ratios and design guidelines to ensure that the proposed development would not eliminate or preclude preservation of visual assets (LG12.2); and developing multi-unit design guidelines to address unit sizes, setbacks, open space, landscaping, building size, bulk, and scale, and site planning (LG13) (City of Santa Barbara 2011a). Several of these actions have been or are being implemented, including adoption of Infill Design Guidelines in 2017 and Objective Design Standards for Streamlined Housing Projects in 2021 and adoption of Objective Design and Development Standards for multi-unit housing in 2025.

The Circulation Element (1997 with a several new goals, policies, and implementation actions in 2011) contains the Scenic Highways Element (1974) which provides goals for development, establishment, and protection of scenic highways. Within the City, State Route (SR) 154 is the only officially designated scenic highway and U.S. 101 is eligible for official designation. The Scenic Highways Element contain goals for the following potential State Scenic Highways, but the City has not pursued official designation:

- Cabrillo Boulevard (no longer a State Highway)
- Sycamore Canyon Road (SR 144) from Stanwood Drive (SR 192) to Mission Ridge Road where it intersects with Mountain Drive, and Mountain Drive to the Santa Barbara Mission on Los Olivos Street

The Scenic Highways Element also includes Shoreline Drive for potential designation as a Scenic Route, recommending landscaping on then vacant parcels that are now landscaped parking lots for the harbor, and on the City College parking lots on the north side of Shoreline Drive. It also recommends a speed limit lower than 30 miles per hour, which was accomplished along with reducing the street from two lanes to one lane on the portion of Shoreline Drive past Loma Alta (City of Santa Barbara 2011b). 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.

The Environmental Resources Element (2011), which includes the 1979 Conservation Element, addresses visual resources, including hillsides, shorelines, trees, and open space throughout the City. The Conservation Element's Scenic Resources Map specifically designates scenic resources as:

- Creeks (Mission, Arroyo Burro, San Roque, and Sycamore);
- Hillsides (slope of 30% or greater);
- Shoreline;
- Specimen and Street Trees; and
- Open Space (including Douglas Family Preserve, Montecito Golf Course, Andree Clark Bird Refuge, Clark Estate, Child's Estate, and the "Kim Nursery" property on the westside as significant areas of open space and/or visual features) and City Parks.

Most of these resources are mapped in the City as Visual Unique, Visual Hillside, and Visual Shoreline. Trees are not specifically mapped except for historic and specimen trees protected by the Municipal Code.

The Environmental Resources/Conservation Element incorporates goals and policies which intend to maintain the scenic character of the City. Implemented policies limit the alteration of natural topography and vegetation on hillsides, protect setback trees, limit the obstruction of scenic view corridors, and prevent degradation of creeks or their riparian environments (City of Santa Barbara 2011c). Aesthetic and Visual Resources possible implementation actions not yet implemented include ER29.1 to document important public views and prepare related development standards to protect views as seen from public viewpoints, ER29.5 to incorporate visual guidelines as part of project design and environmental review guidelines, and ER30.1 to establish a list of priority locations to underground as many overhead utilities in the City by 2030.

Local Coastal Program

The California Coastal Act requires all local governments located within the Coastal Zone to prepare a Local Coastal Program (LCP). LCPs regulate future development within the Coastal Zone and define where public access and urbanization will occur, where industrial facilities will be placed, and how sensitive species and habitats, open spaces, and recreational areas will be protected. The City is located within a Coastal Zone, and, as such, adopted a Coastal Land Use Plan (Coastal LUP) in 2019.

Chapter 4.3, *Scenic Resources & Visual Quality*, of the City's Coastal LUP addresses scenic resources and methods for evaluation of impacts and implements development standards to minimize scenic resource impacts and protect the visual quality of the Coastal Zone. The City's Coastal LUP standards include, but are not limited to, requiring site-specific visual evaluations for residential development, prohibiting obstruction of scenic view corridors, and requiring new development to be visually compatible with existing surrounding development (City of Santa Barbara 2019).

Chapter 6.2, *Highway 101*, addresses the visual quality of Highway 101 and references the Highway 101 Coastal Parkway Design Guidelines for review of aesthetics, design, compatibility, landscaping, and cultural resources for the Highway 101 corridor design district.

City Charter

The City's Charter authorizes the Architectural Board of Review or Historic Landmarks Commission to review and approve applications for building permits as specified by ordinance. The Charter also establishes the City's building height limitation of 30 feet in areas zoned for single unit and two-unit residences, 45 feet in areas zoned for three or more units, and 60 feet in areas zoned for industrial, manufacturing, and other commercial uses. The Council may, by ordinance, set up reasonable methods of measuring the heights set in the Charter. 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.

City of Santa Barbara Municipal Code

The City of Santa Barbara Municipal Code Title 28 and Title 30 (each referred to as the “Zoning Ordinance”) jointly implement land use designations established within the LCP and General Plan. While land use designations are more generalized in nature, the Zoning Ordinances and zoning maps provide specific controls on land use, density or intensity of development, and development standards to implement the City’s LCP and General Plan goals and policies. The Zoning Ordinances provide standards for protection of visual resources, compatible design, and illumination for new development associated with particular zoning. Title 28 and Title 30 establish height restrictions consistent with or more restrictive than the City Charter for both residential and non-residential development. The maximum height of 60 feet is only allowed for a Community Benefit Project or Community Benefit Housing Project which can only be approved with specific findings. Chapter 30.180 sets performance standards for buildings, including standards for glare reduction. Chapter 30.57 includes the design review process and standards for projects within Landmark District (LD) and Historic District (HD) overlay zones and subject to review and approval by the Historic Landmarks Commission.

Title 22 sets forth standards for development and construction throughout the City. Chapter 22.68 includes the design review process and standards for projects subject to the Architectural Board of Review and Chapter 22.69 includes the design review process and standards for projects subject to the Single Family Design Board. Standards for light and glare are implemented through Chapter 22.75 and all projects for which design review is required are reviewed for consistency with the City’s Outdoor Lighting Design Guidelines.

The Tree Preservation Ordinance in Chapter 15.24 prohibits the removal or alteration of Street Trees and other protected trees visible from the public right-of-way, without a permit.

Title 25, Objective Design and Development Standards (ODDS), implements the 6th Cycle Housing Element Program HE-7: Objective Design Standards. They are included as a new Title 25 of the Municipal Code to provide detailed objective design and development review standards and a process for developers seeking streamlined design review in accordance with State law. The ODDS apply to all areas of the city currently zoned for two or more residential units

Design Review Boards

The City’s Architectural Board of Review, Historic Landmarks Commission, and Single Family Design Board are responsible for ensuring applicable standards of design are maintained in Santa Barbara. The Architectural Board of Review is responsible for review and approval of all applications for commercial, industrial, and multi-unit residential, two-unit residential, or mixed-use development, with the exception of projects within the El Pueblo Viejo Landmark District or other landmark districts which fall under the purview of the City’s Historic Landmarks Commission. The City’s Single Family Design Board reviews visual compatibility for applicable single-unit projects (e.g., within Special Design Districts, new buildings or two or more stories or 17 feet or taller in height, and other triggers as described in Chapter 22.69) .The Architectural Board of Review and Historic Landmark Commission considers Project Compatibility Criteria when reviewing the design of a proposed project including whether the design of the project responds appropriately to established scenic public vistas. The Single Family Design Board makes neighborhood preservation findings that the development, including proposed structures and grading, preserves significant public scenic views of and from the hillside.

Design Guidelines

The City's Design Guidelines establish a set of goals, values, and qualities by which projects are evaluated in design review. The Design Guidelines provide detailed direction for specific areas and types of projects. Not all guideline techniques or approaches are appropriate or practical for every project. In cases where sets of multiple design guidelines apply, the guidelines are viewed as "layers" where the most specific guidelines take precedence. The Design Guidelines include several references to preserving public scenic vistas and views in terms of project compatibility with the existing environment. The City does not regulate private views.

While the guidelines listed below are mainly subjective, the City has adopted architectural design criteria for ADUs in the Title 28 and Title 30 Zoning Ordinances and Objective Design and Development Standards for multi-unit housing.

Board and Commission Guidelines: The Architectural Board of Review, Historic Landmarks Commission, and Single Family Design Board each have General Design Guidelines and Meeting Procedures documents. They are intended to clarify the goals and policies. Infill Design Guidelines were added to the HLC and ABR Guidelines in 2017. Other guidelines specific to residential development include the following:

- **El Pueblo Viejo (EPV) Landmark District Guidelines.** These guidelines clarify the design criteria and procedures for the EPV district.
- **Haley-Milpas Design Manual.** The purpose of these guidelines is to assist developers in the Haley-Milpas area to improve the appearance of their properties, provide a more human-scale and pedestrian environment, and encourage mixed-use.
- **Lower Riviera Special Design District Guidelines.** These guidelines direct development within and adjacent to the Bungalow District to be compatible with the existing architectural character.
- **Upper State Street Area Design Guidelines.** These guidelines describe different neighborhoods and provide guidance for compatibility and landscaping.
- **Urban Design Guidelines.** These apply to the urban grid to ensure that traditional design principles and pedestrian friendly design concepts are incorporated into development.
- **Single Family Residence Design Guidelines.** These guidelines assist the public in designing compatible single unit residential development.
- **Historic Resources Design Guidelines.** For owners of historic resources, these guidelines assist in development of successful alterations, additions, and new construction next to a historic resource.

The City also implements several building and site features guidelines which assist in ensuring development is compatible with the visual character of Santa Barbara, including Fence, Screen, Wall, Hedge Guidelines; and Outdoor Lighting Design Guidelines. These guidelines explain the application of Municipal Code standards for fences, screens, walls, and hedges; and itemize acceptable design standards for outdoor lighting installations throughout the City to avoid excessive glare.

4.1.3 Impact Analysis

a. Methodology and Significance Thresholds

The assessment of potential environmental impacts related to aesthetic and visual resources involves qualitative analysis that is inherently subjective in nature. Different viewers react to views and environmental conditions related to aesthetics differently. This evaluation measures the existing visual environment, described above, in comparison to the reasonably foreseeable physical changes that may result from implementation of the Housing Plan programs, analyzing the nature of the anticipated change. As a programmatic document, this Program EIR presents a regionwide assessment of residential growth and does not evaluate development proposals for individual projects.

The City's environmental checklist and Appendix G of the *CEQA Guidelines* state, except as provided in Public Resources Code Section 21099, that a project may have a significant adverse impact if it would:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway.
3. Substantially degrade the existing visual character or quality of public view of the site and its surroundings (Public view are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.
4. 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.

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.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project have a substantial adverse effect on a scenic vista?
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Impact AES-1 THE HOUSING PLAN WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA. COMPLIANCE WITH EXISTING MUNICIPAL CODE STANDARDS AND GENERAL PLAN/ COASTAL LAND USE PLAN POLICIES WOULD ENSURE THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The City has designated ridgelines and foothills; ocean, beach, and harbor; and substantial open space areas identified as Important Visual Resources (City of Santa Barbara 2010).

The Housing Plan programs prioritize new residential development in mixed-use zones downtown and along transit corridors, which are typically already developed and not in areas identified as Important Visual Resources. Individual projects would continue to be subject to applicable design guidelines, the Santa Barbara Municipal Code, zoning standards, and applicable General Plan and Coastal LUP policies.

Under Public Resources Code Section 21099, residential development in transit priority areas is not considered a significant visual impact pursuant to CEQA. However, these projects in transit priority areas must still comply with City policies and undergo design review, as Public Resources Code Section 21099 does not alter or limit the ability of the City to enforce local design ordinances. Some residential development enabled by Housing Plan programs may be subject to ministerial and administrative processes such as AB 130 (2025) but would still undergo zoning plan check or design review per City Council adopted objective standards. Other projects may require discretionary design review. At a minimum, development must generally demonstrate compliance with local zoning requirements. Projects that qualify under the “builder’s remedy” provisions of the Housing Accountability Act would still be subject to project-specific CEQA review if discretionary approval is triggered.

The Housing Plan programs do not propose changes to the height restrictions established in the City’s Charter and Municipal Code Title 28 and Title 30 (City of Santa Barbara 2022b). Although residential development may cause a change in existing views, existing City building height requirements limit the potential for new residential development to substantially obstruct scenic vistas beyond what is permitted by the City. State density bonus projects have the ability to request height waivers; however, any potential impacts from such development is speculative and would be reviewed on a case-by-case basis when an application is submitted to the City.

Figure 2-4 in Section 2, *Environmental Setting*, shows the City’s inland land use map, including residential areas of Santa Barbara characterized as “Hillside” (Low Density Residential, up to three du/ac), portions of which are considered important visual resources. The Housing Plan programs do not change the existing development potential in the “Hillside” areas.

Programs within the Housing Plan would be developed to be consistent with the Coastal LUP and related visual resource policies. New residential development requiring a Coastal Development Permit is required to adhere to Coastal LUP policies to minimize potential impacts to scenic vistas.

- LUP Policy 4.3-6 aims to preserve views of Important Visual Resources by prohibiting new development that would obstruct public scenic view corridors of scenic resources, including those of the ocean viewed from the shoreline and of the upper foothills and mountains viewed respectively from the beach and lower elevations of the City (City of Santa Barbara 2019).
- LUP Policy 4.3-5 requires new development to be sited and designed to avoid impacts to public scenic views, and requires the City to approve project alternatives that would result in the least adverse impact to views if there is no feasible alternative that can avoid impacts to public scenic views (City of Santa Barbara 2019).
- LUP Policy 4.3-8 states that project alternatives, including re-siting or reducing the height or bulk of structures if feasible, is preferred over landscape screening as a means of mitigation (City of Santa Barbara 2019).

Residential development in accordance with implementation of the Housing Plan programs may result in an increase in residential density in some areas of the city, which has the potential to change views. However, individual development projects would be required to be consistent with

existing Municipal Code requirements, design review guidelines, and other applicable City regulations that would limit the potential for new residential development to substantially impact views of Important Visual Resources in the city. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 2: Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact AES-2 THE HOUSING PLAN WOULD NOT SUBSTANTIALLY DAMAGE SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY. COMPLIANCE WITH EXISTING DESIGN REVIEW GUIDELINES, MUNICIPAL CODE STANDARDS, AND GENERAL PLAN/ COASTAL LAND USE PLAN POLICIES WOULD ENSURE THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

According to the Caltrans California State Scenic Highway System Map, there is one officially designated scenic highway (SR 154) and one eligible scenic highway (U.S. 101) in the City (Caltrans 2018). State Route 154 is only within a small section of the northwest city limits. The Coastal LUP identifies the segment of U.S. 101 within the Coastal Zone (from approximately Olive Mill Road to Bath Street) as providing a distinctive visual gateway to the community (City of Santa Barbara 2019). However, due to existing walls and vegetation lining U.S. 101 and the speed at which vehicles travel on U.S. 101, scenic resources are obscured and only visible for a short, temporary period. The majority of residential development facilitated by the Housing Plan is anticipated to be infill development within urban areas and on previously developed sites, with limited visibility along State Routes.

In addition to City-wide programs and policy restrictions, residential development in the Coastal Zone is required to adhere to Coastal LUP policies to protect scenic resources along the eligible segment of U.S. 101. These policies would be compatible with programs within the Housing Plan.

Development facilitated by Housing Plan implementation would also be required to be consistent with the City of Santa Barbara Tree Preservation Ordinance within Chapter 15.24 of the Municipal Code. Continued implementation of this ordinance would ensure the protection of scenic trees visible from the public right-of-way.

Compliance with applicable Municipal Code requirements, design review guidelines, the General Plan, and the Coastal LUP would ensure that residential development would not substantially damage scenic resources within a state scenic highway. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3: Would the project substantially degrade the existing visual character or quality of public view 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?

Impact AES-3 THE HOUSING PLAN WOULD NOT SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF PUBLIC VIEWS IN A MANNER THAT WOULD CONFLICT WITH APPLICABLE ZONING AND OTHER REGULATIONS GOVERNING SCENIC QUALITY. COMPLIANCE WITH EXISTING MUNICIPAL CODE STANDARDS AND DESIGN REVIEW PROCEDURES WOULD ENSURE THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The City of Santa Barbara is an urbanized area (as defined in CEQA Guidelines Section 15387, as a city with a population of 50,000 or more). Distinct architectural styles, such as the California Adobe, Monterey Revival, and Spanish Colonial Revival are central to the city's visual character (City of Santa Barbara 2010).

The Housing Plan programs may result in an increase in residential density compared to existing conditions in some areas, such as the La Cumbre Plaza Planning Area, areas within the Priority Housing Overlay, and transit priority areas. Increased residential density, including development up to the City's zoning and Charter height limits, and massing as compared to the existing setting, may alter the visual character of portions of the city. 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. Implementation of zoning standards, design review guidelines, or applicable General Plan and Coastal LUP policies would minimize or avoid adverse effects.

Under Public Resources Code Section 21099, aesthetic and parking impacts resulting from new developments within a transit priority zone are exempt from being considered significant under CEQA for any project that would be considered a residential development, mixed-use development, or employment center. According to the California Public Resources Code Section 21099(a)(7), a transit priority area means an area within one-half mile of a major transit stop that is existing or planned (refer to Figure 4.1-1). Forecasted development under the Housing Plan would be primarily infill, and residential mixed-use developments would be encouraged in proximity to existing transit and established transit priority areas. If a project is located within a transit priority area, it would continue to be subject to local design review processes and guidelines, as Public Resources Code Section 21099 does not limit the City's authority in this regard.

Residential development that requires discretionary review, would be evaluated for consistency with adopted design guidelines by the Architectural Board of Review (ABR), Historic Landmarks Commission (HLC), or Single Family Design Board (SFDB). Together, these boards and commissions evaluate development plans for discretionary projects prior to the issuance of building or grading permits. These boards and commissions also consider and review consistency with the City's design guidelines and criteria; architectural character of the surroundings; appropriate size, mass, bulk, height, and scale; sensitivity to adjacent landmarks and historic resources; public views of the ocean and mountains; and use of open space and landscaping. Their responsibilities include evaluation of exterior color, landscape plans, accessory buildings, and minor zoning changes. This ensures development aligns with the local visual character. 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.

The Housing Plan Program HE-1 would facilitate the conversion of non-residential buildings to residential uses. Development projects enabled by this program would continue to be subject to Municipal Code regulations and would not result in a change to the building height or massing beyond minimal additional development allowed within the current zoning envelope. If exterior alterations are proposed, projects under Program HE-1 would be subject to applicable design guidelines and review by the applicable Board or Commission.

The Housing Plan Program HE-7 supports the development of City-wide ODDS for multi-unit housing development projects. These standards would provide alternatives to discretionary design review processes to accommodate infill development in existing neighborhoods and are intended to apply to all areas of the City that are zoned for two or more units. The ODDS were adopted in February 2025 and include objective standards for building types, massing, form, and architectural style intended to ensure appropriately scaled infill residential and mixed-use development that promotes high quality community design compatible with existing neighborhoods and historic resources. Further, the ODDS include additional massing and height requirements that limit height on portions of corner parcels to preserve public views along street corridors. Projects using the objective design review process, including potential future development in the R-2 zone or downtown buildings, would be limited to ministerial determinations of compliance with the objective standards. Project applicants who opt-in to using the ODDS would continue to be required to abide by other applicable objective Municipal Code standards.

Housing Plan programs may facilitate an increased amount of mixed-use and multi-unit residential development. Larger, discretionary projects would continue to be subject to design review (City of Santa Barbara 2022c). For these projects, mandatory compliance with existing review procedures, policies, guidelines, and design standards would ensure that reasonably foreseeable development under the Housing Plan would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, or conflict with applicable zoning and other regulations governing scenic quality. For smaller development projects approved administratively, compliance with the Santa Barbara Municipal Code and zoning standards would ensure that development is generally compatible with the size and scale of the surrounding built environment. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 4: Would the project 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?

Impact AES-4 THE HOUSING PLAN WOULD NOT CREATE NEW SOURCES OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT SURROUNDING AREAS OR IMPORTANT PUBLIC DAY OR NIGHTTIME VIEWS IN THE AREA. COMPLIANCE WITH EXISTING MUNICIPAL CODE STANDARDS AND DESIGN REVIEW PROCEDURES WOULD ENSURE THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development forecasted in accordance with the Housing Plan programs would primarily occur in urbanized areas with existing sources of light and glare. New sources of light (security lighting,

parking lot lighting, ornamental lighting, lighting from ground floor storefronts, and signs) would increase overall lighting levels in areas where residential development is forecasted to occur.

The city is characterized by existing residential, commercial, and other land uses that already generate high ambient levels of nighttime lighting, and any additional sources of lighting from reasonably foreseeable residential development under the Housing Plan would be incremental. Residential development would be required to comply with all applicable provisions of the City's Municipal Code, including Chapter 22.75 which sets outdoor lighting requirements to preserve and enhance the unique qualities of Santa Barbara's residential neighborhoods and its visual environment (City of Santa Barbara 2022b). Section 22.75.030 prohibits specific lighting fixtures that are mounted to aim light toward a property line, mounted to illuminate a roof or awning, mounted in a way that is distracting to motorists, among other restrictions. Section 22.75.050 requires projects subject to design review to be reviewed for consistency with the City's Outdoor Lighting Design Guidelines (City of Santa Barbara 2022b).

Glare is a common occurrence in the city, primarily due to the high number of days per year with direct sunlight and the highly urbanized nature of the city. Daytime glare can result from sunlight reflecting off glass, other structural fixtures of buildings, and windshields of parked and moving vehicles within the roadways in the city. Development forecasted in accordance with the Housing Plan would be required to comply with Section 30.180.070 of the Municipal Code, which states that no use shall be operated such that significant, direct glare, incidental to the operation of the use is visible beyond the boundaries of the lot where the use is located. Title 30 and Title 22 states that any project involving exterior lighting with apparent potential to create significant glare on neighboring parcels is required to undergo a noticed design review hearing (City of Santa Barbara 2022b). Section 22.75.060 sets standards to control nuisance lighting and glare in and adjacent to residential zones through enforcement measures applied by the Community Development Department. Such measures could include the preparation and implementation of a professional lighting plan, and control through the use of vegetation, or use of appropriate shielding.

The ODDS (Program HE-7) includes standards to reduce light pollution, glare, and light trespass including requirements that all exterior lighting shall be designed, located, and lamped with the light directed downward and that glass guardrails for rooftop decks be treated to reduce glare.

Exterior lighting installed for residential development would be regulated by the energy efficiency standards of Title 24 of the California Code of Regulations which includes, but is not limited to, installation of automatic shutoff lights. Reasonably foreseeable development under implementation of the Housing Plan programs would not 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. Therefore, potential light and glare impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.1.4 Cumulative Impacts

Regional cumulative impacts consider the city-wide impacts together with similar impacts of reasonably anticipated regional projects/programs including the City's Safety Element Update, Open Space Element Update, the City's State Street Master Plan, and the California Department of Transportation's (Caltrans') South Coast Highway 101 High-Occupancy Vehicle Lanes project. Cumulative projects also include planned and pending residential development projects that

contribute to the City's RNHA. The general approach to cumulative impact analysis used in this Program EIR is discussed in Section 4, *Environmental Impact Analysis*.

Cumulative development would contribute to the gradual change in the City's urban character, incrementally contributing to regional urbanization and altering the aesthetic character of the City. While additional development within the City may result in new structures with increased height, massing and density, cumulative impacts would be minimized through existing zoning and height restrictions, design guidelines and design review processes overseen by HLC, ABR, and SFDB, and ODDS for applicable multi-unit developments. These local regulations are in place to ensure infill development is compatible with the surrounding neighborhood.

Forecasted growth in the Cities of Santa Barbara and Goleta and in the County encourage infill development, prioritizing new medium- and high-density housing near existing transportation corridors. Given the predominantly developed nature of the region, extensive protected open space in and around the city, and existing zoning standards to ensure appropriate siting, massing, and building envelope for structures, visual changes from increased residential development would not result in sprawling land development patterns. Consequently, the potential to substantially degrade the existing visual character or scenic quality of the city would not result in a cumulatively significant impact.

Ongoing new multi-unit and mixed-use residential development would have the potential to alter views. However, existing development review procedures in compliance with the Municipal Code, design review requirements, and the ODDS (Program HE-7) would substantially reduce potential impacts to scenic views from reasonably foreseeable residential development forecasted in accordance with the Housing Plan. As a result, the Housing Plan programs would not result in a cumulatively considerable impact to regionally important views or vistas.

Residential development forecasted in accordance with implementation of the Housing Plan programs would introduce new sources of light and glare that would contribute to a cumulative increase in sources of light and glare. However, new sources of light and glare would be introduced primarily within urbanized areas where sources of light and glare exist, thereby minimizing the introduction of sources of light and glare that could affect day or nighttime views. The City's Municipal Code sets standards to control nuisance lighting and glare in and adjacent to residential zones. Reasonably foreseeable future residential development would be required to comply with all applicable State and local regulations concerning the protection of visual resources and minimization of light and glare generating sources. Consequently, the potential to create a new source of substantial light or glare in the city which would adversely affect surrounding areas or important public day or nighttime views would not result in a cumulatively significant impact.

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4.2 Air Quality

This section describes the existing environmental conditions and regulatory setting for air quality in the city and assesses the potential impacts the Housing Plan could have on air quality standards and implementation of the local air quality plan.

4.2.1 Environmental Setting

a. Climate and Meteorology

The City of Santa Barbara is located in the South Central Coast Air Basin (SCCAB), which includes San Luis Obispo, Santa Barbara, and Ventura counties. The Santa Barbara County portion of the SCCAB is under the jurisdiction of the Santa Barbara County Air Pollution Control District (SBCAPCD).

Geographic features that influence Santa Barbara's air quality include the Santa Barbara Channel (Pacific Ocean) to the south, and the east-west trending Santa Ynez Mountains to the north, with elevations up to 4,707 feet. The regional climate in the SCCAB is Mediterranean and is characterized by warm summers and mild winters with relatively dry weather. The annual precipitation is 17.7 inches on average, with most (95 percent) occurring during the rainy season, which generally spans October through April. The warmest month is August, and the coolest month is January (Western Regional Climate Center 2016).

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

Wind patterns can link Santa Barbara and Ventura counties with the more polluted air of the South Coast Air Basin (Los Angeles area). Air pollutants generated in the South Coast Air Basin can be blown offshore then carried to other coastal cities such as Santa Barbara. In addition, some pollution is transported from the San Fernando Valley to Ventura County, then into Santa Barbara. The prevailing winds passing through the City do not increase ground-level ozone (smog), and generally serve to transport pollutants offshore. However, atypical wind flow patterns can transport pollutants generated in other areas, such as Los Angeles, into the SCCAB (City of Santa Barbara 2010).

b. Sources of Air Pollution

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

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. 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).
- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

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

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

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

c. Air Pollutants of Primary Concern

The federal and state Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for “criteria pollutants” and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, reactive organic compounds (ROC)/reactive organic gases (ROG),¹ nitrogen oxides (NO_x), particulate matter with diameters of up to ten microns (PM₁₀) and up to 2.5 microns (PM_{2.5}), sulfur dioxide (SO₂), and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROC and NO_x. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). The characteristics, sources and effects of criteria pollutants are discussed in the following subsections. The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

Ozone

Ozone is produced by a photochemical reaction (triggered by sunlight) between NO_x and ROC/ROG are composed of non-methane hydrocarbons (with some specific exclusions), and NO_x is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and nitrogen dioxide. NO_x are formed during the combustion of fuels, while ROC are formed during combustion and evaporation of organic solvents. As a highly reactive molecule, ozone readily combines with many different components of the atmosphere. Consequently, high levels of ozone tend to exist only while high ROC and NO_x levels along with abundant sunshine are present to sustain the ozone formation process. Once the precursors have been depleted, ozone levels rapidly decline. Because

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

these reactions occur on a regional rather than local scale, ozone is considered a regional pollutant. In addition, because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans, including changes in breathing patterns, reduction of breathing capacity, increased susceptibility to infections, inflammation of lung tissue, and some immunological changes (USEPA 2022a). Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

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

Nitrogen Dioxide

Nitrogen dioxide is a by-product of fuel combustion; the primary sources are motor vehicles and industrial boilers and furnaces. The principal form of NO_x produced by combustion is nitric oxide, but nitric oxide reacts rapidly with the oxygen in the air to form nitrogen dioxide, creating the mixture of nitric oxide and nitrogen dioxide commonly called NO_x . Nitrogen dioxide is an acute irritant that can aggravate respiratory illnesses and symptoms, particularly in sensitive groups (SCAQMD 1993 and 2005; USEPA 2021). A relationship between nitrogen dioxide and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility (USEPA 2022c). It can also contribute to the formation of PM_{10} and acid rain.

Sulfur Dioxide

Sulfur dioxide is included in a group of highly reactive gases known as “oxides of sulfur.” The largest sources of sulfur dioxide emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of sulfur dioxide emissions include industrial processes such as extracting metal from ore and the burning of fuels with a high sulfur content by locomotives, large ships, and off-road equipment. Sulfur dioxide is linked to a number of adverse effects on the respiratory system, including aggravation of respiratory diseases, such as asthma and emphysema, and reduced lung function (USEPA 2022d).

Particulate Matter

Suspended atmospheric PM₁₀ and PM_{2.5} is comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. Both PM₁₀ and PM_{2.5} are directly emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. Particulate matter is also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with PM₁₀ and PM_{2.5} can be very different. PM₁₀ is generally associated with dust mobilized by wind and vehicles while PM_{2.5} is generally associated with combustion processes as well as formation in the atmosphere as a secondary pollutant through chemical reactions. Due to its small size, PM_{2.5} is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems (CARB 2020a). More than half of PM_{2.5} that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance. Suspended particulates can also reduce lung function, aggravate respiratory and cardiovascular diseases, increase mortality rates, and reduce lung function growth in children (CARB 2022a).

Lead

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

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about 1/70th the diameter of a human hair) and thus is a subset of PM_{2.5}. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2022b). Particulate matter emitted from diesel engines contributes more than 70 percent of the air emission cancer risk associated with the on-road heavy-duty sector within the SCAB (SCAQMD 2017).

TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC

impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

d. Current Air Quality

The Santa Barbara County portion of the SCCAB is designated nonattainment for the CAAQS for ozone and PM₁₀. The SBCAPCD operates a network of air quality monitoring stations throughout the SCCAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the NAAQS and CAAQS. There is one monitoring station within the City, located at 700 East Canon Perdido Street. However, NO₂ and SO₂ data is not available from the 700 East Canon Perdido Street monitoring station; therefore, data for these pollutants has been taken from the next closest available monitoring stations, which are the Carpinteria-Gobernador Road station for NO₂ located ten miles east of the City and the Lompoc-H Street station located 40 miles west of the City. No data was available for CO or lead at any monitoring sites within the SCCAB.

Table 4.2-1 summarizes the representative annual air quality data for all criteria pollutants for the nearest local monitoring stations using available data for 2019 through 2021. As shown in Table 4.2-1, the eight-hour ozone CAAQS and NAAQS were exceeded in 2021. Daily exceedances of the CAAQS for PM₁₀ occurred in 2021, 2022, and 2023. All other CAAQS and NAAQS were not exceeded at these monitoring stations from 2021-2023.

Table 4.2-1 Annual Ambient Air Quality Data

Pollutant	2021	2022	2023
Ozone (ppm), Worst 1-Hour ¹	0.082	0.077	0.071
Number of days above CAAQS (>0.09 ppm)	0	0	0
Number of days above NAAQS (>0.12 ppm)	0	0	0
Ozone (ppm), Worst 8-Hour Average ¹	0.072	0.069	0.068
Number of days above CAAQS (>0.070 ppm)	1	0	0
Number of days above NAAQS (>0.070 ppm)	1	0	0
Carbon Monoxide (ppm), Highest 8-Hour Average	*	*	*
Number of days above CAAQS or NAAQS (>9.0 ppm)	*	*	*
Nitrogen Dioxide (ppm), Worst 1-Hour ¹	0.062	0.024	0.034
Number of days above CAAQS (>0.180 ppm)	0	0	0
Number of days above NAAQS (>0.100 ppm)	0	0	0
Sulfur Dioxide (ppm), Worst Hour ¹	0.005	0.036	0.002
Number of days above CAAQS (>0.25 ppm)	0	0	0
Number of days above NAAQS (>0.075 ppm)	0	0	0
Particulate Matter ≤10 microns (mg/m ³), Worst 24 Hours ¹	73	73	108
Number of days above CAAQS (>50 mg/m ³)	*	*	*
Number of days above NAAQS (>150 mg/m ³)	*	*	*
Particulate Matter ≤2.5 microns (mg/m ³), Worst 24 Hours ¹	20.2	20.7	32.6
Number of days above NAAQS (>35 mg/m ³)	0	0	0

Pollutant	2021	2022	2023
Lead (mg/m ³), 3-Month Average	*	*	*
Number of days above NAAQS (>0.15 mg/m ³)	*	*	*

ppm = parts per million; µg/m³ = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard

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

¹ Data presented represents the worst measurement of the five air quality monitoring stations in Santa Barbara County utilized by USEPA.

* Insufficient data to determine value.

Source: CARB 2025 and USEPA 2025

e. Sensitive Receptors

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

Sensitive receptors are located throughout the city, and some are located near existing stationary sources. For example, residential areas west of Milpas Street, south of Cota Street, and east of State Street are interspersed with auto body shops, gas stations, and businesses that use solvents. In addition, land uses in the lower State Street area south of Sola Street features a high density of internal combustion engines, surface coating operations, and other sources of air pollution. The area north of the Santa Barbara Airport also has a high density of facilities using solvents, internal combustion engines, and other sources of air pollution. However, such heavy commercial and light industrial uses are regulated by SBCAPCD permits to minimize emissions and reduce potential for such conflicts. City building codes also provide for separation between residential and non-residential uses where new permits are considered.

CARB's *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways* (2017) suggests that sensitive receptors located within 1,000 feet could be adversely impacted by poor air quality. CARB recommends strategies to reduce exposure to diesel particulates, including the use of indoor filtration systems (CARB 2017). SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (2022) provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SBCAPCD recommends policies which require designing residential projects to orient sensitive receptors 500 feet away from the freeway to reduce potential health impacts (SBCAPCD 2022a).

4.2.2 Regulatory Setting

a. Federal Regulations

Federal Clean Air Act

The Federal CAA governs air quality in the United States. The CAA is administered by USEPA at the federal level, CARB at the state level, and by the Air Quality Management Districts at the regional and local levels. The CAA of 1970 and the CAA Amendments of 1971 required the USEPA to establish the NAAQS, with states retaining the option to adopt more stringent standards or to include other specific pollutants. On April 2, 2007, the Supreme Court found that CO₂ is an air pollutant covered by the CAA; however, no NAAQS have been established for CO₂.

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

Construction Equipment Fuel Efficiency Standard

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

b. State Regulations

California Clean Air Act

The California CAA allows the state to adopt ambient air quality standards and other regulations provided that they are at least as stringent as federal standards. CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California, including setting the CAAQS. CARB also conducts research, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB also has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the federal government and the local air districts.

c. Local Regulations

SBCAPCD 2022 Ozone Plan

As the local air quality management agency, the SBCAPCD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the SCCAB is classified as being in “attainment” or “nonattainment.” In areas designated as non-attainment for one or more air pollutants, a cumulative air quality impact exists for those air pollutants, and the human health impacts described in Section 4.2.1 (c), *Air Pollutants of Primary Concern*, are already occurring in that area as part of the environmental baseline condition.

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

City of Santa Barbara General Plan

Policies and actions pertaining to air quality and included in the Land Use and Circulation Elements are as follows (City of Santa Barbara 2011):

Land Use Element

- **Policy LG4: Principles for Development.** Establish the following Principles for Development to focus growth, encourage a mix of land uses, strengthen mobility options and promote healthy active living:
 - **Focus Growth.** Encourage workforce and affordable housing within a quarter mile of frequent transit service and commercial services through smaller units and increased density, transit resources, parking demand standards, targeted infrastructure improvements, and increased public areas and open space. Incorporate ideas as a result of an employee survey.
 - **Mix of Land Uses.** Encourage a mix of land uses, particularly in the Downtown to maintain its strength as a viable commercial center, to include retail, office, restaurant, residential, institutional, financial and cultural arts, encourage easy access to basic needs such as groceries, drug stores, community services, recreation, and public space.
 - **Mobility and Active Living.** Link mixed-use development with main transit lines; promote active living by encouraging compact, vibrant, walkable places; encourage the use of bicycles; and reduce the need for residential parking.

- **Policy LG6: Location of Residential Growth.** Encourage new residential units in multi-family and commercial areas of the city with the highest densities to be located in the Downtown, La Cumbre Plaza/Five Points area and along Milpas Street.

Circulation Element

- **Policy C1: Transportation Infrastructure Enhancement and Preservation.** Assess the current and potential demand for alternative transportation and where warranted increase the availability and attractiveness of alternative transportation by improving related infrastructure and facilities without reducing vehicle access.
- Possible Implementation Actions to be Considered
 - **Action C1.1: Pedestrian and Bicycle Infrastructure.** Emphasize high quality public right-of-way infrastructure to include enhanced pedestrian and bicycle facilities.
 - **Action C1.2: Personal Transportation.** In partnership with private interests, promote and provide incentives including the provision of funding, for shared-cost personal transportation options such as car-sharing and bike-sharing to increase personal mobility, reduce air pollution and greenhouse gas emissions, reduce parking demand, and decrease cost of transportation to individuals.
 - **Action C1.3: Intermodal Connections.** Improve intermodal connections for public transit, car pools, carshare or bikeshare programs, bicycle, and pedestrian routes. Provide intermodal connectivity at transit accessible centers, including the train depot, to support sustainable commute options such as feeder shuttles, bicycle storage facilities, bike-sharing, and car-sharing.
- **Policy C2: Regional Transportation and Commuter Transit.** Coordinate regionally with agencies and the private sector to establish viable rail, bus, and carpooling options for commuters, and create an energy efficient regional transportation network.
- Possible Implementation Actions to be Considered
 - **Action C2.1: Regional Transportation Networks.** Actively pursue regional transportation solutions through SBCAG to address regional transportation needs, in conjunction with regional housing and development patterns that are responsive to the requirements of AB 32 and SB 375.

City of Santa Barbara Municipal Code

- Municipal Code Chapter 22.65 applies to any property located within 250 feet of United States Route 101 (U.S. 101) as measured from the outer edge of the nearest highway travel lane. Chapter 22.65 sets standards for the development of residential uses and other sensitive land uses within 250 feet of U.S. 101, including building orientation, implementation of vegetative screening, and implementation of air infiltration systems. Chapter 22.65 permits the Community Development Director or their designee to grant approval for residential uses and other sensitive land uses within 250 feet of U.S. 101 if project design features satisfactorily address air quality risks.

SBCAG 2050 RTP/SCS

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

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

SBCAPCD Regulations

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

Regulation II, Rule 206 (Conditional Approval of Authority to Construct or Permit to Operate)

This rule governs the construction and operation of any new, modified, or reevaluated source for which a permit is required, subject to specified written conditions. Such conditions are for the purpose of ensuring that construction and operation of the source complies with all applicable local, state, and federal air quality laws, rules, and regulations.

Regulation III, Rule 303 (Nuisance)

This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material in violation of Section 41700 of the Health and Safety Code which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety or any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.

Regulation III, Rule 323 (Architectural Coatings)

This rule governs the manufacture, distribution, and sale of architectural coatings and limits the reactive organic gases content in paints and paint solvents. Although this rule does not directly apply to the project, it does dictate the ROG content of paint available for use during the construction.

Regulation III, Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities)

This rule applies to any activity associated with construction or demolition of a structure or structures. Activities subject to this regulation are also subject to Rule 302 (Visible Emissions) and Rule 303 (Nuisance).

Regulation VIII, Rule 802 (New Source Review)

The purpose of New Source Review is to provide for the review of new and modified stationary sources of air pollution and provide mechanisms by which Authorities to Construct for such sources may be granted without interfering with the attainment or maintenance of any ambient air quality standard, preventing reasonable further progress towards the attainment or maintenance of any ambient air quality standard and without interfering with the protection of areas designated attainment or unclassifiable. This rule applies to any applicant for a new or modified stationary source which emits or may emit any affected pollutant.

4.2.3 Impact Analysis

a. Methodology and Significance Thresholds

This analysis follows the guidance and methodologies recommended in the CEQA Appendix G thresholds and SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (2022b).

Appendix G of the *CEQA Guidelines* states a project may have a significant adverse impact if it would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
3. Expose sensitive receptors to substantial pollutant concentrations; and/or
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Plan Consistency and Regional Criteria Pollutant Emissions

Consistency with land use and population forecasts in local and regional plans, including the 2022 Ozone Plan (previously known as the Clean Air Plan), is required under CEQA for all projects. As SBCAPCD has not established quantitative thresholds related to criteria pollutant release for plan-level documents, the Housing Plan's potential impacts related to the release of criteria air pollutants are evaluated based on its consistency with the 2022 Ozone Plan which addresses SBCAPCD's progress toward attaining federal and state standards for criteria pollutants for which the SCCAB is currently in nonattainment.

The 2022 Ozone Plan relies primarily on the land use and population projections provided by SBCAG and CARB on-road emissions forecast as a basis for vehicle emission forecasting (SBCAPCD 2022b). The 2022 Ozone Plan uses SBCAG's Countywide Regional Transportation Demand Model for on-road mobile source emissions estimates and SBCAG's socio-economic projections contained in the most recent RTP-SCS to form the basis for some stationary and area source growth forecasts.

The SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* states that any general plan amendment that would provide for increased population growth above that forecasted in the most recently adopted Ozone Plan is inconsistent with the Ozone Plan and may have a significant impact on air quality (SBCAPCD 2022a).

Temporary Criteria Pollutant Emissions

Standard dust control measures are required to be implemented for any discretionary project involving earthmoving activities, regardless of size or duration. According to the SBCAPCD, proper implementation of these required measures reduces fugitive dust emissions to a level that is less than significant (SBCAPCD 2022a).

Long-Term Regional Criteria Pollutant Emissions

For informational purposes, operational emissions were quantified using the California Emissions Estimator Model (CalEEMod) version 2022.1. In CalEEMod, operational sources of criteria pollutant emissions include area, energy, and mobile sources. Area emissions were based on CalEEMod defaults for each land use type. Electricity use assumed CalEEMod default values and Title 24 compliance based on the construction/operational year. Modeling for water and wastewater were based on CalEEMod defaults. Mobile source emissions consist of emissions generated by vehicles to and from the development sites proposed under the Housing Plan. Average daily VMT was derived from CalEEMod default trip generation rates for the mid-rise apartments land use subtype.

Toxic Air Contaminants

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

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project conflict with or obstruct implementation of the applicable air quality plan?
Threshold 2:	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Impact AQ-1 THE HOUSING PLAN WOULD NOT CONFLICT WITH THE 2022 OZONE PLAN, AND THEREFORE WOULD NOT PROMOTE THE RELEASE OF A CUMULATIVELY CONSIDERABLE NET INCREASE OF A CRITERIA POLLUTANT FOR WHICH THE SOUTH CENTRAL COAST AIR BASIN IS IN NON-ATTAINMENT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The potential for the Housing Plan to result in a cumulatively considerable net increase of criteria pollutants in the SCCAB is evaluated based on the Housing Plan's consistency with the 2022 Ozone Plan. The 2022 Ozone Plan addresses SBCAPCD's progress toward attaining federal and state standards for criteria pollutants for which the SCCAB is currently in nonattainment.

A project would conflict with or obstruct implementation of the applicable air quality plan if a project is not consistent with the land use and population forecasts that underlie the air pollutant emissions forecasts contained in the plan. Therefore, consistency with the 2022 Ozone Plan is based on whether the population growth accommodated by the Housing Plan was accounted for in SBCAG's 2050 Regional Growth Forecast. In addition, in order to be consistent with the 2022 Ozone Plan, projects involving earthmoving activities must implement SBCAPCD's standard dust control measures. In accordance with the 2022 Ozone Plan, standard dust control measures would be implemented during grading and earth moving activities for new development requiring a grading permit. Similarly, all construction activities within the SBCAPCD's jurisdiction are required to comply with the requirements of SBCAPCD Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities) which would reduce temporary construction emissions.

Vehicle use and emissions are directly related to population, as additional residents would result in more vehicular use; however, implementation of the Housing Plan would also promote infill development and land use patterns that discourage vehicle use and reduce vehicle dependency. Populations that remain within 2022 Ozone Plan and SBCAG forecasts are accounted for within SBCAPCD emissions inventories. When population growth and employment growth exceed these forecasts, emission inventories could be surpassed, affecting attainment status. The 2022 Ozone Plan is based on population projections provided by SBCAG and the U.S. Department of Finance, which are shown in Table 4.2-2. Any general plan amendment (which, for the purpose of this evaluation, includes updated elements such as the Housing Plan) that would provide for increased population growth above that forecasted in the 2022 Ozone Plan may have a significant impact on air quality.

Table 4.2-2 Population Projections for the City of Santa Barbara

Year	Population
2022	86,591
2035	99,900

Source: SBCAG 2019; DOF 2022

Development forecasted in accordance with the Housing Plan anticipates a potential increase of up to 8,001 residential units, consistent with Santa Barbara’s RHNA allocation for the 2023-2031 planning period. SBCAG’s 2050 Regional Growth Forecast projections are used in the methodology for allocating the RHNA to cities within SBCAG jurisdiction. The Housing Plan does not propose any changes in land use to meet the City’s RHNA allocation. Therefore, the Housing Plan would not result in increased residential density limits or other changes which could increase population growth such that it exceeds the growth assumptions (99,900 people by 2035) of the RHNA allocation and, by extension, the 2050 Regional Growth Forecast. Because the Housing Plan would be consistent with the SBCAG 2050 Regional Growth Forecast, the Housing Plan would be consistent with underlying growth assumptions the 2022 Ozone Plan utilizes to forecast emissions within the SCCAB. Therefore, the Housing Plan would have a less than significant impact related to conflicts with an air quality plan and release of criteria pollutants.

For informational purposes, operational emissions of the Housing Plan were modeled using CalEEMod version 2022.1. Table 4.2-3 provides the CalEEMod outputs. These results represent a conservative estimate of potential long-term criterial pollutant emissions associated with up to 8,001 new housing units in the city, and are not intended to be compared to SBCAPCD’s adopted thresholds of significance for individual projects. Individual projects that exceed APCD screening criteria listed within the *Scope and Content of Air Quality Sections in Environmental Documents* would be subject to additional air quality analysis (SBCAPCD 2022a).

Table 4.2-3 Estimated Operational Criteria Air Pollutant Emissions (lbs/day)

Emission Source	Maximum Daily Emissions (lbs/day)					
	ROC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	28	149	309	<1	<1	<1
Energy ¹	0	0	0	0	0	0
Mobile	90	86	370	1	24	4
Housing Plan Buildout Emissions	118	235	679	1	24	4

Notes: See Appendix B for modeling results. Some numbers may not add up precisely due to rounding considerations.

Mitigation Measures

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

Threshold 3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-2 DEVELOPMENT FACILITATED BY THE HOUSING PLAN COULD RESULT IN CONSTRUCTION ACTIVITY THAT COULD PRODUCE TOXIC AIR CONTAMINANT EMISSIONS IN PROXIMITY TO RESIDENTIAL RECEPTORS. MITIGATION MEASURE AQ-1 WOULD REQUIRE LARGE CONSTRUCTION PROJECTS TO USE EQUIPMENT MEETING CARB TIER 3 OR HIGHER FOR OFF-ROAD HEAVY-DUTY DIESEL ENGINES, WHICH RESULTS IN SUBSTANTIALLY LOWER TOXIC AIR CONTAMINANT EMISSIONS THAN OLDER EQUIPMENT. IMPLEMENTATION OF MITIGATION MEASURE AQ-1 WOULD REDUCE THIS POTENTIAL IMPACT TO A LESS THAN SIGNIFICANT LEVEL.

Carbon Monoxide Hotspots

A carbon monoxide hotspot is a localized concentration of carbon monoxide that is above the NAAQS and CAAQS for carbon monoxide. Localized carbon monoxide hotspots can occur at

intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local carbon monoxide concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm (CARB 2016).

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

Based on the low background level of carbon monoxide in the project area, improved vehicle emissions standards for new vehicles in accordance with state and federal regulations, and the low level of operational carbon monoxide emissions anticipated for reasonably foreseeable development facilitated by the Housing Plan, the Housing Plan would not create new hotspots or contribute substantially to existing hotspots. Therefore, the Housing Plan would not expose sensitive receptors to substantial concentrations of carbon monoxide.

Toxic Air Contaminants

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

Construction

Construction-related activities from development facilitated by the Housing Plan would result in temporary project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment required for mass grading, excavation and trenching, building construction, and other construction activities. DPM is identified as a TAC by CARB. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts (CARB 2022b) and is therefore the focus of this analysis.

The extent of DPM emissions from any individual construction project depends upon the following factors: (1) the amount of disturbed soils; (2) the length of disturbance time; (3) whether existing structures are demolished; (4) whether excavation is involved; and (5) whether transporting excavated materials off site is necessary. DPM emissions would be reduced during the other phases of individual project construction because activities such as building construction and architectural coating require less diesel-fueled construction equipment.

As discussed in Section 4.2.3.a, SBCAPCD has not established plan-level significance thresholds for construction air pollutant emissions, and SBCAPCD CEQA guidance does not require preparation of a health risk assessment for short-term construction emissions. At this time, development facilitated by the proposed Housing Plan do not have sufficient detail (e.g., construction schedule, amount of soil export, specific buildout parameters) to allow for project-level analysis given the programmatic nature of the plan. As a result, it would be speculative to analyze project-level impacts. In addition, SBCAPCD does not recommend project-level emissions thresholds for construction activity. Therefore, a qualitative approach to characterizing construction-related air emissions has been employed for this analysis.

According to the California Office of Environmental Health Hazard Assessment, construction of individual projects lasting longer than two months could potentially expose sensitive receptors to substantial pollutant concentrations and therefore could result in potentially significant health risk impacts (California Office of Environmental Health Hazard Assessment 2015). In addition, individual residential development projects larger than single-unit residences, ADUs, or duplexes can result in potentially significant health risk impacts when equipment meeting CARB Tier 3 or higher for off-road heavy-duty diesel engines, which results in substantially lower TAC emissions than older construction equipment, is not utilized. SBCAPCD recommends diesel equipment meeting the CARB Tier 3 or higher emission standards be used in place of older construction equipment to the maximum extent feasible. As a result, the construction of certain individual housing development projects – those with three or more units and a construction duration longer than two months – could result in potentially significant health risk impacts if construction equipment does not meet CARB Tier 3 or higher for off-road heavy-duty diesel engines. Therefore, this impact would be potentially significant, requiring mitigation.

Operation

EFFECTS ON EXISTING SENSITIVE RECEPTORS

CARB's guidelines do not designate residential uses as land uses that generate substantial TAC emissions. As a result, this analysis considers quantities of hazardous TACs that could be generated by new residential uses (e.g., cleaning solvents, paints, landscape pesticides, etc.) as below thresholds warranting further study under the California Accidental Release Program. Because the Housing Plan would not result in new nonresidential development, and new residential development would not include substantial new TAC sources, the Housing Plan would not result in exposure of existing sensitive receptors to significant carcinogenic or toxic air contaminants and would be consistent with CARB and SBCAPCD guidelines.

EFFECTS ON NEW SENSITIVE RECEPTORS

As described in Section 4.2.1.e, CARB suggests that sensitive receptors located within 1,000 feet of a freeway could be adversely impacted by poor air quality and recommends strategies to reduce exposure to diesel particulates, including the use of indoor filtration systems (CARB 2017). SBCAPCD recommends designing residential projects to orient sensitive receptors 500 feet away from the freeway to reduce potential health impacts (SBCAPCD 2022a). New residential development facilitated by the Housing Plan could occur in proximity to U.S. 101. As a result, new sensitive receptors could be exposed to higher levels of DPM and carbon monoxide associated with the freeway. Health risks from vehicle emissions on U.S. 101 represent an existing condition, and new residential development associated with the Housing Plan would not substantially exacerbate this condition.

The California Supreme Court in a December 2015 opinion (*California Building Industry Assn. v. Bay Area Air Quality Management District*) confirmed that CEQA is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project. Therefore, potential health risks in the vicinity of U.S. 101 are described here for informational purposes and do not constitute a significant impact pursuant to CEQA. Furthermore, City staff follow SBCAPCD guidance regarding potential health risk effects when reviewing residential development applications, which may include project-specific conditions of approval to reduce health risks, such as orienting windows, doors, and balconies away from potential sources of DPM and carbon monoxides, and forced air ventilation with filter screens on outside air intake ducts, which have been

found to reduce residents exposure to DPM, carbon monoxides, and other toxic air contaminants. 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.

Mitigation Measures

The following mitigation measure would be implemented due to potentially significant health risk impacts from TAC exposure during project construction.

AQ-1 Construction Equipment Exhaust Control Measures

The City of Santa Barbara shall develop and enforce appropriate Municipal Code amendments, or other adopted regulations, to require individual residential projects of three or more units and involving demolition, mass grading, or excavation and trenching phases of longer than two months, to use off-road heavy-duty diesel engines that meet California Air Resources Board (CARB) certified Tier 4 emission standards, or zero-emission off-road equipment, to the extent that this equipment is commercially available. "Commercially available" means the availability of required equipment in geographic proximity to the project site and within a reasonable timeframe relative to critical path construction timing. If Tier 4 equipment is not commercially available, 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. All equipment shall be kept in working order and maintained in operable condition according to manufacturer's specifications, as applicable. Projects shall comply with all the applicable regulatory requirements, including applicable regulations of the CARB and Santa Barbara County Air Pollution Control District.

Significance after Mitigation

Implementation of Mitigation Measure AQ-1 would reduce potential residual impacts associated with exposure of sensitive receptors to substantial pollutant concentrations of DPM and TACs to a less than significant level.

Threshold 4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?
--

Impact AQ-3 FUTURE DEVELOPMENT FACILITATED BY THE HOUSING PLAN WOULD NOT CREATE OBJECTIONABLE ODORS THAT COULD AFFECT A SUBSTANTIAL NUMBER OF PEOPLE OR EXPOSE FUTURE RESIDENTS TO ODORS THAT WOULD PRODUCE A PUBLIC NUISANCE OR HAZARD. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The occurrence and severity of objectionable odors depend on a number of factors, including the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of the receiving location. Although objectionable odors seldom cause physical harm, they can be perceived as a nuisance, cause distress among the public, and result in citizen complaints.

The Housing Plan would facilitate the development of additional housing units in a primarily urbanized area with existing residential, commercial, and industrial uses. Construction activities for development forecasted in accordance with the Housing Plan may produce temporary odors.

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

The City of Santa Barbara Municipal Code Section 30.180.120 prohibits a person or business to cause or allow the emission of offensive, noxious, or foul odors in concentrations which are offensive to a reasonable person, which produce a public nuisance or hazard on adjoining property, or which could be detrimental to human, plant, or animal life, in inland areas (City of Santa Barbara 2021b). Additionally, construction activities forecasted in accordance with the Housing Plan would be required to comply with SBCAPCD Rule 303, which regulates nuisance odors (SBACPD 1978). Accordingly, the construction of future development in accordance with the Housing Plan is not anticipated to create objectionable odors affecting a substantial number of people or expose future residents to odors in concentrations that would produce a public nuisance or hazard. Therefore, this impact would be less than significant.

Mitigation Measures

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

4.2.4 Cumulative Impacts

Project related air pollution may combine with other cumulative projects (past, present, and reasonably foreseeable future) to violate criteria pollutant standards if the existing background sources cause nonattainment conditions. Air districts manage attainment of the criteria pollutant standards by adopting rules, regulations, and attainment plans, which comprise a multifaceted programmatic approach to such attainment.

The geographic scope for analyzing cumulative air quality impacts is the SCCAB. The SCCAB is designated a nonattainment area for the ozone CAAQS and the PM₁₀ CAAQS. The SCCAB is in attainment of all other NAAQS and CAAQS. As described under Impact AQ-1, the SBCAPCD's approach for assessing cumulative impacts is based on consistency with the latest adopted Ozone Plan. The Housing Plan would not result in exceedance of the population forecasts upon which the 2022 Ozone Plan is based and would therefore be consistent with the Ozone Plan. Additionally, SBCAPCD standard dust control measures are required for all earthmoving activities in the SBCAPCD's jurisdiction, which would reduce Citywide emissions of PM₁₀ from construction facilitated by the Housing Plan. Therefore, the Housing Plan would not conflict with or obstruct implementation of the 2022 Ozone Plan. Because the potential for the Housing Plan to result in a cumulatively considerable net increase of criteria pollutants in the SCCAB is evaluated based on the Housing Plan's consistency with the 2022 Ozone Plan, the Housing Plan would not result in a cumulatively considerable net increase in criteria pollutants for which the SCCAB is in non-attainment. Therefore, the Housing Plan's contribution to cumulative air quality impacts would not be cumulatively considerable.

As identified under Impact AQ-2, the Housing Plan would result in a potentially significant impact related to DPM and TAC exposure within the City. Health risk impacts are localized to the immediate vicinity of DPM and TAC sources, such that people affected by construction-related TAC emissions generated at one housing site would likely not be affected by construction-related TAC emissions generated at another housing site should construction activities occur simultaneously. Discussion of these impacts considers the cumulative nature of the pollutants in the region; for example, the

cancer risk and non-cancer risk thresholds have been set pursuant to existing cancer risks in the area and exceeding those thresholds would be considered a cumulative impact. Implementation of Mitigation Measure AQ-1 would ensure that construction activity associated with future development under the Housing Plan would not expose sensitive receptors to cumulatively considerable pollutant concentrations from DPM or TACs. Therefore, the Housing Plan's contribution to cumulative air quality impacts related to these pollutants would not result in a cumulatively considerable impact.

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4.3 Biological Resources

This section describes the existing environmental conditions and regulatory setting for biological resources in the city and assesses potential impacts to special status species, sensitive natural communities, riparian areas and wetlands, trees, and wildlife movement corridors. Rincon Consultants, Inc. gathered information for this assessment through a desktop literature review of the United States Fish and Wildlife Service's (USFWS) National Wetlands Inventory (NWI), the California Department of Fish and Wildlife's California Natural Diversity Database (CNDDDB), the City's 2010 General Plan Environmental Impact Report (EIR), and the City's 2019 Coastal Land Use Plan (LUP).

4.3.1 Environmental Setting

a. Habitats

Although the City is largely developed, Santa Barbara contains substantial areas of relatively undisturbed natural habitats. These include a large range of upland habitats, wetlands, riparian areas, streams, hillsides, and marine areas. Descriptions of the different habitats throughout Santa Barbara are provided below. The locations of habitats throughout the city are shown in Figure 4.3-1.

Upland Habitats

Contiguous areas of upland habitats within the city of Santa Barbara are located in the foothills, the Las Positas Valley, Rivera slopes and canyons, and the north side of the Mesa. Within the upland habitat areas, vegetation communities are primarily dominated by California annual non-native grassland; native perennial grassland; coastal sage scrub; chaparral; coast live oak woodland, savanna, or forest; ruderal; ornamental trees; and invasive species. Urban, suburban, and open space areas provide habitat and movement corridors for wildlife that have adapted to human-modified environments.

California Annual Non-Native Grassland

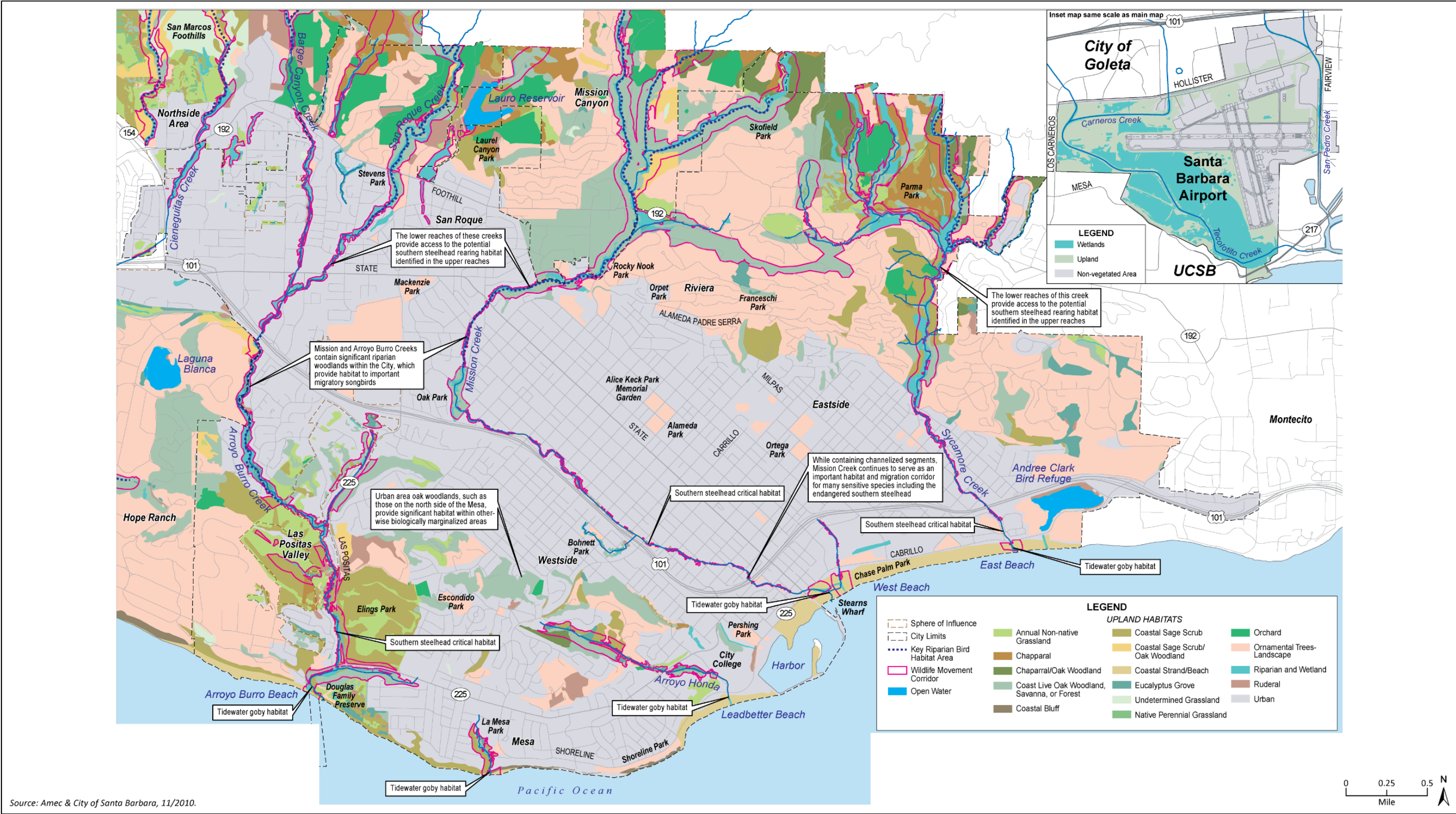
California annual non-native grassland supports many local species of birds and mammals, including white-tailed kite and grasshopper sparrow. These grasslands are typically found on hillsides and mesas in Elings Park and San Marcos Foothills, and scattered in undeveloped land on the Mesa, Rivera, Las Positas Valley, and in Mission Canyon.

Native Perennial Grasslands

Native perennial grasslands are grasslands with at least 10 percent cover of native grasses. These grasslands exist at the San Marcos Foothills Preserve, with smaller stands at Elings Park and along Arroyo Burro Creek north of Stevens Park. Native perennial grasslands provide high-quality habitat for small mammals and birds, and foraging habitat for raptors.

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Figure 4.3-1 Habitats within Santa Barbara



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Coastal Sage Scrub

Coastal sage scrub consists of low-growing, drought-deciduous, semi-woody shrubs, limited evergreen species, and annual and perennial grasses. Prominent native coastal sage scrub species in Santa Barbara include coyote brush (*Baccharis pilularis*) and California sagebrush (*Artemisia californica*), with more limited stands of lemonade berry (*Rhus integrifolia*), white sage (*Salvia apiana*), black sage (*S. mellifera*), and purple sage (*S. leucophylla*). Large stands of coastal sage scrub are found on the slopes and ridges of the Las Positas Valley, in Parma Park, and in the lower foothills and Mesa hillsides (Benson 2023).

Chaparral

Chaparral is composed of larger shrub species adapted to summer drought conditions and periodic wildfires. Typical native species in the City include ceanothus (*Ceanothus spp.*), toyon (*Heteromeles arbutifolia*), scrub oak (*Quercus berberidifolia*), and chamise (*Adenostoma fasciculatum*) at higher elevations. Chaparral is found on ridges and slopes in the foothills of the Santa Ynez Mountains near the City's northern boundary.

Coast Live Oak Woodland, Savanna, or Forest

The city's contiguous Coast live oak woodland, savanna, and forest provide shelter, food, and corridors for wildlife to travel and migrate comfortably. Oaks are slow growing trees with limited reproduction and do not recover quickly from removal or disturbance. Oak savanna canopies are open while oak forest canopies are closed. Small groves of oak are present throughout the city, including canyons along the Riviera. Larger oak woodlands are limited to the north side of the Mesa, Douglas Family Preserve, upper Arroyo Burro Creek, Hope Ranch, Mission Canyon, Las Positas Valley, and on north-facing or shaded slopes in the foothills.

Ruderal

Ruderal vegetation, plants associated with areas of human disturbance, are generally present in disturbed fields, such as abandoned cropland, and typically does not include ornamental gardens, grasslands, or eucalyptus groves. Ruderal habitats occur throughout the city in disturbed areas, such as railroad rights-of-way or landslides.

Ornamental Trees

Ornamental trees are found throughout residential areas and provide nesting, roosting, and foraging opportunities for native and migratory birds, as well as foraging and corridor habitat for terrestrial species. These areas can include native oak trees and riparian habitat, but human presence can limit the biological value of ornamental trees.

Invasive Species

Invasive species are non-native plants which can spread rapidly and displace native habitats. Such species include giant reed, Russian thistle, pampas grass, bamboo, nasturtium, periwinkle, poison hemlock, castor bean, ivy, fennel, ice plant, and mustard. Areas in the city subject to a history of disturbance, such as open space areas bordered by urban development, are more likely to have invasive species present.

Creek, Wetland, Coastal and Marine Habitats

Creeks, wetlands, and marine habitats exhibit a prevalence of vegetation adapted for life in saturated soil. These habitats are essential to the survival of many threatened or endangered species and have value to the public for flood retention, storm abatement, aquifer recharge, water quality improvement, passive recreation, and aesthetic qualities. Habitats within the City limits include riparian corridors, wetlands and marshes, the Goleta Slough, and nearshore marine habitat (City of Santa Barbara 2019).

Riparian

Riparian habitat ranges from low-growing herbaceous and scrub areas to major woodlands. Riparian habitat supports native species such as willows (*Salix spp.*), mulefat scrub (*Baccharis salicifolia*), California sycamore (*Platanus racemosa*), cottonwoods (*Populus spp.*), oaks, alders, bay laurels, lower growing shrubs, and herbs. Riparian woodlands provide shade, habitat, and nesting sites for resident birds, migratory birds, such as the Southwestern willow flycatcher, a State and Federal listed endangered species, and other wildlife such as amphibians such as the Federally threatened California red-legged frog. Riparian habitats occur along major and minor drainages, and mature riparian woodland extends from the foothills through the urban areas. Examples include Mission Creek, Sycamore Creek, and Arroyo Burro Creek which are designated critical habitat for steelhead – southern California distinct population segment. In addition, critical habitat for the tidewater goby exists at the mouth of the Arroyo Burro and Mission Creeks. Mature oak and sycamores exist at these creeks in the urban area of the city, transitioning to willow woodland or scrub near the coast. These larger creeks serve as wildlife corridors which link urban areas and open spaces (City of Santa Barbara 2019; USFWS 2023).

Wetlands

Wetlands and marshes include freshwater and saltwater habitats, streamside wetlands, ponds, lagoons, and estuaries. Freshwater wetlands are limited to vernal and perennial depressions, at springs, and along the margins of slow-moving streams such as the lower Arroyo Burro Creek. Brackish marshes are found at coastal estuaries or lagoons such as the mouth of Mission Creek, Arroyo Burro Creek, Sycamore Creek, the Andrée Clark Bird Refuge, and Goleta Slough. The Andrée Clark Bird Refuge is located in the southeastern portion of Santa Barbara between United States Route 101 (U.S. 101) and Cabrillo Boulevard. The Andrée Clark Bird Refuge supports as many as 192 bird species including migratory waterfowl and wading birds. The Goleta Slough is located within and surrounding the Santa Barbara Municipal Airport. The Goleta Slough supports approximately 430 acres of saltwater, brackish, and freshwater marsh habitats. The Goleta Slough is a large area in the city with tidal-influenced creeks and saltwater or brackish marshes. The Goleta Slough, the Arroyo Burro Estuary, Andrée Clark Bird Refuge, Lower Mission Creek, and Lower Sycamore Creek are all tidal influenced creeks, wetlands, or estuaries with brackish water supporting rare, declining and migratory wildlife. Wetlands and marshes are used by wildlife species such as waterfowl, amphibians, reptiles, and foraging and nesting birds. In addition, estuaries within the city can be found at the mouths of Arroyo Burro Creek, Mission Creek, and Sycamore Creek. The Arroyo Burro Estuary contains tidewater goby habitat. In addition, tidewater gobies have been encountered in lower Mission Creek, Sycamore Creek, and the Andrée Clark Bird Refuge (City of Santa Barbara Parks and Recreation 2023; Benson 2023).

Nearshore Marine

Nearshore marine habitats of the city's coast include sand flats, rocky reefs, and kelp forests. Nearshore marine habitats are dominated by smaller marine species, although large mammals such as the California sea lion, stellar sea lion, Pacific common dolphin, and grey whale are not uncommon. Nearshore marine habitat from Hope Ranch to Leadbetter Beach is primarily rocky reef which supports smaller fish and invertebrates such as the spiny lobster. Tidepool habitat between Leadbetter Point and Arroyo Burro Beach supports invertebrates such as anemones, mollusks, and crustaceans. Kelp forests provide habitat, forage, and nursery grounds for species such as white seabass, kelp bass, perch and rockfish species. Nearshore marine areas also support foraging by seabirds and shorebirds such as the brown pelican, sandpipers, and gulls (City of Santa Barbara 2019; Ferguson 2023). 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.

Coastal Bluff Habitat

Coastal bluff habitat supports annual and perennial shrubs and is typically a mix of coastal bluff scrub and ruderal species. Coastal bluff scrub vegetation exists in Hope Ranch and portions of the Mesa; however, past and ongoing disturbances have created many bluffs dominated by non-native ice plant, pampas grass, and mustard (City of Santa Barbara 2019).

Coastal Strand and Beach

Coastal strand and beach habitats are found on sandy soil on the shoreline, and are impacted by recreational use, maintenance activities, bike paths, parking lots, dredging activities, and the Santa Barbara Harbor. Consequently, non-native species were dominant in this area including the invasive hottentot fig ice plant (*Carpobrotus edulis*); approximately two miles of the City Waterfront from Leadbetter Point to the Cabrillo Bathhouse were restored in 2023 with native dune habitat. Ephemeral low-tide beaches below coastal bluffs do not support coastal strand vegetation; however, these beaches provide access to the rocky intertidal zones that support invertebrate communities, kelp beds, and reefs. Coastal strand vegetation and beach wrack, including kelp and seaweed, provides habitat for sand-dwelling invertebrates and foraging habitat for shorebirds, including the western snowy plover (City of Santa Barbara 2019).

Special Status Habitats

Special status habitats support high wildlife density or diversity and/or are in substantial decline. Within the city, these include coastal and inland riparian and wetland habitats. Riparian and wetland habitats are important as they serve as highly productive habitats for fish and wildlife, provide water storage, flood control, nutrient cycling, water quality protection, and recreational and economic benefits throughout the state. Due to a steep decline in the extent and quality of riparian and wetland habitats, the California Coastal Act, the City's Environmental Resources Element, and the City's Local Coastal Program (LCP) identify riparian and wetland habitats as sensitive. The City's creeks and associated riparian and estuarine habitats in the Coastal Zone are considered Environmentally Sensitive Habitat Areas (ESHA) which could support special status species. These

include the Arroyo Burro Creek, Arroyo Honda Creek, Mesa Creek, Goleta Slough, Lighthouse Creek, Mission Creek, Laguna Creek, and Sycamore Creek, all of the creek mouth estuaries/coastal lagoons, and other minor tributaries (City of Santa Barbara 2019).

Special Status Species

For the purpose of this analysis, special status species are those plants and wildlife listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS and National Marine Fisheries Service (NMFS) under the federal Endangered Species Act (ESA); those listed or proposed for listing as threatened or endangered by the CDFW under the California Endangered Species Act; wildlife designated as “Species of Special Concern,” “Fully Protected,” or “Watch List” by the CDFW; and plants listed as rare by the CDFW under the Native Plant Protection Act. Those plants ranked as California Rare Plant Rank (CRPR) 1 or 2 are typically regarded as rare, threatened, or endangered under CEQA by lead agencies and were considered as such in this EIR. The CRPR utilizes the following code definitions:

- **List 1A** = Plants presumed extinct in California
- **List 1B.1** = Rare or endangered in California and elsewhere; seriously endangered in California (over 80 percent of occurrences are threatened or have a high degree and immediacy of threat)
- **List 1B.2** = Rare or endangered in California and elsewhere; fairly endangered in California (20 to 80 percent of occurrences are threatened)
- **List 1B.3** = Rare or endangered in California and elsewhere but not very endangered in California (less than 20 percent of occurrences threatened or no current threats known)
- **List 2** = Rare, threatened or endangered in California, but more common elsewhere

CRPR 3 species are “review list,” and CRPR 4 species are considered “watch list” species. CRPR 3 and 4 species do not typically warrant analysis under CEQA except where they are part of a unique community, from the type locality, or designated as rare or significant by local governments, or where cumulative impacts could result in population-level effects. Within the city, there are approximately 27 plant species and 35 wildlife species tracked and mapped by the CNDDB (CDFW 2022). Of these, 14 plant species and 28 wildlife species meet at least one of the criteria for special-status species, described above. These include the federally endangered and State-threatened Gambel’s water cress (*Lonicera subspicata* var. *subspicata*), the federally threatened western snowy plover (*Charadrius nivosus nivosus*), the federally endangered tidewater goby (*Eucyclogobius newberryi*), the listed species of special concern western pond turtle (*Emys marmorata*), and the federally endangered and State candidate endangered steelhead -southern California DPS (*Oncorhynchus mykiss irideus* pop. 10). Other special status species include the southwestern pond turtle (*Actinemys pallida*) (Appendix C; Benson 2023). 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.

Wildlife Movement Areas

Habitats for wildlife nesting, foraging, congregation, and movement by special status species in the city are important wildlife areas. These include migration corridors and habitat for monarch

butterflies, potential southern steelhead rearing, tidewater gobies, and birds (City of Santa Barbara 2019). 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.

Migration Corridors

Migration corridors, such as riparian corridors, function as movement corridors to allow wildlife to move between larger habitat areas. These areas provide nearly continuous pathways of native and natural vegetation used by wildlife species to move through the area, mostly in a north-south direction, often between open foothill lands and larger urban open spaces. Migration corridors allow greater access to food sources, and allow wildlife to safely migrate, ensuring genetic diversity and the health of ecosystems. As urban development continues, these corridors are crucial for maintaining biodiversity and preventing habitat fragmentation. These corridors can be bordered on either side by urban land uses, and within the City limits, these corridors often include barriers to movement such as disturbed urban areas, large roads, and bridges. Creeks and riparian zones are the primary migratory corridors in the city, providing habitat for southern steelhead, tidewater gobies, and mammal and bird species. Upland migration corridors are also present in the city, including contiguous stretches of native vegetation, oak woodland, eucalyptus groves, and coastal sage scrub.

Monarch Butterfly Habitat

Monarch butterflies migrate to the Santa Barbara County coastline each year and aggregate in groves of trees near the coast. Monarch butterflies remain in these trees during the winter season. Monarch butterfly aggregation sites, including fall and winter roost sites, are defined as ESHAs. While the city's coastal zone does not contain highly active aggregation sites, potential monarch butterfly habitat exists at the Douglas Family Preserve, La Mesa Park, and on the Arroyo Honda Preserve between Shoreline Drive and Cliff Drive (City of Santa Barbara 2019).

Southern Steelhead Rearing Habitat

Mission Creek, Arroyo Burro Creek, and Sycamore Creek support aquatic habitat which is important for southern steelhead trout rearing. Southern steelhead migrate up the creeks in winter to spawn, leaving behind fish which live in the creeks for one or more years before migrating to the ocean. Permanent pools are critical to steelhead survival, particularly during the summer and fall dry seasons. Mission Creek, Arroyo Burro Creek, and Sycamore Creek are all federally designated critical habitat deemed essential for the recovery and continued existence of southern steelhead (City of Santa Barbara 2010; Federal Register 2005).

Tidewater Goby Critical Habitat

The tidewater goby resides year-round in Mission Creek, Arroyo Burro Creek, Sycamore Creek, Laguna Creek, and the Andrée Clark Bird Refuge. Their populations vary greatly between years, depending on the suitability of habitat at the mouths of these creeks. The USFWS has designed the estuaries at Arroyo Burro Creek, Mission Creek, and Laguna Creek as critical habitat for the tidewater goby (City of Santa Barbara 2010; City of Santa Barbara 2019).

Bird Habitat

Positioned along the Pacific Flyway migration route, numerous land and sea birds migrate through this portion of western North America each spring and fall. Bird species are supported by Santa Barbara's oak woodland habitats and creek and riparian woodlands, particularly during spring and fall migrations where migrant species can find food, water, and shelter as they travel north or south. In the winter, creekside vegetation attracts wintering species which can find food in non-native blooming species along creeks, such as eucalyptus, bottlebrush, and Cape honeysuckle. In the spring and summer, a variety of nesting birds utilize the riparian corridors, such as warblers, vireos, wrens, flycatchers, and sparrows. In the fall, the lagoons at the mouths of the Arroyo Burro Creek, Mission Creek, Sycamore Creek, Laguna Creek, and the Andrée Clark Bird Refuge, are important habitats for waterfowl, wading birds and shorebirds. The upper reaches of Arroyo Burro Creek, Mission Creek, Sycamore Creek, and the Goleta Slough all provide excellent habitat for bird species. During the winter months, Lighthouse Creek and Arroyo Honda attract a wide complement of wintering birds. The proximity of these creeks to the ocean lures migratory birds, some of which stay through the winter (City of Santa Barbara 2019).

Western Snowy Plover Critical Habitat

The western snowy plover is a federally threatened and State species of special concern (CDFW 2022). The Pacific coast population of the western snowy plover breeds on the coast from southern Washington to southern Baja California, Mexico. Western snowy plovers may remain at breeding sites or move north or south to other sites along the Pacific coast. USFWS has designated West Beach and East Beach as critical habitat for overwintering western snowy plovers (City of Santa Barbara 2019).

4.3.2 Regulatory Setting

a. Federal Regulations

Endangered Species Act

The federal ESA, enacted in 1973, establishes protections for fish, wildlife, and plants that are listed as threatened or endangered, as well as provides for interagency cooperation to list species as endangered, implement plans for species recovery, and remove species from listing. Under the ESA, authorization is required to "take" a listed species. Take is defined under Section 3 of the ESA as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Under federal regulation (50 Code of Federal Regulations [CFR] Sections 17.3, 222.102), "harm" is further defined to include habitat modification or degradation where it would be expected to result in death or injury to listed wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Critical habitat is a specific geographic area(s) that is essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. Section 7 of the federal ESA outlines procedures for federal interagency cooperation to conserve federally listed species and designated critical habitat.

Section 7(a)(2) of the ESA and its implementing regulations require federal agencies to consult with USFWS or NMFS to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species, or result in the destruction or adverse

modification of critical habitat. For projects where federal action is not involved and take of a listed species may occur, the project proponent may seek to obtain an incidental take permit under Section 10(a) of the ESA. Section 10(a) allows USFWS to permit the incidental take of listed species if such take is accompanied by a Habitat Conservation Plan (HCP) that includes components to minimize and mitigate impacts associated with the take.

The USFWS and NMFS share responsibility and regulatory authority for implementing the ESA (7 United States Code [USC] Section 136, 16 USC Section 1531 et seq.).

Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act

The Migratory Bird Treaty Act (MBTA) authorizes the Secretary of the Interior to regulate the taking of migratory birds. The act provides that it is unlawful, except as permitted by regulations, “to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, [...] any migratory bird, or any part, nest, or egg of any such bird” (16 USC Section 703(a)). The Bald and Golden Eagle Protection Act is the primary law protecting eagles, including individuals and their nests and eggs. The USFWS implements the MBTA (16 USC Section 703-711) and the Bald and Golden Eagle Protection Act (16 USC Section 668). Under the Bald and Golden Eagle Protection Act’s Eagle Permit Rule (50 CFR 22.26), USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) regulates marine fisheries in U.S. federal waters. The Magnuson-Stevens Act was first passed in 1976 and was revised in 1996 and 2007. The purpose of the Magnuson-Stevens Act is to provide long-term biological and economic sustainability of U.S. marine fisheries.

The NMFS has regulatory authority for implementing the Magnuson-Stevens Act. The NMFS requires regional fishery management councils to develop Fisheries Management Plans (FMPs) specific to their regions, fisheries and fish stocks. For waters off the U.S. West Coast, the Pacific Fishery Management Council has developed four FMPs, which are implemented through fisheries regulations for coastal pelagic species, groundfish species, highly migratory species and salmon species. These FMPs also identify Essential Fish Habitat, which is broadly defined as those waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity.

Rivers and Harbors Act, Section 10

Section 10 of the Rivers and Harbors Act of 1899 requires authorization from the Secretary of the Army, acting through the U. S. Army Corps of Engineers (USACE), for the construction of any structure in or over any navigable water of the United States. Regulated activities include dredging or disposal of dredged materials, excavation, filling, re-channelization and construction of any structure or any other modification of a navigable water of the United States.

Clean Water Act

Under Section 404 of the Clean Water Act, the USACE, with U.S. Environmental Protection Agency (EPA) oversight, has authority to regulate activities that result in discharge of dredged or fill material into wetlands or other “waters of the United States.” Perennial and intermittent creeks are considered waters of the United States if they are hydrologically connected to other jurisdictional waters. In achieving the goals of the Clean Water Act, the USACE seeks to avoid adverse impacts and

offset unavoidable adverse impacts on existing aquatic resources. Any discharge of dredged or fill material into jurisdictional wetlands or other jurisdictional “waters of the United States” would require a Section 404 permit from the USACE prior to the start of work. Typically, when a project involves impacts to waters of the United States, the goal of no net loss of wetlands is met by compensatory mitigation; in general, the type and location options for compensatory mitigation should comply with the hierarchy established by the USACE/EPA 2008 Mitigation Rule (in descending order): (1) mitigation banks; (2) in-lieu fee programs; and (3) permittee-responsible compensatory mitigation. Also, in accordance with Section 401 of the Clean Water Act, applicants for a Section 404 permit must obtain water quality certification from the State Water Resources Control Board (SWRCB) or appropriate Regional Water Quality Control Board (RWQCB).

b. State Regulations

California Endangered Species Act

The California Endangered Species Act (Fish and Game Code Section 2050 et seq.) prohibits take of State-listed threatened and endangered species without a CDFW incidental take permit. Take under the California Endangered Species Act is restricted to direct harm of a listed species and does not prohibit indirect harm by way of habitat modification.

Protection of fully protected species is described in California Fish and Game Code Sections 3511, 4700, 5050 and 5515. These statutes prohibit take or possession of fully protected species. Incidental take of fully protected species may be authorized under an approved Natural Communities Conservation Plan.

Natural Communities Conservation Planning Act

The Natural Communities Conservation Planning Act was established by the California Legislature, is directed by the CDFW, and is implemented by the State, as well as public and private partnerships as a means to protect habitat in California. The Natural Communities Conservation Planning Act takes a regional approach to preserving habitat. A Natural Communities Conservation Plan identifies and provides for the regional protection of plants, wildlife and their habitats, while allowing compatible and appropriate economic activity. Once a Natural Communities Conservation Plan has been approved, CDFW may provide take authorization for all covered species, including fully protected species, as described in Section 2835 of the California Fish and Game Code.

Native Plant Protection Act

The CDFW has authority to administer the Native Plant Protection Act (NPPA) (California Fish and Game Code Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under Section 1913(c) of the NPPA, the owner of land where a rare or endangered native plant is growing is required to notify the CDFW at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

California Fish and Game Code Sections 3503, 3503.5 and 3511

California Fish and Game Code Sections 3503, 3503.5 and 3511 describe unlawful take, possession, or destruction of birds, nests and eggs. Fully protected birds (California Fish and Game Code Section 3511) may not be taken or possessed except under specific permit. Section 3503.5 protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs.

Section 1600 et seq. of the California Fish and Game Code

Section 1600 et seq. of the California Fish and Game Code prohibits, without prior notification to CDFW, the substantial diversion or obstruction of the natural flow of, or substantial change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. For these activities to occur, the CDFW must receive written notification regarding the activity in the manner prescribed by the CDFW and may require a lake or streambed alteration agreement. Lakes, ponds, perennial and intermittent streams and associated riparian vegetation, when present, are subject to this regulation.

Porter-Cologne Water Quality Control Act

Pursuant to Section 401 of the Clean Water Act, projects that apply for a USACE permit for discharge of dredge or fill material must also obtain water quality certification under Section 401 from the RWQCB. Additionally, the SWRCB and each of nine local RWQCBs have jurisdiction over “waters of the State” pursuant to the Porter-Cologne Water Quality Control Act, which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State. The SWRCB has issued general Waste Discharge Requirements (WDRs) regarding discharges to “isolated” waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction). The local RWQCB implements this general order for isolated waters not subject to federal jurisdiction.

The Clean Water Act and associated federal regulations (Title 40 of the CFR 123.25(a)(9), 122.26(a), 122.26(b)(14)(x) and 122.26(b)(15)) require nearly all construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more, including smaller sites in a larger common plan of development or sale, to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit for their stormwater discharges, and develop a Storm Water Pollution Prevention Plan (SWPPP). The NPDES Program is a federal program which has been delegated to the State of California for implementation through the SWRCB and RWQCBs.

California Coastal Act

The California Coastal Act (Coastal Act) outlines standards for development within the coastal zone and includes specific policies (Division 20 of the Public Resources Code) that address issues such as terrestrial and marine habitat protection, commercial fisheries, and water quality. The coastal zone encompasses 1.5 million acres of land and stretches from three miles at sea to an inland boundary that varies from several blocks in urban areas to as much as five miles in less developed areas. Areas of Santa Barbara are located within the coastal zone. The coastal zone extends into federal waters under the federal Coastal Zone Management Act.

Chapter 3 of the Coastal Act contains the standards used by the California Coastal Commission in the review of coastal development permits and local coastal plans. The seven articles within Chapter 3 govern all development along the coast, and mandate protection of public access, recreational opportunities, and marine and land resources. Chapter 3, Article 4 addresses protection of the marine environment including water quality issues, wetlands protections, and coastal armoring. Chapter 3, Article 5 includes protections for environmentally sensitive habitat.

c. Local Regulations

City of Santa Barbara General Plan

The Environmental Resources Element of the City's General Plan, which incorporates the 1979 Conservation Element, contains goals policies, and implementation measures aimed toward protecting biological resources within Santa Barbara (City of Santa Barbara 2011).

Goal

- **Sustainable Resource Use.** Protect and use natural resources wisely to sustain their quantity and quality, minimize hazards to people and property, and meet present and future service, health and environmental needs.

Policies

- **ER 11: Native and Other Trees and Landscaping.** Protect and maintain native and other urban trees, and landscaped spaces, and promote the use of native Mediterranean drought-tolerant species in landscaping to save energy and water, incorporate habitat, and provide shade.
- **ER 12: 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.
- **ER 13: Trail Management.** Existing and future trails along creeks or in other natural settings shall be managed for both passive recreational use and as native species habitat and corridors.
- **ER 14: Integrated Pest Management Program.** To the extent allowable under state health and safety laws, establish ordinance provisions to apply integrated pest management requirements to development permits.
- **Conservation Element Policy 11.0:** Where Biological Resources policies conflict, the policy most protective of the natural environment shall prevail.

Possible Implementation Actions to be Considered

- **ER 12.4 Native Species Habitat Planning.** Protect and restore habitat areas for native flora and fauna and wildlife corridors within the City, including for chaparral, oak woodland, and riparian areas. In particular, provide land use/design guidelines to:
 - a. Require buildings and other elements of the built environment, and landscaping to be designed to enhance the wildlife corridor network as habitat.
 - b. Ensure that the City and new development preserve existing trees within identified wildlife corridors, and promote planting new trees, and installing and maintaining appropriate native landscaping in new developments within or adjacent to important upland wildlife corridors and all streams. Ensure that efforts are made to minimize disturbance to understory vegetation, soils, and any aquatic habitats that are present below the trees in order to provide movement of species that utilize the habitat.
 - c. Ensure that new development and redevelopment projects will not result in a net reduction or loss in size and value of native riparian habitats.
 - d. Increase riparian habitat within the City and / or its sphere of influence by 20 acres or more, and 1 linear mile or more, over the 20-year life of Plan Santa Barbara. Priorities for restoration include perennial reaches of the major streams, reaches of creek on publicly owned land, and degraded areas of the City's three major creeks.

- **ER 12.5 Riparian Woodland Protection.** Site new development outside of riparian woodlands to the extent feasible. Within and adjacent to riparian woodlands:
 - a. Avoid removal of mature native trees;
 - b. Preserve and protect native tree saplings and understory vegetation;
 - c. Provide landscaping within creek setback compatible with the continuation and enhancement of the habitat area, consisting primarily of appropriate native species and excluding use of invasive non-native species
 - d. Include conditions of approval for habitat restoration of degraded oak woodlands where such development creates direct or indirect impacts to the affected habitat;
 - e. Include water quality protection and enhancement measures consistent with the adopted City Storm Water Management Plan.
- **ER 21.1 Creek Setback Standards.** Establish updated creek setback and restoration standards for new development and redevelopment along all creeks, and prepare or update guidelines for restoration, increase of pervious surfaces and appropriate land uses within designated creek side buffers.
 - a. Develop setback standards of greater than 25 feet from the top of bank for new structures and hard surfaces adjacent to creeks and wetlands
 - b. At a given site, creek buffers should be adequate for protection from flood, erosion, and geologic hazards, and to provide habitat support.
 - c. In developing creek setback and restoration standards, consider applicable creek standards in surrounding jurisdictions and the Santa Barbara County Flood Control District general recommendation for new development setbacks of 50 feet from the top of bank of major creeks with natural creek banks, with a reduction up to 25 feet where “hard bank” protection is present.
 - d. For new development that is closer than 50 feet to the top of the bank of any major stream, creek bank stabilization shall be provided through planting of native trees and shrubs on creek banks and along the top of banks to minimize erosion and the potential for bank failure.
 - e. When the City determines that a structure must be constructed within proposed creek setbacks or where a project would be exposed to unusually high risk of bank erosion or collapse, non-intrusive bank stabilization methods such as bio-engineering techniques (e.g., revegetation, tree revetment, native material revetment, etc.) shall be used where feasible rather than hard bank solutions such as riprap or concrete.

Local Coastal Program

The California Coastal Act requires all local governments located within the Coastal Zone to prepare a Local Coastal Program (LCP). LCPs regulate future development within the Coastal Zone and define where public access and urbanization will occur, where industrial facilities will be placed, and how sensitive species and habitats, open spaces, and recreational areas will be protected. The city is located within a Coastal Zone, and, as such, has an LCP. The City’s Coastal Land Use Plan (Coastal LUP) was adopted in 2019.

Chapter 4.1, *Biological Resources*, of the City’s 2019 Coastal LUP contains policies designed to protect biological resources within the coastal zone. Specifically, the City’s Coastal LUP policies protect ESHAs, wetlands, and creeks; require habitat buffers for new development near ESHAs,

wetlands, and creeks; require vegetation management; protect native trees; require avoidance of beach habitat and sensitive species on beaches; establish creek buffers; and requires provisions to minimize impacts to birds (City of Santa Barbara 2019).

City of Santa Barbara Stormwater Management Program

The City's Storm Water Management Program (SWMP) is in place to reduce the discharge of non-point¹ source pollutants into local creeks and the ocean. The SWMP details how the City protects water quality by listing a series of Best Management Practices (BMPs) and measurable goals that the City must meet each year. The City of Santa Barbara has been implementing a SWMP since 2006 in compliance with the State Water Board's Permit. The SWMP includes a BMP Technical Guidance Manual detailing permanent stormwater protection BMPs required for new development and redevelopment projects within Santa Barbara. The goal of both the SWMP and the BMP Technical Guidance Manual is to provide strategies and guidelines for the protection of water quality and reduction of non-point source pollutant discharges within the City. The City is working to meet this goal by preventing and controlling the impacts of development, which increases storm water runoff volume, velocity, and pollution, using a combination of pollutant source control, site design, and post- construction storm water runoff BMPs.

City of Santa Barbara Municipal Code

The City of Santa Barbara Municipal Code Title 14, Title 15, Title 22, Title 28, and Title 30 implement policies intended to minimize adverse impacts to biological resources from new development by regulating placement of materials in watercourses, erosion control, tree removal, vegetation removal, and development siting.

- **Natural Watercourses and Storm Drain Systems.** Municipal Code Section 14.56.040 prohibits the placement of pipes, concrete, and other drainage structures in natural watercourses except for water supply projects, flood control projects, or to maintain or repair a structure that protects existing development. In addition, Section 14.56.040 prohibits the placement of grade or fill material, conduit, pipe, impervious material, or lining in a watercourse except pursuant to a valid grading and/or building permit.
- **Tree Preservation Ordinance.** Municipal Code Chapter 15.24 establishes a permit process and required findings for the removal of a setback tree, parking lot tree, tree on an approved plan, or tree designated as a historic tree. Chapter 15.24 provides specific findings the applicable review board must make prior to the removal of a tree on private property. Municipal Code Chapter 15.20, Tree Planting and Maintenance, provides specific directives a project applicant must follow in order to remove street trees.
- **Erosion and Sediment Control Standards for Construction.** Municipal Code Chapter 22.85 defines erosion and sedimentation controls for standard construction and requires preparation of an Erosion and Sedimentation Control Plan prior to the issuance of building and grading permits.
- **Storm Water Management Ordinance.** Municipal Code Chapter 22.87 defines storm water runoff requirements for new development in the City including implementation of project-specific Best Management Practices (BMPs). These requirements are consistent with the requirements of the City's Storm Water Management Program (SWMP).

¹ Non-point occurs when rainfall flows off land, roads, buildings, and other features of the landscape. The runoff carries pollutants into creeks, drainages, wetlands, and oceans.

- **Development Along Mission Creek.** Municipal Code Section 30.140.050 (Section 28.87.250 Within the coastal zone) applies to all land within the area of the Mission Creek watercourse and all land located within 25 feet of the top bank of Mission Creek. Municipal Code Section 30.140.050 / 28.87.250 requires applicants to demonstrate proposed development within these areas would not realign stream beds, and requires the Santa Barbara County Flood Control and Water Conservation District and City Parks and Recreation Department, Creeks Division, to review and comment on proposed development in these areas.
- **Vegetation Removal Ordinance.** Municipal Code Section 22.10 regulates the removal of vegetation in the City's Hillside Design District and within Open Space land uses.

City of Santa Barbara Design Guidelines

The City has several design guidelines that address the alteration and removal of mature trees. The City's design guidelines establish a set of goals, values, and qualities by which projects are evaluated in design review. The design guidelines provide detailed direction for specific areas and types of projects.

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds

The assessment of potential impacts to biological resources was informed based on a review of readily available information from the USFWS's NWI, CDFW's CNDDDB, the 2011 General Plan Program Environmental Impact Report (Program EIR), and the City's 2019 Coastal Land Use Plan (Coastal LUP). This Program EIR presents a citywide assessment of the potential for implementation of the Housing Plan to result in significant impacts to biological resources. Because the Program EIR is intended to guide actions for many years into the future, this analysis relies on program-level and qualitative evaluation. The Housing Plan would not directly result in the development of any individual project.

City policies in the General Plan, Coastal LUP, Municipal Code, and State and federal regulatory processes are identified in 4.3.2, *Regulatory Setting*, and considered in the impact analysis below. The locations of suitable development sites identified in the 6th Cycle Housing Element are also discussed as part of the impact analysis.

The City's environmental checklist and Appendix G of the CEQA Guidelines state a project may have a significant adverse impact if it would:

1. 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.
2. 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.
3. 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.

4. 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.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project 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?

Impact BIO-1 THE HOUSING PLAN WOULD ACCOMMODATE NEW RESIDENTIAL AND MIXED-USE DEVELOPMENT THAT MAY HAVE AN ADVERSE EFFECT ON HABITATS USED BY SPECIAL-STATUS SPECIES. IMPACTS TO CANDIDATE, SENSITIVE, AND SPECIAL STATUS SPECIES WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

As discussed in Section 4.3.1, *Environmental Setting*, approximately 14 special-status plant species and 28 special-status animal species have potential to occur in or around the city (Appendix C). Potentially significant effects on candidate, sensitive, or special-status species would occur if temporary disturbance during construction or permanent new residential development forecasted in accordance with the Housing Plan would result in incremental direct loss of habitat, fragmentation of larger open areas and wildlife corridors, or disturbance of special-status wildlife or vegetation species.

The Housing Plan would prioritize residential uses within areas of the city which are generally already developed, previously disturbed, and surrounded by existing development, and therefore do not provide substantial contiguous habitat. As a result, residential and mixed-use development facilitated by the Housing Plan within urbanized areas such as the downtown, would generally avoid direct impacts to special-status species and their habitats.

Nonetheless, designated critical habitat for special-status species including the tidewater goby and steelhead exists within creek corridors, such as Arroyo Burro and Sycamore Creeks, that transverse the city. Residential development facilitated by the Housing Plan may occur on parcels adjacent to creeks and has the potential to impact habitat used by special-status species. Impacts to these habitats could indirectly result in a substantial adverse effect on candidate, sensitive, or special-status species which utilize these habitats such as California red-legged frog. 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.

Citywide policies that address critical habitat include the City's General Plan Environmental Resources Element. For example, Possible Implementation Actions to be Considered ER12.5 and ER21.1, encourage new development to avoid riparian woodlands, and suggests the City develop and enforce creek setbacks.

In the Coastal Zone of Santa Barbara, projects requiring a coastal development permit would be subject to the policies within the Coastal LUP, including policies requiring the protection of ESHA. This includes the establishment of creek and sensitive habitat setbacks within the Coastal Zone. However, not all residential development would be subject to a coastal development permit process. Therefore, the potential remains for residential and mixed-use development to be developed in a manner which could degrade habitat and indirectly result in a substantial adverse effect on candidate, sensitive, or special-status species which utilize creek and riparian habitats. In the absence of enforceable regulatory requirements to minimize substantial adverse effects to riparian and creek habitat, indirect impacts to candidate, sensitive, and special-status species that utilize riparian and creek habitat would be potentially significant.

Nesting birds and raptors present in Santa Barbara could be impacted by residential development. Nesting birds and raptors, such as white-tailed kite and least Bell's vireo, have the potential to nest on buildings, in shrubs and trees, in rocky outcrops, and on bare ground throughout the city. Vegetation, including street trees, in the city can provide refuge cover from predators, perching sites, and favorable nesting habitat. Development forecasted in accordance with the Housing Plan could potentially result in impacts to nesting birds due to construction activities and the potential removal of trees.

The 2019 Coastal LUP Policy 4.1-36 specifies measures to avoid or minimize disturbance to nesting birds. However, outside of the Coastal Zone, the City does not contain local regulations to specifically address nesting birds. Residential development forecasted must comply with the requirements of the MBTA and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code which include obtaining prior authorization by the USFWS before the take of a protected migratory bird species occurs, subject to USFWS requirements, and prohibiting the take, possession, or destruction of nests or eggs. Therefore, it is possible development facilitated by the project could result in disturbance to nesting birds or raptors and potentially violate the MBTA and/or Sections 3503, 3503.5, and/or 3513 of the California Fish and Game Code. Impacts to nesting birds would be potentially significant.

Citywide, many parcels containing habitat that support special status species could be developed under the Housing Plan. Existing policies, such as oak woodland protection policies within the Environmental Resources Element, and ESHA policies in the Coastal LUP, serve to minimize impacts to special status species in some cases. 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. For discretionary projects, development would continue to be screened for potential impacts to biological resources during application review in compliance with the California Environmental Quality Act. These policies would minimize impacts to the maximum extent feasible; however, impacts would continue to be potentially significant.

Mitigation Measures

BIO-1 Creek Protections Requirements

- The City of Santa Barbara Sustainability and Resilience Department and Community Development Department shall develop creek protections through amendments to the Municipal Code with requirements applicable to new development and substantial redevelopment occurring in proximity to City creeks consistent with State laws.
- New development and substantial redevelopment in areas adjacent to creeks shall be sited and designed to prevent impacts that would significantly degrade creeks and adjacent habitat.

BIO-2 Riparian Vegetation Protection

- The City of Santa Barbara shall develop regulatory standards for riparian vegetation protection and amend the Municipal Code with requirements applicable to new development and/or redevelopment within and adjacent to riparian habitat. The regulatory standards will be included in adopted Master Environmental Assessment (MEA) Guidelines for Biological Resources and developed in consultation with the California Department of Fish and Wildlife (CDFW). The MEA Guidelines may also be implemented by appropriate Municipal Code amendments. The regulatory standards will at a minimum:
 - Avoid the removal of riparian vegetation and mature native trees when feasible, or require alternative or compensatory mitigation when avoidance is not feasible;
 - Preserve and protect native tree saplings, understory vegetation, and habitat functions associated with riparian corridors;
 - Provide landscaping compatible with the continuation and enhancement of riparian habitat, consisting of appropriate native species and avoiding non-native invasive species;
 - Include conditions of approval for habitat restoration of degraded riparian habitat where development and/or redevelopment creates direct or indirect impacts to the affected habitat;
 - 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.

BIO-3 Pre-Construction Bird Surveys, Avoidance, and Notification

- The City of Santa Barbara shall develop regulatory standards for nesting birds and amend the Municipal Code to implement requirements to avoid and minimize impacts to nesting birds. The regulatory standards will be included in adopted Master Environmental Assessment (MEA) Guidelines for Biological Resources and developed in consultation with the California Department of Fish and Wildlife (CDFW). The MEA Guidelines may also be implemented by appropriate Municipal Code amendments. The regulatory standards will at a minimum:
 - Avoid construction activities that could impact nesting birds during the nesting bird season (generally February 1 – August 30);
 - If avoidance is not feasible, require pre-construction nesting bird surveys and if necessary, monitoring by a qualified biologist;

- Establish procedures to protect active nests or avoid impacts if encountered; and
- Identify nesting bird protections on project plans.

Significance After Mitigation

Mitigation Measures BIO-1 and BIO-2 would reduce impacts to candidate, sensitive, and special status species in creeks and riparian habitat to a less than significant level by requiring the establishment and enforcement of creek protections and measures to protect riparian vegetation. Mitigation Measure BIO-3 would reduce impacts to nesting birds and raptors to a less than significant level by implementing standard procedures to protect nesting birds in compliance with the MBTA and Sections 3503, 3503.5, and/or 3513 of the California Fish and Game Code.

Threshold 2: Would the project 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?

Impact BIO-2 THE HOUSING PLAN COULD HAVE A SUBSTANTIAL ADVERSE EFFECT ON RIPARIAN HABITAT, CREEKS, AND SENSITIVE NATURAL COMMUNITIES. IMPACTS TO RIPARIAN HABITAT AND SENSITIVE NATURAL COMMUNITIES WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Potentially significant effects on riparian or other sensitive natural communities such as oak woodlands would occur if residential development facilitated by the Housing Plan would result in temporary disturbance during construction, permanent loss of habitat, or degradation of habitat, such as impacts to water quality.

Citywide, many parcels containing riparian habitat, creeks, or other sensitive natural communities such as oak woodlands could be developed under the Housing Plan. Existing policies, such as oak woodland protection policies within the Environmental Resources Element, and ESHA policies in the Coastal LUP, serve to minimize impacts to sensitive natural communities in some cases. For discretionary projects, development would be screened for potential impacts to biological resources during application review in compliance with the California Environmental Quality Act. These policies would minimize impacts to the maximum extent feasible. If project-specific impacts are significant, project-specific mitigation measures would be required. However, ministerial actions facilitated by Housing Plan programs, such as accessory dwelling units (ADUs), may result in disturbance and permanent loss of sensitive natural habitat communities.

In the coastal zone, policies specifically aimed at protecting sensitive habitats are included in the Coastal LUP. However, in the absence of citywide requirements codified in the City's Municipal Code to provide a setback from creeks and riparian areas and protection for oak woodland, residential development could result in habitat degradation which would not be addressed by existing regulations. Therefore, impacts to these habitats would be potentially significant.

Mitigation Measures

In addition to implementation of Mitigation Measures BIO-1 and BIO-2, the following oak woodlands protection mitigation is required:

BIO-4 Oak Woodland Protection

- The City of Santa Barbara shall develop regulatory standards for oak woodland protection and amend the Municipal Code with requirements applicable to new development and/or redevelopment sited within and adjacent to oak woodland habitat. The regulatory standards will be included in adopted Master Environmental Assessment (MEA) Guidelines for Biological Resources and developed in consultation with the California Department of Fish and Wildlife (CDFW). The MEA Guidelines may also be implemented by appropriate Municipal Code amendments. The regulatory standards will at a minimum:
 - Avoid the removal of mature native trees when feasible, or require alternative or compensatory mitigation when avoidance is not feasible;
 - Preserve and protect native tree saplings and understory vegetation;
 - Provide landscaping compatible with the continuation and enhancement of oak woodland, consisting of appropriate native species and avoiding non-native invasive species; and
 - Include standard conditions of approval for habitat restoration of degraded oak woodland where development and/or redevelopment creates direct or indirect impacts to the affected habitat.

Significance After Mitigation

Mitigation Measures BIO-1, BIO-2, and BIO-4 would reduce impacts to riparian habitat and oak woodlands to a less than significant level by requiring the development and enforcement of creek setbacks/buffers and measures to protect riparian vegetation, and implementing measures to protect oak woodlands.

Threshold 3: Would the project 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?

Impact BIO-3 IMPLEMENTATION OF THE HOUSING PLAN WOULD HAVE A POTENTIALLY SUBSTANTIAL ADVERSE EFFECT ON WETLANDS. COMPLIANCE WITH FEDERAL, STATE, AND CITY REGULATIONS WOULD MINIMIZE THE DIRECT REMOVAL, FILLING, AND HYDROLOGICAL INTERRUPTION OF WETLANDS. IMPACTS TO STATE OR FEDERALLY PROTECTED WETLANDS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

According to the USFWS NWI and as described in the *Creek, Wetland, Coastal and Marine Habitats* discussion in 4.3.1, *Environmental Setting*, wetlands in the city include the freshwater, brackish water, and saltwater habitats provided by the Andrée Clark Bird Refuge and Goleta Slough; estuarine habitat along the coastline including at the mouths of Arroyo Burro, Mission, Laguna, and Sycamore Creeks; and scattered lakes, freshwater ponds, freshwater forested/shrub wetlands, and rivers (USFWS 2022). In addition, wetland habitat is present along perennial waterways within the city.

Development forecasted under the Housing Plan may occur near creeks and wetlands and has the potential to degrade creek and wetland habitat through onsite and offsite impacts such as erosion, vegetation removal, and poor stormwater management. Adherence to federal, state, and local policies and regulations help to minimize impacts. For example, a project that would encroach on the jurisdictional wetlands of State and federal agencies, including the United States Army Corps of Engineers, California Department of Fish and Wildlife, California Coastal Commission, and Regional Water Quality Control Board, would be required to adhere to the respective agencies' permitting

requirements. The City would ensure that projects obtain the required jurisdictional permits and enforce conditions. Residential development under the Housing Plan would be required to adhere to the City's Storm Water Management Program (SWMP) and would minimize water quality impacts which could otherwise indirectly adversely affect wetlands and aquatic habitats.

Within the Coastal Zone, residential development would also be subject to policies within the Coastal LUP that minimize impacts to wetlands. For example, a development project located in the Coastal Zone must be designed to minimize disturbance of wetlands via habitat avoidance buffers or, where unavoidable, developers are required to fulfil habitat creation and/or restoration requirements at a minimum of a 4:1 ratio.

However, development sited adjacent to creeks within inland areas of the city may continue to result in offsite impacts to wetlands within major creek systems. Therefore, this impact would be potentially significant.

Mitigation Measures

Implement Mitigation Measure BIO-1.

Significance After Mitigation

Mitigation Measure BIO-1 would reduce impacts to wetland habitat to a less than significant level by requiring the establishment and enforcement of citywide creek setbacks/buffers. Creek setbacks/buffers would further ensure federal and state wetlands are protected.

Threshold 4: Would the project 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?

Impact BIO-4 THE HOUSING PLAN WOULD BE CONSISTENT WITH FEDERAL, STATE, AND CITY REGULATIONS DEVELOPED TO MINIMIZE IMPACTS TO SPECIES MOVEMENT, WILDLIFE CORRIDORS, AND NURSERY SITES. IMPACTS TO THE MOVEMENT OF FISH AND WILDLIFE SPECIES WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Migration corridors in the city exist primarily within riparian corridors which provide nearly continuous pathways of native and natural vegetation used by wildlife species to move between open foothill lands and larger urban open spaces. Upland migration corridors such as oak woodland, eucalyptus groves, and coastal sage scrub provide migratory bird habitat in the city. Mission Creek, Sycamore Creek, and Arroyo Burro Creek provide spawning and rearing habitat for southern steelhead, and habitat for tidewater goby. These corridors can be bordered on either side by urban land uses which could act as potential barriers to movement. Potentially significant effects on wildlife movement would occur if temporary disturbance during construction or permanent new residential development facilitated by the Housing Plan results in the fragmentation or degradation of wildlife corridors or nursery sites.

The Housing Plan would primarily facilitate residential development on infill sites generally developed or surrounded by existing development and urban disturbance. 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. While the largely urban setting within the city and amount of human activity limits the quality and utility of terrestrial wildlife movement corridors, riparian corridors within urban settings continue to provide habitat and nest sites for a variety of birds, reptiles, amphibians and mammals.

Residential development could occur in proximity to aquatic wildlife corridors such as Arroyo Burro Creek, San Roque Creek, Sycamore Creek, and Mission Creek. Mission Creek currently has development setbacks implemented for flood hazard reduction purposes. Adherence to the Municipal Code would prevent the direct alteration of creek habitat used by southern steelhead or tidewater goby. However, due to a lack of enforceable creek setbacks outside of the Coastal Zone and Mission Creek, it is possible the riparian and creek habitat which serve as a wildlife corridor could be degraded through the improper siting of residential projects in proximity to these corridors. Similarly, the implementation measures designed to preserve upland bird migratory corridors such as oak woodland detailed in the Environmental Resources Element of the General Plan are not applicable to all development in Santa Barbara, and residential development could impair upland bird migratory corridors. As a result, the Housing Plan's impacts on migratory wildlife corridors would be potentially significant.

Mitigation Measures

Implement Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4.

Significance After Mitigation

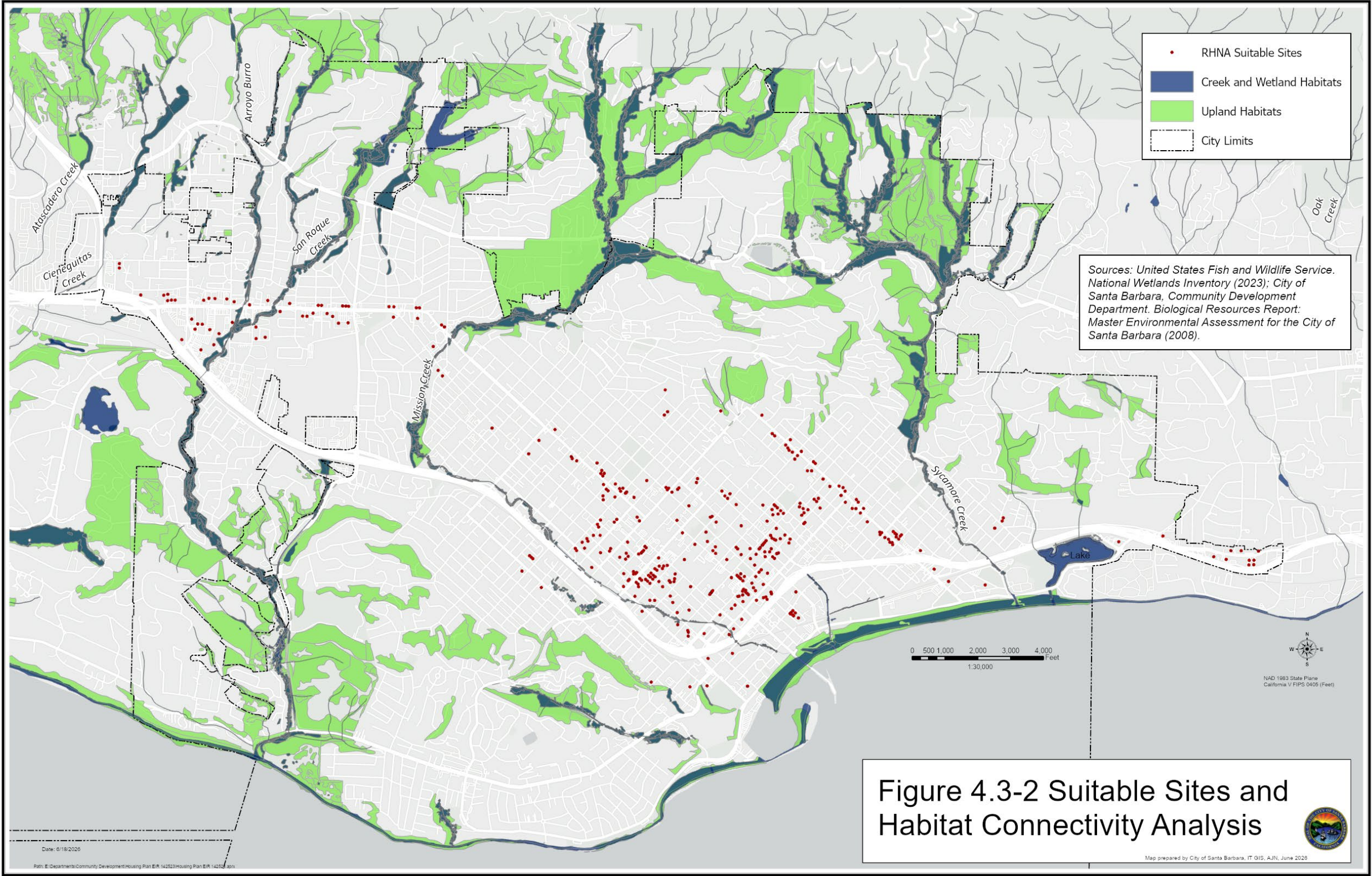
Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 would reduce impacts to creek, riparian, and upland wildlife corridors and migratory species to a less than significant level by requiring the development and enforcement of creek setbacks/buffers, implementation of measures to protect riparian and oak woodland habitat, and the requirement to conduct pre-construction bird surveys.

Threshold 5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact BIO-5 IMPLEMENTATION OF THE HOUSING PLAN COULD RESULT IN THE REMOVAL OF TREES AND VEGETATION. IMPACTS RELATED TO CONFLICTS WITH CITY TREE PRESERVATION ORDINANCE AND OTHER TREE PROTECTION GUIDELINES WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

The City of Santa Barbara contains native and non-native trees within its urbanized areas, as well as its surrounding suburban areas, parks, and open space. The City contains a Tree Preservation Ordinance (Municipal Code 15.24), policies within the Environmental Resource Element of the General Plan, and design guidelines that protect mature native and non-native trees. Municipal Code Chapter 15.24, Preservation of Trees, establishes a permit process and required findings for the removal of a setback tree, parking lot tree, tree on an approved plan, or tree designated as a historic tree. Municipal Code Chapter 15.20, Tree Planting and Maintenance, establishes a permit process and required findings for removal of street trees.

Figure 4.3-2 Habitat Connectivity Analysis



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Although Municipal Code regulations and design guidelines provide standards and processes for the removal of trees, currently, the City's Municipal Code does not specifically address the removal of native trees on private parcels unless the trees are located within a front setback or are shown on an approved landscape plan. Therefore, residential development, such as ADUs, and other residential development facilitated by the Housing Plan could result in the removal of native or riparian trees or oak woodland and therefore conflict with the City's regulations intended to protect trees. This impact would be potentially significant.

Mitigation Measures

Implement Mitigation Measures BIO-2 and BIO-4.

Significance After Mitigation

Mitigation Measures BIO- 2 and BIO-4 require the enforcement of measures to protect riparian trees and oak woodland. Following implementation of Mitigation Measures BIO-2 and BIO-4, impacts would be less than significant.

Threshold 6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact BIO-6 DEVELOPMENT FORECASTED IN ACCORDANCE WITH THE HOUSING PLAN WOULD NOT BE LOCATED WITHIN AN AREA DELINEATED ON A HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN. NO IMPACT WOULD OCCUR.

The City of Santa Barbara is not located within any approved local, regional, or State Habitat Conservation Plan or Natural Community Conservation Plan (CDFW 2019). Therefore, the Housing Plan would not conflict with any applicable conservation plan.

Mitigation Measures

No mitigation measures are required.

4.3.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts together with similar impacts of reasonably anticipated regional projects/programs including the City's Safety and Open Space Element Updates, the City's State Street Master Plan, and the California Department of Transportation's (Caltrans') South Coast Highway 101 High-Occupancy Vehicle Lanes project. Cumulative projects also include planned and pending residential development projects that contribute to the City's RNHA. The general approach to cumulative impact analysis used in this Program EIR is discussed in Section 4, *Environmental Impact Analysis*.

Cumulative development in the city has the potential to result in new structures which may result in adverse effects to special status species. Direct impacts to special status species would be minimized through compliance with the Endangered Species Act which requires authorization for the take of a species in accordance with applicable regulations concerning the protection of such a species. Cumulative impacts would include continued fragmentation and loss of creek and riparian areas which provide habitat for special status species. Although the City's Coastal LUP and General

Plan contains measures designed to preserve these habitats, standards for the protection of these habitats have not yet been codified for inland areas. Mission Creek currently has development setbacks; however, the setback is designed solely to reduce flood hazards rather than protect creek and riparian habitat. Cumulative development would be required to adhere to applicable State policies which would reduce potential impacts associated with habitat degradation, such as the NPDES Construction General Permit and the Storm water Management Program. However, cumulative development could still result in the removal of riparian habitat and degradation of creeks. Accordingly, cumulative development sited on parcels adjacent to creek and riparian habitat could result in habitat degradation which could have indirect effects on candidate, sensitive, or special-status species. Therefore, cumulative impacts are potentially significant. Mitigation Measures BIO-1 and BIO-2 would require the City to develop standards for the protection of these creek and riparian habitats and therefore would minimize the potential for development to impact candidate, sensitive, and special status species in creeks and riparian habitat. Therefore, the Housing Plan would not have a cumulatively considerable contribution to impacts to habitat degradation and candidate, sensitive, or special-status species.

Cumulative development could involve the removal of trees or include construction activities which could potentially impact nesting birds. Cumulative development must comply with the requirements of the MBTA and/or Sections 3503, 3503.5 and 3513 of the California Fish and Game Code. However, existing City regulations do not mandate procedures City-wide to ensure compliance with the MBTA or Sections 3503, 3503.5 and 3513 of the California Fish and Game Code. It is possible cumulative development could result in the disturbance of birds or raptors and potentially violate the MBTA and/or Sections 3503, 3503.5 and 3513 of the California Fish and Game Code. Therefore, cumulative impacts are potentially significant. While the Housing Plan has the potential to contribute to cumulative nesting bird impacts, Mitigation Measure BIO-3 would require the City to adopt an ordinance requiring pre-construction bird surveys, avoidance measures, and notification measures, which would protect nesting birds in compliance with the MBTA and Sections 3503, 3503.5, and/or 3513 of the California Fish and Game Code. With implementation of Mitigation Measure BIO-3, the Housing Plan would not have a cumulatively considerable contribution to impacts to nesting birds.

Cumulative development within the city could occur near state or federally protected wetlands. However, regulations within the Municipal Code prohibit the alteration and grading of a natural watercourse. Adherence to these Municipal Code requirements would minimize potential environmental impacts associated with filling or hydrological interruption of wetlands. Compliance with applicable federal, State, and City regulatory requirements, along with implementation of Mitigation Measure BIO-1, would ensure cumulative development would not have a substantial adverse effect on a state- or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. Therefore, potential cumulative impacts concerning substantial adverse effects on state or federally protected wetlands would be less than significant.

Cumulative development could result in increased development density which may alter wildlife corridors, including through habitat loss or degradation of existing wildlife corridors. Due to a lack of enforceable creek setbacks in inland regions of the city, it is possible that riparian and creek habitat which serves as a wildlife corridor could be degraded by cumulative development in proximity to these corridors. Cumulative development could impair upland bird migratory corridors. Therefore, cumulative impacts are potentially significant. Implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 would require the establishment and enforcement of citywide creek setbacks, measures to protect riparian and oak woodland habitat, and pre-construction bird surveys.

Implementation of these mitigation measures would reduce the potential for the Housing Plan to adversely impact wildlife corridors or migratory wildlife in Santa Barbara. With implementation of these mitigation measures, the Housing Plan would not have a cumulatively considerable contribution to cumulative impacts to wildlife migration.

Cumulative development could result in the removal or alteration of trees within the city. Municipal Code Chapters 15.24 and 15.20 regulate the removal of specific trees on private property and street trees. However, existing ordinances do not regulate the removal of native or riparian trees on private parcels, unless the trees are located within a front setback or are on an approved landscape plan. Cumulative development occurring on private property could result in the removal of native or riparian or oak woodland trees and therefore conflict with the City's regulations and guidelines intended to protect trees. Similarly, residential development could result in the removal of native or riparian trees and vegetation. Therefore, cumulative impacts are potentially significant. However, the Housing Plan would implement Mitigation Measure BIO-2 and BIO-4 which require the enforcement of measures to protect riparian trees and oak woodland. Therefore, the Housing Plan would not have a cumulatively considerable contribution to cumulative impacts related to tree alteration.

The nearest areas to the city within the jurisdiction of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or State Habitat Conservation Plan are the Kern Water Bank in unincorporated Kern County, approximately 55 miles northeast of the city, and Orange County, located approximately 100 miles southeast of the city (CDFW 2019). Therefore, cumulative projects would not be located in the jurisdiction of these plans and cumulative impacts associated with potential conflicts to the provisions of a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan would be less than significant.

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4.4 Cultural and Tribal Cultural Resources

This section assesses potential impacts to prehistoric archaeological resources, historic-period resources, and tribal cultural resources in the City of Santa Barbara. Rincon Consultants, Inc. gathered information for this assessment through a desktop literature review of the State Office of Historic Preservation website, the National Parks Service website, the City's General Plan, the City's Historic Webmap, and the City's Archaeological Sensitivity Maps. In addition, this section includes a summary of the City's consultation efforts pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18.

4.4.1 Environmental Setting

a. Archaeological and Ethnographic Setting

The earliest documented human habitation of the Santa Barbara region dates to approximately 13,000 years ago, based on several recorded archaeological sites extending throughout the urban and rural landscape. Such sites are often located on elevated landforms, along the coastline, and prehistoric watercourses and estuaries. The presence of sites on the Northern Channel Islands indicates early knowledge and use of marine resources.

Occurring shortly after 9,000 years ago, a large number of seed grinding tools appear in the archaeological record, indicating people had a broad-spectrum diet which consisted of plants and shellfish, with lesser emphasis on nearshore fish and terrestrial animals. During this time, people lived in small, dispersed extended family groups, and used generalized tool kits (City of Santa Barbara 2010). Following an apparent drop in occupied sites from 6,500 to 5,000 years ago, populations appeared to have rebounded, and subsistence practices intensified to include increased reliance on acorns and marine fish and mammals. In addition, mortars and pestles were added to the milling tool kit. Beginning approximately 3,000 to 2,500 years ago, population growth, intensified subsistence, diversified food resource bases, and more elaborate technology appeared to have accelerated, with a greater emphasis on hunting and fishing (City of Santa Barbara 2010).

Santa Barbara has been occupied by Native American groups known as the Chumash. The Chumash lived in permanent, largely autonomous villages with political leaders who inherited their rank. Early accounts noted Chumash villages in Santa Barbara included hemispherical semi-subterranean houses built of poles and thatch and oriented in rows along streets. Communal dance areas, temescals (sweat lodges), and cemeteries also were present in these villages. The largest and most populous villages in the region were present near the Goleta Slough (City of Santa Barbara 2010).

Records from the Santa Barbara Mission indicate each of the eight major political centers along the coast between Gaviota and Carpinteria had at least two chiefs, with the two larger villages having as many as four or five. The primary Chumash village in the City was *Syuxtun* located near the beach west of Mission Creek. *Syuxtun* was likely the home of approximately 400 to 600 people at the time of European contact. The village may have been in close proximity to a lagoon near the intersection of Chapala Street and West Cabrillo Boulevard, where an archaeological site known as the Burton Mound is located. Smaller villages occurred in Mission Canyon, near the mouth of the Arroyo Burro Creek, and other locations within the City limits (City of Santa Barbara 2010).

Numerous archaeological studies within and around the City have confirmed most prehistoric archaeological sites occur within 300 feet of drainages, coastal bluffs, and the margins of coastal estuaries. The City Master Environmental Assessment Guidelines for Archaeological Resources

(2025) outline watercourses, bluff edges, estuaries, and other locations where prehistoric archaeological sites are more likely to occur (City of Santa Barbara 2025).

b. Historical Setting

Recorded history in Santa Barbara County began in 1542 when explorer Juan Rodriguez Cabrillo entered the Santa Barbara Channel and made the first European contact with the Barbareño Chumash. In 1782, Governor Felipe de Neve and Lieutenant José Francisco Ortega, along with Franciscan Father Junipero Serra, founded the Presidio of Santa Barbara which encompassed an area roughly bounded by the modern-day De la Guerra, Anacapa, Garden, and Carrillo streets. In 1786, the Santa Barbara Mission was established. The Mission and associated facilities were concentrated two miles northwest of modern-day East Los Olivos and Laguna Streets. Pueblo Santa Barbara grew around the Presidio with scattered adobe buildings on all four sides with a greater concentration south and west of the Presidio along modern-day Santa Barbara, Anacapa, and State streets. By the end of the 19th century, the heart of the Spanish/Mexican pueblo had become known as *El Pueblo Viejo*. Many historic buildings and sites are located in this area, including the Santiago De la Guerra adobe, 1830s Lugo Adobe, the Covarrubias Adobe now occupied by the Santa Barbara Historical Museum and the Casa de la Guerra (City of Santa Barbara 2010).

In 1850, at the time California became a state, the Santa Barbara population was almost completely Spanish, and political control of the City remained with old Spanish families. The City's "Americanization" was a gradual transition exemplified by the grid system laid out by Captain Salisbury Haley in 1851. In this system, an American-European business district was concentrated along State Street between Gutierrez and Ortega Streets. The Hispanic community was concentrated near State Street in an eight-block area between Ortega and Figueroa streets. Californios, Hispanic Californians descended from Spanish and Mexican settlers, remained in control of local government until Anglos, people descended from European settlers, swept government elections in 1873. Spanish political influence is still reflected in the City's street names which pay homage to the people and events of pre-American and early American history of the City (City of Santa Barbara 2010).

The early American Period saw the construction of Stearns Wharf in 1872 and completion of the Southern Pacific Railroad, which reached Santa Barbara in 1887 from the south. Between 1886 and 1907, population grew from 4,500 to 12,000 as tourism expanded and wealthy individuals from the eastern United States discovered the mild climate and subsequently constructed brick and wood-framed buildings constructed in the popular Victorian-era styles of the 19th century such as Italianate, Eastlake, and Queen Anne. Urbanization occurred during the late 19th and early 20th centuries which included the introduction of paved streets, residential tracts, the installation of lights along State Street, and implementation of sewer and water mainlines. Mule-drawn streetcars appeared in the City in 1875, which was replaced by electric power substitutes in 1897. However, with the automobile gaining increasing popularity, the streetcar system was shut down in 1929 (City of Santa Barbara 2010).

Prior to the 1925 Santa Barbara earthquake, the Santa Barbara Community Arts Association supported the creation of an Architectural Review Board and City Planning Commission that would establish design controls for new development in the City. After the 1925 Santa Barbara earthquake damaged much of the downtown area, portions of the City were designed and rebuilt in the Spanish Colonial Revival architectural style. Community leaders pursued the preservation of the Mission, Presidio, and older Pueblo-related structures and adobes. The El Pueblo Viejo Landmark District was established in 1960. The same year, Advisory Landmark Committee was created to protect the

integrity of the district that included such historic buildings as the Casa de la Guerra, Santa Barbara County Courthouse, and several adobe residences. El Presidio de Santa Barbara State Historic Park was established in 1966 in the heart of the district to recognize and protect the site of the Royal Presidio. El Presidio de Santa Barbara (now encompassed within El Presidio de Santa Barbara State Historic Park) represents the historic beginnings of Spanish influence in the City, and thus is recognized by historical preservation groups as critical to preservation of the City's heritage (City of Santa Barbara 2010).

Table 4.4-1 shows historic resources located in the City which are listed in the National Register of Historic Places (NRHP) and/or California Register of Historical Resources (CRHR)¹. The NRHP, in addition to the locally designated historic register, is a guide used to identify some of the cultural resources important to the community and to indicate what properties shall be considered for protection from destruction or impairment at the national, state, and local level. Similar to the NRHP, the CRHR is a guide to the State's significant historical and archaeological resources and identifies historical resources for state and local planning purposes.

Table 4.4-1 Historic Resources Within Santa Barbara

Andalucia Building	316-324 State Street.	NRHP
El Paseo and Casa de la Guerra	808--818 State St., 813--819 Anacapa Street, and 9--25 E. de la Guerra Street	NRHP
Faith Mission	409 State Street	NRHP
Gonzalez, Rafael, House	835 Laguna Street	NRHP
Hill-Carrillo Adobe	11 E. Carrillo Street	NRHP
Janssens-Orella-Birk Building	1029--1031 State Street	NRHP
Los Banos del Mar	401 Shoreline Drive	NRHP
Rattlesnake Canyon Bridge	1819 Las Canoas Road	NRHP
Santa Barbara Club	1105 Chapala Street	NRHP
Santa Barbara County Courthouse	1100 Anacapa Street	NRHP, CRHR
Santa Barbara Mission	2201 Laguna Street	NRHP
Santa Barbara Presidio	Roughly bounded by Carrillo, Garden, De la Guerra and Anacapa Streets	NRHP
Santa Barbara Veterans Memorial Building	Address Restricted	NRHP
Southern Pacific Train Depot	209 State Street	NRHP
St. Vincent Orphanage and School Building	925 De La Vina Street	NRHP
US Post Office-Santa Barbara Main	836 Anacapa Street	NRHP
Virginia Hotel	17 and 23 W. Haley Street	NRHP
Source: National Parks Service 2022; State Office of Historic Preservation 2022		

In addition, the City has a Historic Resources Register which is a list consisting of structures, sites, or features identified by the City's Historic Landmarks Commission or City's Architectural Historian as historically significant and eligible for formal designation as a Landmark, Structure of Merit, Historic District, or contributing historic resource to a Historic District and indicate what properties shall be

¹ Buildings are continuously reviewed and added to the NRHP and/or CRHR. As a result, the buildings identified in Table 4.4-1 may not represent a comprehensive list as new properties may have been identified as historic after the publication of this document.

considered for protection from destruction or impairment at the national, state, and local level (City of Santa Barbara 2022c; City of Santa Barbara 2010). As of December 2022, there were 136 Designated City Landmarks and 458 Designated Structures of Merit.² The Historic Resources Register, Structures of Merit and Landmark lists constantly are growing as the city continues to identify historic resources. The City also has designated four areas as Historic District Overlay Zones. These include the El Pueblo Viejo Landmark District, Brinkerhoff Avenue Historic District, Riviera Campus Historic District, and the El Encanto Hotel Historic District. Within these districts, historic structures are distinguished as contributing, non-contributing, or conditional contributing. To constitute a Historic District Overlay Zone, at least 80 percent of the historic resources in a district must be considered as contributing historic resources. Definitions of these distinctions are as follows (City of Santa Barbara 2021):

- **Contributing Historic Resources:** Add to the historical and architectural qualities of a historic district, were present during the period of significance, and retain physical integrity.
- **Non-contributing Historic Resources:** Located within the district boundaries but do not add to the historic or architectural qualities of the district, as they were constructed outside the period of significance or are no longer recognizable as such.
- **Conditional Contributing Historic Resources:** Historic resources that have lost historic and architectural integrity due to inappropriate alterations or deterioration. If restored, the historic resources could contribute to the historic district. The degree of alterations and the amount of integrity remaining in the historic resource that can be reversed will be factors for this determination.

4.4.2 Regulatory Setting

a. Federal Regulations

National Register of Historic Places

The NRHP was established by the National Historic Preservation Act of 1966 as “an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment” (36 Code of Federal Regulations 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it meets any one of the following criteria:

- **Criterion A:** Are associated with events that have made a significant contribution to the broad patterns of our history
- **Criterion B:** Are associated with the lives of persons significant in our past
- **Criterion C:** Embody the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

² Buildings are continuously reviewed and added to the City’s Local Register of Historic Resources. Historic resources are updated regularly, and therefore the total number of Landmarks, Structures of Merit, and structures listed in the Local Register of Historic Resources may differ from the values presented in this Program EIR.

- **Criterion D:** Have yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined in the following manner:

- **Location:** The place where the historic property was constructed or the place where the historic event occurred
- **Design:** The combination of elements that create the form, plan, space, structure, and style of a property
- **Setting:** The physical environment of a historic property
- **Materials:** The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property
- **Workmanship:** The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory
- **Feeling:** A property's expression of the aesthetic or historic sense of a particular period of time
- **Association:** The direct link between an important historic event or person and a historic property

b. State Regulations

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires that a lead agency determine whether a project could have a significant effect on historical resources and tribal cultural resources (Public Resources Code [PRC] Section 21074 [a][1][A]-[B]). A historical resource is a resource listed in or determined to be eligible for listing in the CRHR (Section 21084.1), a resource included in a local register of historical resources (Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (Section 15064.5[a][3]).

PRC Section 5024.1 requires an evaluation of historical resources to determine their eligibility for listing in the CRHR. The purpose of the register is to maintain listings of the state's historical resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, as enumerated according to CEQA and quoted below.

Section 15064.5(a)(3) [...] Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC, Section 5024.1, Title 14 California Code of Regulations, Section 4852) including the following:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
- (2) Is associated with the lives of persons important in our past

- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
- (4) Has yielded, or may be likely to yield, information important in prehistory or history

Section 15064.5(a)(4) The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

Section 15064.5(b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

In addition, if a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b], and [c]).

PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it does one or more of the following:

- a. Contains information needed to answer important scientific research questions and that there is 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

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (CEQA Guidelines Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion or eligibility for inclusion in the CRHR (CEQA Guidelines Section 15064.5[b][2][A]).

California Assembly Bill 52

On July 1, 2015, California Assembly Bill (AB) 52 was enacted and expanded CEQA by defining a new resource category, "Tribal Cultural Resources." AB 52 states, "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). AB 52 further states that, when feasible, the CEQA lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource (PRC Section 21084.3). PRC Sections 21074(a)(1)(A) and (B) define tribal cultural resources as "sites, features, places, cultural landscapes,

sacred places, and objects with cultural value to a California Native American tribe” and that meets at least one of the following criteria, as summarized in Appendix G of the CEQA Guidelines:

1. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k); and/or
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 Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 establishes a formal consultation process with California Native American tribes that must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a project. California Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency. As part of this statutorily required consultation processes, the City sent letters to seven Native American Tribes that had previously requested to be formally notified of proposed projects in Santa Barbara.

Senate Bill 18

Senate Bill 18 (SB 18) of 2004 (California Government Code Section 65352.3) requires local governments to contact, refer plans to and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government’s jurisdiction and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research’s Tribal Consultation Guidelines (2005), “The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.” As part of this statutorily required consultation processes, the City sent letters to seven Native American Tribes that had previously requested to be formally notified of proposed projects in Santa Barbara.

Senate Bill 35 and Assembly Bill 168

Enacted on September 29, 2017, Senate Bill 35 (SB 35) (California Government Code Section 65913.41) grants a ministerial approval process that expedites and facilitates construction of affordable housing projects without normal CEQA documentation. Following, in May 2021, Assembly Bill 168 (AB 168), an act to amend Sections 65400, 65913.4, and 65941.1 of SB 35, was passed. AB 168 requires a pre-consultation process with Native American Tribes to identify and protect tribal cultural resources prior to the submission of an SB 35 permit for a housing development.

California Health and Safety Code Section 7050.5

Section 7050.5(b) of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area responsibly suspected to overlie adjacent remains until the County Coroner for the area in which the remains are discovered has determined that the remains are not subject to provisions concerning the investigation of the

circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. Section 7050.5(c) goes on to state if the remains are of Native American origin, the coroner must notify the NAHC within 24 hours of identification.

California Public Resources Code Section 5097.98

PRC Section 5097.98 states the NAHC, upon notification of the discovery of human remains from a county coroner pursuant to California Health and Safety Code Section 7050.5(c), shall immediately notify those persons it believes to be the Most Likely Descendant (MLD) from the deceased. With the permission of the landowner, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

c. Local Regulations

City of Santa Barbara Historic Resources Element

The Historic Resources Element of the City's General Plan contains four overarching goals and ten policies, each with several associated implementation measures aimed toward preserving and protecting Santa Barbara's historic, cultural, and tribal cultural resources (City of Santa Barbara 2012):

Goals

- ***Protection and Enhancement of Historical Resources.*** Continue to identify, designate, protect, preserve and enhance the City's historical, architectural, and archaeological resources. Ensure Santa Barbara's "sense of place" by preserving and protecting evidence of its historic past, which includes but is not limited to historic buildings, structures, and cultural landscapes such as sites, features, streetscapes, neighborhoods, and landscapes.
- ***Increased Awareness and Appreciation.*** Increase public awareness and appreciation of Santa Barbara's history and pre-history, its historical, cultural and paleontological resources, their value and the need to protect them. Recognize that historic resources are necessary contributors to attaining sustainability, environmental and economic vitality, and preservation of the city's quality of life.
- ***Governmental Cooperation.*** Incorporate preservation principles as a valid and necessary component in decision-making, at every phase of City government, and secure cooperation from all levels and agencies of government in these efforts.
- ***Neighborhood Historic Preservation.*** Protect the significant contribution made by Santa Barbara's neighborhood historic resources to the City's charm and sense of historical context.

Policies

- **HR1: Protect Historic and Archaeological Resources.** Protect the heritage of the City by preserving, protecting and enhancing historic resources and archaeological resources. Apply available governmental resources, devices and approaches, such as the measures enumerated in the Land Use Element of this Plan, to facilitate their preservation and protection.

- **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 the 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.
- **HR3: Discourage Demolition.** Develop effective measures to discourage and curtail the demolition of historic resources.
- **HR4: Pursue Adaptive Reuse.** Encourage the adaptation of historic buildings or structures for uses other than the original intended use when the original use is no longer viable.
- **HR5: Protect Neighborhood Historic Resources.** Identify neighborhoods in the city that have substantially maintained historical character, and pursue measures to preserve that character. Protect such neighborhoods, especially those in close proximity to the downtown and commercial cores, from development that might transform their historic character.
- **HR6: Protect Traditional Public Resources and Streetscapes.** Identify and preserve significant public resources and streetscapes and ensure a public review process in order to protect their historical features and attributes.
- **HR7: Protect Cultural Landscapes.** Identify and preserve historic landscapes.
- **HR8: Survey and Document All Historic Resources.** Continue to identify, document, and designate individual historic resources, as well as historic areas.
- **HR9: Increase Awareness of Santa Barbara's Heritage.** Promote recognition that conservation of historic and cultural resources is a necessary contributor toward economic vitality, attaining sustainability and preservation of quality of life. Increase public awareness and appreciation of the significance of Santa Barbara's history. Promote awareness, appreciation and understanding of the early inhabitants of Santa Barbara.
- **HR10: Assure Governmental Effectiveness.** Provide adequate resources to enable implementation of the goals and policies within this Element. Ensure coordination between agencies and review bodies at all levels of government by every means, including provision of easy access to all relevant information and materials.

Local Coastal Program

The California Coastal Act requires all local governments located within the Coastal Zone to prepare a Local Coastal Program (LCP). LCPs regulate future development within the Coastal Zone and define where public access and urbanization will occur, where industrial facilities will be placed, and how sensitive species and habitats, open spaces, and recreational areas will be protected. The City adopted the Coastal Land Use Plan (Coastal LUP) in 2019, which serves as the City's LCP.

Chapter 4.4, *Cultural Resources*, of the Coastal LUP contains policies designed to preserve, protect, and enhance archaeological and cultural resources within the Coastal Zone. Specifically, Coastal LUP policies increase the visibility of Chumash history and culture, set development standards which require avoidance and preservation of archaeological resources and Native American consultation, implements standard mitigation for projects likely to adversely impact archaeological resources in the Coastal Zone, implements conditions of approval which require monitoring by a qualified archaeologist, and provides a methodology for evaluating archaeological resources (City of Santa Barbara 2019).

City of Santa Barbara Municipal Code

The City of Santa Barbara Municipal Code Section 30.220.020 implements the powers and duties of the Historic Landmarks Commission. Approval by the Historic Landmarks Commission is required for any exterior alteration, relocation, or demolition, including demolition by neglect of a structure, site, or feature developed with, containing, or located within any of the following (City of Santa Barbara 2022b):

- a. **City-Owned or Leased Property.** If the alteration, construction or relocation of any structure, natural feature, site or area owned or leased by the City has a historic resource on the lot, the entire property is under Historic Landmarks Commission jurisdiction, except for the Airport Property due to the size of the property and demand for air use and the Historic Landmarks Commission purview will be over historic resources on the site only.
- b. **El Pueblo Viejo Landmark District.** As defined in Municipal Code Section 30.57.030
- c. **Historic Resource.** A historic resource as defined in Municipal Code Section 30.300.080 “H” Historic Resources Related Definitions.
- d. **Historic District (HD) Overlay Zones.** All properties, contributing and non-contributing, within a HD Overlay Zone.
- e. **Publicly Owned Buildings Generally.** Except as provided in subsections B.1.f. and g of Section 30.220.020, any structure, natural feature, site or area owned or leased by any public entity other than the City of Santa Barbara and designated as a Landmark or Structure of Merit, or located within any landmark district, shall not be subject to the provisions of Chapter 30.220.
- f. **Public Interest Exception for City Facilities.** The City Council shall first make a public interest determination on whether the alteration, construction or relocation of any structure, natural feature, site or area owned or leased by the City and designated as a Landmark or Structure of Merit, or located within any Landmark or Historic District, is exempt from review by the Historic Landmarks Commission.
- g. **Highway 101 Santa Barbara Coastal Parkway Special Design District.** A natural feature, site or area owned or leased by a public entity within the U.S. Highway 101 Santa Barbara Coastal Parkway Special Design District as defined by Municipal Code Section 22.68.060.C, which requires a Coastal Development Permit and which is designated as a Landmark, Structure of Merit, or which is located within any Landmark or Historic District shall be reviewed by the Historic Landmarks Commission.

Municipal Code Chapter 30.157 specifies the procedures and criteria that apply citywide to regulate the designation of individually significant historic resources. In considering a designation or recommendation for a site or feature as a Landmark, Structure of Merit, or for inclusion on the Local Register of Historic Resources , any structure, site, or feature must be at least 50 years of age, retain historic integrity, and meet one or more of the criteria outlined below (City of Santa Barbara 2022b):

1. It is associated with events that have made a significant contribution in our past;
2. It is associated with the lives of persons significant in our past;
3. It embodies the distinctive characteristics of a type, period, architectural style or method of construction, or represents the work of a master, or possesses high artistic or historic value, or represents a significant and distinguishable collection whose individual components may lack distinction;
4. It yields, or may be likely to yield, information important in prehistory or history; or

5. Its unique location or singular physical characteristic represents an established and familiar visual feature of a neighborhood

Nominations for the designation of a Landmark or Structure of Merit are submitted to the Community Development Department's Planning Division for initial review by the City Architectural Historian. Any structure, site or feature having potential historic, architectural, archeological, cultural, or aesthetic significance may be proposed to the Historic Landmarks Commission for designation as a Landmark or Structure of Merit. The designating authority must find that the structure, site or feature retains enough historic integrity of location, design, setting, materials, workmanship, feeling, and association that it conveys its historic significance in accordance with the most recent National Register of Historic Places Bulletin *How to Apply the National Register Criteria for Evaluation*. Pursuant to Municipal Code Section 30.157.050, the Historic Landmarks Commission, through the City's Architectural Historian, maintains and updates a robust Local Register of Historic Resources identifying historic resources that are not designated as Landmarks, Structures of Merit or contributing to a Historic District Overlay Zone, yet qualify for historic designation as defined by Chapter 30.157. The Local Register of Historic Resources is available to the public and is maintained for the purpose of clearly identifying historic resources not officially designated, yet whose preservation is important to the heritage of the community.

Section 30.157.110(F) and Section 30.157.110(G) detail the conditions under which a Landmark or other historic resources could be substantially redeveloped or demolished. Section 30.157.110(G) states a proposal to demolish a historic resource other than a Landmark may only be approved if the Historic Landmarks Commission has made at least one of the following findings:

1. Specific measures have been incorporated into the project scope to mitigate the loss of the historic resource to a less than significant level;
2. The historic resource has been damaged by an earthquake, fire, or other similar casualty such that its repair or restoration is not reasonably practical or economically feasible as supported by substantial evidence provided by at least one qualified structural engineer or architect qualified in historic preservation. The Historic Landmarks Commission may require, as conditions of approval of a demolition, that the property owner(s) salvage historic materials from the property and/or provide archival quality photo documentation of the remaining historic materials of the structure, site or feature to the City;
3. Preservation of the historic resource is not economically feasible or practical, or no viable measures could be taken to adaptively use, rehabilitate, or restore the historic resource as supported by substantial evidence provided by at least one qualified historic preservation specialist, structural engineer (qualified in historic preservation), or architect (qualified in historic preservation) sufficient to warrant demolition; or
4. A compelling public interest justifies demolition.

Municipal Code Chapter 30.57 sets design review standards applicable to properties within designated Landmark District and Historic District Overlay zones. The purpose of these design review standards is to preserve and enhance unique historic and architectural character within the El Pueblo Viejo Landmark District, Brinkerhoff Avenue Historic District, Riviera Campus Historic District, and the El Encanto Hotel Historic District. Any structure, site, or feature constructed or altered which is located within a Historic District or Landmark District is required to be compatible with the design requirements for the respective district.

Pursuant to Titles 28 and 30 of the Municipal Code, two-unit residential developments and accessory dwelling units are prohibited if the development would cause a substantial adverse change in the significance of a historic resource that is listed on the NRHP, CRHR, designated as a City of Santa Barbara Landmark or Structure of Merit, or located in a designated historic district.

Municipal Code Chapter 22.12 is enforced in order to preserve and protect significant archaeological resources found in Santa Barbara. Section 22.12.020 sets standards for known and unknown archaeological sites. Pursuant to Section 22.12.020 in known archaeological sites, grading permits are conditioned such that ground disturbing activities would ensure the preservation or avoidance of the site, minimize adverse impacts, and allow for reasonable time for qualified professionals to perform archaeological investigations. In unknown archaeological sites, where it is subsequently determined significant archaeological resources may exist, the Municipal Code outlines procedures if such archaeological resources are found. This includes notification of appropriate City staff, preliminary investigations, suspension of work, and the development of conditions to address the find.

Master Environmental Assessment Guidelines

The City Master Environmental Assessment (MEA) Guidelines for Archaeological Resources, Historic Resources, and Tribal Cultural Resources were adopted by Resolution of the City Council and updated on April 29, 2025. They establish procedures for determining the significance of impacts on cultural resources which may result from discretionary development projects subject to CEQA review. The MEA Guidelines provide procedures for the preservation and protection of significant historic, archaeological resources, and tribal cultural resources in a manner consistent with the City's General Plan and Municipal Code. The MEA Guidelines for Archaeological Resources require the City's Planning Division staff to determine whether a Phase I Archaeological Resources Report or a Letter Report Confirming No Archaeological Resources is required for new planning applications. When a Phase I Archaeological Resources Report is required, the MEA provides standard reporting procedures that shall be followed. If archaeological resources are identified on a project site during a Phase I or Phase II survey, a Phase III Archaeological Resources Report is required to be prepared with the intention of outlining mitigation of adverse effects to the known archaeological resource through data recovery (City of Santa Barbara 2025). The MEA Guidelines for Tribal Resources require coordination with Native American tribes throughout the assessment process if it is determined archaeological resource could potentially be disturbed. This includes Native American monitoring during ground-disturbing activities. The MEA Guidelines for Historic Resources define when historic resource evaluations are required by qualified consultants or the City's Architectural Historian and clarify the environmental review process for historic resources.

Historic Resource Design Guidelines

The City's Historic Resources Design Guidelines assists owners of historic resources in preservation of historic resources and guides building updates that may be made on a historic resource. The guidelines are intended to assist in designing a project that will be appropriate, compatible, and beneficial to the City's historic resources and historic districts. The Historic Resources Design Guidelines assist the Historic Landmarks Commission, applicants, and City staff in the review of proposed alterations to existing structures and applications for new development on properties identified as having historic significance (City of Santa Barbara 2021).

4.4.3 Impact Analysis

a. Methodology and Significance Thresholds

The assessment of potential impact to historical, archaeological, and tribal cultural resources were informed based on a review of readily available information from the City's Historic Treasures Webmap, and the City's Archaeological Sensitivity Area Maps. In addition, this assessment includes a summary of the City's consultation efforts pursuant to AB 52 and SB 18. As a programmatic document, this Program EIR presents a citywide assessment of development that would be facilitated by implementation of the Housing Plan. Because the Program EIR is a long-term document intended to guide actions for many years into the future, this analysis relies on program-level and qualitative evaluation. The Housing Plan does not include development proposals for individual projects.

The City's environmental checklist and Appendix G of the CEQA Guidelines state a project may have a significant adverse impact on cultural and/or tribal cultural resources if it would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;
3. Disturb any human remains, including those interred outside of formal cemeteries;
4. 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 to 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 5020.1.1(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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

The criteria for determining archaeological and historical resource importance are specified in the CEQA Guidelines and 2025 City MEA Guidelines for Archaeological Resources, and Guidelines for and Historic Resources, and are generally summarized as follows:

- **Scientific Value:** Contains information needed to answer important scientific research questions and there exists a demonstrable public interest in that information;
- **Unique Quality:** Has a special, distinctive quality of a type, period, region, or method of construction, such as being the oldest or best available example of its type;
- **Federal, State, or City Designations:** Landmark or Structure of Merit status or a qualitative assessment of the physical state and context of the resources; and/or
- **Historic Event or Person:** Is directly associated with an important prehistoric or historic event or person.

Resource importance is determined based on designations (e.g., Landmark status) or a qualitative assessment by archaeologists or historians of the physical state and context of specific resources using the criteria for resource importance. For the Housing Plan Program EIR analysis, the designations and resources sensitivity area maps are used to identify potential areas of important resources. Tribal cultural resources are identified based upon information from California Native American tribes obtained during consultation processes.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact CUL-1 THE HOUSING PLAN COULD RESULT IN POTENTIALLY SIGNIFICANT IMPACTS TO HISTORICAL RESOURCES THAT ARE ELIGIBLE BUT NOT YET DESIGNATED. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Implementation of the Housing Plan would have a significant impact on historical resources if Housing Plan programs and associated residential development would cause a substantial adverse change in the significance of a historical resource. A substantial adverse change would include the demolition or substantial alteration of a resource such that it would no longer be able to convey its significance. Historical resources include properties eligible for listing in the NRHP or CRHR or as a local historic resource, City-designated Landmark, or Structure of Merit. The City of Santa Barbara contains many structures that may be eligible for historic designation but have not yet been formally evaluated. Properties with documented evidence of meeting the criteria for historic designation have been added to the Register. Residential development under the Housing Plan could occur in historic districts or parcels containing designated or eligible structures. Such development would have the potential to result in alteration or demolition of significant historic structures, or may alter the historic setting or character through inappropriate siting and design.

Designated and Eligible Historical Resources

The City's Historic Preservation Ordinance and Historic Resources Element contain a regulatory framework that provide protections against the demolition of City-designated Landmarks, and establish procedures for proposed development that has the potential to affect historical resources as defined in the Santa Barbara Municipal Code. The City Architectural Historian maintains and updates the Local Register of Historic Resources, which lists qualifying historic structures over 50 years old that are not currently designated as Landmarks, Structures of Merit, or contributing to a Historic District Overlay Zone or Landmark District Overlay Zone. Under Municipal Code Chapter 30.157, structures over 50 years old must be evaluated prior to approval of an application for an addition, alteration, or demolition to determine if the structure qualifies as a historical resource pursuant to CEQA requirements. Resources eligible for designation are also defined as historical resources for CEQA purposes and are subject to the same local regulations as designated historical resources. Projects that would alter these eligible historical resources, as determined by the City Architectural Historian and/or Historic Landmarks Commission, may be subject to project-specific environmental review.

Under existing regulations, individual projects are reviewed by the City for consistency with the Historic Preservation Ordinance. The Historic Landmarks Commission reviews projects, including residential and mixed-used projects, that may have a significant effect on character-defining

features of a historic resource. Pursuant to the Historic Preservation Ordinance in Municipal Code Chapter 30.157, the Historic Landmarks Commission must make findings on whether a project containing a historical resource is consistent with the Secretary of Interior's Standards for the Treatment of Historic Properties. While these procedures provide strong protections for designated resources, they do not fully address the potential for demolition or alteration of unevaluated and undesignated historical resources under ministerial or streamlined approval processes for housing developments.

With adoption of AB 130 (2025) and ministerial and streamlined housing approvals under state law, unevaluated structures may be redeveloped without the City's determination of historic significance, as historic designation is required prior to preliminary project submittal. This leaves unevaluated and undesignated properties unprotected and unmitigable. If a project facilitated by a Housing Plan program proposes to demolish or alter an eligible historical resource, the project would be required to implement measures to reduce impacts to historical resources to a less than significant level unless the City's Historic Landmarks Commission makes the required demolition findings for the resource, based in part, on the analysis and conclusions of the project-specific environmental review document. Housing Plan Program HE-1, which allows for the adaptive reuse of historic buildings, also has the potential to alter and add on to the rear of historic structures; however, as described in Section 3, *Project Description*, these projects must meet the Secretary of Interior's Standards for Rehabilitation, ensuring that alterations are consistent with the historic character-defining features of a building and do not affect the significance of a historic structure.

Historic/Landmark Districts

Within the City's historic/landmark districts, the loss or alteration of contributing buildings, or inappropriate development that is out of scale with the existing setting, or incompatible in design or lay-out, could diminish a district's physical character, setting, feeling, and associations. Residential development facilitated by Housing Plan programs, such as HE-7 Objective Design Standards and HE-12 Affordable Housing Strategy, could potentially result in increased residential density or facilitate construction within districts such as El Pueblo Viejo Landmark District and Brinkerhoff Historic District, as well as potential historic districts in West Beach, lower De La Vina Street, Castillo Street, Mission Gardens, and Plaza Bonita, that have not been formally designated. In addition, Housing Plan programs could result in more structures developed up to the City's zoning and Charter height limits in historic districts, including the Downtown in the El Pueblo Viejo Landmark District. The combined effect of multiple new residential developments within or adjacent to a district has the potential to cumulatively alter the district's historic character.

Although the City reviews discretionary projects for consistency with the Municipal Code, the Historic Resources Element, and Historic Resources Design Guidelines, unevaluated resources and undesignated resources on the site of certain infill housing projects may not receive protection under AB 130. Consequently, development under the Housing Plan could potentially alter the historic integrity of districts and their contributing structures.

Housing Plan Program HE-1, Adaptive Reuse, has the potential to alter contributing buildings; however, compliance with the Secretary of Interior's Standards for Rehabilitation, would ensure alterations are consistent with the historic character-defining features of a building. Therefore, adaptive reuse facilitated by the Housing Plan would protect character-defining features of contributing buildings in the City's Historic Districts and Landmark Districts.

Conclusion

Although existing City policies and regulatory processes provide an extensive framework for preservation of the integrity of important historic resources and historic and landmark districts, the Housing Plan would facilitate increased levels of housing development across the City, including in areas with unevaluated resources. As a result, the potential exists for demolition or alteration of significant but currently undesignated resources, as well as cumulative changes to the integrity of historic districts. Therefore, the impact on historical resources from implementation of the Housing Plan would be potentially significant.

Mitigation Measures

CUL-1 Historical Resources Protection

The City of Santa Barbara Community Development Department shall amend the Municipal Code as necessary to ensure the protection of eligible historic resources that have not been formally designated. Key provisions include the following:

- **Identify and Add Historic Resources to the Local Register of Historical Resources.** The City Architectural Historian or qualified designee shall identify structures, sites, or features eligible for inclusion on the Local Register of Historical Resources based upon the criteria established for the National Register of Historic Places (36 CFR Part 60), California Register of Historical Resources (PRC 5024.1), and/or the Historic Preservation Ordinance (SBMC 30.157).
- **Planning Application Requirements.** The Community Development Department shall amend the planning application checklist to require a historic resource evaluation for structures over 50 years old.
- **Application Completeness Requirement.** Planning applications shall not be deemed complete and/or approved for demolition permits until compliance with the historic resource evaluation requirements under the Historic Preservation Ordinance SBMC Chapter 30.157 have been demonstrated.

Significance After Mitigation

Implementation of Mitigation Measure CUL-1 would ensure new residential development, including projects subject to streamlined or ministerial approvals, are reviewed for potential historical significance. Where significant resources are identified, protections under the City Historic Preservation Ordinance would be implemented to avoid impacts to historical resources. Implementation of Mitigation Measure CUL-1 would reduce impacts to historical resources to a less than significant level.

Threshold 2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact CUL-2 PROJECTED DEVELOPMENT FACILITATED BY THE HOUSING PLAN COULD IMPACT PREVIOUSLY UNDISCOVERED ARCHAEOLOGICAL AND TRIBAL CULTURAL RESOURCES. IMPACTS ON ARCHAEOLOGICAL AND TRIBAL CULTURAL RESOURCES WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

The Santa Barbara region was settled by several Chumash villages and the City contains known archaeological sites and areas of tribal cultural sensitivity. There is the potential to encounter previously unidentified archaeological and tribal cultural resources on sites that may be developed

with residential uses under implementation of the Housing Plan. While the city is largely developed with few vacant parcels, sites located along waterways, bluffs, and estuaries have a higher potential to contain previously unidentified archaeological and tribal cultural resources given the greater likelihood of Chumash habitation in these areas. However, ground disturbance into native (previously undisturbed) soils on any development site could encounter previously undiscovered prehistoric or historic-period resources. The potential exists for archaeological and tribal cultural resources to occur below the ground surface throughout Santa Barbara, which may be disturbed and damaged by grading and excavation activities associated with new housing development. The 2025 City MEA Guidelines for Archaeological Resources establish procedures for the evaluation and protection of archaeological resources and sites, consistent with the CEQA Statute and Guidelines. In addition, Municipal Code Chapter 22.12 provides standard conditions in the event of unanticipated discovery of archaeological and tribal cultural resources. Through imposition of standard conditions, survey requirements, and procedures for unanticipated discovery, the City ensures impacts to archaeological and tribal cultural resources are minimized.

The Housing Plan would facilitate residential development that may not be subject to the City's MEA Guidelines. Such development has the potential to result in substantial ground disturbance in areas with archaeological sensitivity and could potentially uncover and disturb significant archaeological and tribal cultural resources. Thus, development projects that involve substantial ground disturbance in archaeologically sensitive areas have the potential to result in impacts to previously unidentified archaeological resources. Therefore, this impact is potentially significant.

Mitigation Measures

CUL-2 Archaeological Resources Protection

- The City of Santa Barbara Community Development Department shall amend the Municipal Code with requirements applicable to development involving substantial ground disturbance occurring in areas with potential for known or unknown archaeological resources to exist. The amendments to the Municipal Code shall implement and enforce archaeological resource protections requirements.
- The City shall require development or redevelopment projects that have the potential to impact areas identified as archaeologically sensitive to complete an archaeological resource report. Archaeological resource reports shall identify site-specific measures to avoid or lessen effects in areas of suspected but not known archaeological resources. Measures may include, but are not limited to, archaeological monitoring and implementation procedures in the event of an unanticipated discovery.
- Where archaeological resources are identified and may be impacted by the project, the City shall require additional testing and evaluation, or other measures to minimize significant impacts, such as site avoidance.
- If resources are determined to be significant or unique, avoidance of the resource shall be the preferred mitigation. If site avoidance is not possible, appropriate site-specific measures shall be identified. Measures may include, but are not limited to, a Phase III Data Recovery Program or other appropriate actions to be determined by a qualified archaeologist.

CUL-3 Tribal Cultural Resources Protection

- The City of Santa Barbara Community Development Department shall amend the Municipal Code with requirements applicable to development involving substantial ground disturbance occurring in areas with potential for tribal cultural resources to exist. The amendments to the Municipal Code shall implement and enforce tribal cultural resource protection requirements.
- Measures may include, but are not limited to, coordination with tribal representatives, Native American monitoring, and implementation procedures in the event of an unanticipated discovery.

Significance After Mitigation

Implementation of Mitigation Measures CUL-2 and CUL-3 would ensure new residential development, including projects subject to ministerial approval, within areas of archaeological and tribal cultural resource sensitivity would be adequately reviewed and standard measures would be implemented to avoid impacts to archaeological and tribal cultural resources prior to ground disturbing activities. Implementation of Mitigation Measures CUL-2 and CUL-3 would reduce impacts to archaeological and tribal cultural resources to a less than significant level.

Threshold 3: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impact CUL-3 GROUND DISTURBING ACTIVITIES ASSOCIATED WITH DEVELOPMENT FORECASTED IN ACCORDANCE WITH THE HOUSING PLAN COULD RESULT IN DISTURBANCE OF HUMAN REMAINS. IMPACTS ON HUMAN REMAINS WOULD BE LESS THAN SIGNIFICANT.

Human burials outside of formal cemeteries can occur in prehistoric archaeological contexts. Excavations during construction activities could have the potential to disturb remains, which could include Chumash burial sites. Although it is unlikely that unidentified human remains are present, there is a remote possibility of uncovering previously unidentified human remains during construction and ground disturbance.

Human burials and remains have specific provisions for treatment and protection in the Public Resources Code (PRC) Section 5097 and California Health and Safety Code Sections 7050.5, 7051, and 7054. Existing state regulations protect them from disturbance, vandalism, or destruction, and include established procedures in the scenario that Native American human remains are discovered. PRC Section 5097.98 also addresses the disposition of Native American burials, protects such remains, and established the NAHC to resolve any related disputes.

Development projects are subject to State of California Health and Safety Code Section 7050.5 which states that, if human remains are unearthed, no further disturbance can occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the County Coroner has 24 hours to notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site and make recommendations to the landowner within 48 hours of being granted access. Therefore, this impact is less than significant.

Mitigation Measures

Mitigation Measures CUL-1 and CUL-2 would further reduce this less than significant impact.

Significance After Mitigation

Implementation of Mitigation Measures CUL-1 and CUL-2 would ensure new residential development that has the potential to impact undiscovered human remains would comply with the provisions set forth pursuant to California Health and Safety Code Section 7050.5 and PRC Section 5097.98. Implementation of Mitigation Measures CUL-1 and CUL-2 would further ensure the potential for impacts to human remains is less than significant.

Threshold 4a: Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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)?

Threshold 4b: Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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 Section 5024.1?

Impact CUL-4 PROJECTED DEVELOPMENT FACILITATED BY THE HOUSING PLAN WOULD BE SUBJECT TO ADOPTED CITY REGULATORY REQUIREMENTS DEVELOPED TO MINIMIZE IMPACTS TO POTENTIAL TRIBAL CULTURAL RESOURCES. COMPLIANCE WITH CONSULTATION CONDUCTED PURSUANT TO THE REQUIREMENTS OF AB 52 AND THE CITY MEA GUIDELINES WOULD MINIMIZE POTENTIAL IMPACTS TO TRIBAL CULTURAL RESOURCES. IMPACTS ON TRIBAL CULTURAL RESOURCES WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

A tribal cultural resource is a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. This may include prehistoric archaeological resources, and sites listed within the Sacred Lands File.

In order to assess the potential for Housing Plan programs to impact tribal cultural resources, the City conducted the request for tribal consultation process pursuant to AB 52 and SB 18. The City contacted the Native American Heritage Commission (NAHC) on December 14, 2021, and requested a list of tribal representatives and a Sacred Lands File search. The NAHC responded on February 23, 2022 and found the Sacred Lands File search to be negative for the City of Santa Barbara. The City sent letters to seven Native American tribal representatives in April 2022 that had previously requested to be formally notified of proposed projects in Santa Barbara. Responses were received from the Barbareño Band of Chumash Indians and the Santa Ynez Band of Chumash Indians, who both requested to be informed of project updates and added to the interested parties list. However, there were no requests for formal consultation for the Program EIR. Communications with tribal representatives under AB 52 and SB 18 did not yield any information about tribal cultural resources that could be impacted by the Housing Plan. Nonetheless, due to the programmatic nature of the Housing Plan, it remains a possibility that tribal cultural resources may be present within geographic areas affiliated with Chumash tribes.

Individual residential development projects facilitated by the Housing Plan could adversely affect resources that may qualify as tribal cultural resources. There is potential to encounter tribal cultural resources on potential sites for residential development facilitated by the Housing Plan. Individual projects that require preparation of a Mitigated Negative Declaration or Environmental Impact Report, require AB 52 tribal consultation with local California Native American Tribes prior to approval of the project. Compliance with state regulations and local policies related to Native

American consultation and tribal cultural resources would minimize the potential for impacts to occur. AB 168 requires a pre-consultation process with Native American Tribes to identify and protect tribal cultural resources prior to the submission of an SB 35 permit for affordable housing development. Furthermore, ministerial development, such as housing development pursuant to AB 130 and ADUs, has the potential result in the disturbance of tribal cultural resources, as no consultation processes are currently required for ministerial approvals. Therefore, implementation of the Housing Plan has the potential to result in significant impacts to tribal cultural resources.

Mitigation Measures

Implement Mitigation Measures CUL-2 and CUL-3.

Significance After Mitigation

Implementation of Mitigation Measures CUL-2 and CUL-3 would require the City to develop procedures to coordinate with tribal representatives and evaluate potential impacts to tribal cultural resources from development projects. Implementation of Mitigation Measures CUL-2 and CUL-3 would reduce impacts to tribal cultural resources to a less than significant level.

4.4.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts together with similar impacts of reasonably anticipated regional projects/programs including the City's Objective Design Standards, the City's Safety Elements update, Open Space Element update, the City's State Street Master Plan, and the California Department of Transportation's (Caltrans') South Coast Highway 101 High-Occupancy Vehicle Lanes project. Cumulative impacts also include planned and pending residential development projects that contribute to the City's RNHA. The general approach to cumulative impact analysis used in this Program EIR is discussed in Section 4, *Environmental Impact Analysis*.

Existing City regulations codified in the Municipal Code prevent the physical demolition, destruction, relocation, or alteration of a historic resource unless measures are provided to mitigate potential impacts, the historic resource is damaged, preservation is not economically feasible or practical, or a compelling interest justifies demolition. Pursuant to Municipal Code Section 30.57.220, design compatibility standards for historic districts in the City apply to all properties located within or propose to be located within Landmark District or Historic Districts of the City. Therefore, all development within a Landmark District or Historic District would be subject to the required architectural styles of the respective district and revised as part of the City's review of developments prior to permit issuance. As a result, cumulative development would not contribute considerably to a substantial adverse change in the significance of historical resources within the City's historic districts. Further, implementation of Mitigation Measure CUL-1 would amend the Historic Preservation Ordinance and would minimize the potential for cumulative impacts to eligible historic resources related to housing development.

Cumulative development could increase ground disturbing activities within the City's identified archaeological sensitivity areas, which could increase the likelihood of encountering previously undiscovered archaeological and tribal cultural resources. Cumulative ministerial development that involves ground-disturbing activities would not be required to be reviewed for the potential to disturb archaeological resources prior to construction which, similar to the implementation of the Housing Plan, would result in potential to result in uncovering and destroying unanticipated archaeological and tribal cultural resources. Implementation of Mitigation Measures CUL-1 and CUL-2 would require the City to amend the Municipal Code to provide for the increased protection of

archaeological and tribal cultural resources. With implementation of Mitigation Measures CUL-2 and CUL-3, development facilitated by the Housing Plan would minimize the potential destruction of archaeological and tribal cultural resources. As a result, the Housing Plan would not contribute considerably to the regional cumulative impact on archaeological and tribal cultural resources.

Cumulative development could occur in geographic areas affiliated with tribal organizations where tribal cultural resources may be present. Compliance with the requirements of AB 52 would assess whether a specific project would have an adverse impact on tribal cultural resources. However, cumulative development could result in the disturbance of tribal cultural resources. As described above, the Housing Plan would require implementation of Mitigation Measures CUL-2 and CUL-3, which require the City to amend the Municipal Code to avoid or minimize potential impacts to tribal cultural resources from ministerial and discretionary development projects. With implementation of Mitigation Measures CUL-1 and CUL-2, the Housing Plan would not contribute considerably to the regional cumulative impact on tribal cultural resources.

The disturbance of human remains is largely site-specific, and the disturbance of remains at one site is generally not considered additive at another site. In addition, the disturbance of human remains is regulated under the California Health and Safety Code Section 7050.5 and PRC Section 5097.98. Together, these regulations set standard procedures for the discovery of human remains and further evaluation if the remains are determined to be of Native American origin. While cumulative development has the possibility of uncovering unidentified human remains, all cumulative development would be subject to the requirements set forth within California Health and Safety Code Section 7050.5 and PRC Section 5097.98. Consequently, the potential disturbance of human remains would not result in a cumulatively significant impact.

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4.5 Greenhouse Gas Emissions

This section summarizes the setting for greenhouse gas (GHG) emissions and climate change and analyzes the impacts related to GHG emissions and climate change due to the Housing Plan.

4.5.1 Setting

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂); methane (CH₄); nitrous oxides (N₂O); fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs); and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as “carbon dioxide equivalent” (CO₂e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a 100-year GWP of 30, meaning its global warming effect is 30 times greater than CO₂ on a molecule per molecule basis (United Nations Intergovernmental Panel on Climate Change [IPCC] 2021).¹

GHGs are emitted by natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Emissions of CO₂ are usually by-products of fossil fuel combustion, and CH₄ results from off-gassing associated with agricultural practices, landfills, and other sources. Human-made GHGs, many of which have greater heat-absorption potential than CO₂, include fluorinated gases and SF₆ (United States Environmental Protection Agency [USEPA] 2022a).

Climate change is the observed increase in the average temperature of the Earth’s atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term “climate change” is often used interchangeably with the term “global warming,” but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record, which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The IPCC expressed in their Sixth Assessment Report that the rise and continued growth of atmospheric CO₂ concentrations is unequivocally due to human activities (IPCC 2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, a total of 2,390 gigatons of

¹ The Intergovernmental Panel on Climate Change’s (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the Intergovernmental Panel on Climate Change’s (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

anthropogenic CO₂ was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be approximately 33 degrees Celsius (°C) cooler (World Meteorological Organization 2013). However, since 1750, estimated concentrations of CO₂, CH₄, and N₂O in the atmosphere have increased by 47 percent, 156 percent, and 23 percent, respectively, primarily due to human activity (IPCC 2021). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity and gas production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that currently occur naturally.

a. Greenhouse Gas Emissions Inventory

Global Emissions Inventory

Worldwide anthropogenic GHG emissions totaled 47,000 million metric tons (MMT) of CO₂e in 2015, which is a 43 percent increase from 1990 GHG levels (USEPA 2022b). Specifically, 34,522 MMT of CO₂e of CO₂, 8,241 MMT of CO₂e of CH₄, 2,997 MMT of CO₂e of N₂O, and 1,001 MMT of CO₂e of fluorinated gases were emitted in 2015. The largest source of GHG emissions were energy production and fuel use from vehicles and buildings, which accounted for 75 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and six percent, respectively. Waste sources contributed three percent and international transportation sources contributed two percent. These sources account for approximately 98 percent because there was a net sink of two percent from land-use change (including afforestation/reforestation and emissions removals by other land use activities) (USEPA 2022b).

United States Emissions Inventory

Total United States (U.S.) GHG emissions were 6,558 MMT of CO₂e in 2019. Emissions decreased by 1.7 percent from 2018 to 2019. Since 1990, total U.S. emissions have increased by an average annual rate of 0.06 percent for a total increase of 1.8 percent between 1990 and 2019. The decrease from 2018 to 2019 reflects the combined influences of several long-term trends, including population changes, economic growth, energy market shifts, technological changes such as improvements in energy efficiency, and decrease carbon intensity of energy fuel choices. In 2019, the industrial and transportation end-use sectors accounted for 30 percent and 29 percent, respectively, of nationwide GHG emissions; while the commercial and residential end-use sectors accounted for 16 percent and 15 percent of nationwide GHG emissions, respectively, with electricity emissions distributed among the various sectors (USEPA 2022c).

California Emissions Inventory

Based on the California Air Resources Board (CARB) California Greenhouse Gas Inventory for 2000-2019, California produced 418.2 MMT of CO₂e in 2019, which is 7.2 MMT of CO₂e lower than 2018 levels. The major source of GHG emissions in California is the transportation sector, which comprises 40 percent of the state's total GHG emissions. Vehicle miles traveled (VMT), a measure of how much and how far people drive by private vehicle, is an indicator of GHG emissions from transportation. CARB has determined State GHG emissions goals would not be achieved without reducing VMT growth (Office of Planning and Research 2018). The industrial sector is the second

largest source, comprising 21 percent of the state's GHG emissions, while electric power accounts for approximately 14 percent (CARB 2021). The magnitude of California's total GHG emissions is due in part to its large size and large population and total overall energy consumption compared to other states. However, its relatively mild climate is a factor that reduces California's per capita fuel use and GHG emissions as compared to other states. In 2016, the State of California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels, as emissions fell below 431 MMT of CO₂e (CARB 2021).

Local Emissions Inventory

Based on the City of Santa Barbara's 2019 GHG Emissions Inventory, the city generated approximately 622,110 MMT of CO₂e in 2019. On-road transportation was the major source, accounting for 44 percent of the total, largely due to passenger vehicles, but also commercial trips and buses. Off-road transportation accounted for 7 percent. VMT is a substantial contributor to GHG emissions in Santa Barbara, due to the large amount of single-occupancy vehicle travel that occurs to, from, and within the city. Residential and nonresidential natural gas usage was the second largest source of emissions at 22 percent. Residential and nonresidential electricity use accounted for 18 percent. Solid waste, water, and wastewater combined accounted for 9 percent of emissions. These calculations are based on fuel sources used for each respective category, including the use of natural gas, petroleum, and electricity. The 2019 inventory does not account for two programs launched following 2019: Santa Barbara Clean Energy, which now offers 100% carbon free electricity to City customers, and the Santa Barbara County ReSource Center, which reduces GHG emissions from waste.

b. Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Each of the past three decades has been warmer than all the previous decades on record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature from 2015 to 2017 was approximately 1.0°C higher than the average global mean surface temperature over the period from 1880 to 1900 (National Oceanic and Atmospheric Administration 2020). Furthermore, several independently analyzed data records of global and regional land-surface air temperature obtained from station observations jointly indicate that land-surface air temperature and sea surface temperatures have increased.

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 0.6 to 1.1°C higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, larger forest fires, and more drought years (State of California 2018). In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the State and regionally specific climate change case studies (State of California 2018). However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. A summary follows of some of the potential effects that could be experienced in California because of climate change.

Air Quality

Scientists project that the annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C in the next 50 years and by 3.1 to 4.9°C in the next century (State of California 2018). Higher temperatures are conducive to air pollution formation, and rising temperatures could therefore result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level ozone. The magnitude of the effect of the increased concentration of ground-level ozone, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the state has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains (State of California 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains could tend to temporarily clear the air of particulate pollution, which would effectively reduce the number of large wildfires and thereby ameliorate the pollution associated with them (California Natural Resources Agency 2009).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring snowpack in the western U.S., including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meters along the central and southern California coasts (State of California 2018). The Sierra snowpack provides most of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack (State of California 2018). Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (State of California 2018).

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding (State of California 2018). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding. The rate of increase of global mean sea levels between 1993 to 2022, observed by satellites, is approximately 3.5 millimeters per year, double the twentieth century trend of 1.6 millimeters per year (World Meteorological Organization 2013; National Aeronautics and Space Administration 2022). Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust GHG emission control measures. Sea level rise may jeopardize California's water supply due to saltwater

intrusion and induce groundwater flooding and/or exposure of buried infrastructure (State of California 2018).

In Santa Barbara, coastal storms cause accelerated erosion of beaches and coastal bluffs from wave action, landslides from saturation of the ground from water, damage to the shoreline from wave runup, and flooding from high water events and storm surge. Models show rising sea level will result in increased coastal flooding, erosion, property damage, and resource loss, including the loss of recreational, economic, cultural, and ecological beach resources (City of Santa Barbara 2019).

Agriculture

California has an over \$50 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2020). Higher CO₂ levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2018). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems

Climate change and the potential resultant changes in weather patterns could have ecological effects on the global and local scales. Soil moisture is likely to decline in many regions because of higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2018).

4.5.2 Regulatory Setting

a. Federal Regulations

Federal Clean Air Act

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

- **Endangerment Finding:** The Administrator finds the current and projected concentrations of six GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds the combined emissions of these GHGs from new motor vehicles and new motor vehicle engines contribute to GHG pollution, which threatens public health and welfare.

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

Federal Fuel Efficiency Standards (CAFE)

Under the CAA, corporate average fuel economy (CAFE) standards have been set for passenger cars and light trucks. The State of California has traditionally had a waiver to set its own more stringent fuel efficiency standards. In 2020, the NHTSA and USEPA implemented the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). Part One of the SAFE Rule revoked a waiver granted by USEPA to the State of California to enforce more stringent emission standards for motor vehicles those required by USEPA for the explicit purpose of GHG reduction. However, in 2021 the federal government formally proposed to roll back portions of the SAFE Rule, restoring California's right to enforce more stringent fuel efficiency standards (NHTSA 2022). Most recently, in December 2021, the NHTSA finalized rules to repeal the SAFE I Rule established in 2020.

Executive Order 14057

In 2021, the President issued Executive Order 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*, which sets GHG emissions reduction requirements for the United States. Executive Order 14057 requires federal agencies to achieve the following:

- Achieve 100 percent carbon pollution-free electricity by 2030, including 50 percent on a 24/7 basis.
- Reach 100 percent zero-emission vehicle acquisition by 2035, including 100 percent light-duty acquisitions by 2027.
- Achieve net-zero building emissions by 2045, including a 50 percent reduction by 2032.
- Reduce Scope 1 and 2 greenhouse gas emissions by 65 percent from 2008 levels by 2030.
- Establish targets to reduce energy and potable water use intensity by 2030.
- Reduce procurement emissions to net-zero by 2050.

b. State Regulations

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

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO₂e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others.

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

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

Senate Bill 100 (100 Percent Clean Energy Act)

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

Senate Bill 375 (Sustainable Communities and Climate Protection Act)

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

Executive Order B-55-18

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

CARB Innovative Clean Transit Regulations

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

California Code of Regulations Title 24 (California Building Code)

Updated every three years through a rigorous stakeholder process, Title 24 of the California Code of Regulations requires California homes and businesses to meet strong energy efficiency and sustainability measures, thereby lowering their GHG emissions. Title 24 contains numerous subparts, including Part 1 (Administrative Code), Part 2 (Building Code), Part 3 (Electrical Code), Part 4 (Mechanical Code), Part 5 (Plumbing Code), Part 6 (Energy Code), Part 8 (Historical Building Code), Part 9 (Fire Code), Part 10 (Existing Building Code), Part 11 (Green Building Standards Code), Part 12 (Referenced Standards Code). The California Building Code is applicable to all development in California (Health and Safety Code Sections 17950 and 18938[b]). Part 6 and Part 11 set forth energy and other conservation standards which establish, among other requirements, rules for installation of solar photovoltaic and battery storage standards, solid waste diversion standards, water conservation requirements, and electric vehicle accommodation requirements. The most recent iteration of the California Building Code, the 2022 Title 24 standards, is applicable to all buildings for which an application for a building permit is submitted on or after January 1, 2023.

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

Assembly Bill 341/Assembly Bill 1826 (Mandatory Recycling/Composting)

The California Integrated Waste Management Act of 1989, as modified by AB 341, requires each jurisdiction’s source reduction and recycling element to include an implementation schedule that shows diversion away from landfills of 75 percent of all solid waste by 2020 and annually thereafter. AB 1826 requires recycling of organic waste (i.e., composting). All businesses and public entities that generate four or more cubic yards of solid waste per week and multi-family residential dwellings that have five or more units are required to recycle and compost. The County’s ReSource Center, located at the Tajiguas Landfill, includes a Materials Recovery Facility (MRF) which separates excess recyclable material and assists to fulfill the requirements of AB 341.

California Model Water Efficient Landscape Ordinance

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

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

c. Local Regulations

SBCAG Connected 2050 RTP/SCS

The Connected 2050 RTP/SCS was adopted by SBCAG in 2021, and it builds upon the goals, policies, and forecasts of preceding plans. The Connected 2050 RTP/SCS demonstrates that the SBCAG region would achieve emissions reductions consistent with targets set forth by SB 375. GHG reductions achieved through the Connected 2050 RTP/SCS would result in corresponding reductions in energy consumption in the region. The Connected 2050 RTP/SCS sets forth goals and objectives related to mixed-use development and the jobs-housing balance by allotting more housing to the southern portion of Santa Barbara County, as well as incorporating region-specific analysis of environmental justice indicators.

Santa Barbara Clean Energy

Santa Barbara Clean Energy is a Community Choice Aggregator which procures electricity from carbon-free energy sources, such as solar, wind, biomass, and hydroelectricity for delivery to Santa Barbara. Southern California Edison, the investor-owned utility serving Santa Barbara, maintains the responsibility of providing transmission and distribution services, and metering, billing collection, and customer service, however procurement of electric power is the responsibility of the Santa Barbara Clean Energy. At a minimum, energy procured through Santa Barbara Clean Energy provides 50 percent carbon-free energy, and buildings are automatically opted-in to the Santa Barbara Clean Energy system.

City of Santa Barbara Climate Action Plan

In 2024, the City adopted a climate goal of carbon neutrality by 2035 and approved a Climate Action Plan (CAP) entitled *Together to Zero* which serves as an update to the City's 2012 CAP. The CAP sets forth measures and actions to meet an emissions reduction target of 40 percent below 1990 levels by 2030 (SB 32 target year) and reaching City Council's adopted longer-term goal of carbon neutrality by 2035 (ten years sooner than Assembly Bill [AB] 1279 goal of carbon neutrality by 2045). The CAP includes new climate action strategies that address building energy use, transportation, solid waste, water, and wastewater, carbon sequestration, and community potential.

The CAP includes a *Master Environmental Assessment Guidelines for Greenhouse Gas Emissions Analysis* document. This document is intended to provide methodological guidance and quantitative thresholds of significance for use by city planners, project applicants, consultants, agencies, and members of the public in the preparation of GHG emissions analyses under CEQA for plans and projects located within the City.

City of Santa Barbara General Plan

The City of Santa Barbara General Plan was updated in 2011 and contains goals, policies, and actions aimed at guiding future growth within the City. Policies and actions pertaining to reduction of greenhouse gas emissions and included in the General Plan Land Use, Circulation, and Environmental Resources Elements are as follows (City of Santa Barbara 2011):

Land Use Element

- **Policy LG4: Principles for Development.** Establish the following Principles for Development to focus growth, encourage a mix of land uses, strengthen mobility options and promote healthy active living:
 - **Focus Growth.** Encourage workforce and affordable housing within a quarter mile of frequent transit service and commercial services through smaller units and increased density, transit resources, parking demand standards, targeted infrastructure improvements, and increased public areas and open space. Incorporate ideas as a result of an employee survey.
 - **Mix of Land Uses.** Encourage a mix of land uses, particularly in the Downtown to maintain its strength as a viable commercial center, to include retail, office, restaurant, residential, institutional, financial and cultural arts, encourage easy access to basic needs such as groceries, drug stores, community services, recreation, and public space.
 - **Mobility and Active Living.** Link mixed-use development with main transit lines; promote active living by encouraging compact, vibrant, walkable places; encourage the use of bicycles; and reduce the need for residential parking.
- **Policy LG6: Location of Residential Growth.** Encourage new residential units in multi-family and commercial areas of the City with the highest densities to be located in the Downtown, La Cumbre Plaza/Five Points area and along Milpas Street.
- **Policy LG15: Sustainable Neighborhood Planning.** Neighborhoods shall be encouraged to preserve and enhance the sense of place, provide opportunities for healthy living and accessibility, while reducing the community's carbon footprint.

Circulation Element

- **Policy C1: Transportation Infrastructure Enhancement and Preservation.** Assess the current and potential demand for alternative transportation and where warranted increase the availability and attractiveness of alternative transportation by improving related infrastructure and facilities without reducing vehicle access.
- **Policy C2: Regional Transportation and Commuter Transit.** Coordinate regionally with agencies and the private sector to establish viable rail, bus, and carpooling options for commuters, and create an energy efficient regional transportation network.

Environmental Resources Element

- **Policy ER3: Decrease City's Global Footprint.** In addition to promoting reduced unit size, building footprints and GHG emissions, and energy conservation, promote the use of more sustainable building and landscaping materials and methods.
- **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 insulating 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.

4.5.3 Impact Analysis

a. Methodology and Significance Thresholds

Appendix G of the *CEQA Guidelines* states that a project may have a significant adverse impact if it would:

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

The issue of climate change typically involves an analysis of whether or not a project's contribution towards an impact is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]). In relation to GHG emissions, the effects of projects refer to the global accumulation of GHG emissions in the atmosphere.

Section 15064.4 of the CEQA Guidelines recommends that lead agencies quantify GHG emissions and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7[c]).

According to CEQA Guidelines Section 15183.5, projects can tier off of a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through analyzing the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan, such as a CAP. The adopted 2024 CAP, *Together to Zero*, functions as the City's qualified GHG reduction plan.

The City's CAP includes a goal of reducing communitywide GHG emissions consistent with the SB 32 target for 40 percent reduction below 1990 levels by 2030. It also includes an aspirational goal to achieve carbon neutrality by 2035. As part of the CAP, the City adopted *Master Environmental Assessment Guidelines for Greenhouse Gas Emissions Analysis*, which provides methodology for qualitatively determining a project's consistency with the CAP. This document states that if a plan/project is consistent with the existing General Plan Land Use designation and maximum densities allowed by existing zoning², then the plan/project is consistent with business-as-usual demographic forecasts and land use assumptions and are therefore within the scope of the CAP's analysis of communitywide GHG emissions.

² Projects using State Density Bonus but retain consistency with the land use designation are deemed consistent with the demographic forecasts and land use assumptions used in the CAP.

In addition, the document provides quantitative GHG thresholds to utilize for CEQA analysis in the event a project does not demonstrate conformance with the CAP utilizing the CEQA GHG checklist contained within the *Master Environmental Assessment Guidelines for Greenhouse Gas Emissions Analysis*, which are based on a per capita rate. The City's quantitative thresholds are 2.18 metric tons (MT) CO₂e per resident per year for residential projects and 2.13 MT CO₂e per service person³ per year for mixed-use projects.

Although the City has established quantitative GHG thresholds, a quantitative threshold is typically used for the evaluation of project-level impacts and is not applicable to programmatic review of plan-level documents such as the Housing Plan. As described in Section 3, *Project Description*, although the total number of housing units analyzed for the purposes of this Program EIR (8,001) is known, it is speculative to determine the housing type, location, and number of units associated with individual development projects implemented in accordance with the Housing Plan. Accordingly, the use of the quantitative thresholds identified in the *Master Environmental Assessment Guidelines for Greenhouse Gas Emissions Analysis* is not feasible for this programmatic analysis. Instead, GHG emissions associated with project implementation are discussed qualitatively by comparing the Housing Plan to statewide emission reduction targets established in CARB's 2022 Scoping Plan and consistency with the City's CAP, as well as to the goals of the SBCAG Connected 2050 RTP/SCS.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
Threshold 2:	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-1 THE HOUSING PLAN WOULD BE CONSISTENT WITH CONNECTED 2050, THE 2022 SCOPING PLAN, AND THE CITY'S CAP. THEREFORE, THE HOUSING PLAN'S POTENTIAL IMPACTS ON GREENHOUSE GAS EMISSIONS WOULD BE LESS THAN SIGNIFICANT.

Construction

New residential development facilitated by the Housing Plan would result in GHG emissions during construction, primarily from fuel consumption associated with heavy equipment, light-duty vehicles, machinery, and generators for lighting. Temporary grid power may also be provided to construction trailers or electric construction equipment that may result in indirect GHG emissions from energy generation. Construction activities in the City are required to comply with applicable federal, state, and local regulations, which minimizes inefficient fuel consumption and associated GHG emissions. Construction activities are also subject to applicable regulatory requirements of CALGreen, which describe construction waste management practices to divert construction and demolition debris from landfills. Compliance with applicable regulatory requirements for construction activity would minimize inefficient use of energy during construction and, therefore, would minimize new GHG emissions from construction activity. Furthermore, in the interest of cost efficiency, it is reasonable to assume construction contractors would not utilize fuel in a manner that is wasteful or unnecessary, which also contributes to minimizing GHG emissions.

³ The service population is equal to the residential population plus the number of employees.

GHG emissions from construction are short-term and temporary in nature and represent a relatively small portion of a project's lifetime GHG emissions. Operational GHG emissions typically represent the vast majority of project GHG emissions. Pursuant to the Santa Barbara County Air Pollution Control District (SBCAPCD) *Scope and Content of Air Quality Sections in Environmental Documents* (2022) SBCAPCD does not recommend a construction-related climate impact threshold. Therefore, the evaluation of GHG emissions impacts associated with project implementation is focused on operational emissions, discussed below.

Operations

The Housing Plan includes new residential development that would individually result in new GHG emissions during operation, typical of those associated with residential uses, including emissions from building energy usage and fuel consumption associated with vehicle trips. A discussion of operational GHG emissions from the Housing Plan and its consistency with applicable GHG plans is presented below. As a policy document, the Housing Plan promotes a residential development pattern that reduces energy consumption, VMT, water consumption, and solid waste generation. However, the rate of GHG emissions generation in Santa Barbara with implementation of the Housing Plan is speculative, and individual residential development projects are assumed to result in direct GHG emissions generation due to fuel use, water use, vehicle trips, and other factors.

SBCAG Connected 2050 RTP/SCS

The Connected 2050 RTP/SCS demonstrates that the SBCAG region would achieve emissions reductions consistent with targets set forth by SB 375. GHG reductions achieved through the Connected 2050 RTP/SCS would result in corresponding reductions in energy consumption in the region. The Connected 2050 RTP/SCS includes goals and objectives related to mixed-use development and balancing jobs and housing by allotting more housing to the southern portion of Santa Barbara County, as well as incorporating region-specific analysis of environmental justice indicators. As shown in Table 4.5-1, the Housing Plan would be consistent with SBCAG's GHG emission reduction strategies established in the Connected 2050 RTP/SCS.

Table 4.5-1 Housing Plan Consistency with Applicable SBCAG 2050 RTP/SCS Strategies

Policy	Project Consistency
Land Use. - Make land use decisions that adequately address regional transportation issues and are consistent with the RTP-SCS. - Promote better balance of jobs and housing to reduce long-distance commuting by means of traditional land use zoning, infill development, and other, unconventional land use tools, such as employer-sponsored housing programs, economic development programs, commercial growth management ordinances, average unit size ordinances and parking pricing policies. - Identify, minimize and mitigate adverse environmental impacts and, in particular, require mitigation of traffic impacts of new land development through onsite and related off-site improvements for all modes of transportation, including incentives to encourage the use of alternative transportation modes.	Consistent. The Housing Plan programs prioritize housing production on vacant and underutilized sites near transportation corridors and within biking and walking distance of existing residential and commercial development (refer to Chapter 3, <i>Project Description</i>, Section 3.1.1). The Housing Plan facilitates multimodal access to work, educational, and other destinations; plans growth near existing transit corridors; prioritizes infill and redevelopment of underutilized land to accommodate new growth and increase connectivity in existing neighborhoods; and encourages design and transportation options to reduce reliance on single-occupancy passenger automobiles.
Alternative Fuels and Energy. - Encourage the use of alternative fuels, and the application of advanced transportation and energy technologies to reduce vehicular emission production and energy consumption. - Promote renewable energy and energy conservation, consistent with applicable federal, State, and local energy programs, goals, and objectives.	Consistent. Residential development projects facilitated by the Housing Plan would be required to comply with State and local regulations, including the California Building Energy Efficiency Standards and CALGreen, specifically related to the provision of electric vehicle supply equipment for parking spaces and the installation of photovoltaic solar panels on low-rise residential buildings (three stories or less) that generate an amount of electricity equal to expected electricity usage. Therefore, the Housing Plan would facilitate the use of alternative fuels and energy.
Alternative Transportation Modes. - Encourage alternatives to single-occupancy vehicle trips and the use alternative transportation modes to reduce vehicle miles traveled and increase bike, walk and transit mode share. - Provide for a variety of transportation modes and ensure connectivity within and between transportation modes both within and outside the Santa Barbara region. Alternative mode planning and projects shall be compatible with neighboring regions' transportation systems. - Promote local and inter-city transit.	Consistent. The Housing Plan programs plan for infill development and redevelopment for housing units located near existing commercial destinations and transit centers, which would encourage the use of alternative transportation and connectivity between various transportation modes. Therefore, the Housing Plan encourages alternatives to single-occupancy vehicle trips and facilitates an increase, in bike, walk, and transit mode share.
Source: SBCAG 2021	

2022 Scoping Plan

The 2022 Scoping Plan's strategies that are applicable to the Housing Plan include reducing fossil fuel use, energy demand, and VMT; maximizing recycling and diversion from landfills; and increasing water conservation. The Housing Plan is consistent with these goals as individual residential development projects would be required to comply with the latest Title 24 Green Building Code and Building Efficiency Energy Standards and install energy-efficient LED lighting, water-efficient faucets and toilets, water efficient landscaping and irrigation, and EV charging stations. Residential development in Santa Barbara is served electricity by Southern California Edison, which is required by SB 100 to increase procurement from eligible renewable energy resources to 60 percent by 2030 and 100 percent by 2045.

The Housing Plan prioritizes housing production on vacant and underutilized infill sites near transportation corridors and within biking and walking distance of existing residential and commercial development. Additionally, residential projects facilitated by the Housing Plan may be required to provide street dedications to maintain and/or improve walking paths for pedestrians if street standards in Chapter 22.44.080 of the Municipal Code are not met. As a result, the Housing Plan could potentially result in improved pedestrian facilities Citywide. In addition, nonresidential sites that are converted to housing would be required to change the number of bicycle parking spaces available on-site under existing conditions based on the parking requirements of Municipal Code Chapter 30.175.040. As described in Chapter 30.175.040, multi-unit residential housing requires one bicycle space per unit, while a majority of commercial, industrial, and office uses are required to provide bicycle parking at a rate of one space per 1,750 square feet. Accordingly, it is anticipated the number of bicycle parking spaces required on redeveloped residential properties would increase compared to the non-residential use due to the anticipated density increase of residences. The Housing Plan would facilitate the use of walking, biking, and transit to access destinations, which would reduce future residents' VMT and associated fossil fuel usage. Therefore, the Housing Plan would be consistent with these goals of the 2022 Scoping Plan.

Climate Action Plan

As discussed in Section 4.5.2(c), *Local Regulations*, the City approved the 2024 CAP to meet the 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). The CAP includes the *Master Environmental Assessment Guidelines for Greenhouse Gas Emissions Analysis*. This document states that if a plan/project is consistent with the General Plan land use designation and maximum densities allowed by existing zoning, then the plan/project is consistent with business-as-usual demographic forecasts and land use assumptions and are therefore within the scope of the CAPs analysis of communitywide GHG emissions. The Housing Plan does not propose any changes in land use to meet the City's RHNA allocation and therefore would be consistent with the existing land use designations and zoning implemented by the City. Therefore, the Housing Plan would meet the criteria presented within the *Master Environmental Assessment Guidelines for Greenhouse Gas Emissions Analysis*, for consistency with the CAP's analysis of communitywide GHG emissions. Therefore, the Housing Plan would be consistent with the CAP and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.5.4 Cumulative Impacts

GHG emissions are, by definition, cumulative impacts, as they add to the global accumulation of greenhouse gases in the atmosphere. Potential new residential development envisioned by the Housing Plan may generate temporary and long-term GHG emissions. However, as described in Impact GHG-1, the Housing Plan would be consistent with the City CAP's analysis of communitywide GHG emissions. Furthermore, residential development envisioned by the Housing Plan would be reviewed in accordance with the CAP's *Master Environmental Assessment Guidelines for Greenhouse Gas Emissions Analysis*, which would require individual projects to demonstrate consistency with the State's GHG emission reduction goals. If a residential project is found to be potentially inconsistent with the thresholds included within the *Master Environmental Assessment*

Guidelines for Greenhouse Gas Emissions Analysis, the project would be required reduce impacts associated with GHG emissions. Therefore, the Housing Plan's contribution to cumulative GHG and climate change impacts would not be cumulatively considerable.

4.6 Hazards and Hazardous Materials

This section addresses impacts associated with the transport, use, or disposal of hazardous materials, risk of upset related to hazardous materials, hazards to schools, hazardous materials cleanup sites, airports, emergency response plans, and wildfires.

4.6.1 Environmental Setting

The term hazardous material has different definitions for different regulatory programs. For the purpose of this Program Environmental Impact Report (EIR), the term hazardous material refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501(n)(1) defines a hazardous material as any material that, “because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.” Hazardous materials include but are not limited to hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

Prior to the 1980s, most land disposal of chemicals was unregulated, resulting in numerous industrial properties and public landfills becoming dumping grounds for unwanted chemicals. Sources of contamination in Santa Barbara include past industrial uses; fertilizer and pesticide use from historic agricultural practices; the coast route of the Southern Pacific Railroad, which facilitates the shipment of hazardous materials; historic rubble from an earthquake occurring in 1925; and historic dumping sites within the Downtown and Funk Zone of Santa Barbara. The Santa Barbara County Public Health Department, Environmental Health Services Division’s Site Mitigation Unit (SMU) program provides regulatory oversight for the clean-up of hazardous material releases into the environment. In addition, the Central Coast Regional Water Quality Control Board (RWQCB) oversees the Leaking Underground Fuel Tank (LUFT) program for Santa Barbara county. LUFT sites and SMU sites within the city of Santa Barbara are primarily located within the Downtown Santa Barbara area (State Water Resources Control Board 2024). These sites are primarily comprised of former gas stations, dry cleaning facilities, and autobody shops. Soil and groundwater can become contaminated by hazardous material releases in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity. These types of hazardous materials are defined below:

- **Toxic Substances.** Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or even death. For example, such substances can cause disorientation, acute allergic reactions, asphyxiation, skin irritation, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substances involved and is chemical-specific). Carcinogens, substances that can cause cancer, are a special class of toxic substances. Examples of toxic substances include benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- **Ignitable Substances.** Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.

- **Corrosive Materials.** Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- **Reactive Materials.** Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

a. Contaminated Sites

The City has identified parcels in Santa Barbara with known contamination issues. California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to compile, maintain, and update specified lists of hazardous material release sites, also referred to as the Cortese List. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites). The California Environmental Quality Act (CEQA) Guidelines (Public Resources Code [PRC] Section 21092.6) requires the Lead Agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project site or any alternatives are identified on any of the following lists:

- List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) EnviroStor database.
- List of Leaking Underground Storage Tank (LUST) sites from the State Water Board's GeoTracker database.
- List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit.
- List of active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) from the Regional Water Board.
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

Reviews of the Department of Toxic Substances Control's (DTSC) EnviroStor database and the SWRCB's GeoTracker database indicate a variety of hazardous waste sites located throughout the city (Figure 4.6-1). As of 2024, there are 453 known past or existing LUST sites and Clean Up sites within the city, which have required regulatory oversight to address site contamination issues. Of these LUST sites, 397 sites are closed, and 56 sites remain open and undergoing remediation. In addition, the city contains one DTSC Envirostor Hazardous Waste Site and 22 CDO and CAO sites as of 2024 (Figure 4.6-2). There are no federal Superfund sites within the city. Appendix D provides a summary of the number of each type of site along with a definition of site type for the Cortese List sites in the city.

Table 4.6-1 Known Cortese List Sites within the City of Santa Barbara

Site Type	Number of Sites	Definition	Source
LUST Cleanup Site	268	Includes all UST sites that have had an authorized release (i.e., leak or spill) of a hazardous substance, usually fuel hydrocarbons, and are being cleaned up.	SWQCB Geotracker 2024
State Response Hazardous Waste Site	1	Identifies confirmed release sites where Department of Toxic Substances Control (DTSC) is involved in remediation, either in a lead or oversight capacity. These confirmed release sites are generally high-priority and high potential risk.	DTSC Envirostor 2024
CDO and CAO sites	22	Active CDO and CAO from the State Water Board. Please Note: This list contains many Cease-and-Desist Orders and Cleanup and Abatement Orders that do NOT concern the discharge of wastes that are hazardous materials.	SWQCB 2024

The City and the Santa Barbara County Environmental Health Services Division (EHS) have identified areas of the city that have the potential to contain historic fill material (Figure 4.6-3). The area consists of low-lying land, historic commercially zoned areas, and/or natural drainages that have been filled in as the city has developed. Infilling began in the 1800s and continued until at least the early 1950s. The most significant infilling occurred after the 1925 earthquake, which resulted in significant damage to unreinforced masonry commercial structures.

Fill generally consisted of dirt mixed in with historic debris, such as ceramics, glass, brick, metal, and other household items. Depending on the original source, the soil may contain petroleum products and be stained and odiferous. Contaminants may include Total Petroleum Hydrocarbons (gasoline, Stoddard solvent, diesel, kerosene and/or oil), Polycyclic Aromatic Hydrocarbons (lamp black), Volatile Organic Compounds (benzene, toluene, ethylbenzene, xylenes, chlorinated solvents, etc.), metals (lead, arsenic, cadmium, copper, etc.), and other constituents (cyanide, PCBs, organochlorine pesticides, etc.). Some of these constituents are found at RCRA and non-RCRA Hazardous Waste levels and require special handling.

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Figure 4.6-1 Geotracker List Sites

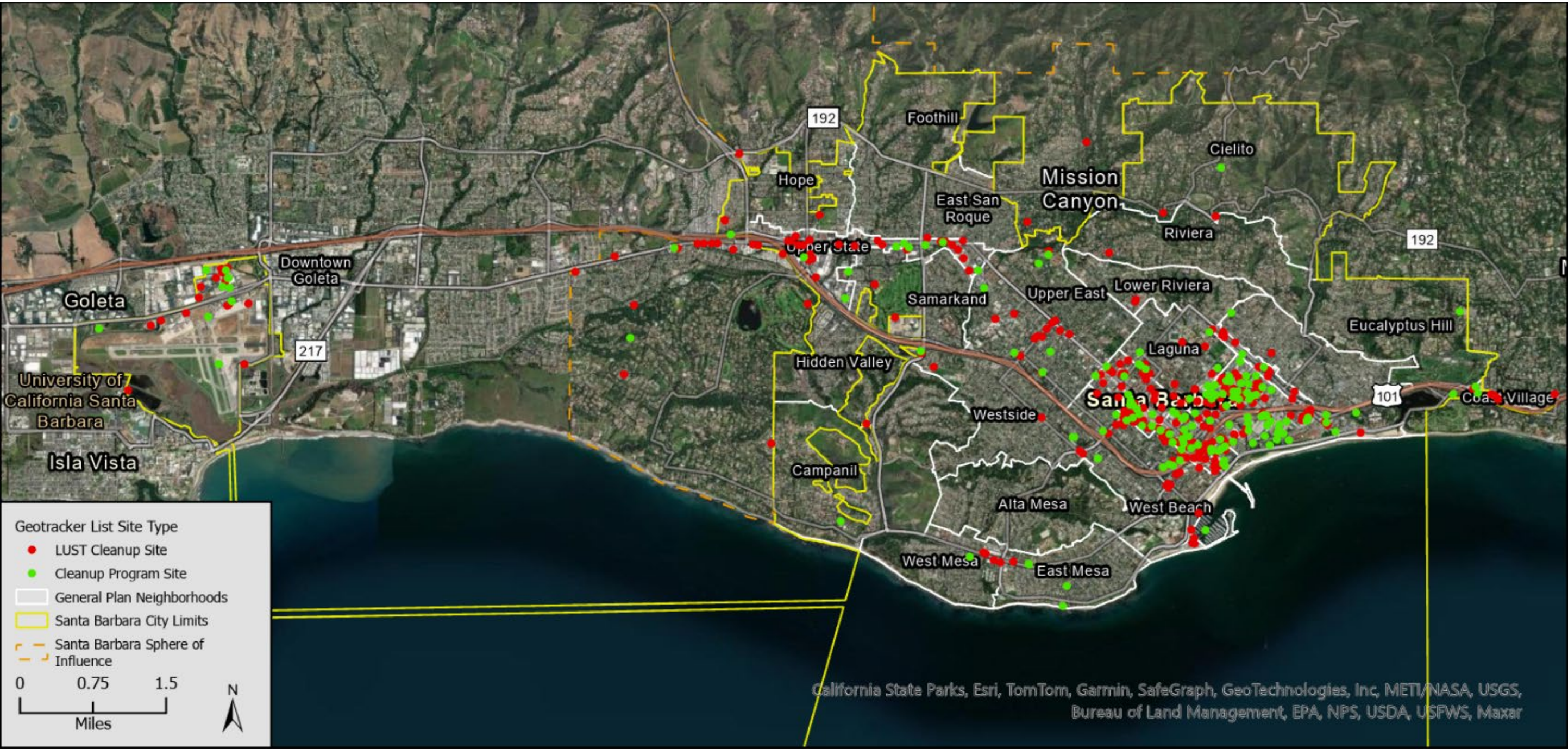


Figure 4.6-2 Active Cease and Desist Order and Cleanup and Abatement Order Sites

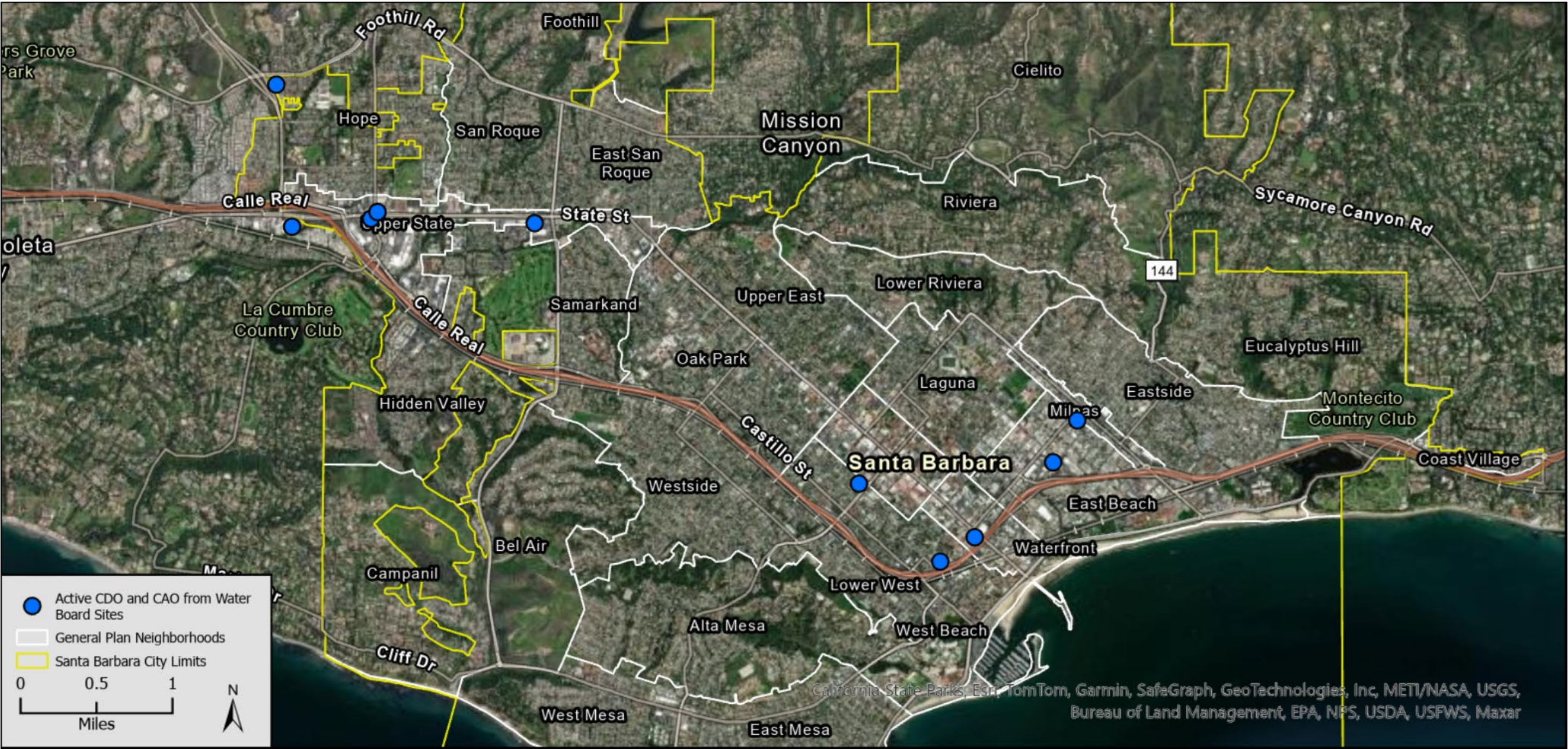


Figure 4.6-3 Areas of Potentially Contaminated Fill



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In addition, the following databases identify other potential contamination sites that may not be included on the Cortese List:

- **SWQCB Clean Up Program Sites:** Clean Up Program sites include non-federally owned sites that are regulated under the State Water Resources Control Board's Site Cleanup Program and/or similar programs conducted by each of the nine Regional Water Quality Control Boards. Cleanup Program Sites are varied and include but are not limited to pesticide and fertilizer facilities, rail yards, ports, equipment supply facilities, metals facilities, industrial manufacturing and maintenance sites, dry cleaners, bulk transfer facilities, refineries, mine sites, landfills, RCRA/CERCLA cleanups, and some brownfields. Unauthorized releases detected at Cleanup Program Sites are highly variable and include but are not limited to hydrocarbon solvents, pesticides, perchlorate, nitrate, heavy metals, and petroleum constituents, to name a few. As of 2024, there are 159 Clean Up Program sites within the city (SWQCB 2024).
- **Oil Wells:** CalGEM has jurisdiction over more than 242,000 wells, including nearly 101,300 defined as active or idle oil producers. CalGEM's authority extends from onshore to three miles offshore. CalGEM retains well records dating back to the early 1900s. The abandoned Mesa Oil Field is located within the Mesa Neighborhood of the city of Santa Barbara and contains dozens of oil wells that were drilled, plugged, and abandoned in the first half of the 20th century.
- **USEPA National Priorities List:** Lists all sites under the U.S. Environmental Protection Agency (USEPA) Superfund program, which was established to fund the cleanup of contaminated sites that pose risks to human health and the environment.
- **USEPA CERCLIS and Archived Sites:** The Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list contains 15,000 sites nationally identified as hazardous sites. This would also involve a review of archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned status.
- **USEPA RCRIS (RCRAInfo):** Resource Conservation and Recovery Act Information System (RCRIS or RCRAInfo) is a national inventory system for hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC HazNet:** DTSC uses this database to track hazardous waste shipments.

Commercial/Industrial Facilities

Santa Barbara County EHS is the Certified Unified Planning Agency (CUPA) and regulates hazardous materials use and storage through the Business Plan program. Facilities that require a Business Plan include iron and metal working, auto repair, cellular phone service providers, metal plating and photo/color services, public pools/pool companies, auto parts stores, dry cleaners, grocery stores, hospital/medical facilities, gas stations, airports, and electricity substations. Facilities that store hazardous materials that could pose an explosion, fire hazard, or toxic fume-threat (such as sulfuric acid or chlorine gas) are not permitted near predominantly residential neighborhoods and/or facilities that house immobile populations (i.e., schools, childcare centers, and convalescent homes). Hazardous materials are governed by regulations that require proper storage and handling, employee and public noticing, spill contingency planning, business/environmental management plans, and other emergency preventative and response measures necessary to ensure public safety and to minimize the risk of accidental releases and associated environmental impacts.

Santa Barbara County EHS has the responsibility of emergency planning for hazardous materials incidents and for coordination among other emergency response agencies. The City of Santa Barbara Fire Department, Fire Prevention Bureau has Standard Operating Procedures for the City's Emergency Response Area Plan (City of Santa Barbara 2023a).

b. Other Hazardous Materials

Transportation Corridors

A potential source of major hazardous materials incidents are transportation accidents involving a vehicle or rails carrying hazardous materials. Truck weight limit and regulatory manifest tracking requirements regulate truck traffic for tankers carrying hazardous materials. Tanker trucks transporting hazardous materials travel via US Highway 101, State Route (SR) 192 and SR 154 (Federal Motor Carrier Safety Administration 2020). Hazardous materials are transported through the city via the Union Pacific Railroad on several northbound and southbound freight trains daily. Material shipped includes explosives, compressed and liquefied gasses, petroleum products, agricultural chemicals, industrial chemicals, military ordinance, radioactive materials, and hazardous wastes.

Asbestos Containing Materials

Asbestos is a naturally occurring fibrous material that was widely used in structures built between 1945 and 1978 for its fireproofing and insulating properties. Asbestos-containing materials (ACM) were banned by the United States Environmental Protection Agency (USEPA) between the early 1970s and 1991 under the authority of the federal Clean Air Act (FCAA) and the Toxic Substances Control Act (TSCA) due to their harmful health effects. Exposure to asbestos increases risk of developing lung disease, such as lung cancer, mesothelioma, or asbestosis (USEPA 2023a). Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Pre-1973 commercial and industrial structures are affected by asbestos regulations if damage occurs, or if remodeling, renovation, or demolition activities disturb ACMs.

Lead and Lead-Based Paint

Lead is a naturally occurring metallic element. Because of its toxic properties, lead is regulated as a hazardous material. Excessive exposure to lead can result in the accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems because lead is easily absorbed into developing systems and organs. Lead can affect almost every organ and system in the body. In children, lead can cause behavior and learning problems, lower IQ and hyperactivity, hearing problems, and anemia. In adults, lead can cause cardiovascular effects, decreased kidney function, and reproductive problems. In addition, lead can result in serious effects to the developing fetus and infant for pregnant women (USEPA 2023b). Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils surrounding buildings and structures that are painted with lead-based paint (LBP). LBP was primarily used during the same time period as ACMs. Pre-1978 commercial and industrial structures are affected by LBP regulations if the paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb LBP surfaces.

Oil and Gas

The Southern California Gas Company operates a network of natural gas lines through Santa Barbara. In addition, numerous historic oil drilling wells exist on the Mesa within the Mesa Oil Field discovered in 1929. These wells were plugged and abandoned to the standards of their time and often do not meet current standards. It remains a possibility that historic wells have the potential to leak. These wells are located in varying areas on either side of Cliff Drive from La Marina Road on the east side to Mesa Lane on the west side in primarily residential neighborhoods. CalGEM has jurisdiction over these historic wells and may require property owners to implement measures to address wells that are leaking.

c. Wildfire Hazards

Wildfire hazards have been a significant part of Santa Barbara history and remain a great natural hazard to the Santa Barbara community. The interface between the urban land and wildlands in the Santa Ynez Mountains poses a substantial fire risk to the homes and structures in the Santa Barbara front-country. The combination of steep terrain, rocky outcroppings, dense chaparral, vegetation, dry summer climate, and local Santa Ana and Sundowner winds creates a high fire hazard environment. As part of the natural ecosystem, wildfire hazard is an inherent risk for those that choose to live in the area. Difficult and limited access makes these wildfires extremely challenging to battle after ignition.

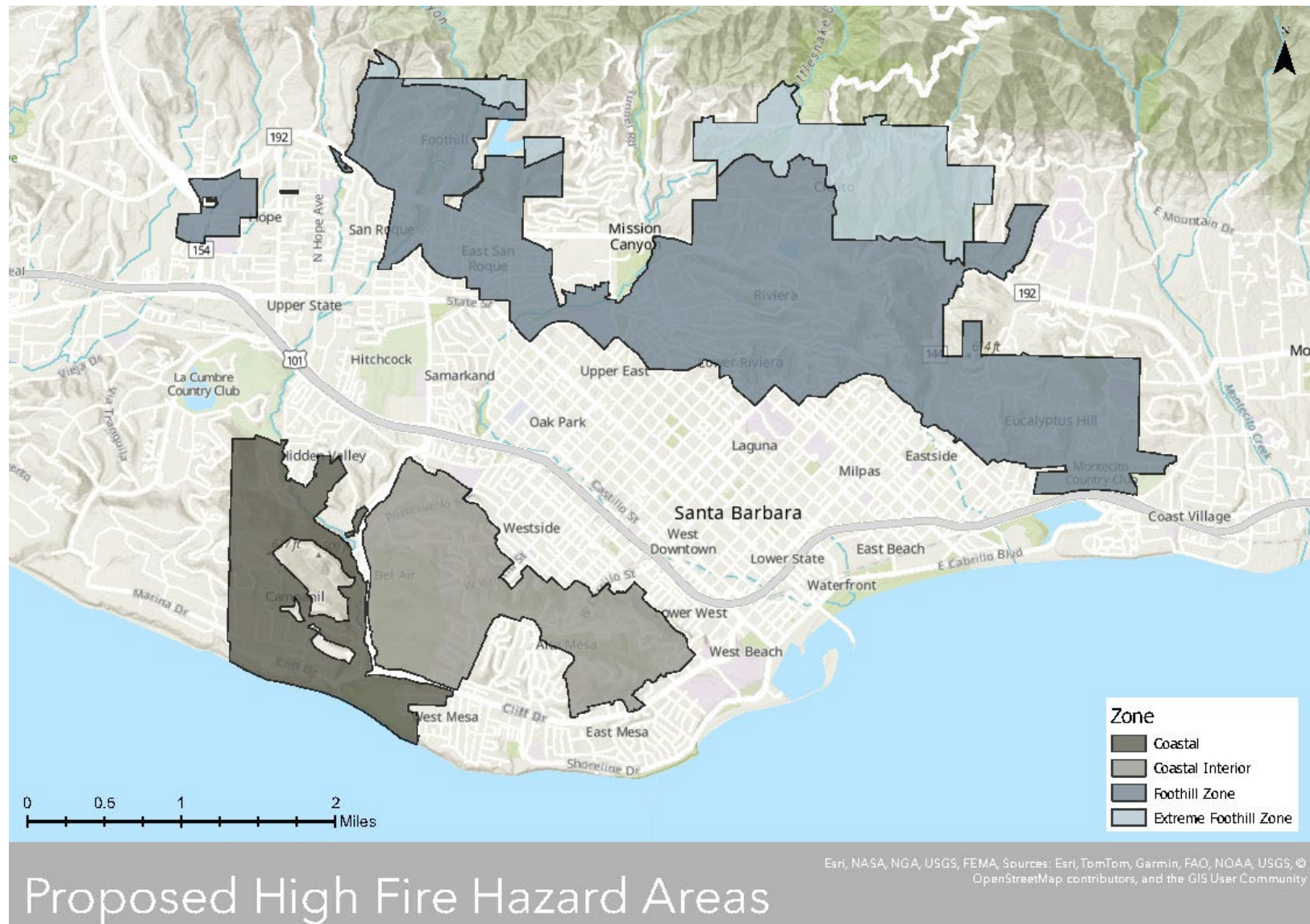
Public water systems are designed and maintained to fight individual structure fires, and development applicants are required to meet fire flow requirements for structures as determined by the City or County Fire Department, as applicable. Water flow from public water systems are sometimes able to help protect structures during wildfires, however it cannot be expected that flow from fire hydrants could be effective in stopping the advance of a major wildfire.

The fire history and potential for loss of life, property, and natural resources due to wildfires have made fire planning a priority for the City. Several comprehensive wildfire programs have been developed by the City including the City of Santa Barbara Emergency Management Plan and the Santa Barbara Community Wildfire Protection Plan (CWPP) (City of Santa Barbara 2021a).

Fire Hazard Areas

Vegetation of the Santa Ynez Mountains is primarily dense chaparral. Santa Barbara's Mediterranean climate is characterized by concentrated precipitation from October to May and dry summers. Steep terrain and dense vegetation make some neighborhoods and structures adjacent to the Santa Ynez Mountains and other open space areas susceptible to greater risk of wildfire. This wildland urban interface boundary runs approximately 8 miles along the city's northern boundary. The California Department of Forestry and Fire Protection (CAL FIRE) has identified fire hazard zones in the city and the surrounding areas. CAL FIRE's State fire hazard severity zone map for Santa Barbara was updated in 2022. In 2025, CAL FIRE updated Local Responsibility Maps where the city is responsible for wildfire protection. In July 2025, the City adopted updated High Fire Hazard Area maps that align with but also expand beyond CAL FIRE's designated Very High, High, and Moderate Fire Hazard Severity Zones. Per CAL FIRE, the Very High Fire Hazard Severity Zones are located in Cielito, foothills above San Roque and the Northridge/Santa Teresita area. High Fire Hazard Zones are located in the Hope, San Roque, Riviera, and Bel Air neighborhoods. The City does not use the same terminology as CAL FIRE and designates high fire hazard areas as Extreme Foothill, Foothill, Coastal, and Coastal Interior. Areas of high fire hazard in Santa Barbara are shown in Figure 4.6-4.

Figure 4.6-4 High Fire Hazard Areas Surrounding Santa Barbara



4.6.2 Regulatory Setting

Hazardous materials and waste can pose a potential hazard to human health and the environment when improperly treated, stored, transported, disposed of, or otherwise mismanaged. Federal, State, and local programs that regulate the use, storage, and transportation of hazardous materials and hazardous waste are in place to prevent unwanted consequences. In addition, there are federal, State, and local programs in place designed to reduce risk involving wildland fires. These regulatory programs are designed to reduce the risk that hazardous substances may pose to people and businesses under normal daily circumstances, and as a result, reduce the risk of emergencies and disasters.

a. Federal Regulations

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 gives the USEPA the authority to control hazardous waste from “cradle-to-grave.” This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled USEPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

Toxic Substances Control Act

Congress enacted the Toxic Substances Control Act (TSCA) of 1976, codified in Title 40 of the Code of Federal Regulations (CFR), to give USEPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. USEPA repeatedly screens these chemicals and can require reporting or testing of those that may pose an environmental or human-health hazard. USEPA can ban the manufacture and import of those chemicals that pose an unreasonable risk. More specifically, in California, polychlorinated biphenyls (PCBs) are regulated by both State (RCRA and Title 22 of the California Code of Regulations [CCR]) and federal (TSCA) rules. TSCA has banned the manufacture, processing, use, and distribution in commerce of PCBs. TSCA gives USEPA the authority to develop, implement and enforce regulations concerning the use, manufacture, cleanup, and disposal of PCBs. TSCA also establishes USEPA’s Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.¹

U.S. Department of Transportation Regulations

USDOT prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers that transport hazardous waste on public roads. The Secretary of the USDOT receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 U.S. Code (U.S.C.) Section 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of 49 U.S.C. Title 49 of the CFR, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receives

¹ USEPA, *40 CFR Part 745, Rules 402 and 404*, August 29, 1996.

training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary “may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any ‘person’ in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any ‘person’ of hazardous materials in commerce.”

Occupational Safety and Health Act of 1970

The U.S. Department of Labor’s OSHA was created to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. The Occupational Safety and Health Act, which is implemented by OSHA, contains provisions with respect to hazardous materials handling. Federal Occupational Safety and Health Act requirements, as set forth in Title 29 of the CFR Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker’s right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California.

Title 49 of the CFR, which contains the regulations set forth by the Hazardous Materials Transportation Act of 1975, specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity-specific requirements.

Federal Disaster Mitigation Act

The Disaster Mitigation Act of 2000 requires a State-level mitigation plan as a condition of disaster assistance and provides funding to communities developing their own mitigation plans through the Pre-Disaster Mitigation Grant Program. There are two different levels of State disaster plans: “Standard” and “Enhanced.” States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also established new requirements for local mitigation plans.

National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. Its intent is to establish plans for active response to severe wildfires and their impact to communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

b. State Regulations

The primary State agencies with jurisdiction over hazardous chemical materials management are the DTSC and the Central Coast RWQCB. Other State agencies involved in hazardous materials management include California OSHA (CalOSHA) and the State Office of Emergency Services (CalOES).

Authority for statewide administration and enforcement of RCRA rests with DTSC. While DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, DTSC is responsible and/or provides oversight for contamination cleanup and administers statewide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) manage the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

The storage of hazardous materials in USTs is regulated by the SWRCB, which delegates authority to the Central Coast RWQCB on the regional level, and typically to the local fire department on the local level.

The CalOSHA program is administered and enforced by the Division of Occupational Safety and Health. CalOSHA is similar to the federal OSHA program. Both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, CalOSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

The CalOES Hazardous Materials (HazMat) section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the HazMat section staff is called upon to provide State and local emergency managers with emergency coordination and technical assistance.

California Occupational Safety and Health Act – California Labor Code, Section 6300 et seq.

The California Occupational Safety and Health Act of 1973 addresses California employee working conditions, enables the enforcement of workplace standards, and provides for advancements in the field of occupational health and safety. The Act also created CalOSHA, the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. CalOSHA's standards are generally more stringent than federal regulations. Under the former, the employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure. The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. At sites known or suspected to be contaminated by hazardous materials, workers must have training in hazardous materials operations and a Site Health and Safety Plan must be prepared, which establishes policies and procedures to protect workers and the public from exposure to potential hazards at the contaminated site.

California Code of Regulations, Title 22, Hazardous Waste Management

At the State level, under Title 22, Division 4.5 of the CCR, DTSC regulates hazardous waste in California primarily under the authority of the Federal RCRA and the California Health and Safety Code (HSC). The Hazardous Waste Control Law (HWCL), under CCR 22, Chapter 30, establishes regulations that are similar to RCRA but more stringent in their application and empowers the DTSC to administer the State's hazardous waste program and implement the federal program in California. The DTSC is responsible for permitting, inspecting, ensuring compliance, and imposing

corrective action programs to ensure that entities that generate, store, transport, treat, or dispose of potentially hazardous materials and waste comply with federal and State laws. The DTSC defines hazardous waste as waste with a chemical composition or other properties that make it capable of causing illness, death, or some other harm to humans and other life forms when mismanaged or released into the environment.

The DTSC shares responsibility for enforcement and implementation of hazardous waste control laws with the SWRCB and, at the local level, the CCRWQCB, and city and county governments.

California Code of Regulations Title 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b)

CCR 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b) pertains to water quality aspects of waste discharge to land. The regulation establishes waste and site classifications as well as waste management requirements for waste treatment, storage, or disposal in landfills, surface impoundments, waste piles, and land treatment facilities. Requirements are minimum standards for proper management of each waste category, which allows regional water boards to impose more stringent requirements to accommodate regional and site-specific conditions. In addition, the requirements of CCR 23, Chapter 15 applies to cleanup and abatement actions for unregulated hazardous waste discharges to land (e.g., spills).

California Fire Code, Title 24, Part 9

The 2022 California Fire Code, written by the California Building Standards Commission, is based on the 2021 International Fire Code (IFC). The IFC is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. The IFC addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

California Fire Plan

The Strategic Fire Plan for California is the State's roadmap for reducing the risk of wildfire, and the most recent iteration (2018) directed CAL FIRE to update maps of fire threat potential in California. In 2022, CAL FIRE updated their maps of fire threat potential in areas under State jurisdiction throughout California and in 2025, CAL FIRE updated their maps of Local Responsibility Areas where the local government is responsible for wildfire protection. CAL FIRE maps fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The threat levels include no fire threat, moderate, high, and very high fire threat. The CAL FIRE Office of the State Fire Marshal provides oversight of enforcement of the California Fire Code as well as overseeing hazardous liquid pipeline safety.

California Multi-Hazard Mitigation Plan

The California Office of Emergency Services (CalOES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Federal Disaster Mitigation Act of 2000 for the State to receive Federal funding. The Federal Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

California Public Resources Code

The California Public Resources Code (PRC) includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that use an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas. These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC § 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period—from April 1 to December 1 (PRC § 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain the appropriate fire suppression equipment (PRC § 4427); and
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (PRC § 4431).

Hazardous Wastes and Substances List (Cortese List)

California Government Code Section 65962.5, enacted in 1985 and amended in 1992, refers to the compilation of a list of sites containing known contamination and hazardous waste facilities; this is commonly referred to as the Cortese List. The presence of a site on the Cortese List has bearing on local permitting processes for land use entitlements and the California Environmental Quality Act (CEQA). While Government Code Section 65962.5 makes reference to a “list”, many changes have occurred, and the sites are instead recorded on publicly available websites and databases managed by various state agencies. In accordance with CEQA Guidelines Section 15300.2(e), a categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

c. Regional and Local Regulations

Santa Barbara County Air Pollution Control District

The federal asbestos requirements found in the National Emission Standards for Hazardous Air Pollutants (NESHAP) found in CFR Title 40, Part 61, Subpart M. USEPA has delegated the Santa Barbara County Air Pollution Control District (SBCAPCD) the authority to enforce the federal asbestos NESHAP, and SBCAPCD is the local enforcement authority for asbestos (SBCAPCD 2022).

Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan

The Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (HMP) contains goals and objectives that are intended to reduce loss of life and property from natural disasters. The HMP was comprehensively updated in 2023 and the City is a participating agency. During the planning process, this plan used Federal Emergency Management Agency (FEMA) tools to determine the most likely possible threats would be wildfire, earthquakes, drought and water shortage, pandemic/public health emergency, energy shortage and resiliency, extreme heat and freeze, and flooding. The HMP identifies mitigation action items that aim to meet objectives and reduce the impacts of these hazards. The Santa Barbara County Office of Emergency Management leads the

responsibility for overseeing the Plan implementation and maintenance strategy. Plan implementation and evaluation will be a shared responsibility among all planning partnership members and agencies identified as lead agencies in the mitigation action plans (County of Santa Barbara 2023).

City of Santa Barbara Hazardous Waste

The City of Santa Barbara and University of California, Santa Barbara (UCSB) operate three drop-off locations, located on the UCSB campus, at 132 Nopalitos Street, and at 4430 Calle Real. The three facilities allow for residents and qualified small businesses to drop off accepted hazardous waste. Hazardous waste that is accepted includes chemical bottles, acids and caustics, batteries, light bulbs, motor oil, pesticides, and solvents (City of Santa Barbara 2022).

City of Santa Barbara Emergency Operations Plan (2021)

The Emergency Operations Plan for the City of Santa Barbara addresses the planned response to emergency situations associated with natural disasters, technological and intentional incidents, and national security emergencies in or affecting the City. The operational concepts reflected in the plan focus on potential large-scale disasters which can generate unique situations requiring expanded emergency responses. The Plan establishes the framework for implementation of the California Standardized Emergency Management System and National Incident Management System in the City of Santa Barbara. The Plan is intended to facilitate multi-agency and multi-jurisdictional coordination in emergency operations, particularly between the City of Santa Barbara, Special Districts, and the Santa Barbara County Operational Area (City of Santa Barbara 2021b).

City of Santa Barbara Storm Water Management Program

The City's Storm Water Management Program (SWMP) requires development to install stormwater protection Best Management Practices (BMPs) pertaining to stormwater. The SWMP includes a Storm Water BMP Technical Guidance Manual that provides stormwater BMP options for development. As stated in the Storm Water BMP Technical Guidance Manual, infiltration BMPs are not suitable to collect runoff from sites that use or store hazardous materials unless hazardous materials are prevented from contaminating runoff. In addition, infiltration BMPs are not suitable for industrial sites where spills can occur (City of Santa Barbara 2020).

City of Santa Barbara General Plan

The City's Land Use Element designates most of the hillside areas for low density residential development ranging from a maximum of one to three dwelling units per acre. This is intended to limit residential development in areas of steep slopes and high fire hazard.

The City's Safety Element contains policies and implementation measures related to hazards and hazardous materials. Specific policies and implementation measures include the following (City of Santa Barbara 2013):

- **S33: Fire Hazard Programs.** The City shall continue to implement programs that reduce the risk of wildland and structure fires, and that minimize the short- and long-term effects of fires.
 - Wildfire Risk Reduction. Continue to implement risk reduction measures identified by the Wildland Fire Plan, such as vegetation fuels management and vegetation chipping.
 - Limit Residential Development in High Fire Hazard Areas. Land use map designations limit residential density in High Fire Hazard Areas.

- Wildland Fire Suppression Assessment District. Continue to implement wildfire risk reduction programs facilitated by the Wildland Fire Suppression Assessment District, such as vegetation management and homeowner education and assistance programs.
- Coordination. Continue to coordinate fire risk prevention, management, response, recovery and public education programs with the County of Santa Barbara, Montecito Fire Protection District, U.S. Forest Service, California Emergency Management Agency, CAL FIRE, Federal Emergency Management Agency, and other agencies.
- **S34: Evacuation Routes.** Development projects located in the Extreme Foothill and Foothill High Fire Hazard Zones shall be evaluated to determine if the project would have the potential to substantially affect emergency evacuation. A project would result in a substantial effect on evacuation if it would result in either of the following conditions:
 - Physically interfere with evacuation capabilities. A project could physically interfere with evacuation capabilities if it would reduce evacuation capacity by substantially decreasing the width of road or other access way, or result in the closure of a road or access way.
 - Add substantial additional evacuees to routes with limited capacity. A project could substantially reduce evacuation capacity if it would add a considerable amount of traffic to probable evacuation routes that do not meet current Fire Department roadway or access standards; or add a considerable amount of traffic to probable evacuation routes in relation to roadway capacity and evacuation traffic volumes reasonably expected to be generated by existing development in the project area.
- **S35: Evacuation Route Evaluation.** The Fire Department shall periodically evaluate the effectiveness of existing and proposed fire emergency evacuation routes, and develop standards or conditions that can be applied to projects to assure that adequate evacuation capacity is provided and maintained.
- **S36: Fire Department Tactical Areas.** To increase fire fighter safety during wildfire emergencies, new development and major redevelopment proposals located in designated high fire hazard areas shall be reviewed to the potential for the project to provide on-site fire suppression tactical areas, such as staging areas, operational safety zones, and escape routes. Fire suppression tactical areas should be provided consistent with criteria provided by the Fire Department.
- **S37: Fire Hazard Reduction Design Requirements.** Project designs shall adequately address fire hazard, providing for appropriate site layout; building design and materials; fire detection and suppression equipment; landscaping and maintenance; road access and fire vehicle turnaround; road capacity for evacuation; and water supply.
- **S38: Fire Education and Training.** The Fire Department shall continue working with the Planning Commission, Design Review Boards, development review staff and the public to enhance understanding and appropriate application of measures to reduce fire hazard.
- **S39: Defensible Space.** Require that defensible space be provided around existing and proposed development projects located in high fire hazard areas in accordance with the Wildland Fire Plan, or as recommended by the Fire Department.
- **S40: Vegetation Management.** Vegetation management programs to reduce fire fuel loads, as well as project-related landscape and maintenance plans, shall protect and preserve environmentally sensitive habitat areas (ESHAs) and balance fire risk reduction benefits with possible aesthetic, habitat, and erosion impacts. Potential effects resulting from fuel management activities shall be avoided or reduced as feasible.

- **S41: Fire Prevention and Creek Restoration.** Coordinate fire prevention and vegetation management activities with creek and riparian resource protection by developing and implementing Best Management Practices for vegetation/fuel management operations conducted within and adjacent to creek corridors.
- **S42: Post Fire Recovery.** Rebuilding that occurs in designated high fire hazard areas shall incorporate all applicable design measures that reduce the risk of future fire-related impacts. Expedited project review and permitting shall occur as determined by the Community Development Director.
- **S43: Building Code Updates.** Periodically adopt amendments or updated provisions of the California Building Code to implement new building design measures that reduce fire risks.
- **S44: Public Water System Improvements for Fire Fighting.** Continue to periodically evaluate the potential for additional water system improvements to assist in emergency preparedness and incorporate feasible measures into the City Capital Improvement Plan.
- **S45: Private Water Supplies for Fire Fighting.** Encourage and assist homeowners in High Fire Hazard Areas to install their own emergency water supplies to support fire fighting operations.
- **S56: Hazardous Materials Exposure.** Continue to provide adequate hazardous material collection facilities and to minimize the potential for exposure to hazardous materials and to provide for their safe disposal.
- **S57: Contaminated Sites.** The City shall continue to identify ways to facilitate hazardous waste site remediation, protect public health, and minimize environmental impacts resulting from the presence of waste material and from remediation activities.
- **S59: Prioritize Remediation.** The City shall reduce health hazards associated with polluted runoff, including runoff which contains harmful bacteria and or viruses.
- **S62: Development on Sites with Contaminated Soils and High Groundwater.** New development in areas of high groundwater and high potential for contaminated soils or contaminated groundwater shall incorporate appropriate vapor control measures into the design of buildings. Control measures may include measures such as vapor barriers, passive air ventilation systems, sealing of ducts and cracks, and depressurizing soil below the foundation. New development shall comply with all County, State, and Federal regulations regarding contaminated soils.
- **S61: Electromagnetic Field Development Setbacks.** Continue application of prudent avoidance policy in siting development near transmission lines with adequate setbacks.
- **S62: Natural Gas Transmission and Distribution Pipelines.** New development shall provide adequate setbacks from natural gas transmission and distribution pipelines to facilitate pipeline maintenance activities and provide for public safety.
- **S64: Hazardous Substance Transportation.** Potential health and safety impacts that could occur as a result of hazardous substance release shall be evaluated during the environmental review of projects located adjacent to US Highway 101 and the Union Pacific railroad tracks.

Local Coastal Program

The California Coastal Act requires all local governments located within the Coastal Zone to prepare a Local Coastal Program (LCP). LCPs regulate future development within the Coastal Zone and define where public access and urbanization will occur, where industrial facilities will be placed, and how sensitive species and habitats, open spaces, and recreational areas will be protected. The City is located within a Coastal Zone, and, as such, has an LCP.

Chapter 5.1, *Coastal Hazards*, of the City's Coastal Land Use Plan (LUP) contains policies to avoid or minimize the effect of high fire hazards. Chapter 6.1, *Public Works & Energy*, of the City's LUP contains policies designed to provide guidance regarding hazardous materials transport (City of Santa Barbara 2019).

City of Santa Barbara Municipal Code

The City of Santa Barbara Municipal Code Chapter 30.180 sets performance standards for the use, handling, storage, and transportation of hazardous materials. Municipal Code Chapter 22.05 states that decisions on projects made by and on behalf of the City of Santa Barbara shall be consistent with the Hazardous Waste Management Plan for the County of Santa Barbara. The Municipal Code contains several provisions related to construction in High Fire Hazard Areas. The Slope Density Ordinance as implemented in the Zoning Ordinance requires new lots in areas with 10 percent or greater slopes to provide more lot area than required by base density to provide more open space area and limit density. Title 8, Fire Protection, of the City's Municipal Code includes International and California Fire Code adoption by reference with local amendments, fire prevention development standards, and weed abatement standards. The City's defensible space clearance requirements mandate 150 feet of defensible space in the Extreme Foothill Zone and 100 feet of defensible space in the Foothill Zone. Fire prevention standards also apply to accessory dwelling units, which are also subject to special parking standards and size limitations in the High Fire Hazard Areas due to health and safety concerns.

Municipal Code Title 27, Subdivisions, Section 27.60.020 prohibits residential development that would take place within a Very High Fire Hazard Severity Zone from utilizing the urban lot split provisions of Senate Bill 9 unless existing and proposed buildings are designed to meet the high fire construction standards adopted through Title 8 and Title 22 of the Municipal Code, and the proposed development is not located in the Foothill or Extreme Foothill High Fire Hazard Zones identified in the CWPP.

Community Wildfire Protection Plan

The City completed an update to the Community Wildfire Protection Plan (CWPP) in 2021, aimed at mitigating wildland fire impacts. CWPP Policy 7.9 requires the City of Santa Barbara's Fire Department to conduct a detailed evacuation study which addresses increased residential density on roadway capacities and evacuation capabilities (City of Santa Barbara 2021a).

As part of standard development procedures in the City, development plans must be submitted to the City's Community Development Department for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with existing City and Fire Department regulations.

4.6.3 Impact Analysis

a. Methodology and Significance Thresholds

This impact analysis addresses the potential to encounter hazardous substances during future project construction in the city resulting from Housing Plan implementation and the potential to create a significant hazard to the public or the environment. The evaluation was performed based on current conditions in the city, information in environmental databases, applicable regulations and guidelines, and future development that may have the potential to introduce hazards. Relationships and proximities of potential future development to schools were also identified.

Based on the City's environmental checklist and Appendix G of the CEQA Guidelines, a project would have a significant adverse impact related to hazards or hazardous materials if it would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. 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.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
5. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

In addition to Significance Threshold 7, the CEQA Guidelines include specific significance thresholds related to wildfire. These significance thresholds are discussed in Section 4.11, *Effects Found Not to Be Significant*.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
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Impact HAZ-1 DEVELOPMENT FACILITATED BY THE HOUSING PLAN COULD RESULT IN THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS. COMPLIANCE WITH APPLICABLE LOCAL, STATE, AND FEDERAL REGULATIONS WOULD MINIMIZE THE RISK OF POTENTIAL EXPOSURE OF THE PUBLIC TO HAZARDOUS MATERIALS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

New residential uses facilitated by Housing Plan programs may require the routine transport, use and storage of limited quantities of hazardous materials. The use, transport, and disposal of hazardous materials and wastes are required to comply with federal, state, and local regulations. These regulatory safeguards minimize exposure of the public and environment to a potential release of hazardous materials.

Construction of residential development may involve limited quantities of regulated hazardous materials, such as vehicle fuels and fluids, petroleum products, solvents, and paint. Contractors of individual development projects would be required to implement standard construction BMPs for the use of handling such materials to avoid or reduce the potential for a spill, leak, or other release to occur. These types of hazardous materials are not acutely hazardous in small quantities. All storage, handling, use, and disposal of these materials are regulated by local, state, and federal regulations, and minimize the risk of a release during construction. Regulations include the

Hazardous Material Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Materials Management Act, and California Code of Regulations Title 22. Oversight by appropriate agencies, including, but not limited to, the Central Coast RWQCB, DTSC, Santa Barbara County EHS, and SBCAPCD, and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize risk associated with potential exposure of the public to these substances.

After construction is completed, residential uses are not a land use typically associated with the use, transportation, storage, or generation of significant quantities of hazardous materials. Operation of new residential units may result in incremental uses in common household chemicals and regulated hazardous materials, such as cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in regular property and landscaping maintenance. Compliance with the City's SWMP and regulation and guidelines for proper waste disposal minimize the potential for a release above regulatory levels. Pursuant to the City's SWMP, stormwater infiltration BMPs would not be permitted for use on sites that use or store hazardous materials unless hazardous materials are prevented from contaminating runoff. There are multiple hazardous waste services provided in the City and Santa Barbara County that encourage the responsible disposal of household hazardous wastes, including the Community Hazardous Waste Center at the University of California, Santa Barbara; MarBorg Industries Antifreeze, Batteries, Oil, and Paint facility; South Coast Recycling and Transfer Station; and various local businesses accept household hazardous wastes (City of Santa Barbara 2022b).

Mandatory compliance with all applicable local, state, and federal laws and regulations relating to the transportation, use, and disposal of hazardous materials during construction and operation of development forecasted in accordance with the Housing Plan would reduce potential impacts to a less than significant level. Therefore, Housing Plan implementation would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Mitigation Measures

No mitigation measures are required.

Threshold 2: Would the project 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?

Impact HAZ-2 COMPLIANCE WITH APPLICABLE LOCAL, STATE, AND FEDERAL REGULATIONS WOULD MINIMIZE POTENTIAL HAZARDS FROM REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

As described in Section 4.6.1, *Environmental Setting*, development facilitated by the Housing Plan could occur on sites with either known or unknown contamination or sites containing a past release of hazardous materials, including but not limited to Clean Up Program sites, sites containing potentially contaminated artificial fill material, and sites with building materials containing hazardous materials. Disturbance of these sites and materials during construction may result in the exposure of contaminants or hazardous materials to site workers, residents, or neighboring uses including schools or other residential uses.

Further, sites that have previously undergone remediation may have residual contamination that could affect new residential land uses. Therefore, development forecasted in accordance with the Housing Plan would have the potential to expose these hazardous materials during construction activities.

Soil and Groundwater Contamination

Existing sites that use or have previously used hazardous materials, or that may contain contaminants in soils or groundwater in Santa Barbara, include large- and small-quantity generators of hazardous waste, such as gas stations, dry cleaners, and industrial uses. In addition, a substantial area of the downtown and waterfront regions of the City include lead-containing artificial fill material. Potential development facilitated by the Housing Plan may occur on these sites containing soil and groundwater contamination.

During the City's review of individual development applications, City staff would determine if a project site contains potential site contamination that requires remediation based on a review of information from the Central Coast RWQCB, DTSC, Santa Barbara County EHS, SBAPCD and information provided by the applicant. However, unknown contamination may also exist at sites eligible for housing under the Housing Plan resulting from a prior use of the site.

Oil of Gas Wells

Future residential development enabled under the Housing Plan could occur in areas that have been previously utilized for oil exploration and drilling in the Mesa Oil Field, thereby exposing additional persons to hazards associated with abandoned oil wells, sump material, and other anomalies. CalGEM has jurisdiction over historic oil and gas wells and may require property owners to implement measures to remediate wells that are leaking. 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 generally be required. CalGEM's Construction Site Plan Review Program assists local permitting agencies in identifying and reviewing the status of oil or gas wells located near or beneath proposed structures. The Construction Site Plan Review Program may issue a Well Review Letter to the local permitting agency (i.e., the City), and would provide the current status of all known oil and gas well facilities located on a property. Remedial plugging operations may be required in some cases where a known release has occurred. In the event that any unrecorded wells are uncovered during construction, CalGEM would be notified and remedial actions may be required.

Asbestos

Demolition of existing structures, particularly older structures prior to 1980, has the potential to expose workers and the public to asbestos containing materials or dust that contains asbestos. Several federal, state, and local regulations govern the handling and remediation of such materials, that would minimize the risk of a release or a hazard to the public or environment from exposure. The control of asbestos during demolition or renovation of buildings is regulated under the Federal Clean Air Act. The Federal Clean Air Act requires a thorough inspection for asbestos where demolition would occur and specifies construction work practices to control emissions, such as removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expeditiously as practicable (USEPA 2021). The California Health and Safety Code Section 19827.5 requires that local agencies not issue demolition or alteration permits until an

applicant has assessed the potential for a structure to contain asbestos and demonstrated compliance with notification requirements under federal regulations regarding hazardous air pollutants, including asbestos. Compliance with applicable standards related to demolition and asbestos is reviewed and monitored by City Building and Safety staff and SBAPCD.

Friable asbestos containing materials are regulated as a hazardous air pollutant under the Clean Air Act. As a construction worker safety hazard, they are also regulated under the authority of CalOSHA and SBCAPCD. In structures that would be demolished, any asbestos containing materials would be abated in accordance with State and Federal regulations prior to the start of demolition or renovation activities and in compliance with all applicable existing rules and regulations, including SBCAPCD. These programs would ensure that asbestos removal would not result in the release of hazardous materials to the environment that could impair human health.

Polychlorinated Biphenyls (PCBs)

Fluorescent lighting ballasts manufactured prior to 1978, and electrical transformers, capacitors, and generators manufactured prior to 1977, may contain PCBs. In accordance with the Toxic Substances Control Act and other federal and State regulations, individual projects would be required to properly handle and dispose of electrical equipment and lighting ballasts that contain PCBs during demolition of older buildings, ensuring that construction impacts related to hazardous materials, specifically PCBs, release would not result in a release into the environment.

In summary, new residential development facilitated by the Housing Plan may create a significant hazard through reasonably foreseeable release of hazardous materials into the environment. This impact would be potentially significant.

Mitigation Measures

HAZ-1 Environmental Site Assessment

The City of Santa Barbara Community Development Department shall develop regulatory standards and amend the Municipal Code to implement and enforce the following requirements:

The City shall require the preparation of a project-specific Phase I Environmental Site Assessment (ESA) in accordance with the most current American Society for Testing and Materials (ASTM) Standard Practice or the Standards and Practices for All Appropriate Inquiry (AAI) for:

1. Any Clean Up Program site listed on the State Water Resources Control Board data management system (GeoTracker) or included on the Certified Unified Program Agencies (CUPA) program, including an open or closed leaking underground storage tank (LUST) case or other Cortese List site.
2. Any site located within the City's Area of Potential Contaminated that results in any of the following:
 - Demolition of existing structures;
 - Changes to an existing foundation;
 - New foundation; and/or
 - New stormwater infiltration basins.
 - Sites that have been exclusively used as single-family land use are excluded from the above requirement, unless otherwise recommended by an environmental oversight agency.

In instances where specific Recognized Environmental Conditions (RECs) are identified which may require further sampling, a qualified hazardous materials environmental professional with site characterization experience shall prepare a Phase II ESA. If the Phase II ESA reveals RECs, the environmental professional shall identify remedial activities controlled by federal, state, and local regulations.

HAZ-2 Inadvertent Discovery of Contamination

The City of Santa Barbara Community Development Department shall develop regulatory standards and amend the Municipal Code to implement and enforce the following requirements:

In the event that previously unknown or unidentified soil, soil vapor, and/or groundwater contamination could present a threat to human health or the environment is encountered during construction at a development site:

- Construction activities in the immediate vicinity of the contamination shall cease immediately.
- Following discovery, the contractor shall notify Santa Barbara County Public Health Department, Environmental Health Services or other appropriate federal, state, or local regulatory oversight agency, and the City Environmental Analyst, immediately.
- A qualified environmental professional will be required to conduct an investigation to identify risks and describe measures to be taken to protect workers and the public from exposure to potential site hazards.

HAZ-3 Inadvertent Discovery of Oil or Gas Well

The City of Santa Barbara Community Development Department shall develop regulatory standards and amend the Municipal Code to implement and enforce the following requirements in the event that any unrecorded oil or gas wells are uncovered during excavation or grading:

- Construction activities in the immediate vicinity of the contamination shall cease immediately.
- The Santa Barbara County Public Health Department, Environmental Health Services, County Energy, Minerals & Compliance Division, and Department of Conservation Geologic Energy Management Division (CalGEM) shall be notified immediately to determine if remedial action may be required.
- The property owner shall be responsible for ensuring all remedial actions recommended by these agencies are implemented.

Significance After Mitigation

Mitigation Measure HAZ-1 requires the preparation of a project-specific ESA prior to any demolition or construction activities. If unknown waste or suspect materials are discovered during construction activities, Mitigation Measure HAZ-2 and Mitigation Measure HAZ-3 would address notification and remediation requirements in compliance with all federal, state and local regulations. Mitigation Measures HAZ-2 and Mitigation Measure HAZ-3 would result in standard development conditions that would direct applicants to stop work and contact City staff and the appropriate regulatory agency in the case that site contamination is discovered during construction. With implementation of Mitigation Measures HAZ-1, HAZ-2, and HAZ-3, the Housing Plan would be mitigated to less than significant.

Threshold 3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter mile of an existing or proposed school?

Impact HAZ-3 DEVELOPMENT FACILITATED BY THE HOUSING PLAN COULD OCCUR WITHIN 0.25 MILE OF A SCHOOL. HOWEVER, COMPLIANCE WITH LOCAL, STATE, AND FEDERAL REGULATIONS RELATED TO HAZARDOUS MATERIALS WOULD MINIMIZE THE RISK OF HAZARDOUS EMISSIONS OR EXPOSURE TO ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The California Public Resources Code requires projects located within 0.25 mile of a school and might reasonably be expected to emit or handle hazardous materials to consult with the school district regarding potential hazards. There are approximately 17 schools in the city, operated by the Hope School District, Santa Barbara Unified School District, Cold Spring School District, and Montecito Union School District. Development forecasted in accordance with the Housing Plan may occur within 0.25 mile of a school; however, residential uses would not involve the use or transport of large quantities of hazardous materials. Any transport of hazardous materials would be required to comply with applicable regulations for the use, transport, and disposal of hazardous materials. Any development forecasted in accordance with the Housing Plan which would be reasonably anticipated to emit hazardous air emissions or would handle a hazardous substance within 0.25-mile of an existing school would be required to notify the affected school district, pursuant to Public Resources Code Section 21151.4. Furthermore, forecasted residential development in proximity to a school, such as development of La Cumbre Plaza, is anticipated to require project-level discretionary approval and project-specific environmental review whereby potential impacts associated with hazardous materials in proximity to schools would be evaluated and mitigated, if required. Compliance with existing regulations would reduce potential exposure hazards and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 4: Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact HAZ-4 DEVELOPMENT FACILITATED BY THE HOUSING PLAN COULD RESULT IN DEVELOPMENT ON CORTESE LIST SITES. IMPACTS RELATED TO DEVELOPMENT ON A CORTESE LIST SITE WOULD BE LESS THAN SIGNIFICANT IMPACT WITH MITIGATION.

Development facilitated by the Housing Plan could occur on sites included on a list compiled pursuant to Government Code Section 65962.5, otherwise known as the Cortese List. As described in Section 4.6.1, there are approximately 268 open and closed LUST sites within the city. In addition, other Cortese List sites include 22 CDO and CAO sites, and one hazardous waste site (refer to Table 4.6-1). Many of these sites are concentrated in the downtown, waterfront area, and upper State Street corridor, where residential uses under the Housing Plan would be prioritized. As such, residential development forecasted in the Housing Plan may occur on Cortese List sites. Disturbance of these sites and materials during construction may result in the exposure of contaminants or hazardous materials to site workers, residents, or neighboring uses including schools or other residential uses. Further, Cortese List sites may have residual contamination that could affect new

residential land uses. Without site specific assessments, contamination could be released into the environment or, upon future occupation, cause a hazard to the public due to exposure to hazardous materials above the applicable regulatory exposure limits.

Existing federal, state, and local regulations and requirements enforced by regulatory agencies and the Certified Unified Planning Agency (CUPA), generally address remediation for sites listed on the Cortese List. Santa Barbara County EHS is certified by the California Environmental Protection Agency as the CUPA for Santa Barbara and ensures compliance with applicable laws and regulations. Development and remediation of LUST sites is overseen by the RWQCB. Generally, the agency responsible for oversight would determine the types of remediation and cleanup actions required. This may include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. However, not all potential housing sites within the city have been investigated for the presence of hazardous materials or presence on the Cortese List. Therefore, impacts would be potentially significant.

Mitigation Measures

Implement Mitigation Measure HAZ-1.

Significance After Mitigation

Mitigation Measure HAZ-1 would minimize potential impacts associated with the development of sites listed on the Cortese List. Mitigation Measure HAZ-1 requires the preparation of a project-specific Phase I ESA for any site listed on the State Water Board data management system (GeoTracker) or included on the CUPA program, including an open or closed LUST case, and any site located within the City's Potential Contaminated Fill Area. As part of the City's review process for individual development applications, staff would screen projects to determine whether a project site is listed on the Cortese List. If a project contains a LUST case or other Cortese site listing, a Phase I Report would be required. If Recognized Environmental Conditions are found on the potential project site, the City would notify the applicant and coordinate with the appropriate oversight agency to ensure that the applicant brings the site to regulatory compliance. Additionally, project sites would be reviewed on a case-by-case basis to identify any site-specific measures needed to address impacts related to development on Cortese List sites. With implementation of Mitigation Measure HAZ-1, the Housing Plan would be mitigated to a level of less than significant.

Threshold 5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
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Impact HAZ-5 COMPLIANCE WITH LOCAL, STATE AND FEDERAL REGULATIONS WOULD MINIMIZE SAFETY HAZARDS AS RESIDENTIAL DEVELOPMENT WOULD NOT OCCUR WITHIN AN AIRPORT SAFETY ZONE OR AIRPORT NOISE CONTOUR. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The City operates the Santa Barbara Airport, located in the Goleta area, approximately four miles west of the City proper. The Airport is within the City's jurisdiction, and City-designated land use and zoning patterns apply to the approximate 950-acre property. Airport zoning, defined by Title 29 of the City of Santa Barbara Municipal Code, restricts residential development within the Airport

property and immediate vicinity (City of Santa Barbara 2021b, City of Santa Barbara 2003). Residential development resulting from the City of Santa Barbara's Housing Plan would not occur within an Airport Safety Zone or Airport Noise Contour, as defined by the Santa Barbara County Association of Governments (SBCAG) (SBCAG 2012). Specific projects that may affect navigable airspace would be subject to Federal Aviation Administration review, pursuant to the Code of Federal Regulations, Parts 77.5, 77.7, and 77.9.

As discussed in Section 4.12, *Effects Found Not to be Significant*, although aircraft overflights have the potential to expose people residing or working in the city to aircraft noise, this intermittent and temporary noise disturbance is present under existing conditions, and implementation of the Housing Plan would not exacerbate or increase aviation related noise levels. The Santa Barbara Airport's 65 dBA CNEL noise contour extends approximately 3,000 feet to the east of the airport but remains outside of the City's boundaries (Santa Barbara 2010). Therefore, the Housing Plan would not expose people residing or working in the area to excessive noise levels. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-6 DEVELOPMENT FACILITATED BY THE HOUSING PLAN WOULD NOT RESULT IN CHANGES TO EMERGENCY EVACUATION ROUTES NOR WOULD IT SUBSTANTIALLY INCREASE ROADWAY CONGESTION SUCH THAT THE USE OF AN EVACUATION ROUTE WOULD BE HINDERED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Increased housing development density in accordance with the Housing Plan could result in additional traffic congestion on local roadways. Multiple guidance documents, including the City's Emergency Operations Plan (2021), Tsunami Response Plan (2012), and the County's Multi-Jurisdictional Hazard Mitigation Plan (2023) provide guidance during unique situations requiring an unusual or extraordinary response, including traffic control and management. Implementation of these plans involve coordination with all facilities and personnel of City and County government, along with the jurisdictional resources within the County, into an efficient organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid, and other appropriate response procedures (City of Santa Barbara 2021b, City of Santa Barbara 2012, County of Santa Barbara 2023b).

Construction activities associated with development forecasted in accordance with the Housing Plan could interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within rights-of-way, due to temporary construction barricades or other obstructions that could impede emergency access. Projects facilitated by the Housing Plan would be evaluated on a project-by-project basis to determine if construction would impede emergency access. Standard development conditions of approval typically require projects to stage construction equipment onsite and establish construction truck haul routes, or otherwise implement a Construction Management Plan to facilitate circulation and access during construction. Any temporary construction barricades or other obstructions that could impede emergency access would require a Public Works Permit and may be subject to the standards set forth in the California Manual of Uniform Traffic Control Devices (Manual) (Caltrans 2021). The Public Works Encroachment Permit requires the creation and approval of temporary traffic control plans to be

used for facilitating road users through a work zone. Adherence to the requirements of standard development conditions and/or a Public Works Permit for all construction activity would minimize potential impacts associated with the impairment or physical interference of an adopted emergency response plan or evacuation procedures for State highways. Future development forecasted in accordance with the Housing Plan would be reviewed by the Santa Barbara City Fire Department to ensure consistency with emergency access requirements. Infrastructural improvements that involve work in the public right-of-way would require an Encroachment Permit and would be subject to applicable City requirements to ensure appropriate traffic control, pursuant to the Santa Barbara Municipal Code Chapter 10.55. Additionally, as part of standard development procedures in the City, the City's Community Development Department, Fire Department, and Public Works Department must review proposed development to ensure that all new development would have adequate emergency access and escape routes in compliance with existing City and Fire Department regulations and pursuant to the regulations as set forth by the CWPP.

Large residential projects that require discretionary approval would require project-specific environmental review in which potential impacts associated with emergency response plans and emergency evacuation plans would be evaluated and mitigated, if required. Therefore, implementation of the Housing Plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact HAZ-7 DEVELOPMENT FACILITATED BY THE HOUSING PLAN THAT WOULD OCCUR WITHIN HIGH FIRE HAZARD AREAS WOULD BE REQUIRED TO COMPLY WITH LOCAL AND STATE REGULATIONS AND WOULD UNDERGO SITE-SPECIFIC DEVELOPMENT REVIEW. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development forecasted in accordance with the Housing Plan would prioritize residential mixed-use and infill development in proximity to existing transit and established transit priority areas which are mostly located outside of Santa Barbara's fire hazard areas. As discussed in Section 3, *Project Description*, the Housing Plan would prioritize development in locations zoned for multi-unit development and generally not within High Fire Hazard Areas.

Development forecasted in accordance with the Housing Plan would be subject to applicable State and local standards and project-specific environmental review that would ensure compliance with fire safety regulations. As forecasted in the Housing Plan, accessory dwelling units (ADUs), would be the most common type of housing project constructed within the City's High Fire Hazard Areas. Pursuant to the City of Santa Barbara's Municipal Code Sections 30.185.040 and 28.86.085, all ADUs located in High Fire Hazard Areas are required to be designed to meet high fire construction standards as determined by the Chief Building Official or the Fire Code Official. In addition, ADUs within a fire hazard area defined in the CWPP must meet High Fire Hazard Area Standards provided in Section 30.185.040(K).

Regarding multi-unit housing development, applicable housing development projects would be required to comply with General Plan, zoning, and subdivision standards and criteria, which include density limits. Although there is potential for a small number of housing sites in High Fire Hazard

Areas to be developed with multi-unit housing, these developments would adhere to the existing density limits and therefore would not encourage substantial residential growth within the city's fire hazard areas.

New development forecasted in accordance with the Housing Plan that would occur with a High Fire Hazard Area would be subject to several regulatory standards that would limit wildfire risk. This includes Title 14 of the California Code of Regulations, the City 2021 Community Wildfire Protection Plan (CWPP), Building Code requirements such as sprinklers, fuel modification requirements and defensible space, and project review by the City Fire Department. Compliance with applicable regulations and standards, which would be confirmed upon Fire Department review of individual projects, would minimize the risk associated with fires burning in defensible space areas (City of Santa Barbara 2020b).

The project would not exacerbate wildfire risks or the uncontrolled spread of a wildfire, and this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.6.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts together with similar impacts of reasonably anticipated regional projects/programs including the City's Safety Element Update, Open Space Element Update, the City's State Street Master Plan, and the California Department of Transportation's (Caltrans') South Coast Highway 101 High-Occupancy Vehicle Lanes project. Cumulative projects also include planned and pending residential development projects that contribute to the City's RNHA. The general approach to cumulative impact analysis used in this Program EIR is discussed in Section 4, *Environmental Impact Analysis*.

Generally, exposure to hazardous materials may cause localized adverse effects. A combination of federal, state, and local regulations limit or minimize the potential for exposure to hazardous materials. The types and sizes of residential development anticipated in the City of Santa Barbara would not involve large quantities of hazardous materials or activities that transport or handle hazardous materials nor be sited on known hazardous materials sites. However, cumulative plans and projects may include demolition of structures that have the potential to contain hazardous building materials. Building materials may contain asbestos and lead-based paint. To address potential release of asbestos and lead-based paint, the City would require applicants to assess structures and impose standard procedures in accordance with State regulations (required testing, removal, and proper disposal) to minimize release prior to any demolition. Cumulative development could be located in areas that have previously been subject to soil and groundwater contamination, such as a Cortese List site, or in proximity to previously abandoned oil or gas wells. In the absence of City-specific requirements for hazardous material review or procedures for the inadvertent discovery of hazardous materials or oil wells, cumulative development could potentially result in cumulatively significant impacts related to hazardous material release. To address the potential release of hazardous materials, the Housing Plan would implement Mitigation Measures HAZ-1 through HAZ-3 which require developers to prepare project-specific Phase I ESAs in potentially hazardous areas and follow procedures in the event of the discovery of contamination or oil wells. With implementation of Mitigation Measures HAZ-1 through HAZ-3, the Housing Plan would not contribute considerably to cumulative impacts related to hazardous material release.

As part of project approval for the cumulative projects, the City would assess the need for fire protection services, which would inform efforts to improve or expand needed facilities. All cumulative development in the City would be required comply with emergency access requirements as directed by respective City and Fire Department regulations. Cumulative projects are not reasonably anticipated to result in permanent road closures, impede an established emergency or evacuation access route, or interfere with emergency response requirements established by the City's General Plan. Therefore, the cumulative impacts related to emergency response and evacuation plans consistency would be less than significant.

A combination of Federal, State, and local regulations limit or minimize the potential for exposure to wildfires by reducing the amount of development in wildland urban interface areas, ensuring new development is developed according to California Building Code and California Fire Code, and incorporating requirements for fire-safe construction into the land use planning. Cumulative development in the City may occur in designated High Fire Hazard Areas. However, project construction would adhere to respective city building and fire codes designed to provide minimum standards to increase fire-resiliency in buildings, prevent the occurrence of fires, and to provide adequate fire-protection facilities to control the spread of fire which might be caused by recreational, residential, commercial, industrial or other activities conducted in a wildland urban interface area. Adherence to the City's building code would ensure that California Fire Code standards including automatic sprinkler systems are incorporated into project design and permit requirements. Therefore, the cumulative impact related to wildfire exposure risk would be less than significant.

Compliance with the City's development standards regarding types of development allowed and maximum stories allowed would reduce potential cumulative project impacts related to aviation related hazards. Existing requirements for airports and existing local, State, and Federal regulations would also reduce the noise impacts of airport activity on residents and workers in the plan area. Therefore, the cumulative impact related to aviation-related hazards and excessive noise exposure would be less than significant.

4.7 Noise

This section evaluates potential noise and groundborne vibration impacts that may result from the Housing Plan. Specifically, this analysis describes the environmental and regulatory setting, the criteria used to evaluate significance of potential noise impacts (including the exposure of noise-sensitive receivers to substantial or incompatible noise levels), methods used to evaluate potential impacts, and mitigation required to reduce potential impacts. Noise calculations associated with the analysis herein are included in Appendix E to this Program EIR.

4.7.1 Environmental Setting

a. Fundamentals of Noise

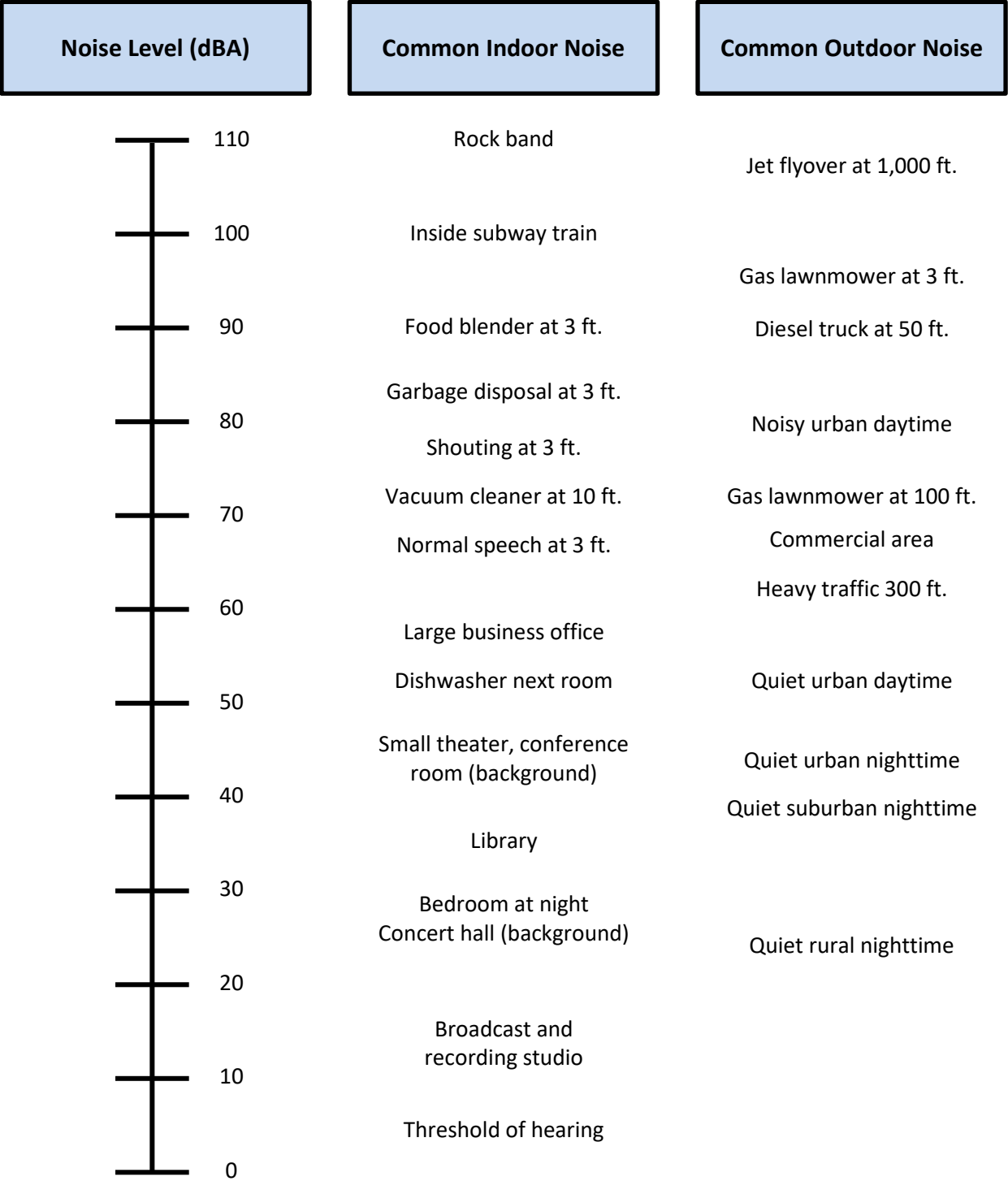
Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs (e.g., the human ear). Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler, et. al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007). Common outdoor and indoor noise sources and their typical corresponding A-weighted noise levels are shown in Figure 4.7-1.

Human perception of noise has no simple correlation with sound energy. The perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Crocker 2007).

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in sound level as the distance from the source increases. The manner by which noise declines with distance depends on factors such as the type of sources (e.g., point or line), the path the sound will travel, site conditions, and obstructions. Noise levels from a point source (e.g., construction, industrial machinery, ventilation units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013).

Figure 4.7-1 Examples of Typical Noise Levels



Source: Caltrans 2013

The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) result simply from the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site (e.g., soft dirt, grass, or scattered bushes and trees) (Caltrans 2013).

Noise levels may also be reduced by intervening structures. The amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5 dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce occupants’ exposure to noise as well. The FHWA’s guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, its frequency, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed.

One of the most frequently used noise metrics that considers both duration and intensity is the equivalent noise level (L_{eq}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, L_{eq} is equivalent to a one-hour period, even when measured for shorter durations as the noise level of a 10- to 30-minute period would be the same as the hour if the noise source is relatively steady. Normal conversational levels at three feet are in the 60- to 65-dBA L_{eq} range and ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (Ldn), which is a 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by Ldn and CNEL usually differ by about 0.5 dBA. Quiet suburban areas typically have a CNEL in the range of 40 to 50 dBA, while areas near arterial streets are typically in the 50 to 70+ CNEL range.

Propagation

Sound from small, localized sources (approximating a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern, known as geometric spreading. The sound level from point sources attenuates at a rate of approximately 6 dBA for each doubling of distance.

Traffic noise is not a single, stationary point source of sound. Rather, the movement of vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point. The attenuation rate for a line source is approximately 3 dBA for each doubling of distance.

b. Fundamentals of Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The frequency of a vibrating object describes how rapidly it oscillates.

Descriptors

Vibration amplitudes are usually expressed in peak particle velocity (PPV). The PPV is normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Response to Vibration

Caltrans has developed limits for the assessment of vibrations from transportation and construction sources. The Caltrans vibration limits are reflective of standard practice for analyzing vibration impacts on structures. The Caltrans *Transportation and Construction Vibration Guidance Manual* (2020) identifies guideline impact criteria for damage to buildings, which are shown in Table 4.7-1.

Table 4.7-1 Building Vibration Damage Potential

	Maximum PPV (in/sec)	
	Continuous/Frequent	
Extremely fragile historic buildings, ruins, ancient mountains	0.12	0.08
Fragile buildings	0.20	0.10
Historic and similar old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV = peak particle velocity; in/sec = inches per second

Source: Caltrans 2020

Propagation

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is exposed to vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

c. Sensitive Receivers

Noise-sensitive receivers are generally uses that are most interfered with by noise. These uses include residences, schools, churches, hotels, as well as some park and open space areas (City of Santa Barbara 2010). The City predominantly consists of land that is designated for residential uses, and residential land uses are also allowed in most commercial zone districts. Therefore, residential uses comprise most of the noise-sensitive receivers in the City.

Vibration-sensitive receivers are similar to noise-sensitive receivers and include residences and institutional uses, such as schools and churches. However, vibration-sensitive receivers may include sensitive species and any use where groundborne vibration may result in physical damage to a building structure. Uses that may have added sensitivity to groundborne vibration include historic sites and structures. Refer to Section 4.4, *Cultural and Tribal Cultural Resources*, for a discussion of historic properties in the City, which may be particularly sensitive to increases in groundborne vibration levels due to the possibility for these properties to have aging architecture and/or infrastructure.

d. Existing Conditions

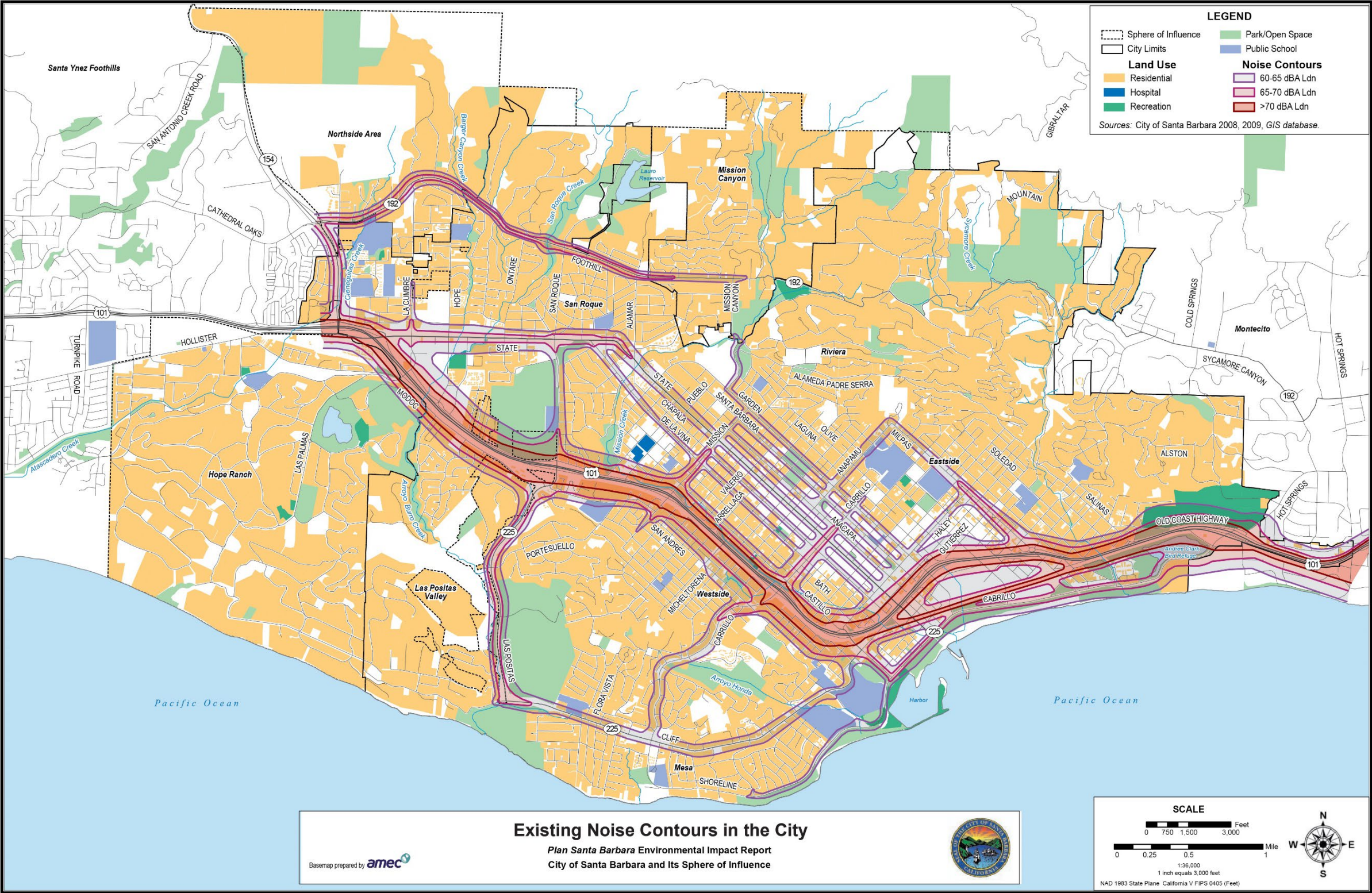
Noise Sources

The noise environment in Santa Barbara is predominantly characterized by transportation sources: vehicles, freight and passenger trains, and aircraft overflights. Vehicle noise affects large areas of the city along major transportation corridors, particularly communities near U.S. Route 101 (U.S. 101), which generates noise levels at or above 70 dBA Ldn generally extending out between 250 and 300 feet from the corridor. Major roadways that generate noise between 65-69 dBA Ldn include Upper State Street, Las Positas Road, and Cabrillo Boulevard, whereas roadways that generate noise between 60-64 dBA Ldn include those within the City's Downtown and Mesa neighborhoods. Freight and passenger train operations intermittently generate high noise levels often exceeding 100 dBA at 100 feet from the track centerline. For instance, portions of U.S. 101 noise overlap that associated with the Union Pacific Railroad (UPRR), which intermittently increases noise exposure at communities near these portions of the corridor. Aircraft overflights also intermittently create higher noise levels citywide. However, the nearest airport is Santa Barbara Airport, which is within the City limits but located in the Goleta area approximately four miles west of City proper as shown in Figure 2-1 and Figure 2-2 in Section 2, *Environmental Setting*. The airport's 65 dBA CNEL noise contour extends approximately 3,000 feet east of the airport which does not reach City proper, located adjacent to La Cumbre Country Club (City of Santa Barbara 2010).

The 2010 General Plan EIR includes a noise contour map depicting the extent of noise exposure in the City above 60 dBA Ldn with respect to various noise-sensitive uses, predominantly residential uses. Roadway volumes have incrementally increased since the development of the noise contour map circa 2010; however, volumes have not increased substantially such that the contours depicted have changed fundamentally since 2010. Therefore, the noise contour map remains an applicable and relevant resource for this analysis. Figure 4.7-2 depicts modeled 60-65, 65-70, and 70+ dBA Ldn noise contours representative of existing conditions. The extent to which existing land uses in Santa Barbara are affected by traffic noise depends on their respective proximity to major roadways and their individual sensitivity to noise.

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Figure 4.7-2 Existing Noise Contours in the City



Source: City of Santa Barbara 2010

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As shown in Figure 4.7-2, land uses with proximity to the following roadways and railroad are generally exposed to noise levels between 60 and 70 dBA Ldn (City of Santa Barbara 2010):

- | | | |
|----------------------------|---------------------|----------------------|
| ▪ U.S. 101 | ▪ State Street | ▪ Carrillo Street |
| ▪ State Route 154 (SR 154) | ▪ Mission Street | ▪ Garden Street |
| ▪ Cliff Drive | ▪ De La Vina Street | ▪ Cabrillo Boulevard |
| ▪ Foothill Road | ▪ Chapala Street | ▪ UPRR |
| ▪ Milpas Street | ▪ La Cumbre Road | |
| ▪ Las Positas Road | ▪ Anacapa Street | |

Vibration Sources

Sources of vibration in the city, similar to that of the noise environment, are also primarily motor vehicles along roadways. Heavy truck traffic and bus operations on roadways generate groundborne vibration, which varies depending on vehicle type, weight, and pavement conditions. In addition, commercial or industrial activities may generate vibration from the use of heavy equipment. More permanent, but intermittent, vibration may also be generated by railroad and airport operations, which would affect communities adjacent to these facilities. Vibration may also be generated by construction equipment (e.g., earth-moving equipment and pile driving); however, these sources are temporary and vary on a project-by-project basis.

4.7.2 Regulatory Setting

a. Federal Regulations

Occupational Safety and Health Act of 1970

Under the Occupational Safety and Health Act of 1970, the Occupational Safety and Health Administration (OSHA) has adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.

b. State Regulations

The State noise and vibration guidelines presented below are to be used as guidance with respect to planning for noise, not standards and/or regulations to which Santa Barbara must adhere.

California Building Standards Code, Title 24, Part 2, Section 1206.4

According to the 2022 California Building Standards Code, Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations, interior noise levels attributable to exterior sources shall not exceed 45 dBA Ldn in any habitable room. A habitable room is typically a residential room used for living, sleeping, eating, or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable rooms for this regulation.

California Department of Transportation

As discussed in the *Environmental Setting* of this section, Caltrans has developed limits for the assessment of vibration from transportation and construction sources, which are reflective of standard practice for analyzing vibration impacts. Table 4.7-1 presents the impact criteria for structural damage to buildings.

c. Local Regulations

City of Santa Barbara General Plan

The Environmental Resources Element of the City's General Plan, which incorporates the 1979 Noise Element, is intended to identify sources of noise and provide goals, objectives, and policies that ensure that noise from various sources, including transportation and stationary sources, does not create an unacceptable noise environment. The City has adopted land use compatibility standards for use in assessing the compatibility of various land use types with noise levels. The City's adopted land use compatibility standards, shown in Table 4.7-2, indicate that the normally acceptable exterior noise level for residential uses is 65 dBA Ldn. The guidelines also identify 45 dBA Ldn as the acceptable interior noise level for residential uses, consistent with the 2022 California Building Standards Code (City of Santa Barbara 2011).

Table 4.7-2 Land Use Compatibility Standards

Residential – Single Family, Duplex, Mobile Homes, Multiple Family, Dormitories, etc.	65
Transient Lodging	70
Schools Classrooms, Libraries, Churches	65
Hospitals, Nursing Homes	65
Auditoriums, Concert Halls, Music Shells	60
Sports Arenas, Outdoor Spectator Sports	65
Playgrounds, Neighborhood Parks	65
Golf Courses, Riding Stables, Water Recreation, Cemeteries	70
Office Buildings, Personal, Business, and Professional	75
Commercial – Retail, Movie Theaters, Restaurants	75
Commercial – Wholesale, Some Retail Industry, Manufacturing, Utilities	80
Manufacturing – Communications (Noise Sensitive)	70
Livestock Farming, Animal Breeding	75
Agriculture (except Livestock), Mining, Fishing	95
Public Right-of-Way	85
Extensive Natural Recreation Areas	75

¹ Represent the upper limit of the range of "normally acceptable" noise levels. "Normally acceptable" is defined as being an exposure that is great enough to be of some concern, but common building constructions will make the indoor environment acceptable, even for sleeping quarters.

Source: City of Santa Barbara 2011

In addition to the City's compatibility noise standards, the following policies and implementation actions from the Environmental Resources Element are consistent with the City's overarching goal to ensure that the City is free from excessive noise, and therefore applicable to the Housing Plan (City of Santa Barbara 2011):

Policies

- **3.0:** Existing and potential incompatible noise levels in problem areas should be reduced through land use planning, building, and subdivision code enforcement and other administrative means.
- **5.0:** A program should be developed for the education of the community in the nature and extent of noise problems in the City.

Implementation Measures

- **3.1:** Locate proposed developments in the City on the Noise Contour Map to determine if there is a potential impact on the development or, conversely, if the development will increase noise levels in a relatively quiet area. The development review and environmental review process should include further analysis in areas of potential impact.
- **3.2:** Discourage development of noise sensitive uses in incompatible noise-impacted areas, particularly adjacent to Highway 101, the Municipal Airport, and the Southern Pacific Railroad.
- **3.3:** Strictly enforce all existing noise control regulations, including building and subdivision laws.
- **3.4:** In existing or future development in noise-impacted areas, especially surrounding the Municipal Airport, encourage or require through ordinance that proper site planning and insulation measures be taken to reduce noise to establish levels.
- **3.5:** Require public housing constructed in noise conflict areas to incorporate noise attenuation measures in site design and construction techniques and materials such that HUD guidelines are met.
- **5.1:** Develop an information release program to familiarize residents of Santa Barbara with the Noise Element and noise problems in general. Special attention should be paid to identifying and informing those people now residing or working in noise problem areas.
- **5.2:** Provide developers and builders with specific design information to reduce noise levels in new and existing developments.
- **5.3:** As part of the permit application process, inform developers and building contractors about potential construction noise problems and measures to reduce construction noise.

The General Plan Environmental Resources Element contains an additional policy and implementation measures applicable to the Housing Plan (City of Santa Barbara 2011):

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.

Possible Implementation Actions to be Considered

- **ER31.1: Residential Exterior Ambient Noise Levels in Non-Residential and Multi-Family Zones.** An average ambient outdoor noise level of 65 dBA Ldn or CNEL or less is established as the level considered normally acceptable for required outdoor living areas of residential units located

within non-residential and multi-family zones. This policy amends the General Plan Noise Element Land Use Compatibility Guidelines for residential units in non-residential and multi-family zones.

- **ER31.2: Residential Exterior Ambient Noise Levels in Single-Family Zones.** An average ambient outdoor noise level of 60 dBA Ldn or CNEL or less is established as the level considered normally acceptable for required outdoor living areas of residential units located within single-family zones except for areas subject to higher ambient noise levels, for which a 65 dBA Ldn or CNEL standard is established. This policy amends the General Plan Noise Element Land Use Compatibility Guidelines for residential units in single-family zones that already experience average ambient noise levels above 60 dBA.
- **ER31.3: Subdivisions in Single-Family Zones.** Subdivisions may be permitted in areas where the existing average ambient noise level exceeds 60 dBA Ldn or CNEL only if it is demonstrated that required outdoor living areas can be provided with an exterior noise level of 60 dBA Ldn or CNEL or less.
- **ER31.4: Construction Noise.** Establish different construction noise standards for mixed-use urban and suburban residential areas, including standards for days, hours, and types of construction.
- **ER31.5: Non-Residential Noise Affecting Residential Neighborhoods.** To further General Plan policies for maintaining quiet, high quality neighborhoods, require more detailed noise assessments for proposed special, conditional, and institutional uses with episodic activities and events that may cause noise effects to residential neighborhoods.

City of Santa Barbara Municipal Code

The City's noise ordinance, found in Title 9, Chapter 9.16 of the City of Santa Barbara Municipal Code, regulates short-term or periodic nuisance noise from existing uses and is enforced by the City's Police Department. The ordinance addresses construction noise, use of mechanical equipment, and amplified sound, and identifies general factors considered in determining whether a noise violation has occurred (volume, duration, proximity to sensitive receivers, etc.).

According to Municipal Code Section 9.16.020, no person shall make, continue or cause to be made or continued, or permit or allow to be made or continued, any noise disturbance in such a manner as to be plainly audible by a person of ordinary sensitivity at a distance of 50 feet from the noise source.

As described in Municipal Code Section 9.16.040, it is unlawful for any person, between the hours of 8:00 p.m. of any day and 7:00 a.m. of the following day to construct, demolish, excavate for, alter, or repair any building or structure unless a special permit has been applied for and granted by the Chief Building Official.

With respect to leaf blower equipment, Municipal Code Section 9.16.050 prohibits the operation of a leaf blower within 250 feet of any residential zone before 9:00 a.m. or after 5:00 p.m. Monday through Saturday, or at any time on Sundays or national holidays. Furthermore, Municipal Code Section 9.16.060 prohibits any person within the City to use or operate any portable machine powered with a gasoline engine, or gasoline-powered generator, to blow leaves, dirt, and other debris off sidewalks, driveways, lawns, or other surfaces.

As described in Municipal Code Section 9.16.070, noise from all mechanical equipment buildings, including Heating, Ventilation, and Air Conditioning (HVAC) shall not exceed 53 dBA at the property line of any adjacent parcel used or zoned for residential, public, or semi-public uses.

4.7.3 Impact Analysis

a. Methodology and Significance Thresholds

Significance Thresholds

The City's environmental checklist and Appendix G of the *CEQA Guidelines* state a project may have a significant adverse impact if it would:

1. Generate 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;
2. Generate excessive groundborne vibration or groundborne noise levels.
3. Site a land use in an area with noise levels exceeding City General Plan noise policies and land use compatibility guidelines; or
4. For a project located within the vicinity of a private airstrip or Santa Barbara County Association of Governments (SBCAG) Airport Land Use Plan/Airport Influence Area, expose people residing or working in the project area to excessive noise levels.

Construction Noise

The City has not adopted noise level criteria for assessing potential construction impacts. Therefore, the impact discussion concerning construction noise is based on a qualitative analysis of the potential for construction noise to cause a temporary increase in ambient noise levels. According to Municipal Code Section 9.16.040 it is unlawful for any person, between the hours of 8:00 p.m. of any day and 7:00 a.m. of the following day to construct, demolish, excavate for, alter, or repair any building or structure unless a special permit has been applied for and granted by the Chief Building Official. Therefore, nighttime construction noise is not discussed further in this section.

Operational Noise

The City has adopted noise standards in their Municipal Code that regulate on-site operational noise sources in the City. The Housing Plan would result in a significant impact if buildout of forecasted residential development may generate noise from on-site sources in excess of standards included in the City's noise ordinance (i.e., Municipal Code Chapter 9.16), which regulates noise from operations that are typical to residential uses (e.g., HVAC equipment, sound-amplifying devices, lawn maintenance equipment, house pets, outdoor activities). Off-site operational noise (i.e., traffic noise) would result in a significant impact if buildout of forecasted residential development would cause a perceptible increase (3 dBA or greater) in the ambient noise level measured at the property line of affected uses.

Groundborne Vibration

The City has not adopted a significance threshold to assess vibration impacts. Therefore, this analysis uses the Caltrans *Transportation and Construction Vibration Guidance Manual* (2020) to evaluate potential vibration impacts on adjacent and nearby structures shown in Table 4.7-1. Vibration impacts would be significant if vibration levels would exceed 0.5 in/sec PPV at modern industrial/commercial/residential structures or 0.3 in/sec PPV at older residential structures, which is the limit where minor cosmetic (i.e., non-structural) damage could typically occur to these types

of structures. Construction vibration impacts would also be significant if vibration levels exceed 0.25 in/sec PPV for historic and similar older structures (Caltrans 2020).

Land Use Compatibility

According to the City's original land use compatibility standards shown in Table 4.7-2, ambient noise up to 60 dBA Ldn was considered normally acceptable for all residential uses prior to the 2011 General Plan update (City of Santa Barbara 2010). Environmental Resources Element Policy ER31 (Noise Policies for New Residential Uses), effectively amended the City's land use compatibility standard for various residential uses from 60 dBA Ldn to 65 dBA Ldn. Implementation Action ER31.1 established an outdoor noise level of 65 dBA Ldn as the level considered normally acceptable for required outdoor living areas of residential units located within non-residential and multi-family zones. Similarly, Implementation Action ER31.2 established an outdoor noise level of 65 dBA Ldn as the level considered normally acceptable for required outdoor living areas of residential units located within single-family zones subject to higher ambient noise levels above 60 dBA. The City's guidelines also identify 45 dBA Ldn as the acceptable interior noise level for residential uses, consistent with the 2022 California Building Standards Code (City of Santa Barbara 2011).

Methodology

The following discussion describes the methodology used to evaluate the significance of potential noise and vibration impacts from new residential development facilitated by the Housing Plan. Noise modeling results associated with the analysis herein are included in Appendix E to this PEIR.

Construction Noise

The primary source of temporary noise associated with the Housing Plan would be construction activities generated by new residential development. Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Mobile equipment moves around a construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders. Each phase of construction has its own noise characteristics due to specific equipment mixes; some have higher continuous noise levels than others and some have high-impact intermittent noise levels. Therefore, construction noise levels fluctuate depending on the type of equipment being used, construction phase, or equipment location.

Based on the assumption that most residential development facilitated by the Housing Plan would be infill projects within developed urban areas, the size and location of the project would influence the required construction equipment, and related duration of construction activities. Regardless of site conditions, mass grading activities and/or foundation excavation work (i.e., use of pile driving) typically generate the highest noise levels related to the use of large equipment. Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle, or percent of operational time, of the activity to determine the L_{eq} of the operation (FTA 2018).

For assessment purposes, noise levels for common construction equipment provided in the FTA *Transit Noise and Vibration Impact Assessment* (2018) guidance document were used to analyze potential noise levels associated with forecasted residential development under the Housing Plan. The FTA provides typical noise levels at 50 feet from various types of equipment. Construction noise

was also estimated using the FHWA's Roadway Construction Noise Model (RCNM) (2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, potential construction noise levels were estimated at a distance of 50 feet from future development. Model results are included in Appendix E to this PEIR.

Operational Noise

Analysis of on-site operational activity (e.g., stationary heating, ventilation, and air conditioning [HVAC] equipment, delivery trucks, trash hauling, outdoor activities) considers the existing noise environment and refers to regulations included in the City's noise ordinance. Traffic noise impacts are analyzed based on a residential trip generation rate of 5.44 trips per dwelling unit, consistent with the Institute of Transportation Engineers' Trip Generation Manual, Tenth Edition.

Potential traffic noise impacts were estimated by comparing existing traffic conditions to projected year 2035 traffic conditions with projected residential development under the Housing Plan. Based on the City's RHNA, the maximum residential growth facilitated by the Housing Plan would be approximately 8,001 housing units through 2035. The City currently has a total of approximately 39,932 housing units. To determine a future scenario with implementation of the Housing Plan, the total number of housing units forecasted under the project (i.e., 8,001 units) was added to the existing 39,932 housing units, resulting in a total of 47,933 housing units by the year 2035. Due to the programmatic nature of the Housing Plan, the traffic noise analysis does not identify which City roadways would experience the highest traffic and noise increases associated with residential development. Any effort to specify concentrations of traffic and noise along City roadways would be speculative at this time. Therefore, this analysis assumes that the increase in traffic associated with residential development would be distributed evenly throughout the City's roadway network.

Groundborne Vibration

The Housing Plan would not directly result in new sources of long-term vibration (e.g., operation of stationary heavy equipment). However, construction or new residential uses facilitated by the Housing Plan would generate groundborne vibration that may affect structures adjacent to a construction site, especially during grading and when a construction site is located near a historic site or structure. As discussed in Section 4.4, *Cultural and Tribal Cultural Resources*, the City has designated several structures as City Landmarks and Structures of Merit. As of December 2022, there were 136 Designated City Landmarks, 458 Designated Structures of Merit, and 311 structures listed on the City's Historic Resources Inventory.

This analysis includes a quantitative assessment of potential vibration impacts from new residential construction activities using equations developed by Caltrans (Caltrans 2020). Table 4.7-3 shows typical vibration levels for various pieces of construction equipment used in the construction vibration assessment.

Table 4.7-3 Typical Vibration Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 Feet
Pile Driver (Impact)	0.644
Pile Driver (Sonic)	0.170
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003

Sources: FTA 2018; Caltrans 2020

Because groundborne vibration can cause physical damage to structures and is measured in an instantaneous period, vibration impacts are typically modeled based on the distance from the location of vibration-intensive construction activities, which is conservatively assumed to be edge of a project site to the edge of the nearest off-site structures. For assessment purposes, vibration levels for construction equipment shown in Table 4.7-3 were modeled at various incremental distances between 25 feet and 125 feet to analyze potential vibration levels associated with forecasted residential development under the Housing Plan. Vibration calculations are included in Appendix E to this Program EIR.

Land Use Compatibility

Agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents. In *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369, the California Supreme Court explained that an agency is only required to analyze the potential impacts to future residents if the project would exacerbate those existing environmental hazards or conditions. CEQA analysis is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents. Therefore, bringing a population into an area where noise currently exists is not a significant environmental impact under CEQA unless doing so would exacerbate noise conditions. The analysis in this section regarding noise exposure to new residential development is provided for informational purposes and refers to the City's existing land use compatibility standards.

As discussed under *Noise Sources* of Section 4.8.1, *Environmental Setting*, the overall noise environment in Santa Barbara is predominantly characterized by transportation sources, predominantly traffic noise. Residential development forecasted under the Housing Plan would generate additional vehicle trips, thereby increasing off-site traffic on area roadways and potentially exacerbating existing conditions. This section evaluates the potential impacts of future growth on noise levels and noise-sensitive receivers within the City and surrounding area, including the establishment of noise-sensitive receivers adjacent to sources of traffic noise (e.g., transportation corridors).

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project result in generation of a substantial temporary 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?

Impact N-1 CONSTRUCTION OF RESIDENTIAL DEVELOPMENT FORECASTED UNDER THE HOUSING PLAN MAY EXCEED APPLICABLE STANDARDS. MITIGATION MEASURE N-1 WOULD MANDATE IMPLEMENTATION OF A CONSTRUCTION NOISE MANAGEMENT PLAN FOR PROJECTS WITH CONSTRUCTION ACTIVITIES THAT COULD IMPACT SENSITIVE RECEIVERS, MINIMIZING CONSTRUCTION NOISE ASSOCIATED WITH NEW RESIDENTIAL DEVELOPMENT AND RESULTING IN A LESS THAN SIGNIFICANT IMPACT.

Construction activity associated with development facilitated by the Housing Plan would require the use of noise-generating equipment that would result in temporary increases in ambient noise levels near future construction locations. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receiver, and presence or absence of noise attenuation barriers. Typical noise levels at 50 feet from various types of equipment that may be used during construction are listed in Table 4.7-4. The loudest noise levels are generated by impact equipment (e.g., pile drivers) and heavy-duty equipment (e.g., cranes, scrapers, and graders). Construction noise would occur intermittently throughout construction, and, in some cases, multiple pieces of equipment may operate simultaneously, generating overall noise levels that are incrementally higher than what is shown for individual pieces of equipment in Table 4.7-4.

Table 4.7-4 Construction Equipment Noise Levels

Equipment	Typical Noise Level (dBA) at 50 Feet from Source
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Derrick	88
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Jackhammer	88
Loader	80
Paver	85
Pile-driver (Impact)	101
Pile-driver (Sonic)	95
Pneumatic Tool	85
Pump	77
Roller	85

Equipment	Typical Noise Level (dBA) at 50 Feet from Source
Saw	76
Scarifier	83
Scraper	85
Shovel	82
Truck	84
Source: FTA 2018	

Sensitive receivers are located throughout the City and could be exposed to noise associated with construction activities from forecasted residential development under the Housing Plan. Residential uses comprise most of the noise-sensitive receivers in the City. As shown in Table 4.7-4, sensitive receivers would be exposed to noise levels ranging from 76 to 88 dBA at 50 feet from typical construction equipment, and could reach as high as 101 dBA near construction projects that require the use of pile drivers. In addition, during construction of residential projects there would be additional traffic noise on roadways due to haul trucks carrying materials to and from the project site. Depending on the haul route utilized, haul trucks could potentially result in substantial noise increases to sensitive receptors in proximity to a haul route.

An excavator, dozer, and jackhammer are among equipment typically used for construction of residential development that would generate some of the highest noise levels during demolition and grading activities associated with typical residential construction projects in Santa Barbara, and, as such, are used in this analysis to provide a reasonable estimate of construction noise. Assuming construction would involve operation of multiple pieces of equipment at once, RCNM was used to estimate construction noise from the simultaneous use of an excavator, dozer, and jackhammer. Based on RCNM results, the combined noise level from an excavator, dozer, and jackhammer is estimated at 84 dBA L_{eq} at 50 feet from the source. Model results are included in Appendix E to this PEIR.

Engine noise reduction technology, including silencers, continues to improve, but heavy construction equipment still generates noise that could substantially increase temporary ambient noise levels at sensitive residential receivers near construction sites. Atypical residential construction projects, such as those that may require the use of pile driving equipment, could result in higher noise levels than estimated herein. Therefore, forecasted residential development under the Housing Plan could result in potentially significant construction noise impacts and would require mitigation to minimize construction noise.

Mitigation Measures

The following mitigation measure is required to reduce construction-related noise impacts to sensitive receivers near future development sites.

N-1 Construction Noise Management Plan

The City of Santa Barbara Community Development Department shall develop a requirement for a Construction Noise Management Plan (CNMP) through amendments to the Municipal Code. The CNMP shall be implemented during construction within 85 feet of noise-sensitive land uses (e.g., residences, schools, churches, hotels, as well as some park and open space areas) for development and substantial redevelopment projects that have one or more of the following characteristics:

- Construction of one or more new subterranean levels;
- Construction of three or more new housing units (excluding ADUs);
- More than 3,000 cubic yards of excavated soils and grading;
- The potential for pile driving.

CNMPs shall include the following:

- Project-specific best management practices (BMPs) in addition to the construction timing limits currently established in Municipal Code Section 9.16.040. BMPs include, but are not limited to, silencers, enclosures, sound barriers, smart back-up alarms, strategic construction staging, and/or placement of restrictions on equipment or construction techniques. Projects that require pile driving shall be subject to the preparation of a construction noise analysis to determine appropriate BMPs.
- Identification of haul routes to reduce construction noise effects on sensitive receptors, ensure safety measures are in place, and minimize disruption to the surrounding roadway network. The identified haul route shall be utilized by all haul trucks throughout the duration of construction.
- Notification requirements including written notice to all property owners and residents within the project vicinity.
- Information and procedures for responding to noise complaints.

Significance After Mitigation

Implementation of Mitigation Measure N-1 would reduce construction noise impacts on sensitive receivers related to residential development by requiring implementation of Construction Noise Management Plans for projects which have the potential to disturb sensitive receivers.

Implementation of Mitigation Measure N-1 would reduce noise impacts from construction activities to a less than significant level.

Threshold 2:	Would the project result in generation of a substantial 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?
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Impact N-2 RESIDENTIAL DEVELOPMENT FORECASTED UNDER THE HOUSING PLAN WOULD GENERATE OPERATIONAL NOISE TYPICAL OF THE URBAN ENVIRONMENT. HOWEVER, LONG-TERM OPERATIONAL NOISE FROM RESIDENTIAL SOURCES WOULD BE REQUIRED TO COMPLY WITH THE CITY'S NOISE ORDINANCE. THEREFORE, PERMANENT OPERATIONAL NOISE INCREASES WOULD BE LESS THAN SIGNIFICANT.

Permanent operational noise factors include on-site activities as well as long-term noise from new vehicle trips on area roadways.

On-site Noise

Typical on-site noise sources associated with residential uses include HVAC equipment, delivery trucks, trash-hauling trucks, and outdoor activities.

HVAC Equipment

Noise levels from HVAC equipment associated with new residential development would be similar to noise from existing HVAC equipment associated with the current urban environment of Santa Barbara. Noise from stationary equipment including HVAC equipment is subject to the limits established in Municipal Code Section 9.16.020, which states that no person shall make, continue or cause to be made or continued, or permit or allow to be made or continued, any noise disturbance in such a manner as to be plainly audible by a person of ordinary sensitivity at 50 feet from the noise source. Additionally, Municipal Code Section 9.16.070.D limits sound at the property line resulting from mechanical equipment such as heating, ventilation, and air conditioning systems to 53 dB(A). Therefore, the Housing Plan would not result in a substantial permanent increase in ambient noise levels from HVAC equipment.

Vehicle Activity (Delivery and Trash-Hauling Trucks)

New residential development would increase the number and frequency of delivery trucks traveling through the City. The number of trash-hauling trucks contracted for solid waste pick-up would be expected to remain similar to current conditions, although with additional waste pick-up stops. Delivery trucks include, but are not limited to, moving trucks (e.g., U-Haul vehicles) and delivery service vehicles (e.g., Amazon, FedEx). An increase in the number of delivery trucks and trash hauling truck waste pick-up stops could intermittently expose various sensitive receivers to increased truck noise. However, Section 23130 of the California Motor Vehicle Code establishes maximum sound levels of 86 dBA L_{eq} at 50 feet for trucks operating at speeds less than 35 miles per hour. While individual delivery truck and/or loading or trash pick-up operations would likely be audible at properties adjacent to individual residential land uses, such operations are already a common occurrence in the urban environment in Santa Barbara. In addition, these noise events are typically transient and intermittent, and do not occur for a sustained period of time. In addition, solid waste pick-up operations are typically scheduled during daytime hours. Therefore, the new residential development that may be facilitated by the Housing Plan would not result in a substantial permanent increase in ambient noise levels from trash and delivery trucks due to State regulations and their prevalence in the City.

Outdoor Activities

New residential development would result in noise from conversations, music, television, or other outdoor sound-generating equipment (e.g., electric leaf blowers), particularly in the event future residents leave windows open or use balconies. However, these types of noise-generating activities would be similar to the existing urban environment in Santa Barbara and are regulated by existing Municipal Code requirements. Municipal Code Section 9.16.020.A. prohibits the operation of any radio, television set, instrument, loudspeaker, or other sound-generating devices between the hours of 10:00 p.m. and 7:00 a.m. in such a manner that creates a noise disturbance across a residential property line. Municipal Code Section 9.16.050 prohibits the operation of a leaf blower within 250 feet of any residential zone before 9:00 a.m. or after 5:00 p.m. Monday through Saturday, or at any time on Sundays or national holidays. Municipal Code Section 9.16.060 prohibits the use of leaf blowers powered with a gasoline engine. Required compliance with and code enforcement of these standards would ensure normal operational noise impacts associated with residential land uses would remain less than significant.

Traffic Noise

For the purposes of analyzing traffic noise from new residential development forecasted under the Housing Plan, a trip generation rate of 5.44 ADT per unit is used as a reasonable conservative estimate of the maximum daily trip generation from new housing units¹. The trip generation scenarios used for this analysis are shown in Table 4.7-5, which assumes that the increase in traffic associated with residential development would be distributed evenly throughout the City's roadway network.

Table 4.7-5 Trip Generation Summary

	Total Housing Units	Estimated Trips Generated for Roadway Noise Analysis ¹
Existing Conditions	39,932	217,230
Future with Housing Plan (2035)	47,933	260,755
Total Change	+8,001	+43,525
Total Percent Change (%)	+16.7%	+16.7%

¹ Calculated by multiplying the total number of housing units by a trip generation rate of 5.44 ADT per unit for the purposes of analyzing roadway noise only. The 5.44 ADT rate reflects the trip generation rate associated with new housing units identified within the Institute of Transportation Engineers' Trip Generation Manual, Tenth Edition.

Source: City of Santa Barbara 2023

As shown in Table 4.7-5, the traffic noise analysis assumes a trip generation increase of 16.7 percent over existing conditions by the year 2035 under the Housing Plan, as a conservative estimate of the maximum daily trip generation from new housing units. A 16.7 percent increase in traffic on a roadway would equate to an increase of 0.8 dBA in ambient roadway noise levels. Ambient noise level increases of 3 dBA are considered a barely perceptible noise increase. Therefore, the project would not result in a perceptible increase in roadway noise levels. Although a concentrated increase in traffic may occur in the vicinity of new housing development, an increase in traffic-related noise is not anticipated based on the already high traffic volumes of major commercial corridors. Therefore, traffic noise impacts would be less than significant.

Mitigation Measures

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

Threshold 3: Would the project generate excessive groundborne vibration or groundborne noise levels?

Impact N-3 CONSTRUCTION OF RESIDENTIAL DEVELOPMENT FORECASTED UNDER THE HOUSING PLAN COULD GENERATE VIBRATION LEVELS THAT HAVE THE POTENTIAL TO DAMAGE HISTORIC OR OTHER OLD BUILDINGS/STRUCTURES. HOWEVER, MITIGATION MEASURE N-2 WOULD REQUIRE PLANNED CONSTRUCTION ACTIVITIES TO PREPARE A VIBRATION CONTROL PLAN TO REDUCE/CONTROL CONSTRUCTION SUCH THAT VIBRATION LEVELS DO NOT CAUSE DAMAGE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

The Housing Plan has the potential to result in new sources of groundborne vibration that have the potential to damage older structures.

¹ ADT per unit is the metric used for noise analysis rather than vehicle miles traveled per capita because vehicle miles traveled does not clearly delineate individual vehicle trips, which are more representative of an increase of traffic than a change in vehicle miles traveled per capita.

Operational groundborne vibration from new residential development in Santa Barbara would be primarily generated by vehicular travel on the local roadways. According to the FTA *Transit Noise and Vibration Impact Assessment* (2018) guidance document, rubber tires and suspension systems dampen vibration levels from trucks to a level that is rarely perceptible. Therefore, traffic vibration levels associated with the expected additional vehicle trips from new residential development forecasted under the Housing Plan would not be perceptible by sensitive receivers. Therefore, the remainder of this analysis focuses on impacts related to construction activities associated with the project.

Construction activities associated with new residential development would result in varying degrees of groundborne vibration depending on the equipment and methods employed. Operation of construction equipment causes vibrations that spread through the ground and diminishes in strength with distance. Buildings with foundations in the soil in the vicinity of a construction site respond to these vibrations with varying results ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight damage at the highest levels. Construction vibration is a localized event and is typically only perceptible to a receiver that is near the vibration source. Construction on sites with certain geologic conditions may require pile driving. Such heavy equipment could potentially operate within 25 feet of nearby buildings. As shown in Table 4.7-6, construction equipment would typically generate vibration levels up to 0.21 in/sec PPV (i.e., vibratory roller) at 25 feet, although pile driving could generate a vibration level of approximately 0.64 in/sec PPV at 25 feet.

Table 4.7-6 Construction Equipment Noise Levels in PPV (in/sec)

Equipment	25 Feet	50 Feet	75 Feet	100 Feet	125 Feet
Pile Driver (Impact)	<u>0.644</u>^{1,2,3}	<u>0.300</u>^{1,2}	0.192	0.140	0.110
Pile Driver (Sonic)	0.170	0.079	0.051	0.037	0.029
Vibratory Roller	0.210	0.098	0.063	0.046	0.036
Hoe Ram	0.089	0.042	0.027	0.019	0.015
Large Bulldozer	0.089	0.042	0.027	0.019	0.015
Caisson Drilling	0.089	0.042	0.027	0.019	0.015
Loaded Truck	0.076	0.036	0.023	0.017	0.013
Jackhammer	0.035	0.016	0.011	0.008	0.006
Small Bulldozer	0.003	0.001	<0.001	<0.001	<0.001

Notes: Vibration levels shown in bolded and underlined text exceed one or more of the Caltrans criteria shown in Table 4.7-1. Superscripts specify the threshold exceeded by each piece of equipment. See Appendix E for vibration calculations.

¹ Exceeds the 0.25 in/sec damage threshold for historic and other/similar old buildings

² Exceeds the 0.3 in/sec damage threshold for older residential structures

³ Exceeds the 0.5 in/sec damage threshold for modern industrial/commercial/residential structures

Sources: FTA 2018; Caltrans 2020

According to impact criteria shown in Table 4.7-1, the damage threshold for historic structures sensitive to impacts from groundborne vibration is 0.25 in/sec PPV. Groundborne vibration from rollers, hoe rams, bulldozers, caisson drilling, loaded trucks, and jackhammers would not exceed the 0.25 in/sec PPV threshold for sensitive historic buildings; therefore, typical construction activities would not exceed the damage threshold for historic and similar old buildings. However, vibration levels from impact pile driving would exceed the thresholds shown in Table 4.7-1 for historic/similar

old buildings, general old residential structures, and modern structures when occurring within 60 feet of historic and similar old buildings.

As discussed in Section 4.4, *Cultural and Tribal Cultural Resources*, the City has designated several structures as City Landmarks and Structures of Merit. Although all buildings would be subject to potential impacts from construction vibration, buildings in these historic districts and groupings would each have varying degrees of susceptibility to groundborne vibration damage depending on the structural integrity of said buildings. Currently no requirement exists for the City to review the potential for a ministerial development to result in vibration damage associated with construction. As such, ministerial development projects have greater potential to result in building damage to historic and similar old buildings than discretionary development projects because no vibration-specific analyses are required to be performed prior to ground-disturbing activities. Therefore, the Housing Plan would result in a potentially significant impact related to construction vibration using impact pile driving.

Mitigation Measure

The following mitigation measure is required to reduce groundborne vibration impacts associated with construction of future development sites using impact pile driving.

N-2 Vibration Control Plan

The City of Santa Barbara Community Development Department shall develop a requirement for a Vibration Control Plan through amendments to the Municipal Code, which requires projects involving impact pile drivers within 60 feet of a structure to prepare a Vibration Control Plan. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods required to minimize vibration, including, but not limited to:

- Survey of baseline conditions at potentially affected historic and/or residential structures within a 60-foot radius of the construction site;
- Alternative installation methods for pile driving (e.g., pile cushioning, drilled piles, cast-in-place systems) within 60 feet of a building to reduce impacts associated with seating the pile;
- Vibration monitoring prior to and during pile driving operations occurring within 60 feet of a building;
- Use of rubber-tired equipment rather than metal-tracked equipment;
- Avoidance of the use of vibrating equipment when allowed by best engineering practices.

Significance After Mitigation

Mitigation Measure N-2 would require vibration monitoring and other controls during construction to reduce vibration levels below the vibration criteria for building damage. Therefore, the vibration impacts from construction activities related to the Housing Plan would be less than significant with mitigation.

Threshold 4: Would the project site a land use in an area with noise levels exceeding City General Plan noise policies and land use compatibility guidelines?
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Impact N-4 RESIDENTIAL DEVELOPMENT FORECASTED UNDER THE HOUSING PLAN COULD BE EXPOSED TO OUTDOOR NOISE LEVELS ABOVE THE CITY'S LAND USE COMPATIBILITY STANDARDS IN ADDITION TO THE 45 dBA LDN INTERIOR NOISE STANDARD. HOWEVER, EXISTING CITY GENERAL PLAN POLICIES, IN COMBINATION WITH THE CITY'S PROJECT REVIEW AND PERMITTING PROCESS, WOULD REDUCE POTENTIAL IMPACTS OF FUTURE NOISE ON NEW HOUSING DEVELOPMENT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

As discussed in Section 4.7.1, *Environmental Setting*, the noise environment in Santa Barbara is characterized by transportation sources, predominantly traffic noise. Traffic noise affects relatively large areas of the City along transportation corridors, particularly neighborhoods near U.S. 101. The extent to which land uses in Santa Barbara are affected by transportation noise depends on their respective proximity to major roadways and UPRR and their individual sensitivity to noise (City of Santa Barbara 2010). Figure 4.7-2 depicts modeled 60-65, 65-70, and 70+ dBA Ldn noise contours representative of existing conditions and the extent of noise exposure in the City above 60 dBA Ldn. As discussed in Impact N-2, housing development forecasted under the Housing Plan would generate additional vehicle trips, increasing off-site traffic on area roadways by approximately 16.7 percent, but this increase would not substantially exacerbate existing traffic noise conditions in the City.

Environmental Resources Element Policy ER31 establishes the City's land use compatibility standard for residential uses as 65 dBA Ldn (City of Santa Barbara 2011). Compared to existing ambient noise in the City, new housing development located near major roadways (e.g., Upper State Street, Las Positas Road, Cabrillo Boulevard) or U.S. 101 could be exposed to outdoor noise levels above 65 dBA Ldn. This impact is considered potentially significant.

The City's Environmental Resources Element also identifies 45 dBA Ldn as the acceptable interior noise level for residential uses, consistent with the 2022 California Building Standards Code (City of Santa Barbara 2011). The Housing Plan would implement programs, such as the Affordable Housing Strategy, which could result in increased residential land use densities. In addition, the Housing Plan would result in increased residential uses along established commercial corridors, including those with late-night businesses such as restaurants and bars. The Housing Plan would also result in mixed-use developments with commercial activity which could increase noise. However, all development in Santa Barbara is subject to the City's existing standards within Santa Barbara Municipal Code (SBMC) Chapter 9.16, and new residential development forecasted under the Housing Plan would be required to adhere to standards for noise included under SBMC Chapter 9.16. Although the Housing Plan may increase residential density in certain areas, the Housing Plan would not result in substantial noise in exceedance of the City's land use compatibility standards through compliance with existing land use compatibility requirements.

Implementation of Mitigation Measure N-3 would reduce the potential impacts of projected future noise on new housing development to a less than significant level with mitigation.

Mitigation Measures

N-3 Noise Study and Site-based Attenuation

The City of Santa Barbara Community Development Department shall update the Master Environmental Assessment Guidelines for Noise and amend the Municipal Code as necessary, with

requirements applicable to multi-unit residential development projects within an area with a noise contour potentially exceeding the acceptable noise level for residential uses.

A site-specific Noise Study shall be completed for residential development located in areas where noise contours indicate that noise levels are above 65 dBA. The Noise Study shall document the existing noise conditions onsite and recommend attenuation strategies and techniques to reduce interior and exterior living area noise levels to acceptable levels as specified in the Environmental Resources Element Land Use Compatibility Guidelines.

- The Noise Study shall be performed by an acoustical engineer.
- The Noise Study shall measure and report the existing ambient Average Day-Night (Ldn or CNEL) noise environment within the project site, including transportation noise sources and any transient or nuisance noise sources.

All noise control techniques and recommendations in the report shall be incorporated into the project design to reduce exterior noise to or below 65 dBA and interior noise to or below 45 dBA.

Significance After Mitigation

Mitigation Measure N-3 would require a site-specific noise study for residential development located in areas where noise contours indicate that noise levels are above 65 dBA. Site-specific attenuation strategies and techniques would be implemented to reduce exterior noise to below 65 dBA and interior noise to below 45 dBA. Therefore, impacts related to noise and land use compatibility would be less than significant with mitigation.

Threshold 5: For a project located within the vicinity of a private airstrip or SBCAG Airport Land Use Plan/Airport Influence Area, would the project expose people residing or working in the project area to excessive noise levels?

Impact N-5 RESIDENTIAL DEVELOPMENT UNDER THE HOUSING PLAN WOULD NOT OCCUR WITHIN AN AIRPORT NOISE CONTOUR. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The Santa Barbara Airport's 65 dBA CNEL noise contour extends approximately 3,000 feet to the east of the airport; however, the Housing Plan does not propose new residential uses within this noise contour. Therefore, any development that would occur immediately surrounding the Santa Barbara Airport is outside of the scope of the Housing Plan, and no residential development would be located within the Airport's 65 CNEL noise contour. Although the aircraft overflights have the potential to expose people residing or working in the City to aircraft noise, this intermittent and temporary noise disturbance is present under existing conditions, and implementation of the Housing Plan would not exacerbate or increase aviation-related noise levels. Impacts would be less than significant.

Mitigation Measures

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

4.7.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts together with similar impacts of reasonably anticipated regional projects/programs including the City's State Street Master Plan, and Caltrans' South Coast Highway 101 High-Occupancy Vehicle Lanes project. Cumulative impacts also include

planned and pending residential development projects that contribute to the City's RNHA. The general approach to cumulative impact analysis used in this EIR is discussed in Section 4, *Environmental Impact Analysis*.

Construction Noise

Cumulative residential development in the city would produce temporary noise impacts that would be localized to a project site and sensitive receivers in the immediate vicinity. Therefore, only sensitive receivers located near each construction site would be potentially affected by each activity. Construction activities associated with all future development would comply with Municipal Code Section 9.16.040 and would not occur during nighttime hours between 8:00 p.m. of any day and 7:00 a.m. of the following day unless a special permit has been applied for and granted by the Chief Building Official. Nonetheless, cumulative construction activities may overlap, including the use of heavy machinery which could result in substantial increases in temporary ambient noise levels. Therefore, cumulative impacts related to construction noise are potentially significant. Implementation of Mitigation Measure N-1 would reduce construction noise impacts associated with residential projects on sensitive receivers through implementation of Construction Noise Management Plans. With implementation of Mitigation Measure N-1, the Housing Plan would minimize disturbance of sensitive receptors due to construction noise and therefore would not contribute considerably to cumulative impacts related to construction noise.

Operational Noise

On-site operational noise impacts are typically localized to individual project sites and sensitive receivers within the immediate vicinity. Such activities would be typical of the urban environment in the City and on-site activities would be required to comply with applicable provisions of the Municipal Code. The incremental effect of the Housing Plan with respect to on-site operational noise would not be cumulatively considerable and cumulative impacts would be less than significant.

Cumulative development through the year 2035, including the Caltrans' South Coast Highway 101 High-Occupancy Vehicle Lanes project, would increase traffic on area roadways which would lead to increased cumulative traffic noise. As shown in Table 4.7-5, future trip generation levels by the year 2035 with housing development forecasted under the Housing Plan, which accounts for cumulative residential development in and around the City, would not double existing trip levels or increase mobile source noise by more than 3 dBA. Therefore, the effect of the Housing Plan on off-site traffic noise would not be cumulatively considerable and cumulative impacts would be less than significant.

Groundborne Vibration

New residential development within the City would not include substantial sources of operational ground-borne vibration. Therefore, cumulative impacts related to operational ground-borne noise and vibration at any sensitive receiver would not be significant.

Construction of future residential development projects in the City would produce temporary vibration impacts that would be localized to a project site and sensitive receivers in the immediate vicinity. Therefore, only sensitive receivers located near each construction site would be potentially affected by each individual activity. Nonetheless, construction activities associated with individual housing projects accommodated under the Housing Plan may overlap for some time with construction activities for other development projects. For the combined vibration impact from

simultaneous construction projects to reach cumulatively significant levels, intense construction from these projects would have to occur simultaneously near a sensitive receiver. This would most commonly occur when development projects using equipment that generates high vibration levels (e.g., pile driving) are proposed next to a sensitive historic building constructed of fragile building. However, Mitigation Measure N-2 would require vibration monitoring and other controls during construction to reduce vibration levels below the vibration criteria for building damage. Therefore, vibration impacts from construction activities related to the Housing Plan would not be cumulatively considerable and cumulative impacts would be less than significant.

Airport Noise

Existing requirements for airports and existing local, State, and Federal regulations would reduce the cumulative noise impacts of airport activity on residents and workers in the City. The residential land use designations and zoning immediately surrounding the Santa Barbara Airport are outside of the City's jurisdiction. Therefore, cumulative residential development would not occur within the Airport's 65 CNEL noise contour. Although aircraft overflights have the potential to expose people residing or working in the City to aircraft noise, this intermittent and temporary noise disturbance is present under existing conditions. Therefore, the impact from aviation-related excessive noise exposure would not be cumulatively considerable and cumulative impacts would be less than significant.

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4.8 Schools

This section evaluates whether new or physically altered school facilities would be required to provide school services with implementation of the Housing Plan, the construction of which could cause significant environmental impacts.

4.8.1 Environmental Setting

Public education in the City of Santa Barbara is provided by four public school districts: Santa Barbara Unified School District (SBUSD), Hope Elementary School District (HESD), Cold Spring School District, and Montecito Union School District (MUSD). There are also private elementary schools, high schools, trade schools, and colleges, such as Santa Barbara City College and Antioch University, that operate in the City. The four local public school district boundaries and existing school locations are shown in Figure 4.8-1.

SBUSD and the City Parks and Recreation Departments share facilities through a joint use agreement. The agreement calls for the two agencies to cooperatively plan the development and maintenance of specific schools, recreational areas, and facilities. The four public school districts are discussed below, focusing on each of the district's facilities and enrollment patterns.

a. School Districts

Santa Barbara Unified School District

SBUSD consists of two separate district boundaries: an elementary district and high school district. The elementary district covers approximately 22 square miles within the City, as well as Goleta. The high school district service area covers approximately 136 square miles within the City, and the surrounding metropolitan areas from Montecito to Goleta. SBUSD maintains 859 certified staff and is comprised of nine elementary schools (TK-6), four junior high schools (7-8), three traditional high schools (9-12), one alternative high school (9-12), one continuation high school (10-12), and three authorized elementary charter schools (TK-6) (SBUSD 2022).

Hope Elementary School District

HESD maintains approximately 183 staff and is comprised of three elementary (TK-6) school sites: Monte Vista Elementary, Viejas Valley Elementary, and Hope Elementary (Anne Hubbard, Ed. D., Superintendent, Hope Elementary School District, February 10, 2026). HESD covers approximately 7 square miles. As shown in Figure 4.8-1, the district serves neighborhoods primarily in the western portion of the City, including Hope Ranch, a variety of multi-family housing options in the Upper State area, and single-family home neighborhoods. HESD is a partner district to SBUSD, as students matriculate into their secondary schools.

Cold Spring School District

Cold Spring School is a TK-6 public school that serves approximately 189 students in a small classroom, one-school district, primarily serving residents in the Montecito community. Cold Spring School covers approximately 4 square miles. The faculty consists of a Superintendent/Principal, 12 classroom teachers; a music specialist; an art specialist; a technology and garden specialist; a science, technology, engineering, arts, and math (STEAM) specialist; a reading specialist/librarian; a physical education specialist, and 13 instructional assistants (Cold Spring School District 2023).

Figure 4.8-1 Local School Districts and Existing Facilities



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Additional data provided by City of Santa Barbara, 2022.

Montecito Union School District

MUSD is a one-school (TK-6) district serving the community of Montecito and a small portion of the City which covers approximately 9 square miles. MUSD has a current enrollment of approximately 390 students. MUSD maintains approximately 74 staff and is governed by a five-member Board of Trustees and is administered by a superintendent, principal, assistant principal, and chief business official (CDE 2023d; MUSD 2022).

b. Enrollment

Current Enrollment

Table 4.8-1 provides 2022-2023 TK-12 enrollment data for SBUSD, the Cold Spring School District, and the Montecito Union School District. Enrollment data from Hope Elementary School District is derived from the district's 2024 Focused Housing Development Impact Study. As shown in Table 4.8-1, there are 13,869 students in SBUSD, 870 in the Hope Elementary School District, 189 in the Cold Spring School District, and 390 in the Montecito Union School District.

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

School District	Total
Santa Barbara Unified School District	13,869
Hope Elementary School District	870
Cold Spring School District	189
Montecito Union School District	390
Total	15,318

Sources: SBUSD 2023a; Schoolwork 2022; Cold Spring School District 2023; Montecito School District 2022; Anne Hubbard, Ed. D., Superintendent, Hope Elementary School District 2026.

As shown in Table 4.8-1, SBUSD serves approximately 91 percent of students in the City. According to the California Department of Education (CDE), between school years 2011-2012 and 2023-2024, the number of students enrolled in SBUSD declined by approximately 9.4 percent, from 15,326 to 13,573. SBUSD experienced enrollment growth from school years 2011-2012 to 2014-2015 and enrollment decrease from 2015-2016 to present (CDE 2023b). Between school years 2011-2012 and 2025-2026, the number of students enrolled in the Hope Elementary School District declined by approximately 13.1 percent from 1,001 to 870 (Anne Hubbard, Ed. D., Superintendent, Hope Elementary School District, February 10, 2026). Between school years 2011-2012 and 2021-2022, the number of students enrolled in the Cold Spring and Montecito School Districts have fluctuated between approximately 152-192 and 368-473, respectively (CDE 2023c; CDE 2023d).

As indicated in the General Plan Program EIR (2010), several individual schools were near or over stated capacity; however, none of these schools were officially designated as overcrowded through the State's Critically Overcrowded Schools program (City of Santa Barbara 2010). As noted above, overall enrollment in the City has generally been declining since 2011 and, as needed, SBUSD retains the ability to transfer students among SBUSD schools to best utilize the existing physical capacity available in the City. Basic Aid districts, including HESD, typically restrict interdistrict transfers except for limited circumstances, such as children of district employees.

Table 4.8-2 provides a comparison of student enrollment in 2011-2012 to 2022-2023 Student Enrollment shown in Table 4.8-1.

Table 4.8-2 2011-2012 Student Enrollment Comparison

School	2011 2012 Enrollment	Percentage Difference from 2022-2023 Enrollment
Santa Barbara Unified School District	15,326	-9.4%
Hope Elementary School District	1,001	-35.2%*
Cold Spring School District	152	21.7%
Montecito Union School District	438	-11.6%

Source: CDE 2023e; SBUSD 2023a; schoolwork 2022; Cold Spring School District 2023; Montecito School District 2022.

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

Projected Enrollment

The following discussion provides projected enrollment data for SBUSD and the Hope Elementary School District, which collectively comprise approximately 96 percent of City-wide public school enrollment. Projected enrollment data is not available for the Cold Spring School District or Montecito Union School District.

Santa Barbara Unified School District

California Demographics Services prepared *Enrollment History and Projections in the Santa Barbara Unified School District* in March 2017, which provides enrollment projections for SBUSD schools through 2029-2030 (California Demographic Services 2017). Local birth data has been the strongest predictor of future kindergarten enrollment in the SBUSD, which, in turn, drives subsequent enrollment in higher grades. “Outmigration”¹ has increased from SBUSD schools in recent years, and the combination of decreased births and outmigration has resulted in the expectation that elementary enrollment will decline in the coming years. On a kindergarten through 12th grade basis, enrollment in SBUSD schools is expected to decline approximately 9 percent by the 2029-2030 school year (over 1,000 students) (California Demographic Services 2017). SBUSD has a student generation factor of 0.3189 students per household (SBUSD 2018).

Hope Elementary School District

Tom Silva Consulting prepared a 2024 Focused Housing Development Impact Study in June 2024 for the Hope Elementary School District to anticipate additional students generated from residential development through 2035. As indicated in this Study, the District anticipates 555 new students from residential development through 2035 (Hope Elementary School District 2024). This equates to a generation factor of 0.258 students per household.

c. Developer Fees

Development fees for schools are imposed by school districts under Education Code Section 17620 and Government Code section 95995 - 65998. Development impact fees on construction projects help support the public school system through the construction of new and expanded school facilities as well as the maintenance of existing school facilities. These fees are not currently at their maximum allowed levels under State law. Residential fee schedules for each of the four school districts are shown in Table 4.8-3 (SBUSD 2019).

¹ “Outmigration” is a local term used to describe the circumstance that there has historically been a departure of families from the south coast which results in less enrollment in local schools (also referred to as the “grade progression ratio” or “cohort survival ratio,” referring to the proportion of students in one grade compared to the number of students in the preceding grade the previous year). This circumstance is not being experienced by the Hope, Cold Spring, and Montecito Union School Districts.

Table 4.8-3 School District Developer Fees in the City of Santa Barbara

School/District	Elementary District Fee (50% of total sf)	Secondary District Fee (50% of total sf)
Santa Barbara Unified School District	\$3.79 per sf	\$3.79 per sf
Hope Elementary School District	\$3.36 per sf	\$3.79 per sf
Cold Spring School District	\$3.36 per sf	\$3.79 per sf
Montecito Union School District	\$3.48 per sf	\$3.79 per sf
Sources: SBUSD 2019		

4.8.2 Regulatory Setting

a. State Regulations

California Education Code

Educational services and school facilities are subject to the rules and regulations of the California Education Code, CDE and governance of the State Board of Education (SBE) (Gov. Code Section 33000, et seq.). CDE is the government agency responsible for public education throughout the State. With the State Superintendent of Public Instruction, CDE is responsible for enforcing education law and regulations and for continuing to reform and improve public elementary school, secondary school, childcare programs, adult education, and preschool programs. CDE oversees funding, and student testing and achievement levels for all state schools. A sector of CDE, SBE is the 11-member governing and policymaking body of the CDE that sets kindergarten through 12th grade (K–12) education policy in the areas of standards, instructional materials, assessment, and accountability. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes. Further, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities².

Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as the Greene Act), enacted in 1998, is a program for funding school facilities largely based on matching funds. For new school construction, grants provide funding on a 50/50 State and local match basis. For school modernization, grants provide funding on a 60/40 State and local match basis. Districts that are unable to provide some, or all, of the local match requirement and meet the financial hardship provisions may be eligible for additional State funding (State of California 2019).

The Greene Act permits the local district to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. The Act also sets a maximum level of fees a developer may be required to pay. Pursuant to Government Code Section 65996, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to a less-than-significant level and is deemed full and complete

² California Education Code Section 17620(a)(1).

mitigation for impacts to school facilities under CEQA.³ 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.

Open Enrollment Policy (Cal. Educ. Code Sections 48350, et seq.)

The open enrollment policy is a state-mandated policy that enables students located in SBUSD to apply to any regular, grade-appropriate SBUSD school with designated “open enrollment” seats. Open enrollment seats are granted through an application process that is completed before the school year begins. SBUSD maintains procedures for new student enrollment and transfer student enrollment within the district (SBUSD 2023a).

Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998

Proposition 1A, the Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998 (Ed. Code, Section 100400–100405) is a school construction funding measure that was approved by the voters on November 3, 1998. This Act created the School Facility Program where eligible school districts may obtain state bond funds.

b. Local Regulations

In accordance with the California Education Code and other regulations, the Santa Barbara County Board of Education sets local policy through the Santa Barbara County Education Office (SBCEO), approves the SBCEO budget, approves the SBCEO Local Control and Accountability Plan, and serves as an appeals board for inter-district transfer requests, student expulsions, and charter school applications.

4.8.3 Impact Analysis

a. Methodology and Significance Thresholds

The Housing Plan’s impacts are evaluated using Appendix G of the *CEQA Guidelines*. Impacts would be significant if implementation of the Housing Plan would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public schools.

The following analysis focuses on determining whether the Housing Plan would result in adverse physical impacts to the environment due to the expansion of existing school facilities or construction of new facilities. Whether additional facilities would be required is determined primarily by considering the adequacy of existing school facilities, effects of the Housing Plan on

³ California Government Code Section 65996.

demand for school facilities, and applicable regulations and policies that would influence future provision of school facilities and allow for mitigation of potential environmental impacts.

For purposes of the Program EIR, a significant impact on schools would occur if the Housing Plan would promote growth patterns resulting in the need for and/or the provision of new or physically altered public school facilities (including charter schools), the construction of which would cause significant environmental impacts to maintain service or other performance objectives. To the extent that the Housing Plan causes impacts to classroom sizes or school service impacts that would result in the need for new facilities or alterations to existing facilities, and the impact from construction of new facilities or alterations to existing facilities results in a potential impact to the environment, such impacts must be disclosed in this EIR. Discussion in this EIR that relates solely to the level of school services provided to the residents of the city, including any existing or future needs and deficiencies, is for informational purposes only. The ultimate determination of whether there is a significant impact related to schools is based on whether a significant impact would result from the construction of new or expanded school facilities.

The discussion of impacts to public schools addresses impacts for the City. Public school service needs are dependent on the size of the service population and the geographic area served. This analysis estimates the number of students that would be generated by housing development accommodated under the Housing Plan using local student generation rates and assesses whether existing and planned school facilities expected to serve the City would have sufficient available capacity to accommodate the students. The analysis also discusses State-required developer mitigation fees and addresses all levels of educational facilities operated by the City's school districts (i.e., elementary, middle, and high schools). If there would not be sufficient available capacity, the EIR considers whether new school facilities would be needed, and whether the construction of the school facilities would result in a significant environmental impact.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public schools?

Impact SCH-1 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. IMPACTS TO SCHOOLS WOULD BE LESS THAN SIGNIFICANT.

For the purposes of estimating student generation from residential development forecasted under the Housing Plan, SBUSD's student generation factor of 0.3189 students per household is used as it provides an estimate that takes into account school-aged children from TK to 12th grade. This student generation factor is a conservative estimate and is greater than the Hope Elementary School District generation factor of 0.258 students per household utilized in their 2024 Focused Housing Development Impact Study (Hope Elementary School District 2024).

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. Based on the SBUSD K-12 student generation rate of 0.3189 students per housing unit, the net increase of up to 8,001 new residential units could generate an increase of approximately 2,551 new students⁴ with approximately 555 students going to Hope Elementary School District and the remainder distributed across grades TK-12 entering local school districts. This estimate is conservative, as many of the housing units constructed under Housing Plan programs are anticipated to be studios and one-bedroom multi-unit development, and could potentially result in a lower student generation rate. Students not entering the Hope Elementary School District would mainly enter SBUSD, as these two districts currently represent 96 percent of students in the city, and the Housing Plan primarily targets new residential development in these School Districts.

New residential development has the potential to result in a need for new or physically altered school facilities when student population increases beyond existing capacity. No SBUSD schools were designated as overcrowded at the time the General Plan Program EIR (2011) was prepared, and SBUSD enrollment has decreased by approximately 12 percent, from 15,326 to 13,573, over the 14-year period since 2011. SBUSD, which represents approximately 91 percent of the City's student population, is not currently overcrowded and has adequate capacity to serve a majority of the anticipated growth in student enrollment that may result from implementation of the Housing Plan. If individual school facilities within a district experience overcrowding, 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.

Due to current declining enrollment and the available enrollment capacity in school facilities across the city, it is not anticipated that the gradual increase in the number of students following implementation of the Housing Plan would exceed the total citywide enrollment capacity of existing public school facilities. 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.

It should be noted that new residential development in the city is required to pay developer fees to fund school facilities. Additional sources of school funding include property taxes, and the federal and state government funding. Pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Thus, payment of the development fees is considered full mitigation 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

⁴ 8,001 housing units x 0.3189 (local student generation rate) = 2,551 students.

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.

Residential development facilitated by the Housing Plan would be required to pay developer fees for school facilities, which would offset the effects of specific projects on school facilities. 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, implementation of the Housing Plan would not result in substantial environmental impacts associated with the provision or need for new or altered school facilities. While localized enrollment constraints may occur at specific schools or within individual districts, these conditions do not constitute a significant impact under CEQA. Therefore, this impact would be less than significant.

Mitigation Measures

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

4.8.4 Cumulative Impacts

The general approach to cumulative impact analysis used in this Program EIR is discussed in Section 4, *Environmental Impact Analysis*. Cumulative projects also include planned and pending residential development projects that contribute to the City's RNHA.

The geographic area to analyze cumulatively considerable impacts to the schools includes the city, including the four public school districts discussed herein, as well as adjacent areas that are served by these school districts that could be affected by the construction of new school facilities. The forecasted population in 2035 with implementation of the Housing Plan is expected to be approximately 99,900 persons.

If individual schools experience over-enrollment, it could require adjustment of enrollment boundaries, inter-school transfers, or other district actions to balance enrollment between schools. Residential development would continue to occur within the Downtown, an area currently served by multiple schools surrounding the downtown area. New students within the Downtown area would continue to be served by the existing school system, including schools which are outside of, but in proximity to, the downtown area. In addition, pursuant to Government Code Section 65996, the payment of fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of specific projects to a less-than-significant level.

Based on the above information, the incremental effect of the Housing Plan with respect to schools would not be cumulatively considerable and cumulative impacts would be less than significant.

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4.9 Transportation and Circulation

This section analyzes the potential effects of the Housing Plan on the transportation system. Information on the transportation system has been compiled from both local and regional sources, including the City's General Plan Circulation Element, and information from other local agencies such as the Santa Barbara County Association of Governments (SBCAG). The analysis of potential transportation impacts is based in part on the CEQA Transportation Impact Analysis prepared by Iteris (August 2024) included in Appendix F.

4.9.1 Environmental Setting

a. Transportation Overview

The city is roughly bisected by U.S. Highway 101 (U.S. 101), which serves as the primary link for vehicular travel between Santa Barbara and other South Coast destinations such as the cities of Goleta and Carpinteria, as well as more distant destinations such as Ventura or northern Santa Barbara County. As of March 2025, the city's roadway network includes:

- 254 miles of roadway that includes a mix of arterial, collector, and local roads as defined by Caltrans Functional Roadway Classification, shown in Figure 4.9-1.
- 300 miles of sidewalks
- 1,200 crosswalks
- 123 signalized intersections
- 98.5 miles of bicycle facilities ranging from Class I, II, III and IV bicycle facilities

As part of the 2011 General Plan Update, the City adopted a Growth Management Program which aims to efficiently use existing transportation capacity and reserve constrained transportation capacity for high priority development (i.e. housing). It does so by dividing the City into six Development Areas, as shown in Figure 4.9-2, and incentivizing development in specific areas. All Development Areas take primary access from U.S. 101 with secondary access from the City's roadway network. The 2011 General Plan Update emphasized higher-density housing and mixed-use development within the Downtown Development Area. In addition to the existing concentration of businesses, amenities, and services, the Downtown Development Area is suitable for higher-density development because the street network is laid out on a grid system with blocks approximately 500 feet long, making it attractive for walking, biking, and transit. In conjunction with City's established active transportation and transit network in the Downtown Development Area, this results in much lower vehicle trip generation for housing and nonresidential development, which enables higher densities with less impact on transportation capacity. 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.

Surrounding Growth Management Development Areas of Upper State, Riviera, Coast Village and the Mesa have discontinuous roadway patterns more common with suburban sprawl, with limited walking, biking and transit infrastructure. Because active transportation and transit infrastructure are not as strong, residents in these areas are more likely to use a vehicle as their primary mode of transportation. As properties develop or re-develop, they must be brought into conformance with City street and sidewalk standards.

Figure 4.9-1 Caltrans Functional Roadway Classification Map

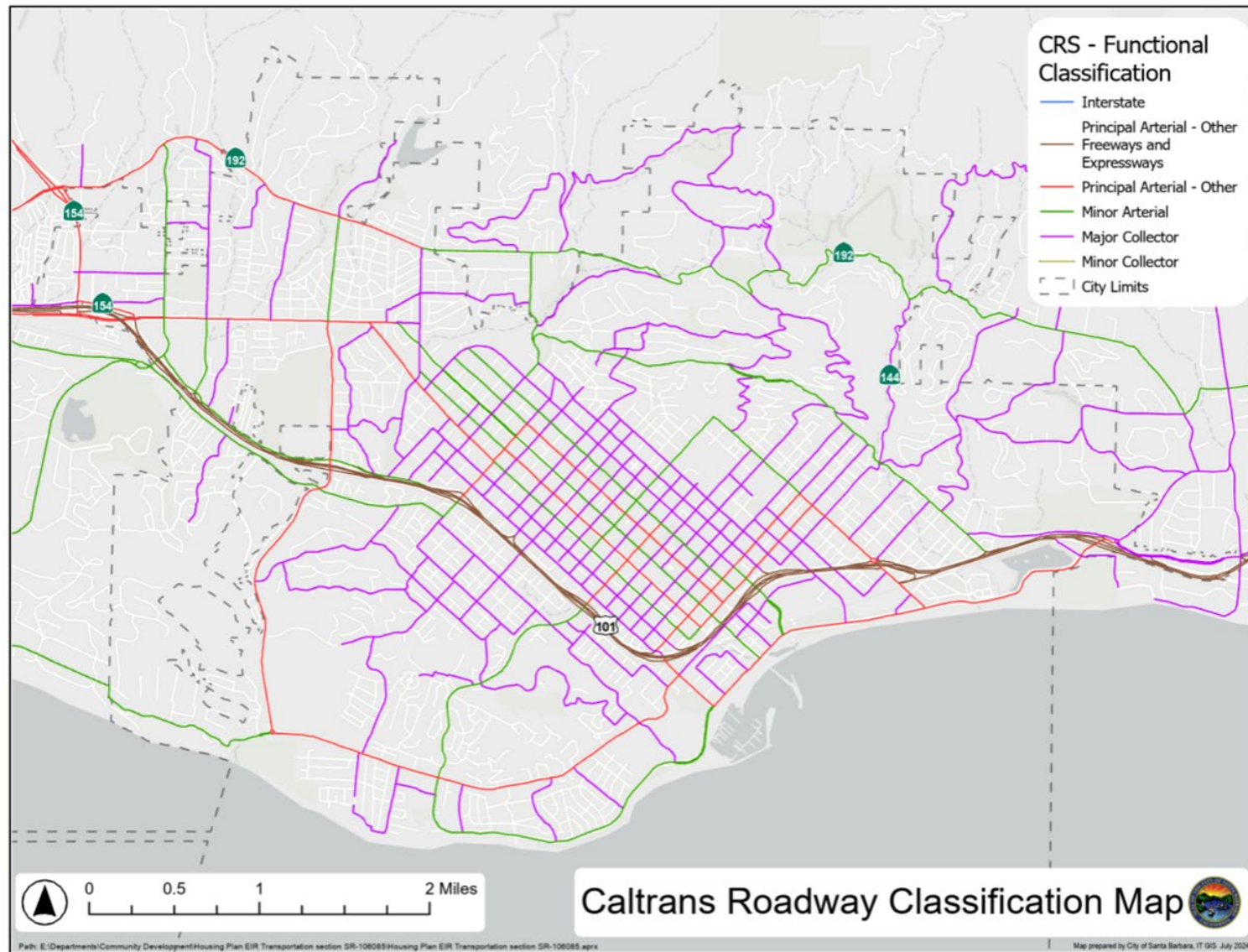
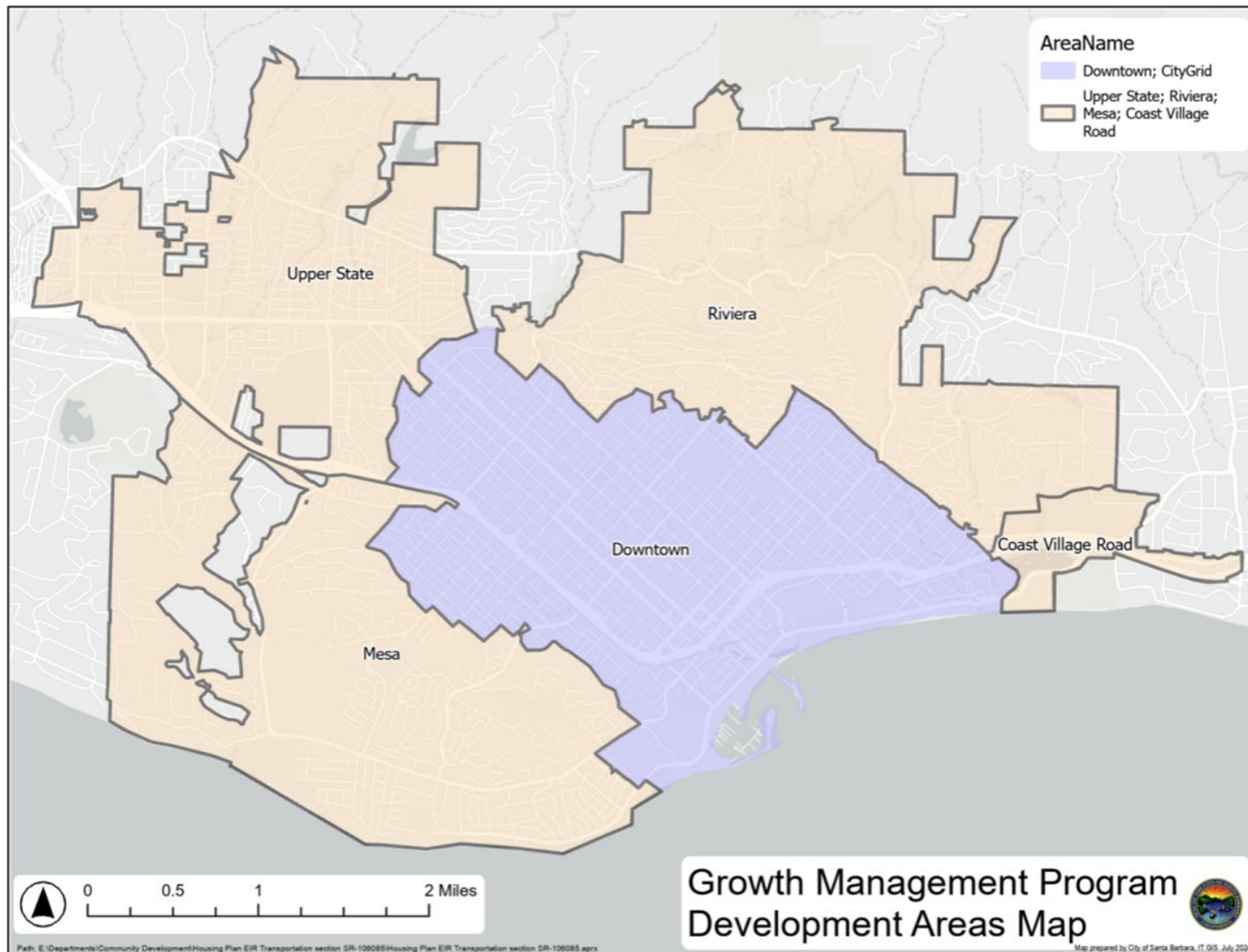


Figure 4.9-2 Growth Management Program Development Areas



b. Active Transportation

Walking

There is currently 300 miles of sidewalk in the City. The Downtown Development Area has a high-quality pedestrian environment with sidewalks on both sides of most roadways (Figure 4.9-2). The Mesa, Upper State, and Coast Village Development Areas have sporadic sidewalks, and the Riveria Development Area has little to no sidewalks due to topographical constraints. Figure 4.9-3 shows the City's Sidewalk Inventory Map, with the blue and green colors representing sidewalk and red representing missing sidewalk. The City's Pedestrian Master Plan (2006) prioritizes sidewalk based on demand- and need-based factors, including proximity to schools, parks, public activity areas; land use and population density; commute modes; safety; sidewalk gap closure; and public input. Currently, the City is only able to fund the repair of existing sidewalks. New sidewalks must either receive grant funding or be constructed as part of public improvements associated with private development. Most of the capital projects identified in the Pedestrian Master Plan have either been completed or have received grant funding, with construction anticipated over the next several years. The Pedestrian Master Plan and Chapter 22.44 of the Municipal Code include development guidelines of sidewalk width required that is based on width of right of way.

Bicycling

Santa Barbara's comprehensive bicycle network connects nearly every part of the City via approximately 98.5 miles of bicycle facilities (Figure 4.9-4). State Street is identified as the spine of the City's bicycle network in the Bicycle Master Plan connecting east-west facilities with supporting facilities on the parallel streets, enabling cross-town travel. The City's off-street multiuse paths include the four-mile Beachway that goes along the entire Waterfront and the 2.6 mile Las Positas/Modoc Path that connects the Hidden Valley, Westside, Bel Air, Campanil and Mesa neighborhoods and is also part of the region's COAST route that connects to UCSB/Goleta and Ventura.

Most of the capital projects identified in the 2016 Bicycle Master Plan have been completed or have received funding, with construction anticipated over the next several years. Given the 8,000 new residential units anticipated by the City's Housing Element Update, it is expected that there will be a continued demand for bicycle infrastructure for all ages and abilities.

Figure 4.9-3 City of Santa Barbara 2020 Sidewalk Inventory

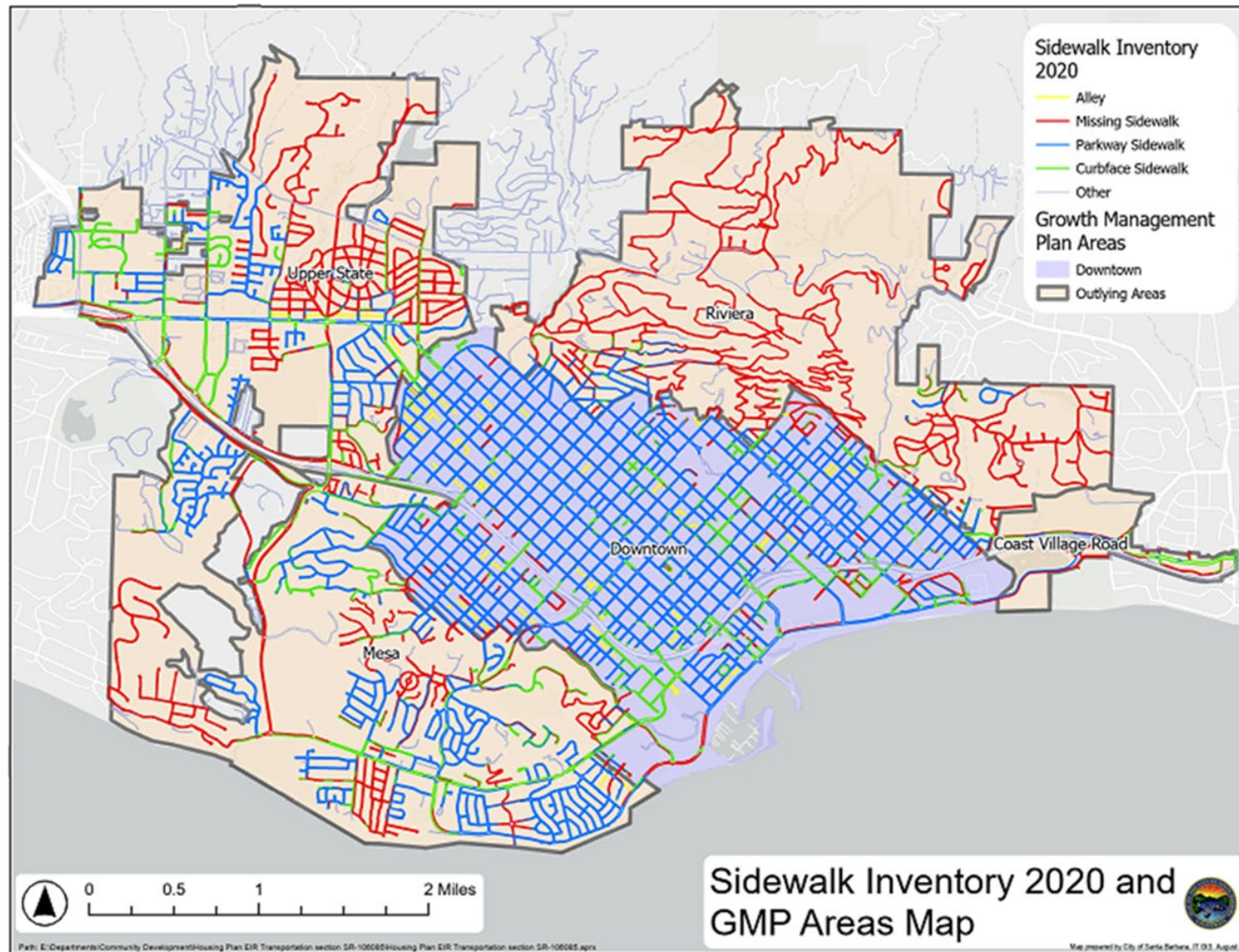
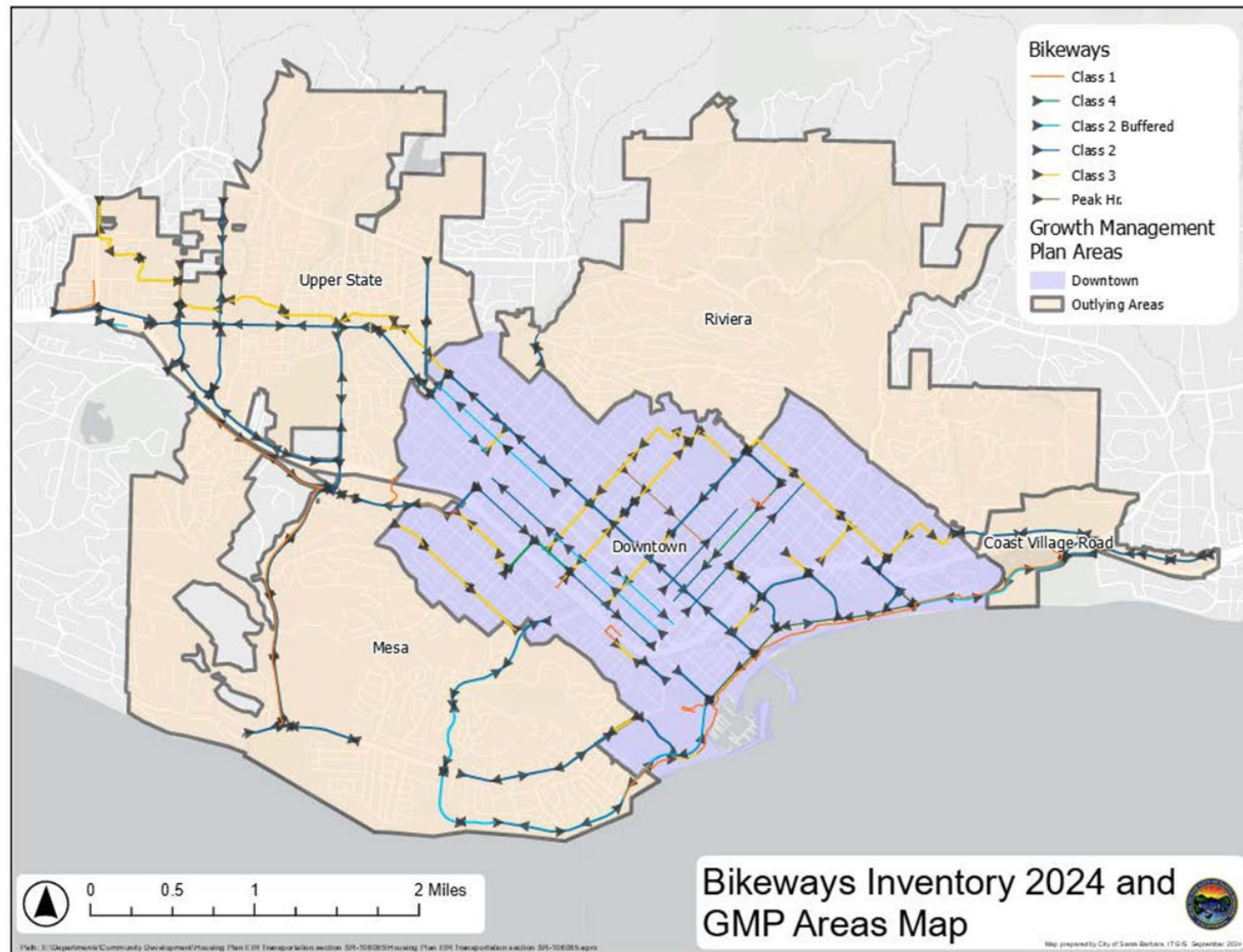


Figure 4.9-4 Bicycle Facilities Map (2024)



c. Public Transit

Santa Barbara Metropolitan Transportation District (MTD) provides fixed route bus service in southern Santa Barbara County, including the City of Santa Barbara and the adjacent communities of Goleta, Carpinteria, Isla Vista, Montecito, and Summerland. MTD's Transit Center is located Downtown at the intersection of Chapala and Carrillo Streets providing local and regional connections (MTD 2020).

Regional transit service is provided by Coastal Express (Ventura) and Clean Air Express (Santa Maria/Buellton). The Clean Air Express operates commuter bus service from Santa Maria to Goleta and Santa Barbara and from Lompoc to Goleta and Santa Barbara. The Coastal Express operates between Ventura and the South Coast, including timed transfers at the Santa Barbara Transit Center to the MTD route 24X serving UCSB (express bus). Routes and service levels are subject to periodic adjustments based on operational needs and service planning.

Amtrak serves Santa Barbara with passenger rail service along the Pacific Surfliner route which travels north-south between San Diego and San Luis Obispo. Amtrak provides trains daily in each direction along with connecting bus services. The Amtrak station is located at the intersection of State Street and Yanonali Street at the City's Depot Lot (Public parking lot, Amtrak Station and Greyhound Station).

d. Transportation Demand Management

Transportation Demand Management (TDM) involves programs that encourage more people to either:

- Shift more of their vehicle trips to times of day that have less congestion (or avoid the auto trip altogether through strategies such as telecommuting).
- Shift more of their individual vehicle travel to modes that create less congestion (carpool, transit, bicycle, or walking).

The City of Santa Barbara, the County of Santa Barbara, and SBCAG all have active TDM programs, as do other public agencies and private companies. Private businesses and government agencies often employ a mix of these types of benefits to help reduce traffic congestion. Projects reviewed through land development process that need discretionary approvals by Planning Commission and/or City Council often include TDM related components.

e. Transportation Funding and Upcoming Projects

Transportation improvements within the city of Santa Barbara are generally overseen by the City, with Caltrans having responsibility for improvements associated with U.S. 101 and the State Highway system (e.g., State Route [SR] 192, SR 154, and freeway on and off ramps to U.S. 101 and State Routes). Transit improvements are generally under the authority of the managing transit agency (e.g., MTD). The typical funding sources for transportation-related infrastructure are listed below.

Utility Users Tax

Utility Users Tax (UUT) is a general tax levied on the use of residential and commercial utility services, including water, refuse, electric, telecommunication, video, and natural gas. The City's UUT rate is 6 percent. City Council policy has established the use of half of UUT monies to Streets capital

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

Measure A

Measure A is the 0.5 cent sales tax approved by Santa Barbara County voters in November 2008. 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 administering 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.

Measure C

Measure C is a one cent general purpose local sales transaction and use tax approved by Santa Barbara voters in November 2017. The new sales tax, which became effective on April 1, 2018, generates an estimated \$22 million annually and provides much-needed funding to address deferred maintenance of City infrastructure, and to replace the City's outdated and unsafe police station. Measure C is a general-purpose sales tax revenue allocated by City Council. In February 2018, City Council established the following priorities for Measure C funds for the first five fiscal years: planning, permitting, and bonding for a new police station facility; repairing local streets throughout the City, including related street infrastructure; replacing Fire Station No. 7; community projects to support the City's parks and library; business district infrastructure projects; and maintenance of City buildings.

Measure C provides for the renewal of Public Right of Way assets, including street pavement, sidewalks, curb ramps, curbs and gutters, traffic signals, bridges, and storm drain systems. This funding is helping the City to achieve the goal of improving streets so that they can be maintained through regular preventive maintenance and avoid costly rehabilitation and reconstruction. Measure C also provides for better public safety through improved traffic control systems, better designs for vehicle and pedestrian infrastructure, pedestrian crossings, and street lighting; and provides for the renewal of old storm drain systems throughout the City.

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.

Grants

Streets and Active Transportation Capital projects are eligible for several federal, state, and local grants. Many grants require a "match" that is a proportional amount of funding that must be provided by the City to qualify for the grant. Some grants contribute a portion of project funding with additional City funds needed to fully fund a project. The most common grant sources funding the Fiscal Years 2026-2030 Streets-Transportation grant program include the Active Transportation Program (State), Highway Bridge Program (federal) and Highway Safety Improvement Program (federal).

As of June 2026, the following current projects are either in construction, coming soon to construction, or recently completed:

- De La Vina Street Safe Crosswalks and Buffered Bike Lanes Project (recently completed)
- Eastside and Westside Community Paseos Projects (recently completed)
- Modoc Multiuse Path Extension Project (recently completed)
- Streets Maintenance Pavement Projects (ongoing)
- Vision Zero State Street Undercrossing Project (recently completed)
- Cabrillo Boulevard and Los Patos Way Roundabout (Phase One of the East Cabrillo Boulevard Pedestrian and Bicycle Improvements, Roadway Roundabout, and Replacement of Union Pacific Railroad (UPRR) Bridge Project) (recently completed)
- Lower Milpas Street Operational Improvements (completed in 2026)
- Vision Zero Priority Corridor Projects [(San Andres Street (recently completed), Cliff Drive (construction anticipated in 2027), and Las Positas Road (recently completed)] ()
- Upper De La Vina Active Transportation Improvements (under construction)
- Upper De La Vina Street/Mission Creek Bridge Replacement (under construction)
- Carpinteria Street/Sycamore Creek Bridge Replacement (construction anticipated in 2027)

As of June 2026, the following major active transportation safety projects are in final design:

- Cliff Drive: Urban Highway to Complete Streets (construction in 2027)
- Milpas Street Crosswalk Safety and Sidewalk Widening Project (construction in 2027)
- Westside and Lower West Active Transportation Plan Implementation (construction in 2027)

Caltrans' largest planned roadway improvement is the South Coast U.S. 101 High Occupancy Vehicle (HOV) Project, which would add a new HOV lane in each direction of U.S. 101 between Bailard Avenue in the City of Carpinteria and the Sycamore Creek Bridge in the City of Santa Barbara. The City's project jurisdiction extends from Sycamore Creek to Olive Mill Road. Portions of the project have been completed, and under construction. Construction is anticipated to be completed by 2028 with additional landscaping through 2030. The HOV Project includes several parallel or mitigation projects that fall within the City limits that will help relieve traffic congestion at critical intersections and provide important active transportation connections.

4.9.2 Regulatory Setting

Transportation issues are addressed in adopted City, County, State, and federal plans, policies and regulations. Within the City, primary responsibility for these issues is addressed in the City's General Plan and Municipal Code as administered by the City's Public Works and Community Development Departments. In 2011, the City Council adopted Plan Santa Barbara, which included a readoption of the 1997 Circulation Element and new 2011 Circulation Element policies. The comprehensive goal and vision of the 2011 Circulation Element is: "While sustaining or increasing economic vitality and quality of life, Santa Barbara should be a city in which alternative forms of transportation and mobility are so available and attractive that use of an automobile is a choice, not a necessity." Supporting transportation planning documents include the Pedestrian Master Plan (2006), Bicycle Master Plan (2016) and Vision Zero Strategy (2018), which aims to eliminate all severe injuries and fatalities on the City's road network. There are also neighborhood specific transportation management plans (NTMP) focusing on neighborhood livability by improving the active

transportation network. Examples of neighborhood plans include: Eastside NTMP (2013), Westside and Lower West NTMP (2020), Cliff Drive Vision Zero Planning Effort (2022) and Milpas Street Corridor (2020/2022). Applicable regulations regarding emergency response and emergency evacuation plans are described in Section 4.6, *Hazards and Hazardous Materials*.

a. Federal Regulations

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

b. State Regulations

Caltrans Authority over the State Highway System

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

Statewide Transportation Improvement Plan

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

Complete Streets Act

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

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

With the passage of AB 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32. On December 11, 2008, CARB adopted its Scoping Plan for AB 32, which was subsequently updated in 2013, 2017, and 2022. This scoping plan included the approval of SB 375 as the means for achieving regional transportation related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: CARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of Housing and Transportation Elements.

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

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

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

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

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.

Senate Bill 743 (SB 743)

SB 743, which was signed into law in 2013, directed OPR to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics instead of traffic level of service (LOS). SB 743 requires the new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also states that alternative measures of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." SB 743 changes the way

that public agencies evaluate the transportation impacts of projects under CEQA by recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (see Pub. Resource Code, § 21099, subd. [b][2]).

CEQA Guidelines Section 15064.3

In 2018, changes to CEQA included the adoption of Section 15064.3, Determining the Significance of Transportation Impacts. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop¹ or a stop along an existing high-quality transit corridor² should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT and may revise those estimates to reflect professional judgment supported by substantial evidence.

On June 23, 2020, City Council amended the City's Traffic Management Strategy to remove the outdated California Environmental Quality Act references and retained traffic congestion as a land use policy. In December 2023 the City adopted new Master Environmental Assessment Guidelines for Transportation Analysis, which include guidelines for VMT analysis as well as thresholds of significance for individual projects as well as land use plans.

Assembly Bill 2097 (AB 2097)

AB 2097, effective on January 1, 2023, no longer requires residential and non-residential parking (excluding hotels and event centers) within a half mile of qualifying public transit facilities (per Section 21155 of the Public Resources Code).

There are two qualifying public transit facilities under AB 2097(see Figure 4.9-5):

- Santa Barbara Metropolitan Transit District (MTD) Transit Center (Transit Center), located downtown, on Chapala Street between Figueroa and Carrillo Streets; and
- Amtrak Station, which is located at the intersection of State Street and Yanonali Street at the City's Depot Lot (Public parking lot, Amtrak Station and Greyhound Station).

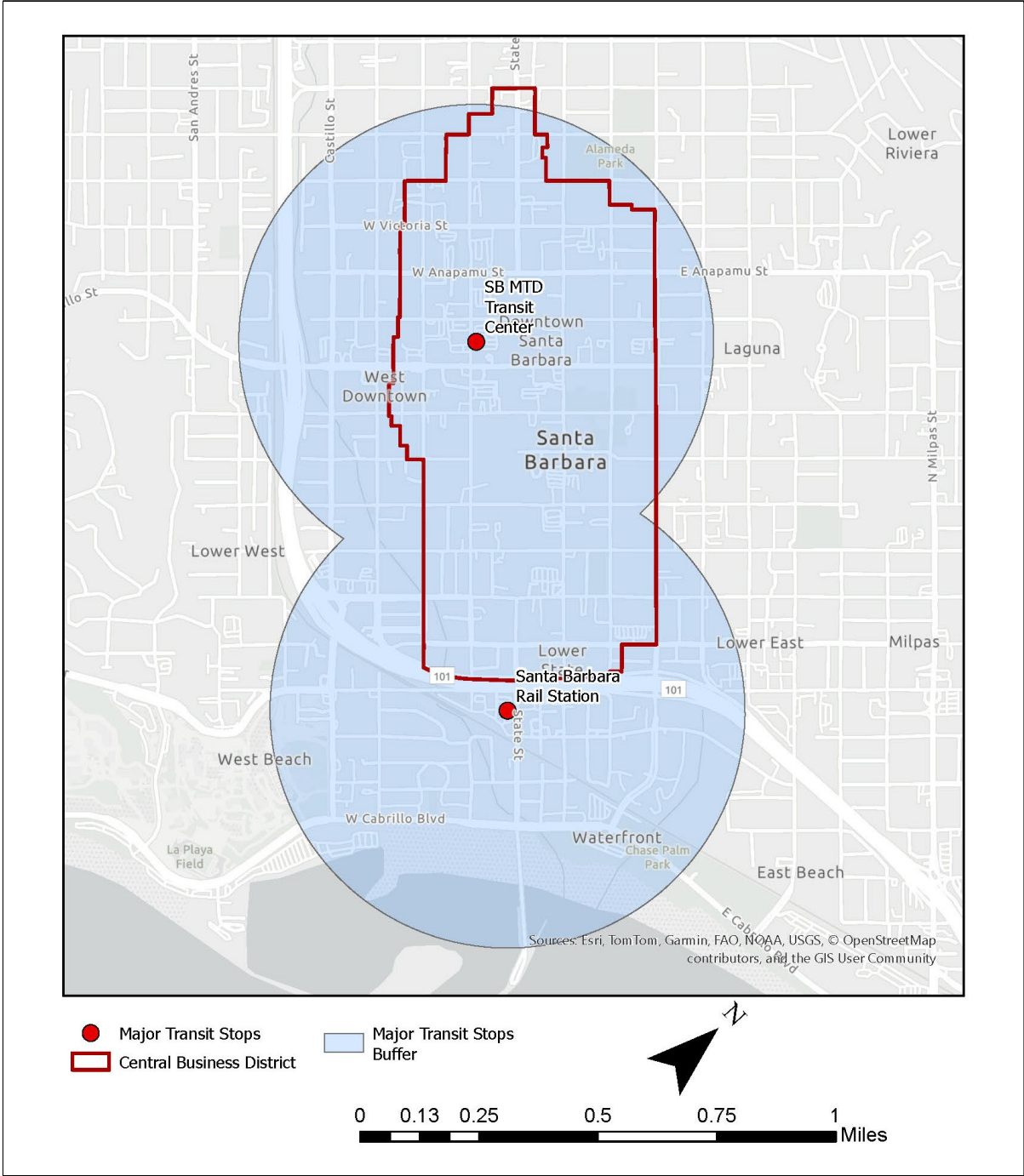
New ground-up development or change of use to existing buildings within the qualifying boundary do not have to provide parking (excluding hotels and event centers).

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. Concentrating development in the Downtown Growth Management Area is also safer from a traffic safety perspective.

¹ "Major transit stop" is defined in Public Resources Code Section 21064.3 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 a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

² "High-quality transit corridors" are defined in Public Resources Code Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Figure 4.9-5 AB 2097 Transit Priority Areas with No Parking Requirements



c. Local Regulations

Santa Barbara County Association of Governments Connected 2050 Regional Transportation Plan and Sustainable Communities Strategy

SBCAG is required by State and federal law to prepare, update, and adopt a Regional Transportation Plan (RTP) every four years. The most recent update to the RTP was completed by SBCAG in 2025 (Connected 2050) and sets forth long-range transportation planning goal describing how the region will meet its transportation needs for the 30-year period from 2020 to 2050. Connected 2050 is currently being updated by SBCAG with the same 30-year period from 2020 to 2050. Connected 2050 provides a collective vision for the region's future that balances transportation and housing needs with social, economic, and environmental goals. Connected 2050 helps guide future planning efforts and policy decisions that affect transportation, including its relationship with housing and land use, with the goal to reduce regional greenhouse gas emissions. Connected 2050 is based, in part, on SBCAG's Regional Growth Forecast which projects population and employment data to 2050. SBCAG designates RHNA allocations based on the Regional Growth Forecast.

Connected 2050 includes five goal areas – Environment, Mobility & System Reliability, Equity, Health & Safety, and Prosperous Economy – with respective policies to meet each goal areas, which are expected to result in significant benefits to the region, not only with respect to transportation and mobility, but also economic activity, safety, and social equity. Policies in Connected 2050 applicable to the Housing Plan address land use, circulation, alternative transportation, affordable housing, and safe roads and highways.

General Plan Circulation Element

The Circulation Element is a required element of the City's General Plan. Government Code Section 65302(b) states that a circulation element shall consist of:

...the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, and other local public utilities and facilities, all correlated with the land use element of the plan.

The comprehensive goal and vision of the Circulation Element is "While sustaining or increasing economic viability and quality of life, Santa Barbara should be a city in which alternative forms of transportation and mobility are so available and attractive that use of an automobile is a choice, not a necessity. To meet this challenge, the City is rethinking its transportation goals and land use policies, and focusing its resources on developing balanced mobility solutions." The City's Plan Santa Barbara 2011 documents the reevaluated transportation goals and land use policies and focused its resources on developing balanced mobility solutions. With the Plan Santa Barbara General Plan update adoption, additional goals, policies, and implementation actions were added, intended to further integrate circulation policies with the City's sustainable focus.

The Circulation Element addresses the requirements of state law, which are to evaluate the transportation needs of the community and to present a comprehensive plan to meet those needs. This includes compliance with the California Complete Streets Act of 2008, which requires cities and counties to include complete streets policies as part of their general plans so that roadways are designed to safely accommodate all users, including bicyclists, pedestrians, transit riders, children, older people, disabled people, as well as motorists. Adoption of the Circulation Element triggered

implementation mechanisms designed to move the ideals identified in the Circulation Element to on-the-ground projects that would improve mobility via a variety of transportation options.

The City's Circulation Element conveys the City's objectives to address and reduce automobile congestion, manage access for all travel modes, and support the enhancement of a multi-modal transportation system. The following Circulation Element policies are especially applicable to the goals of the Housing Plan:

- **Policy C1. Transportation Infrastructure Enhancement and Preservation.** Assess the current and potential demand for alternative transportation and where warranted increase the availability and attractiveness of alternative transportation by improving related infrastructure and facilities without reducing vehicle access.
- **Policy C2. Regional Transportation and Commuter Transit.** Coordinate regionally with agencies and the private sector to establish viable rail, bus and carpooling options for commuters, and create an energy efficient regional transportation network.
- **Policy C6. Circulation Improvements.** Where existing or anticipated congestion occurs, improve traffic flow in conjunction with providing improved access for pedestrians, bicycles and public and private transit through measures that might include physical roadway improvements, TDM strategies and others.
- **Policy C8. Emergency Routes.** It shall be a high priority to keep all emergency evacuation, response and truck routes free of physical restrictions that may reduce evacuation/response times.

Bicycle Master Plan

The City of Santa Barbara's Bicycle Master Plan (BMP) was updated in July of 2016 with mapping updates in March 2022 and October 2024. The BMP involved extensive gathering of community input and field research. The community-driven BMP outlines the goals, policies, and implementation strategies that will improve bicycle safety, convenience, facilities, and infrastructure in the City of Santa Barbara over the next fifteen to twenty years. The BMP will also enhance and preserve Santa Barbara's circulation system for all road users by increasing the number of trips taken by bicycle, thereby reducing future traffic congestion levels and parking demand. The majority of the capital projects from the City's 2016 Bicycle Master Plan have been largely completed or funded for construction that is anticipated over the next several years.

Pedestrian Master Plan

The City of Santa Barbara's Pedestrian Master Plan (PMP) was updated in April 2006 as directed through the adoption of the City's Circulation Element in 1997. The PMP is also to be consistent with *Plan Santa Barbara* and helps guide pedestrian policies found in the Circulation Element. The PMP seeks to extend Santa Barbara's distinction as one of the most pedestrian-friendly urban communities in the country, benefiting residents, business owners, shoppers, and visitors. Pedestrian infrastructure upgrades are proposed in various areas throughout Santa Barbara, especially around schools, libraries, community centers, and business districts. Improvements include intersection safety improvements, sidewalk completion, accessibility compliance, landscaping, and connectivity. In addition, the Safe Routes to School program and other innovative programs covered in the PMP seek to address the needs of people of all ages and abilities. The Pedestrian Master Plan also represents a blueprint for improving residents' quality of life by reducing traffic, noise, and energy consumption. The majority of capital projects from the City's

2006 Pedestrian Master Plan have been completed or funded for construction that is anticipated over the next several years.

Vision Zero Strategy

City Council adopted the Vision Zero Strategy in 2018 to eliminate traffic fatalities and severe injuries, while increasing safe, healthy, and equitable mobility for all. Vision Zero is based on an underlying ethical principle that it can never be acceptable that people are killed or seriously injured when moving on public roadways. As an ethics-based approach, Vision Zero functions to guide priorities and strategic use of limited city resources. It is a new lens through which public officials and professionals make decisions based, above all, on safety outcomes. Historically, road users have held most of the responsibility for safety. Vision Zero changes this relationship by emphasizing that the responsibility is shared by roadway policy makers, designers, and enforcement, as well as road users. With this understanding in mind, Vision Zero is a fundamentally different way to approach traffic safety. The Council adopted strategy document includes a statement of core principles, adoption of a Safety-First mentality, and the identification of a comprehensive, multidisciplinary approach to eliminating roadway deaths and serious injuries.

Safe Streets for All Action Plan

In December 2023, the City of Santa Barbara (City) was awarded Safe Streets and Roads for All (SS4A) Planning Grant in the amount of \$799,400 with a required twenty percent City match to prepare a SS4A Action Plan (Action Plan) from the U.S. Department of Transportation (USDOT). The goal of the Action Plan is to prevent traffic-related fatalities and serious injuries within the City, while increasing safe, healthy, and equitable mobility for all by strategically identifying infrastructure improvements that remove barriers to safe mobility.

The Action Plan builds upon the efforts of the Council-adopted Pedestrian (2006) and Bicycle (2016) Master Plans, and the Santa Barbara Vision Zero Strategy (Vision Zero) by identifying projects, best practices, and community needs to improve safety for all road users. Work on the Action Plan began in fall 2024 and is expected to conclude in summer/fall 2026. The Draft Plan is currently available at SantaBarbaraCA.gov/SafeStreets.

4.9.3 Impact Analysis

a. Methodology and Significance Thresholds

The Housing Plan's potential impacts are evaluated using Appendix G of the 2024 *CEQA Guidelines*. Impacts would be significant if implementation of the Housing Plan would do any of the following:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
2. Conflict or be inconsistent with *CEQA Guidelines* Section 15064.3, subdivision (b), Criteria for Analyzing Transportation Impacts;
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and/or
4. Result in inadequate emergency access.

In March 2024, the City adopted new Master Environmental Assessment Guidelines for Transportation Analysis, which include guidelines for VMT analysis as well as thresholds of significance for land use plans, which are defined as General Plans, Specific Plans, and Master Plans. The Housing Plan implements the 6th Cycle Housing Element and is a land use plan for the purpose of this analysis. Land use plans include developments made up of larger geographies than a standalone land development project. Given the large geographies, the Master Environmental Assessment Guidelines for Transportation Analysis recommend the following criteria be adopted for the evaluation of 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).

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 THE HOUSING PLAN WOULD NOT CONFLICT WITH THE CIRCULATION ELEMENT, THE BICYCLE MASTER PLAN, THE PEDESTRIAN MASTER PLAN, SBCAG's 2050 RPT-SCS, OR ANY OTHER APPLICABLE PROGRAM, PLAN, ORDINANCE, OR POLICY RELEVANT TO THE TRANSPORTATION SYSTEM. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The Housing Plan would result in the potential growth of up to 8,001 new residential units during the 6th Cycle Housing Element planning period, which would increase multimodal trips (vehicle, bicycle, pedestrian, and transit) onto the local and regional circulation network. A portion of new housing development is anticipated in the Upper State, Mesa, and Coast Village Road areas, and will put a higher demand on the City's roadway network. New or enhanced active and transit-oriented infrastructure 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).

The potential increase in multiple modes of travel associated with residential growth under the Housing Plan would be in conformance with the goals and policies contained in the following plans affecting the City's circulation network:

- 2011/1997 Circulation Elements
- 2016 Bicycle Master Plan
- 2006 Pedestrian Master Plan
- 2018 Vision Zero Strategy
- SBCAG Connected 2050 Regional Transportation Plan and Sustainable Communities Strategy
- 2026 Safe Streets for All Action Plan

A brief discussion of the Housing Plan's consistency with the City's 2011/1997 Circulation Element, the 2016 Bicycle Master Plan, the 2006 Pedestrian Master Plan, and SBCAG's 2021 2050 RTP-SCS follows.

2011 Circulation Element

The evaluation of the proposed Housing Plan's consistency with the Circulation Element considers the amount of projected growth and the type and distribution of future growth. Existing Circulation Element programs and policies guide development and management of the transportation system. Circulation Element programs and policies encourage multi-modal transportation and related facilities, reduction of drive-alone trips, TDM programs, and enhanced land use tools and strategies supportive of multi-modal transportation including incentives for mixed-use development.

The forecasted development of up to 8,001 new residential units under the Housing Plan would be primarily infill, and residential mixed-use developments would be prioritized in closer proximity to existing active transportation and transit infrastructure. A majority of the forecasted development falls within the General Plan Downtown Growth Management Area, that facilitates lower vehicle miles traveled. New non-discretionary development is required to be consistent with applicable General Plan goals and policies, including goals and policies related to transportation and circulation contained in the Circulation Element.

Transportation impacts associated with large discretionary residential and mixed-use projects, such as the La Cumbre Plaza Planning Area that falls within the Upper State Street Growth Management Area, where up to 2,000 residential units are anticipated, would be addressed as part of City-review of individual development proposals. It is anticipated that there would be circulation, safety enhancements and significant active infrastructure improvements needed in the Upper State Street Growth Management area. Therefore, the Housing Plan would not conflict with the programs and policies in the Circulation Element.

2016 Bicycle Master Plan, 2006 Pedestrian Master Plan, 2018 Vision Zero Strategy and 2026 Safe Streets for All Action Plan

Both the Bicycle Master Plan and the Pedestrian Master Plan are intended to amplify policies in the City's General Plan that identify bike and pedestrian network gaps and opportunities to enhance existing facilities and where new facilities are needed. The larger infrastructure projects identified in the Pedestrian and Bicycle Master Plans have largely been completed or are funded to be completed in the next few years. The 2018 Vision Zero Strategy also incorporated infrastructure actions which the City has begun obtaining grant funding for infrastructure projects increasing safe, healthy, and equitable mobility for all. The City recently received additional grant funding for a Safe Streets for All Action Plan (SS4A Action Plan) that would identify remaining infrastructure needs for all road users. SS4A Action Plan Planning effort is a two-year effort, that began in fall of 2024.

With respect to the Housing Plan's forecasted residential development, new residential and mixed-use projects would be required to comply with the Bicycle and Pedestrian Master Plans and Vision Zero Strategy, and would need to incorporate right of way improvements proportional to their proposed development. Therefore, the Housing Plan would not result in a significant environmental impact due to conflicts with goals and policies of the Bicycle Master Plan, Pedestrian Master Plan Vision Zero Strategy, and Safe Streets for All Action Plan.

2050 Regional Transportation Plan and Sustainable Communities Strategy SCS and 2024 Regional Travel Patterns Report

The SBCAG 2050 RTP-SCS is a long-range land use and transportation plan for Santa Barbara County. The City's Housing Element is required to be updated every eight years for jurisdictions within an MPO on a 4-year RTP cycle, such as SBCAG. 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.

Goals and Policies

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. The Housing Plan includes programs that support planning future residential development around regional transportation goals established by the City and SBCAG to address the jobs/housing balance, improve residential access to transit opportunities, and mitigate adverse environmental impacts. Program HE-1 provides adaptive reuse opportunities consistent with the General Plan principle of encouraging the highest density housing within a quarter mile of frequent transit service and commercial services. Program HE-12 prioritizes the development of new deed-restricted affordable housing for extremely low-, very low-, low-, and moderate-income households in targeted areas of the City, particularly downtown and areas where transit is readily available.

The 6th Cycle Housing Element identifies housing opportunities near transit corridors, employment centers, and services throughout the City. As a result, implementation of the Housing Plan would encourage development on infill sites and redevelopment around the City already serviced by public transit. Program HE-7, Objective Design Standards, is proposed as a new section of the Municipal Code (Title 25) that would provide alternatives to conventional zoning regulations to accommodate infill development in existing neighborhoods, which would encourage development of housing on infill sites near transit and employment centers, consistent with regional transportation related goals.

Consistency with Regional Housing Needs Allocation

The 2050 RTP-SCS was developed by SBCAG alongside the region's 6th Cycle of the RHNA process (refer to Section 3.2.2, *Regional Housing Needs Allocation and Buffer*). The RHNA process occurs every eight years and directly impacts every RTP-SCS, including SBCAG's 2050 RTP-SCS. Distribution of units by income level adjusts the proportion of low- and very low-income groups in each jurisdiction so that every jurisdiction is allocated its fair share of affordable housing.

The Sustainable Communities Strategy is required to be based on forecasted growth patterns and thereby creates an informal requirement of consistency between the allocation of housing units through the RHNA process and the allocation of population growth for the Sustainable Communities

Strategy. This is codified as a statutory objective of the RHNA process and subject to review by the Department of Housing and Community Development (HCD) through the 6th Cycle Housing Element process. As local agencies update housing elements to comply with the 6th RHNA cycle, the RHNA process will advance the SCS's growth patterns. Therefore, the Housing Plan 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.

Potential discretionary developments that could conflict with City transportation plans would be required to be reviewed by City staff to ensure consistency with all applicable City transportation related plans and policies, including the Circulation Element and the Bicycle and Pedestrian Master Plans, Vision Zero Strategy, and Safe Streets for All Action Plan. The Housing Plan would not conflict with any programs, plans, ordinances and policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, nor would it limit or preclude the City's ability to implement programs and policies to further transportation plans. The Housing Plan would advance the 2050 RTP-SCS growth patterns by demonstrating the City's ability to accommodate the RHNA allocation through the year 2031. As a result, the Housing Plan would result in a less than significant impact to programs, plans, ordinances, or policies addressing the circulation system.

Mitigation Measures

No mitigation measures are required.

Threshold 2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2 FUTURE RESIDENTIAL DEVELOPMENT FACILITATED BY THE HOUSING PLAN WOULD BE EXPECTED TO RESULT IN PROJECT VMT THAT IS LESS THAN 15 PERCENT BELOW THE EXISTING YEAR AVERAGE FOR THE SBCAG REGION. AS A RESULT, THE HOUSING PLAN WOULD NOT CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B). THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

In March 2024, the City adopted Master Environmental Assessment Guidelines for Transportation Analysis by Resolution of the City Council, which include local guidelines and thresholds of significance to address potential transportation related VMT impacts of projects subject to CEQA. These guidelines implement SB 743 by promoting public health, infill development, multimodal transportation networks and the reduction of greenhouse gas emissions. The Master Environmental Assessment Guidelines for Transportation Analysis require analysis of whether the associated project VMT will cause significant impact on the environment. The City adopted the State-recommended threshold of 15 percent below the VMT baseline (i.e., existing conditions).

Individual land use development projects that decrease average vehicle miles traveled per capita, per employee, or per service population in the project area compared to existing conditions are considered to have a less than significant impact. In accordance with the Master Environmental Assessment Guidelines for Transportation Analysis, projects that would generate fewer than 250 average daily trips (ADT), projects within one-half mile of an existing major transit stop or one-quarter mile of an existing high-quality transit corridor, neighborhood serving retail less than 50,000 square feet, projects with 100 percent affordable housing units, accessory dwelling units, and projects that would produce fewer than 1,000 ADT in the Downtown/Upper State/Riviera Areas are

presumed to cause a less than significant impact on the environment, unless substantial evidence is otherwise identified that indicates such projects would generate a potentially significant level of VMT. Most land use development projects that would be facilitated by the Housing Plan would align with these categories of development that are presumed to have a less than significant impact for VMT.

Individual land use development projects that would not be screened from VMT analysis based on these criteria would require a quantitative VMT analysis supported by the City's Travel-Demand Forecasting Model (SBTDFM). Projects that would produce VMT that exceed applicable thresholds would require a mitigation plan that implements VMT Reduction Strategies to reduce the project VMT to at least 15 percent below the baseline of existing development (average City VMT per resident for a residential project) to avoid a significant impact.

Appendix E of the Master Environmental Assessment Guidelines for Transportation Analysis includes on-site and off-site VMT Reduction Strategies including the following that can be implemented by individual residential development projects (City of Santa Barbara 2024):

- Unbundle residential parking costs from property costs
- Implementing preferential rideshare parking
- Providing bicycle parking in multi-unit residential projects that exceeds Zoning Parking Requirements
- Integrating affordable and below-market-rate housing into non-residential development (mixed-use)
- Locating bike path/bike lane connections on project sites
- Expand Bikeway Network (On-Street)
- Implement Market Price Public Parking (On-Street)

The VMT Reduction Strategies in the Master Environmental Assessment Guidelines for Transportation Analysis can reduce VMT by avoiding vehicle travel by site users through promotion of alternative modes, carpooling and avoided trips strategies to reduce travel to and from a project site. Implementation of one or more of these programs can result in the required 15 percent reduction in VMT per resident on average as necessary to reduce individual development project impacts to be less than significant. The maximum potential effectiveness of the identified VMT Reduction Strategies are quantified using industry standard methods as developed by the California Air Pollution Control Officers Association (CAPCOA) in the *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (August 2021) and *Quantifying Greenhouse Gas Mitigation Measures* (August 2010).

Future residential development facilitated by the Housing Plan would be required to adhere to all State and local requirements for avoiding significant impacts related to VMT. Any VMT Reduction Strategies required for mitigation would be required to comply with the policies of the City's General Plan, Local Coastal Program, and Master Environmental Assessment Guidelines for Transportation Analysis to promote infill residential and mixed-use development; enhance residents' access to transit, pedestrian, and bike networks; and facilitate use of these systems to reduce trip lengths. As a result, the Housing Plan would be expected to be consistent with target VMT reductions of least 15 percent below the existing baseline VMT for the SBCAG region. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

Threshold 3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Threshold 4: Would the project result in inadequate emergency access?

Impact TRA-3 THE HOUSING PLAN DOES NOT INCLUDE DEVELOPMENT PROJECTS THAT COULD INCREASE HAZARDS DUE TO DESIGN FEATURES. THEREFORE, THE HOUSING PLAN WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE OR RESULT IN INADEQUATE EMERGENCY ACCESS, AND THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The Housing Plan analyzes forecasted residential growth conditions during the 6th Cycle Housing Element planning period and sets goals and policies for the development and preservation of affordable housing and improvement of fair housing in the city. The Housing Plan does not grant entitlements for any specific project or future development and would not prescribe any modifications to the City's roadway network or implement specific design features or specifications for new project-level development, roadways, or other transportation facilities. 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.

The City maintains standards for public improvements and private facilities (e.g., internal circulation, ingress/egress) that guide the construction of transportation facilities to minimize design hazards for all users of the transportation system. As individual residential projects are proposed, applicants would be required to follow the appropriate City design guidelines in implementing roadway improvements that are necessary to alleviate transportation hazards. Depending on project scope and location, an Intersection Control Evaluation (ICE) may be required to confirm that a specific development project would not result in increased hazards due to a geometric design feature. Therefore, as a policy framework, the Housing Plan would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

The Housing Plan does not include elements that would impede emergency vehicle access. Depending on project scope and location, an Intersection Control Evaluation (ICE) may be required to confirm that a specific development project would not result in inadequate emergency access. Construction activities facilitated by the Housing Plan could temporarily impair emergency access points used for emergency access vehicles. However, standard construction procedures from development of a construction management plan would address these conditions and would require provision of alternative emergency vehicle access points. Any construction on State highway systems would be required to create a temporary traffic control plan that adheres to the standards set forth in the California Manual of Uniform Traffic Control Devices (Caltrans 2021). Future development forecasted under the Housing Plan that would involve work in the public right-of-way would be required to ensure appropriate traffic control, pursuant to the requirements of an encroachment permit, as set forth in Chapter 10.55 of the City of Santa Barbara Municipal Code (City of Santa Barbara 2021).

The new residential development forecasted by the Housing Plan is anticipated to consist of primarily multi-unit and mixed-use development, which could result in alterations to existing transportation infrastructure, including, but not limited to, sidewalks, driveways, streetlights and bike/transit facilities or amenities. Future residential development would be required to adhere to applicable City Fire Department design standards for emergency vehicle access. California Code of Regulations Title 19, Article 3, Section 3.05 requires access roads from every building to a public street to be all-weather hard-surfaced right-of-way not less than 20 feet in width.

While the majority of potential residential growth forecasted by the Housing Plan would consist of infill and residential mixed-use developments that would not be located in high fire-hazard areas, some new residential development, such as accessory dwelling units (ADUs) may be located in Very High Fire Hazard Severity Zones in the northeast and northwest portions of the City and local designated High Fire Hazard Areas mainly in areas with land use designations of open space, hillside low density residential, and low density residential, as well as a small portion of land designated medium density residential. In high fire hazard areas, California Fire Code Appendix D, Sections D106 and D107 require the development of a minimum of two approved fire apparatus access roads for both multi-unit residential development and single-unit residential development. In addition, the City maintains their own requirements for emergency access.

In addition, future residential development would be reviewed by City staff to ensure consistency with all applicable City and State design standards, including standards for project access points, location, and design, sight lines, roadway modifications, provisions for bicycle, pedestrian, and transit transportation connections, and emergency access. Therefore, the Housing Plan would not result in increased hazards due to inadequate emergency access. As a result, these impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.9.4 Cumulative Impacts

The general approach to cumulative impact analysis used in this Program EIR is discussed in Section 4, Environmental Impact Analysis. Cumulative projects also include planned and pending residential development projects that contribute to the City's RNHA.

Cumulative development in the City would include residential and commercial development which has the potential to contribute to an overall increase in citywide VMT and could result in growth and subsequent VMT increases exceeding forecasts projected by SBCAG's RTP-SCS. In addition, increased VMT could conflict with the transportation GHG-reduction goals of the City's Climate Action Plan. Therefore, cumulative development throughout the City has the potential to result in increased citywide VMT. As described in Impact TRA-2, future residential development facilitated by the Housing Plan would be required to adhere to all State and local requirements for avoiding significant impacts related to VMT. Any VMT Reduction Strategies required to reduce the potential impact of individual development project would be required to comply with the policies of the City's General Plan, Local Coastal Program, and Master Environmental Assessment Guidelines for Transportation Analysis. Project-level VMT Reduction Strategies include promoting infill residential and mixed-use development; enhancing residents' access to transit, pedestrian, and bike networks; and facilitating use of these systems to reduce trip lengths. These VMT reduction measures would reduce GHG emissions in accordance with the City's Climate Action Plan. The growth anticipated under the Housing Plan is consistent with the development pattern of the 2050 RTP-SCS; therefore,

the Housing Plan would not contribute considerably to a VMT increase or conflict with the SBCAG 2050 RTP-SCS.

Some types of transportation impacts, such as potential hazards or emergency access issues, are related to site- and project-specific conditions. These issues require site specific analysis and would not be significantly affected by other development outside of the city. Compliance with applicable regulations and oversight, including City and Caltrans design guidelines, City of Santa Barbara Municipal Code requirements, and City and/or County Fire Department design standards for emergency vehicle access, as outlined in Impact TRA-3, would effectively reduce the potential for individual projects to create a transportation hazards or emergency access impact within the City as well as in Santa Barbara County. Therefore, cumulative impacts related to the transportation hazards and emergency access would be less than significant.

4.10 Utilities and Service Systems

This section describes the existing environmental conditions and regulatory setting for utilities in the city and assesses potential impacts the Housing Plan could have on water infrastructure and long-term water supply, wastewater collection and treatment capacity, stormwater drainage, power and communications utilities, and solid waste management.

4.10.1 Environmental Setting

a. Water Infrastructure and Long-Term Supply

Existing Water Supply Infrastructure

The city's water supplies are managed pursuant to the Enhanced Urban Water Management Plan (EUWMP). The service area for the City water system includes most areas within the city limits, aside from the Santa Barbara Airport which is served by the Goleta Water District, and the Coast Village Road and Westmont Road areas which are served by Montecito Water District (City of Santa Barbara 2021a). The City also serves selected areas outside of the city limits, including the unincorporated areas of Mission Canyon and Barker Pass (City of Santa Barbara 2021a). The majority of the City's potable water is treated at the Cater Water Treatment Plant (WTP) which has a capacity of 37 million gallons per day (MGD) and is used to provide water treatment for the Montecito Water District and Carpinteria Valley Water District (City of Santa Barbara 2021a). The City's potable water distribution system consists of approximately 312 miles of distribution main, 15 balancing reservoirs, 15 pumping stations, and nine production wells. The water system is supported by approximately 70 employees within the City's Public Works Department, Water Resources Division (City of Santa Barbara 2021a).

The City water supply is obtained from a diverse water supply portfolio which includes the following (City of Santa Barbara 2021a):

- **Lake Cachuma.** The U.S. Bureau of Reclamation constructed Lake Cachuma and Bradbury Dam in the early 1950s. The City's share of the annual yield is 8,277 acre-feet per year (AFY). Water is delivered for treatment at Cater Water Treatment Plant (WTP) via the Tecolote Tunnel and South Coast Conduit. The City can store allocated Cachuma water in Lake Cachuma for the following year, allowing the City to use other available supplies and build up reserves of Cachuma supplies.
- **Gibraltar Reservoir.** The City has pre-1914¹ appropriative water rights to divert water from the Santa Ynez River. Construction of Gibraltar Dam was completed in 1920. The reservoir had an initial storage capacity of 15,793 acre-feet (AF). As of 2020, siltation has reduced the reservoir capacity to 4,559 AF. Water from the reservoir is conveyed through Mission Tunnel for treatment at Cater WTP.
- **Devil's Canyon Diversion.** The City has pre-1914 appropriative water rights to divert water from Devil's Canyon Creek and maintains a small diversion weir on Devil's Canyon Creek below Gibraltar Dam, which diverts water from Devil's Canyon Creek into Mission Tunnel.

¹ California courts have clarified since 1914 the only way a new water right is acquired is to receive a water right permit from the State Water Resources Control Board. However, some jurisdictions have pre-1914 appropriative water rights which are valid today and do not require a water right permit.

- **Mission Tunnel Infiltration.** Mission Tunnel is 3.7 miles long and conveys water from Gibraltar Reservoir through the Santa Ynez Mountains to the City. Infiltration through cracks and fissures into the tunnel from watersheds on both sides of the mountains contributes to the City's water supply. Infiltration to Mission Tunnel is dependent on rainfall.
- **State Water Project.** The City is entitled to request up to 3,300 AFY from the State Water Project (SWP). The water is conveyed to Lake Cachuma from SWP facilities in the Central Valley via the Central Coast Branch of the California Aqueduct. Once in Lake Cachuma, the water is conveyed along with Cachuma Project water, via the Tecolote Tunnel, to Cater WTP for treatment and distribution.
- **Supplemental Water.** The SWP pipeline provides the City with the ability to convey supplemental water purchases to augment drought-year supplies. During the recent drought, the City purchased water from other SWP water contractors.
- **Desalination.** The Charles E. Meyer Desalination Plant was reactivated in 2017 in response to the recent drought. The plant can provide 3.0 million gallons per day (MGD) of supply, equivalent to 3,125 AFY at 93% of production capacity. The City maintains permits to provide for a desalination supply of up to 10,000 AFY.
- **Groundwater.** The City pumps groundwater from the Foothill Basin and the Santa Barbara Basin, which is subdivided into two water-storage basins: Storage Unit 1, and Storage Unit 3. Storage Unit 1 underlies downtown Santa Barbara, covering approximately seven square miles. Storage Unit 3 lies to the southwest of Storage Unit 1 and covers approximately 2.5 square miles. Foothill Basin and Storage Unit 1 are used to supply the potable water system. Storage Unit 3 is used only to supplement the recycled water system, if needed.
- **Recycled Water.** Recycled water is produced at the El Estero Water Resource Center (WRC) for distribution to the recycled water system for irrigation of large landscapes and toilet flushing at a handful of public locations. The City upgraded the recycled water treatment system in 2015.

Supply and Demand

The EUWMP summarizes actual water supply in 2020 and projects water supply and demand for the City's service area through the year 2050. Table 4.10-1 shows the actual water supply produced in fiscal year 2020 and the EUWMP's projected supplies through 2050 under normal conditions compared to anticipated demand. Some supply in normal years is planned to be reserved to build banked storage and carryover in preparation for a critical drought period. A safety margin of 10 percent is maintained, consistent with City water supply policies, in case of unanticipated added demand (City of Santa Barbara 2021a).

Table 4.10-1 Supply and Demand Comparison, Normal Year

Supplies ¹	Actual Deliveries (AF)			Projected Supplies (AF)			
	2020	2025	2030	2035	2040	2045	2050
Cachuma Project	1,834	8,577	8,577	8,577	8,577	8,577	8,577
Gibraltar Reservoir	3,936	3,510	3,510	3,510	3,510	3,510	3,510
Mission Tunnel	1,128	1,210	1,210	1,210	1,210	1,210	1,210
Desalination	2,763	3,125	5,000	5,000	5,000	5,000	5,000
Groundwater	199	1,250	1,250	1,250	1,250	1,250	1,250
SWP	--	1,865	1,815	1,766	1,716	1,716	1,716
Recycled Water	945	1,221	1,221	1,221	1,221	1,221	1,221
Total Supply	10,805	20,760	22,580	22,530	22,480	22,480	22,480
Total Demand		13,890	14,600	14,580	14,720	14,910	15,160
Available Water Surplus		6,879	7,980	7,950	7,760	7,570	7,320

¹Devil's Canyon Diversion is not included in EUWMP supply projections because Devil's Canyon Diversion is available only intermittently and does not supply a significant portion of the City's demands.

Source: City of Santa Barbara 2021a

Water supply and demand projected in the EUWMP during a single dry year and a five-year drought period are shown in Table 4.10-2 and Table 4.10-3. In a single dry year, available supply from the Gibraltar Reservoir could potentially be significantly reduced. In a single dry year, the City's annual water supply assessment is used to determine whether to offset the deficiency with added SWP deliveries, increased groundwater pumping, or additional use of Lake Cachuma supplies. During a five-year drought period, the City anticipates demand to be reduced by 20 percent of normal demand in year five due to extraordinary conservation measures above and beyond the City's normal conservation program. These measures include enforcement of water use regulations during water shortage conditions as implemented by Municipal Code Section 14.20.215. In 2016, the City achieved a 40 percent conservation rate, demonstrating that a 20 percent demand reduction is possible (City of Santa Barbara 2021a).

Table 4.10-2 Supply and Demand Comparison, Single Dry Year

Cachuma Project	300	300	300	300	300	300
Cachuma Project Carryover	1,870	705	685	825	1,015	1,265
Gibraltar Reservoir	0	0	0	0	0	0
Mission Tunnel	574	574	574	574	574	574
Desalination	3,125	5,000	5,000	5,000	5,000	5,000
Groundwater	3,500	3,500	3,500	3,500	3,500	3,500
SWP	1,980	1,980	1,980	1,980	1,980	1,980
Supplemental Water	1,320	1,320	1,320	1,320	1,320	1,320
Recycled Water	1,221	1,221	1,221	1,221	1,221	1,221
Total Supply	13,890	14,600	14,580	14,720	14,910	15,160
Total Demand	13,890	14,600	14,580	14,720	14,910	15,160

¹Devil's Canyon Diversion is not included in EUWMP supply projections because Devil's Canyon Diversion is available only intermittently and does not supply a significant portion of the City's demands.

Source: City of Santa Barbara 2021a

Table 4.10-3 Supply and Demand Comparison, Multiple Dry Years

Year		2025	2030	2035	2040	2045	2050
Year One	Supply Total	23,050	24,930	24,930	24,930	24,930	24,930
	Demand Total	13,890	14,600	14,580	14,720	14,910	15,160
	Available Water Surplus	9,160	10,330	10,350	10,210	10,020	9,770
Year Two	Supply Total	22,350	24,220	24,220	24,220	24,220	24,220
	Demand Total	13,890	14,600	14,580	14,720	14,910	15,160
	Available Water Surplus	8,460	9,620	9,640	9,500	9,310	9,060
Year Three	Supply Total	20,680	22,560	22,560	22,560	22,560	22,560
	Demand Total	13,890	14,600	14,580	14,720	14,910	15,160
	Available Water Surplus	6,790	7,960	7,980	7,840	7,650	7,400
Year Four	Supply Total	16,300	18,170	18,170	18,170	18,170	18,170
	Demand Total	13,890	14,600	14,580	14,720	14,910	15,160
	Available Water Surplus	2,410	3,570	3,590	3,450	3,260	3,010
Year Five	Supply Total	12,020	13,900	13,900	13,900	13,900	13,900
	Demand Total	11,110	11,680	11,660	11,770	11,930	12,120
	Available Water Surplus	910	2,220	2,240	2,130	1,970	1,780

Source: City of Santa Barbara 2021a

b. Wastewater Collection and Treatment

The City operates a wastewater/stormwater collection system consisting of 255 miles of sewer pipe and seven lift stations which convey water to the El Estero WRC. El Estero WRC has a design capacity of 11 MGD and a long-term average flow of 6.0 MGD (City of Santa Barbara 2021a). El Estero WRC includes a 2.5 MGD of tertiary filtration and disinfection capacity to produce recycled water for use at the plant and for the recycled water distribution system. Treated wastewater at El Estero WRC is mixed with brine from the City's desalination facility and released 1.5 miles offshore into the Pacific Ocean (City of Santa Barbara 2022a). El Estero WRC also provides recycled water from its tertiary treatment plant to irrigate parks, school grounds, golf courses, and other large landscapes (City of Santa Barbara 2022a; City of Santa Barbara 2021a). Approximately four dry tons of biosolids are produced every day at El Estero WRC which are composted and used at farms and parks as a nutrient-rich soil amendment. Gas generated in the treatment process is converted to electricity to offset approximately 50 percent of the electricity needs at El Estero WRC (City of Santa Barbara 2022a).

c. Stormwater Drainage

Stormwater within the City that does not infiltrate into the ground becomes surface runoff, which flows into surface waterways or is channeled into the City's storm drain system which conveys rainwater into creeks and the Pacific Ocean (City of Santa Barbara 2022b). The Creeks Division of the City's Sustainability & Resiliency Department is responsible for the water quality management of stormwater drainage systems within the City. The Public Works Department is responsible for owning and maintaining City owned or street storm drains. Discharges from the City's storm drain system into the ocean and creeks are permitted under the State Water Resources Control Board's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s), Order No. 2013-0001-DWQ (City of Santa Barbara Parks & Recreation 2022; State Water Resources Control Board [SWRCB] 2013).

d. Power and Communication Utilities

Public and private utility companies provide electric, natural gas, telephone, cellular, television, and internet services to residents and businesses within the City. Electrical power is provided through Southern California Edison Company (SCE) infrastructure. Natural gas is provided to the City through the Southern California Gas Company infrastructure. Landline telephone services are provided by Frontier and Cox Communications while cellular phone service is provided by multiple service providers including Verizon Wireless, AT&T, and T-Mobile. Cable television is provided by Cox Communications while satellite television is provided by DirecTV and Dish TV. Internet is provided by multiple service providers such as Cox Communication, Frontier, Cox Communications (fiber optic) Earthlink, and Viasat.

e. Solid Waste Management

Solid waste collection services in the City are provided by the City's franchised waste hauler, MarBorg Industries (City of Santa Barbara 2022c). Solid waste is hauled to the County-owned South Coast Recycling and Transfer Station located at 4430 Calle Real between the cities of Goleta and Santa Barbara. The South Coast Recycling and Transfer Station acts as a consolidation point for waste. The County separates recyclable materials from non-recyclable materials and transfers the non-recyclable materials to the Tajiguas Landfill. The South Coast Recycling and Transfer facility is

permitted to process up to 550 tons per day of solid waste (California Department of Resources, Recycling, and Recovery [CalRecycle] 2022a). The Tajiguas Landfill has a maximum permitted daily throughput of 1,500 tons per day and a remaining capacity of approximately 4,336,335 cubic yards. The Tajiguas Landfill is scheduled for closure January 1, 2036 (CalRecycle 2022b). 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. In addition, the Tajiguas landfill includes the County of Santa Barbara's ReSource Center with a Materials Recovery Facility (MRF) and anaerobic digester. The MRF separates any excess recyclable and organic material delivered to Tajiguas. Organic materials are processed in the anaerobic digester. The ReSource Center converts organics for use in soil (City of Santa Barbara 2022d; County of Santa Barbara 2022).

Construction and demolition waste is primarily disposed of at local construction and demolition recycling facilities. These include MarBorg Construction and Demolition Recycling Facility, Lash Construction, and Granite Construction (City of Santa Barbara 2022e). Recyclables, metal and glass, antifreeze, oil, and e-waste are accepted at multiple drop-off facilities including the Downtown Recycling Center, the Goleta Recycling Center, Santa Barbara Iron & Metal Recyclers, M & M Scrap Metals, and the Community Household Hazardous Waste Collection Center at the University of California Santa Barbara (City of Santa Barbara 2022e).

A food scraps collection service was implemented by the City in 2009 for the business sector, and has over 200 participating businesses including coffee shops, restaurants, hotels, as well as schools and multi-unit apartment buildings. Food scraps are hauled by MarBorg Industries to the South Coast Recycling and Transfer Station and then transferred to the ReSource Center.

4.10.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several state and local laws throughout the country. The Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the United States Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the U.S. Environmental Protection Agency and U.S. Army Corps of Engineers. At the state and regional levels in California, the act is administered and enforced by the SWRCB and nine Regional Water Quality Control Boards (RWQCB).

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) regulates public water systems that supply drinking water (42 United States Code Section 300[f] et seq.; 40 Code of Federal Regulations Section 141 et seq). The SDWA authorizes the USEPA to establish national standards for drinking water (called the National

Primary Drinking Water Regulations) that set enforceable maximum contaminant levels in drinking water and require all water providers in the U.S. to treat water to remove contaminants. The main objectives of the SDWA are to:

- Ensure that water from the tap is potable (i.e., safe and satisfactory for drinking, cooking, and hygiene)
- Prevent contamination of groundwater aquifers that are the main source of drinking water for a community
- Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 Code of Federal Regulations Section 144)
- Regulate distribution systems

Title 40 of the Code of Federal Regulations

Title 40 of the Code of Federal Regulations (CFR), Part 258 (Resource Conservation and Recovery Act RCRA, Subtitle D) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the Federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

b. State Regulations

Water Supply

California Department of Water Resources

The California Department of Water Resources (DWR) is responsible for preparing and updating the California Water Plan, which is a policy document that guides the development and management of State water resources. The plan is updated every five years to reflect changes in resources and urban, agricultural, and environmental water demands. The California Water Plan suggests ways of managing demand and augmenting supply to balance water supply with demand.

CALGreen Compliance

CALGreen is California's first green building code and the first implementation of a state-mandated green building code in the nation. It is formally known as the California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations. The purpose of CALGreen is to improve public health, safety, and general welfare through enhanced design and construction of buildings using concepts which reduce negative impacts and promote those principles which have a positive environmental impact and encourage sustainable construction practices including water efficiency and environmental quality. CALGreen establishes planning and design standards for sustainable site development, including water conservation measures and requirements that new buildings reduce water consumption by 20 percent below a specified baseline. CALGreen requires installations of 1.28 gallons-per-flush toilets and 0.5-gallon-per-flush urinals for all non-residential projects as part of the prescriptive method of reducing indoor water use by the required 20 percent.

Urban Water Management Planning Act

The Urban Water Management Planning Act of 1983 amended California Water Code to require all urban water suppliers in California to prepare and adopt an UWMP and update it every five years. This requirement applies to all suppliers providing water to more than 3,000 customers or supplying more than 3,000 AFY of water. The City's manages its water supplies pursuant to its Enhanced Urban Water Management Plan, last updated in June 2021 (City of Santa Barbara 2021a).

Sustainable Groundwater Management Act

In September 2014, Governor Brown signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins. The project area overlies the Foothill Basin, the Santa Barbara Basin, and the Montecito Basin. Only the Montecito Basin is currently managed by a Groundwater Sustainability Agency (California Department of Water Resources 2022).

Long-Term Water Use Efficiency Framework (Assembly Bill 1668 and Senate Bill 606)

In May 2018, Governor Brown signed into law AB 1668 and SB 606 that will require urban retail water providers to set new permanent water use targets. The framework includes: 1) a standard for indoor residential water use based on a gallons per person per day that decreases by the year 2030, 2) a standard for outdoor residential water use based on the amount of irrigable landscaped area and the local climate, 3) a standard for outdoor commercial, industrial, and institutional (CII) dedicated irrigation meters, and 4) a standard for water loss in the water distribution system. These four standards will be added together to represent an overall water use target for the water provider. In addition to the calculated objective described above, urban water suppliers will also be required to implement performance measures for CII water users. There have been significant delays in the formation of the standards from the CA Department of Water Resources and the timeline for the rulemaking process for the State Water Resources Control Board is at least a year behind schedule. Many details for implementing the new laws will be determined over the next several years, with timeline impacts yet to be determined.

Model Water Efficient Landscape Ordinance (Assembly Bill 1881)

The Model Water Efficient Landscape Ordinance requires cities and counties to adopt landscape water conservation ordinances by January 31, 2010, or to adopt a different ordinance that is at least as effective in conserving water as the Model Water Efficient Landscape Ordinance (WELO). The City first adopted Water Efficient Landscape Standards in 1989 and has updated them several times over the years to reflect best practices in water efficient landscaping. These updates ensure the standards remain at least as stringent as the WELO, keeping the City in compliance with Assembly Bill 1881.

Senate Bills 610 and 221, Water Supply Assessment and Verification

Senate Bills (SB) 610 and 221 amended the California Water Code to require detailed analysis of water supply availability for certain types of development projects. The primary purpose of SB 610 is to improve the link between the information on water supply availability and certain land use decisions made by cities and counties. Both statutes require detailed information regarding water availability to be provided to city and county decision-makers prior to approval of specified large

(greater than 500 dwelling units or 500,000 square feet of commercial space) development projects. Both statutes also require this detailed information to be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects as defined in Water Code 10912 subject to the California Environmental Quality Act (CEQA). Under SB 221, approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply.

Wastewater

National Pollutant Discharge Elimination System

In California, the NPDES program is administered by the State Water Resources Control Board (SWRCB) through the Regional Water Quality Control Boards (RWQCBs) and requires municipalities to obtain permits that outline programs and activities to control wastewater pollution. Discharges from the City's wastewater treatment plant are permitted under the NPDES permit issued by the SWRCB (Order No. R3-2019-0046).

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems

To provide a consistent, statewide regulatory approach to address Sanitary sewer overflows, the State Water Board adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2006-0003 (Sanitary Sewer Systems General Order) on May 2, 2006. The Sanitary Sewer Systems General Order requires public agencies that own or operate sanitary sewer systems to develop and implement sewer system management plans and report all sanitary sewer overflows to the State Water Board's online sanitary sewer overflow database. The State Water Board adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103 on December 6, 2022, and take effect on June 5, 2023.

California Code of Regulations Title 22

The California Department of Public Health sets specific requirements for treated effluent reuse, or recycled water, through Title 22 of the California Code of Regulations. These requirements are primarily set to protect public health. The California Code of Regulations Title 22, Division 4, Chapter 3, Sections 60301 through 60355 regulate recycled wastewater. Title 22 contains effluent requirements for four levels of wastewater treatment, from un-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.

Stormwater

National Pollutant Discharge Elimination System

In California, the NPDES program is administered by the SWRCB through the RWQCBs and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution. Discharges from the City's storm drain system are permitted under the NPDES General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s).

Solid Waste

Assembly Bill 341

The purpose of Assembly Bill (AB) 341 is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. In addition to Mandatory Commercial Recycling, AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

Assembly Bill 939

AB 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare source reduction and recycling elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

Assembly Bill 1826

AB 1826 requires businesses that generate a specified amount of organic waste per week to arrange for recycling services for that waste, and for jurisdictions to implement a recycling program to divert organic waste from businesses subject to the law, as well as report to CalRecycle on their progress in implementing an organic waste recycling program. As of January 1, 2017, businesses that generate four cubic yards or more of organic waste per week, or multi-family residences with five or more units shall arrange for organic waste recycling services.

Senate Bill 1016

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. Beginning January 1, 2018, the Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

Senate Bill 1383

SB 1383 establishes statewide targets to reduce emissions of short-lived climate pollutants (SLCP) by reducing organic waste disposal to 50% by 2020 and 75% by 2025. Organic waste in landfills emits 20% of the state's methane. It also sets a goal to rescue at least 20% of currently disposed edible food by 2025 and redirect that food to people in need.

c. Local Regulations

City of Santa Barbara Urban Water Management Plan

The City's EUWMP serves as a foundational document with a goal of evaluating the adequacy and reliability of the City's water supply and provides a long-term view of how the City's water supplies will be managed. Water demand projections described in the EUWMP account for anticipated

future water demands in the City and changes in land uses including, but not limited to, increased densities and associated increases in water usage (City of Santa Barbara 2021a).

City of Santa Barbara Sewer System Management Plan

The City's Sewer System Management Plan (SSMP) is implemented in order to facilitate proper management of the City's sanitary sewer system in accordance with the SWRCB's General Waste Discharge Requirements for Sanitary Sewer Systems. The SSMP contains Design and Performance Provisions which detail specific design and construction standards and specifications for the installation of new and/or rehabilitated sewer systems and procedures and standards for inspecting and testing new or rehabilitated sewer systems.

City of Santa Barbara General Plan

The City's Environmental Resources Element contains policies and implementation measures related to water supply and waste management. These include the use of water conservation practices, including the use of recycled water and implementation of water conservation programs, and increasing diversion to reduce or eliminate waste. In addition, the City's Circulation Element contains policies and implementation strategies related to water, wastewater, stormwater, electric, natural gas, and telecommunication infrastructure. Specific policies, implementation measures, and implementation strategies include the following (City of Santa Barbara 2011a; City of Santa Barbara 2011b):

Environmental Resources Element

- **ER17: Water Conservation Program.** The use of water conservation practices shall be both encouraged and required, as appropriate, for all development projects.

Possible Implementation Actions to be Considered

- **ER17.3: On-Site Storage and Reuse.** Identify more detailed guidelines for use of cisterns and grey water in new development and retrofitting existing development.
- **ER22: Solid Waste Management Programs.** Continue and expand City recycling programs for resource reduction, reuse, and recycling of solid waste.

Possible Implementation Actions to be Considered

- **ER 22.1: Construction/Demolition Materials Reuse and Recycling.** Upgrade standard development requirements for recycling of construction/demolition debris or architectural salvage and incentives for use of renewable, or reused or recycled materials.

Circulation Element

- **16.1.** Ensure that adequate electrical systems are provided to meet the needs of Santa Barbara residents, industrial uses, and businesses.
 - **16.1.2.** Prior to approval of new or expanded structures that have the potential for significant energy use, contact the Edison Company to identify the adequacy of supplies.
 - **16.1.3.** As appropriate and feasible and based upon demand, work with the Edison Company to plan for and provide recharging stations for electric vehicles.
 - **16.1.4.** Where possible, place gas lines, electrical lines, and equipment underground.

- **16.3.** Provide a storm drainage system that is able to support the permitted land uses while preserving the public safety.
 - **16.3.1.** Maintain and improve, as necessary, the existing public storm drains and flood control facilities.
 - **16.3.3.** Ensure that adequate storm drain facilities are in place to serve new or expanded uses.
- **16.4.** Provide an adequate water supply system to meet the needs of existing and future residents and businesses.
 - **16.4.2.** Require the incorporation of water conservation techniques in the design of new work projects in order to reduce the demand on available water resources.
 - **16.4.3.** Ensure that there is sufficient water capacity and supply prior to approving new development projects or expansions to existing projects.
- **16.5.** Provide a safe, efficient, and cost effective wastewater collection and treatment system that is able to meet the needs of permitted land uses.
 - **16.5.2.** Monitor existing and projected demands on the wastewater system and ensure that adequate capacity exists.
 - **16.5.3.** Prior to allowing the development of new structures, ensure that adequate capacity exists. If capacity does not exist, identify means and costs involved in meeting the increased demand.
- **16.6.** Ensure adequate telecommunication and cable services are provided to meet the needs of Santa Barbara residents and businesses.
 - **16.6.1.** Work with communication service providers to maintain current levels of service and meet future demands.

Local Coastal Program

The California Coastal Act requires all local governments located within the Coastal Zone to prepare a Local Coastal Program (LCP). LCPs regulate future development within the Coastal Zone and define where public access and urbanization will occur, where industrial facilities will be placed, and how sensitive species and habitats, open spaces, and recreational areas will be protected. The City is located within a Coastal Zone, and, as such, has a Coastal Land Use Plan that was adopted in 2019.

Chapter 6.1, *Public Works & Energy*, of the City's LCP Coastal Land Use Plan contains policies designed to promote water conservation and energy conservation, and provide guidance for the development of public works facilities, the siting of utility pipelines, and hazardous materials transport (City of Santa Barbara 2019).

City of Santa Barbara Municipal Code

The City of Santa Barbara Municipal Code Title 14 regulates water and sewers in the City. Title 14 sets standards for water and wastewater main extensions and sewer connections and use. Such requirements include: water main extensions must be within the boundary lines of a public street or recorded City easement, and any sewer connection in a residence which fails to pass inspection by a licensed contractor must be remediated within 10 days of notification.

Municipal Code Title 22 sets standards for environmental policy and construction and includes requirements for stormwater management and energy efficiency standards. Section 22.87.020 requires new development, redevelopment, and public improvements within the City to comply with the Storm Water Runoff Requirements as provided in the City's Storm Water Best Management Practice (BMP) Guidance Manual. The Storm Water BMP Guidance Manual provides guidelines for the reduction of non-point source pollutant discharges and requires implementation of Low Impact Development (LID) features to minimize environmental impacts to water quality associated with runoff. Section 22.82.050 requires new development implement features in order to achieve mandatory energy efficiency requirements.

Municipal Code Chapter 7.16 sets standards for solid waste management in the City. It mandates the collection of solid waste by a City-franchised waste hauler and sets requirements for the number and size of containers for various types of development, including residential.

Municipal Code Section 30.185.340 sets standards for public works and utilities, including limiting construction hours (8:00am to 5:00pm), ensuring the design and operation of lighting and equipment conforms to the City's Outdoor Lighting Ordinance, implementing dust control measures, and requiring review and approval prior to the commencement of construction. Municipal Code Section 30.185.410 implements provisions for telecommunications facilities and antennas, including height restrictions, setbacks, and required permits.

4.10.3 Impact Analysis

a. Methodology and Significance Thresholds

Impacts related to utilities and service systems were evaluated by forecasting utility demands associated with the Housing Plan and comparing estimated utility demands to current and planned service system capacity. Utility and service system demands of the Housing Plan have been quantified where possible, based upon readily available information. Where insufficient data was able to quantify demands, such demands are discussed qualitatively in order to inform the impact analysis.

The City's environmental checklist and Appendix G of the *CEQA Guidelines* utilize the following significance thresholds to determine if the Housing Plan would have a significant adverse impact. Would the project:

1. Require or result in the relocation or construction of new or expanded storm water drainage facilities or expansion of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
3. 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.
4. 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.
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project 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 or relocation of which could cause significant environmental effects?

Impact UTIL-1 FUTURE RESIDENTIAL DEVELOPMENT FORECASTED IN ACCORDANCE WITH THE HOUSING PLAN MAY REQUIRE NEW UTILITY SERVICE INFRASTRUCTURE CONNECTIONS OR UPSIZING OF UTILITY MAINS. PLANNED HOUSING DEVELOPMENT IS ANTICIPATED TO OCCUR IN DEVELOPED AREAS SUPPORTED BY, OR ADJACENT TO, EXISTING UTILITY INFRASTRUCTURE. COMPLIANCE WITH APPLICABLE CITY AND STATE REGULATIONS, AND MITIGATION MEASURES WITHIN THIS PROGRAM EIR WOULD ENSURE ENVIRONMENTAL IMPACTS ASSOCIATED WITH CONNECTIONS TO EXISTING UTILITY INFRASTRUCTURE OR OTHER UTILITY UPGRADES WOULD BE MINIMIZED. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

New residential development under the Housing Plan would result in the construction of new utility connections and facilities to serve the development and would potentially require replacement or upgrades to existing undersized or older infrastructure in certain areas of the city. Replacement of utility laterals and new connections could involve excavation, removal of existing utility infrastructure, and installation or replacement of new infrastructure generally located within existing right of ways. This could result in secondary construction effects including construction air emissions, ground disturbance and potential to disturb cultural resources, disturbance within areas containing potential site contamination, and temporary noise and groundborne vibration.

Water

The majority of Santa Barbara is developed and served by existing water distribution infrastructure, and the Housing Plan would prioritize housing in developed areas served by existing City water infrastructure.

As individual residential development projects are evaluated by the City, applicants would be required to provide connections to the City's water system following the requirements of Title 14 of the Municipal Code. In some cases, individual residential development projects may require the need for construction of new laterals or replacement of existing mains to provide adequate water supply to the individual development. The construction of new laterals or replacement of existing mains associated with residential projects could contribute to air pollutants from construction equipment that could adversely affect sensitive receptors, involve ground-disturbing activities which could alter subsurface archaeological resources, or result in substantial construction noise or groundborne vibration near sensitive receptors. Construction activities associated with implementation of water laterals or replacement of existing mains would be potentially significant.

Increased water demand from new residential development under the Housing Plan has the potential to result in a need for construction of new water supply infrastructure. The City's EUWMP is the City's long-term water supply planning strategy and includes policies and measures to address anticipated growth within the City. Population growth associated with development forecasted in accordance with the Housing Plan would result in an increased water demand of approximately 792 AFY,² based on a water demand factor for multi-family residential development identified for the

² 0.15 AFY * 5,277 housing units = 791.55 AFY. The Housing Plan includes 5,277 housing units above the growth already anticipated in the City's EUWMP. See UTIL-2 for a more detailed explanation of calculations.

City (WSC 2021) which would be satisfied in normal, dry year, and multiple dry year conditions in accordance with the EUWMP. As a result, no new water infrastructure to increase water supply not already identified and planned for in the City's EUWMP would be necessary as a result of population growth associated with the Housing Plan.

Although the Housing Plan has the potential to result in new or expanded water infrastructure, the expansion of water supply infrastructure to serve an increased population is planned for in the EUWMP and City Capital Improvement Program, and no new water infrastructure to increase water supply not already identified and planned for in the City's EUWMP and City Capital Improvement Program would be necessary. However, the construction of water infrastructure for residential development projects could contribute to air quality, cultural resource, hazardous materials, and noise impacts. This impact would be potentially significant, requiring mitigation.

Wastewater

Wastewater is collected by the City which operates and maintains a sewer collections system, the management of which is guided by the SSMP created consistent with the SWRCB's General Waste Discharge Requirements for Sanitary Sewer Systems (City of Santa Barbara 2020a). New residential development that exceeds existing sewer collections capacity forecasted in accordance with the Housing Plan located within the service area of the City's sewer system and may require substantial sewer infrastructure upgrades and improvements. Similar to water infrastructure, the construction of new laterals or replacement of existing mains associated with residential projects could contribute to air pollutants from construction equipment that could adversely affect sensitive receptors, involve ground-disturbing activities which could expose sensitive receptors to potential contamination, alter subsurface archaeological resources, or result in substantial construction noise or groundborne vibration near sensitive receptors.

Once operational, sewer infrastructure would be tested and inspected, and sewers must meet the approval of the Public Works Director. Any sewer connection in a residence which fails to pass inspection by a licensed contractor must be remediated within ten days of notice. New connections to the City's existing sewer system would be designed in accordance with the City's Design and Performance Provisions which provides standards based on peak flow rate and development type (City of Santa Barbara 2020a).

Population growth associated with development forecasted in accordance with the Housing Plan would result in an increased wastewater generation of 0.93 MGD³ which would not exceed the capacity of the El Estero WRC. As a result, no new wastewater treatment infrastructure would be necessary.

The Housing Plan would not necessitate the development of additional wastewater treatment infrastructure. However, the construction of sewer infrastructure associated with residential development projects could contribute to air quality, cultural resource, and noise impacts. This impact would be potentially significant, requiring mitigation.

³ The City typically assumes 77-87 percent of water demand from new development is converted into wastewater (with the remainder retained onsite for landscaping). Consistent with this standard practice, wastewater generation is assumed to be approximately 87 percent of total increased water demand.

Stormwater

Development forecasted in accordance with the Housing Plan would not result in a substantial increase in stormwater infrastructure because the Housing Plan would prioritize development on sites that are either currently developed or surrounded by existing development served by existing City stormwater drainage infrastructure. Future stormwater infrastructure would primarily be implemented in developed areas subject to previous ground disturbance which would preclude the potential for impacts associated with projects in an undeveloped area, such as open space, to occur. Pursuant to Municipal Code Section 22.87.020, all development is required to comply with Storm Water Runoff Requirements applicable to the proposed development as provided by the City's Storm Water Best Management Practice Guidance Manual (City of Santa Barbara 2022f). The purpose of the Storm Water BMP Guidance Manual is to provide guidelines for the reduction of non-point source pollutant discharges. New stormwater infrastructure associated with individual residential projects would be required to implement the City's Stormwater Management Program, including LID features included in the Storm Water BMP Guidance Manual, which include features such as vegetated swales, rainwater gardens, or pervious pavement that would minimize environmental impacts to water quality associated with implementation of development forecasted in accordance with the Housing Plan (City of Santa Barbara 2020b). Although development forecasted in accordance with the Housing Plan could result in implementation of new stormwater infrastructure, new stormwater infrastructure would be implemented in accordance with applicable City and State regulations which would reduce substantial environmental effects to the maximum extent feasible. Therefore, this impact would be less than significant.

Electric Power, Natural Gas, and Telecommunications

The City of Santa Barbara 2024 Climate Action Plan includes measures to discourage the installation of natural gas infrastructure in newly constructed buildings (City of Santa Barbara 2024a). Housing projects which redevelop existing buildings with natural gas connections are anticipated to use the existing natural gas infrastructure at these sites and therefore would not necessitate substantial new natural gas infrastructure. Therefore, impacts associated with new or expanded natural gas facilities would be less than significant.

Projected residential development in accordance with the Housing Plan would occur on sites which are generally developed or surrounded by existing development served by existing electrical infrastructure, and development facilitated by the Housing Plan would have access to electrical infrastructure and would not require the installation of substantial electric infrastructure to meet electricity demands. Similar to electric infrastructure, development within the city would generally have access to existing infrastructure for cable television, landlines services, internet, and cellular phone service, and would not require new substantial telecommunications infrastructure to be constructed. Pursuant to Municipal Code Section 30.185.340, utilities installation would be required to adhere to set daytime construction hours, the City's Outdoor Lighting Ordinance, and dust control measures that apply to ground disturbing construction activities.

Although development facilitated by the Housing Plan would result in new electric and telecommunications connections, the potential for new infrastructure would not be substantial due to the fact that the Housing Plan would generally result in infill development in locations already served by existing City electric and telecommunications infrastructure. Any new electric and telecommunications connections would be implemented in accordance with applicable City and State regulations. Substantial environmental impacts would be reduced to the maximum extent feasible, resulting in a less than significant impact.

Mitigation Measures

Implementation of Mitigation Measures AQ-1, CUL-1, CUL-2, CUL-3, HAZ-1, HAZ-2, HAZ-3, N-1, and N-2, which require the use of California Air Resources Board-certified Tier 3 or higher emissions standards, completion of archaeological resource reports and tribal outreach, completion of an environmental site assessment, and implementation of construction noise management plans and vibration control plans.

Significance After Mitigation

Potential impacts of installing water and sewer infrastructure, such as water and sewer mains and laterals, associated with residential projects facilitated by the Housing Plan would be similar to potential impacts identified in Section 4.2, *Air Quality*, Section 4.4, *Cultural and Tribal Cultural Resources*, Section 4.6, *Hazards and Hazardous Materials*, and Section 4.7, *Noise*. With implementation of Mitigation Measures AQ-1, CUL-1, CUL-2, CUL-3, HAZ-1, HAZ-2, HAZ-3, N-1, and N-2, the potential impacts of construction new water and sewer infrastructure associated with residential development would be reduced to a less than significant level.

Threshold 2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 PROJECTED DEVELOPMENT FORECASTED IN ACCORDANCE WITH THE HOUSING PLAN WOULD INCREASE WATER DEMAND, BUT WOULD NOT EXCEED THE PROJECTIONS OF THE ENHANCED URBAN WATER MANAGEMENT PLAN SUCH THAT A WATER SHORTAGE WOULD OCCUR. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

New residential growth forecasted in accordance with the Housing Plan would increase the population of the City, resulting in a corresponding increase in citywide water demand overall. As discussed in Section 3, *Project Description*, the Housing Plan would primarily promote residential development consisting of multi-family and mixed-use projects. The City relies on water demand factors as a basis for projecting water demand based on various land uses in the City (WSC 2021). The City separates residential land uses into single family and multi-family categories, and assigns different projected water demands to both categories. Because development facilitated by the Housing Plan would primarily occur within high-density areas consistent with land use designations which would allow multi-family residential development, the multi-family water demand factor of 0.15 AFY per dwelling unit is utilized for the purposes of this analysis (WSC 2021).

The water demand anticipated by the City's EUWMP is based on growth which includes the construction of 227 housing units per year through the year 2050. As described in Section 3, *Project Description*, this EIR analyzes the development of up to 8,001 housing units through 2035. From the years 2023 to 2035, the EUWMP anticipates 2,724 housing units would be constructed.⁴ Table 4.10-4 shows the water demand anticipated from the Housing Plan, by the EUWMP, and the Housing Plan's water demand not accounted for in the EUWMP.

⁴ 12 years * 227 housing units per year = 2,724 housing units.

Table 4.10-4 Housing Plan Water Demand Exceeding EUWMP Projections

Housing Units	Water Demand Factor	Water Demand (acre feet per year)
8,001 (Housing Plan)	0.15 acre-feet per year	1,200.15
2,724 (Anticipated by the EUWMP)	0.15 acre-feet per year	408.60
5,277 (Difference from the EUWMP)	Housing Plan Water Demand Exceeding EUWMP Projections	791.55

Source: WSC 2021

As shown in Table 4.10-4, using the City’s multi-family water demand factor of 0.15 AFY, the total water demand anticipated by new residential growth forecasted in accordance with the Housing Plan would be 1,200.15 AFY;⁵ however, only 791.55 AFY of this water demand is not accounted for in the EUWMP by 2035.⁶

Table 4.10-5 2035 Water Supply and Demand Projections with Housing Plan

Year 2035 Projections	Normal Year	Extended Drought Year
EUWMP Water Supply Total	22,530 AFY	13,900 AFY
EUWMP Estimated Water Demand (based on 2,724 additional units)	14,580 AFY	11,660 AFY
EUWMP Estimated Surplus	7,950 AFY	2,240 AFY
Demand over EUWMP from RHNA (additional 5,277 units)	792 AFY	792 AFY
Adjusted Total Water Demand	15,372 AFY	12,452 AFY
Water Surplus Adjusted with Housing Plan	7,158 AFY	1,448 AFY

Source: WSC 2021; City of Santa Barbara 2024b

As shown in Table 4.10-5, the City’s projected water demand in a normal year in 2035 is 14,580 AF, while the City’s projected water supply is 22,530 AF, resulting in a projected surplus of 7,950 AF. The increased water demand from projected residential development in accordance with the Housing Plan would not result in water supplies being depleted such that a water supply deficit would occur. Therefore, increased residential water demand that could result from the Housing Plan would not impact existing City water supplies during normal water years, and a substantial surplus would remain.

The EUWMP projects the City’s water supply during drought periods to be less than the City’s water supply during normal years. As shown in Table 4.10-3, the lowest anticipated supply during a drought period, projected in the year 2035, would be 13,900 AF. In the EUWMP’s 2035 scenario, the available water surplus is the lowest of all projections, with an estimated surplus of 2,240 AF. The estimated increase in water demand from new residential growth forecasted in accordance with the Housing Plan of 791.55 AF would result in a surplus of 1,448 AF, which would not exceed the available water surplus forecasted in EUWMP projections. Accordingly, water supplies would serve increased water demand in accordance with the Housing Plan under single dry year and multiple dry year drought scenarios. Therefore, this impact would be less than significant.

⁵ 0.15 AFY * 8,001 housing units = 1,200.15 AFY

⁶ 0.15 AFY * 5,277 housing units = 791.55 AFY

Mitigation Measures

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

Threshold 3: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact UTIL-3 PROJECTED DEVELOPMENT FORECASTED IN ACCORDANCE WITH THE HOUSING PLAN WOULD RESULT IN AN INCREASE IN WASTEWATER GENERATION; HOWEVER, THIS INCREASE WOULD NOT EXCEED THE DESIGN CAPACITY OF THE EL ESTERO WATER RESOURCE CENTER. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

New residential development facilitated by the Housing Plan would result in increased wastewater generation. The City typically assumes 77-87 percent of water demand from new development is converted into wastewater (with the remainder retained onsite for landscaping). Consistent with this standard practice, wastewater generation is assumed to be approximately 87 percent of total increased water demand. As described in Impact UTIL-2 and Table 4.10-4, the total water demand anticipated from the Housing Plan is approximately 1,200.15 AFY. Approximately 87 percent of 1,200.15 AFY is equivalent to an annual wastewater generation rate of 1,044.13 AFY, or 0.93 MGD.⁷ As stated in Section 4.10.1, *Environmental Setting*, El Estero WRC has a design capacity of 11 MGD and a long-term average flow of 6.0 MGD. The estimated increase of 0.93 MGD to existing wastewater treatment commitments that would result from new residential development facilitated by the Housing Plan would increase the long-term average flow by approximately 15.5 percent and would not exceed the design capacity of El Estero WRC. Therefore, the Housing Plan would be accommodated by sufficient existing wastewater treatment capacity at El Estero WRC. As described in Impact UTIL-1, while existing sewer lines may be required to be replaced to address future capacity needs, these replacements would be subject to the requirements of the City's Municipal Code and subsequent CEQA review, which would ensure potential adverse environmental effects associated with their installation are minimized. Therefore, this impact would be less than significant.

Mitigation Measures

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

⁷ $1,200.15 \text{ AFY} \times 0.87 = 1,044.13 \text{ AFY}$ $(325,851.4 \text{ gallons} / 1 \text{ AFY}) = 340,231,222 \text{ gallons per year} / 365 \text{ days} = 932,140.3 \text{ gallons per day} / 1,000,000 = 0.93 \text{ MGD}$

Threshold 4: Would the project 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?

Threshold 5: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-4 NEW RESIDENTIAL DEVELOPMENT FORECASTED IN ACCORDANCE WITH THE HOUSING PLAN WOULD NOT GENERATE SOLID WASTE THAT WOULD EXCEED THE CAPACITY OF LOCAL INFRASTRUCTURE OR OTHERWISE CONFLICT WITH FEDERAL, STATE, OR LOCAL SOLID WASTE MANAGEMENT AND REDUCTION STATUTES OR REGULATION. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

New residential development facilitated by the Housing Plan would result in an increase in construction and operational solid waste generation and waste disposal. The Tajiguas Landfill has a maximum permitted daily throughput of 1,500 tons per day and a remaining capacity of approximately 4,336,335 cubic yards. The County of Santa Barbara estimates a residential per capita waste generation rate of 0.95 tons/year for projects in Santa Barbara County which is used for the purpose of this analysis to estimate anticipated solid waste generation from the Housing Plan (County of Santa Barbara 2021). Assembly Bill 939 and Assembly Bill 341 set a standard of at least 75 percent solid waste diversion from landfills. City requirements, including the Construction Demolition Ordinance (Municipal Code 7.18), implement the requirements of Assembly Bill 939 and Assembly Bill 341. In addition to these requirements, Assembly Bill 1826 mandates multi-family complexes consisting of five or more units to recycle organic waste. Pursuant to the City of Santa Barbara Municipal Code Chapter 7.16, all single and multi-family residential properties must subscribe to the collection services provided by a franchise waste hauler for solid waste, separated organic waste, and source separated recycled material (City of Santa Barbara 2022f).

As a result of City and State waste diversion requirements that would apply to development facilitated by the Housing Plan, a minimum of 75 percent of solid waste would be diverted from landfills. As described in Section 4.11.7, *Population and Housing*, within Section 4.11, *Effects Found Not to Be Significant*, development forecasted in accordance with the Housing Plan would generate an estimated population increase of approximately 13,309 residents by 2035. Accounting for a mandatory 75 percent waste diversion rate, the anticipated population increase associated with the Housing Plan would result in an annual increase in residential solid waste requiring a landfill capacity of approximately 3,160.9 tons per year, or 8.7 tons per day⁸ by 2035. This increase in solid waste generation represents approximately 0.6 percent of the Tajiguas Landfill's daily maximum throughput which is well within the capacity of the Tajiguas Landfill. Therefore, the Housing Plan would not generate solid waste in excess of existing local infrastructure capacity, and would comply with federal, State, and local management reduction statutes and regulations involving solid waste. This impact would be less than significant.

Mitigation Measures

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

⁸ 13,309 people * 0.95 tons/person/year = 12,643.6 tons/year * 25 percent not diverted = 3,160.9 tons / 365 days = 8.7 tons per day.

4.10.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts together with similar impacts of reasonably anticipated regional projects/programs including the City's Safety Element Update, the City's State Street Master Plan, and the California Department of Transportation's (Caltrans') South Coast Highway 101 High-Occupancy Vehicle Lanes project. The general approach to cumulative impact analysis used in this Program EIR is discussed in Section 4.0, *Environmental Impact Analysis*.

Water

Cumulative growth would increase the demand for water in the City. The EUWMP's projected water demands are based on population projections of the City's service area, anticipated to increase to 104,063 people in 2035 within the entire water service area, and 101,332 for the service area within City limits (City of Santa Barbara 2021a). The anticipated population in the EUWMP is greater than the 2035 population of 99,900 projected by the Santa Barbara County Association of Governments (SBCAG) (SBCAG January 2019). The EUWMP projects there is adequate water supply for a level of growth in the City which is greater than the 2035 growth anticipated by SBCAG. Therefore, adequate water supply would be available to serve the needs of cumulative development in the City's service area through the year 2035 during normal, dry, and multiple dry years. Potential cumulative water demand impacts would be less than significant.

Wastewater

Cumulative growth would increase wastewater generation and demand on the City's existing wastewater collection system and El Estero WRC. The introduction of new wastewater connections as part of cumulative development would be subject to City standards guided by the SSMP and further enforced by the Municipal Code. New wastewater collection connections provided as needed for individual developments would be designed in accordance with the City's Design and Performance Provisions which provide standards based on peak flow rate and development type. Increased peak flow could result in insufficient capacity to the existing downstream collections system. The installation of new wastewater collection sewer main infrastructure would require design review and approval by the City's Department of Public Works. In addition, any localized deficiencies would be adequately addressed by the responsible project at the time of project-specific implementation, in accordance with Municipal Code Title 14. While cumulative growth would increase the need for wastewater treatment, the El Estero WRC has a remaining design capacity of approximately 4.37 MGD after accounting for projected wastewater generation from the Housing Plan. The El Estero WRC has capacity available to treat wastewater generated by reasonably anticipated cumulative development. As a result, potential cumulative wastewater infrastructure impacts would be less than significant.

Stormwater

The City maintains an extensive stormwater drainage system permitted by the SWRCB's MS4 permit. Cumulative development would introduce incremental increases in needs for stormwater conveyance; however, stormwater conveyance would be determined on a project-by-project basis, and all new development in the City is required to demonstrate adequate drainage and stormwater conveyance capacity. Due to the extensive built-out nature of the City, new residential development is not anticipated to introduce substantial new areas of impervious surfaces such that expansion of existing stormwater conveyance infrastructure would be necessary. Implementation of minor additions to stormwater conveyance infrastructure are reviewed by the City on a project-by-project

basis in order to ensure consistency with the MS4 permit. The implementation of minor additions to stormwater conveyance infrastructure would be required to implement LID features pursuant to the City's Storm Water Best Management Practice Guidance Manual which would result in minimal impacts to water quality. Therefore, potential cumulative stormwater infrastructure impacts would be less than significant.

Solid Waste

Cumulative growth would increase solid waste generation in the City and increase the demand of landfill disposal. Based on the existing capacity of the Tajiguas Landfill which has a remaining disposal capacity of 4,336,335 cubic yards and is estimated to remain operational through 2036, sufficient landfill disposal capacity is anticipated to be available to accommodate new residential development forecasted in accordance with the Housing Plan in combination with reasonably anticipated cumulative development. Furthermore, the County of Santa Barbara has proposed the Tajiguas Landfill Capacity Increase Project, which is currently undergoing the process of environmental review. When completed, the Tajiguas Landfill would have an increased landfill capacity to reach a projected refuse disposal filling date of approximately late 2038 (Santa Barbara County Resource Recovery & Waste Management Division 2023).

All regional cumulative development would be subject to applicable federal, State, and local regulations concerning the reduction, reuse, and recycling of solid waste, including the waste diversion requirements associated with Assembly Bill 939 and Assembly Bill 341. The consistency of cumulative development with these waste diversion requirements would substantially reduce solid waste generation requiring landfill disposal. Adherence to existing regulations would ensure cumulative solid waste generation is minimized and the remaining capacity of the Tajiguas Landfill would accommodate cumulative development. Therefore, potential cumulative solid waste impacts would be less than significant.

Telecommunications, Electricity, and Natural Gas

Telecommunications services in Santa Barbara are provided by private companies, including Frontier and Cox Communications, and telecommunications facilities are available throughout the City. Connections for new telecommunications services are implemented on an as-needed basis, in accordance with applicable local, State, and federal regulations. Due to the urbanized nature of the City, there are no anticipated limitations to the availability of telecommunications services which would require the development of substantial telecommunications infrastructure. If implementation of telecommunication improvements would occur, such improvements would be subject to the requirements of Municipal Code Section 30.185.340 and Section 30.185.410. Together, these Municipal Code sections enforce height limits, setbacks, require adherence to specific daytime construction hours, adherence to the City's Outdoor Lighting Ordinance, and implementation of dust control measures. Compliance with applicable City requirements would ensure that installation of minor telecommunication improvements and connections to accommodate cumulative development would be completed in a manner which minimizes environmental effects to the maximum extent feasible. Therefore, potential cumulative impacts associated with telecommunications facilities would be less than significant.

Similar to telecommunications, electricity services, provided by SCE, are available throughout the City. Electricity infrastructure upgrades are provided by SCE as needed to meet electrical needs, in accordance with applicable State and federal regulations. Due to the urbanized nature of Santa Barbara, substantial electric infrastructure is not anticipated to be required in order to serve

cumulative development. Cumulative development would be required to adhere to the City's energy efficiency standards which include installation of Energy Star appliances and providing evidence new buildings meet the State's energy efficiency standards. Adherence to these requirements would further reduce the need for new electrical infrastructure to accommodate cumulative demand. Minor electrical infrastructure upgrades or connections to existing infrastructure would be required to comply with the requirements Municipal Code Section 30.185.340 which requires adherence to daytime construction hours, adherence to the City's Outdoor Lighting Ordinance, and implementation of dust control measures. As a result, minor improvements or additions to electrical infrastructure would be carried out in a manner which minimizes potential adverse environmental impacts to the maximum extent feasible. Therefore, potential cumulative impacts concerning electrical infrastructure would be less than significant.

City of Santa Barbara 2024 Climate Action Plan severely limits the installation of natural gas infrastructure in newly constructed buildings (City of Santa Barbara 2021b). Therefore, natural gas facilities are not anticipated to be constructed to accommodate cumulative development, and potential cumulative impacts associated with natural gas facilities would be less than significant.

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4.11 Effects Found Not to be Significant

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

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

4.11.1 Agriculture and Forestry Resources

Potential Environmental Effects

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

Reasons Why Effects Were Not Found Significant

Agricultural Resources and Williamson Act Contracts

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

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

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

Forestry Resources

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

4.11.2 Energy

Potential Environmental Effects

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

Reasons Why Effects Were Not Found Significant

Consumption of Energy Resources

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

CONSTRUCTION

Energy use during construction activities associated with new housing development would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. In addition, construction contractors would be required to demonstrate compliance with applicable California Air Resource Board (CARB) and Santa Barbara County Air Pollution Control District (APCD) regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would be required to utilize fuel-efficient equipment consistent with State and federal regulations and would comply with State measures to reduce inefficient, wasteful, or unnecessary consumption of energy. Applicable regulatory requirements such as California's Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11), mandate that future infrastructure projects comply with construction waste management practices to divert a minimum of 65 percent of construction and demolition

debris. These practices would result in efficient use of energy during construction of development forecasted in accordance with the Housing Plan. Furthermore, in the interest of both environmental awareness and cost efficiency, construction contractors would not reasonably be expected to utilize fuel in a manner that is wasteful or unnecessary. Future construction activities associated with development forecasted under the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy.

OPERATION

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

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

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

Conflicts with State or Local Plans

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

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

4.11.3 Geology and Soils

Potential Environmental Effects

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

Reasons Why Effects Were Not Found Significant

Earthquake Fault Rupture

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

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

Seismic Groundshaking

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

Liquefaction

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

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

Tsunami

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

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

Geologic or Soil Instability

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

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

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

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

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

Erosion

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

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

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

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

Septic Systems

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

4.11.4 Hydrology and Water Quality

Potential Environmental Effects

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

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

Reasons Why Effects Were Not Found Significant

Surface Water

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

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

Therefore, implementation of the Housing Plan would not substantially alter the existing drainage patterns, substantially increase surface runoff, create runoff water that would exceed the capacity of storm water drainage systems, affect water quality within a creek, or conflict with or obstruct implementation of a water quality control plan. This impact would be less than significant. Also refer to Section 4.3, Biological Resources for further discussion related to impacts to creek resources.

Groundwater

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

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

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

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

Flood Risk

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

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

4.11.5 Land Use and Planning

Potential Environmental Effects

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

Reasons Why Effects Were Not Found Significant

Dividing An Established Community

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

Land Use Conflicts

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

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

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

4.11.6 Mineral Resources

Potential Environmental Effects

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

Reasons Why Effects Were Not Found Significant

Loss of Availability of a Known Mineral Resource

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

Loss of Locally Important Mineral Resource Recovery Site

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

4.11.7 Population and Housing

Potential Environmental Effects

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

Reasons Why Effects Were Not Found Significant

Unplanned Population Growth

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

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

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

Displacement of People or Housing

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

4.11.8 Public Services

Potential Environmental Effects

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

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

Reasons Why Effects Were Not Found Significant

Fire Protection

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

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

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

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

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

Police Protection

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

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

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

Park Services

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

Library Services

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

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

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

4.11.9 Recreation

Potential Environmental Effects

- Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Reasons Why Effects Were Not Found Significant

Physical Deterioration of Existing Recreational Facilities

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

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

New or Expanded Recreational Facilities

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

4.11.10 Wildfire

Potential Environmental Effects

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

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

Reasons Why Effects Were Not Found Significant

Impairment of Emergency Evacuation or Emergency Response Plans

The city includes State designated Very High Fire Hazard Severity Zones in the northeast and northwest portions of the City and local designated High Fire Hazard Areas mainly in areas with land use designations of open space, hillside low density residential, and low density residential, as well

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

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

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

Wildfire Risk from Slope, Prevailing Winds, or Other Factors

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

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

Fire Risk from Installation or Maintenance of Associated Infrastructure

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

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

Exposure to Post-Fire Flooding and Landslides

Wildfire can exacerbate slope failure and landslides. Hillsides can become denuded of vegetation and become unstable, increasing the potential for landslide risks and associated hazards downslope from such landslides. In 2018, the Thomas Fire exacerbated slope failure in the Santa Ynez mountains which triggered a series of mudflows that resulted in 23 deaths and the destruction of more than 100 residences (California Office of Emergency Services 2021). Accordingly, the foothill areas of the city are at risk of mudflows triggered due to post-fire instability. Individual residential development projects located in the foothills would be constructed in accordance with applicable state and local regulations which set standards for structural integrity, erosion control, and defensible space. As discussed in Section 4.11.3, *Geology and Soils*, future development forecasted in accordance with the Housing Plan would be required to comply with the CBC's minimum standards for structural design and site development. As part of standard procedures the SBFD is required to undergo pursuant to the CWPP, following any wildfire that burns into the CWPP plan area a post-fire field assessment shall be conducted by an engineering geologist to identify areas that may be subject to increased risk of post-fire flooding, landslide, or erosion, and any recommendations identified by the geologist to mitigate risks are required to be implemented by the City (City of Santa Barbara 2021f). As described above in the *Impairment of Emergency Evacuation or Emergency Response Plans* discussion, development plans are required to be submitted to the City's Community Development Department for review and approval to ensure that new development has adequate emergency access and escape routes in compliance with existing City and Fire Department regulations. Accordingly, development forecasted under the Housing Element would provide adequate escape routes for residents in the event of a mudflow. As

a result, the Housing Element would not be anticipated to put people or structures at a substantial risk due to mudflow.

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

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

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5 Growth-Inducing Impacts and Other CEQA-Required Discussions

This section discusses growth-inducing impacts, irreversible environmental impacts that would be caused by the project, and other CEQA-required discussions.

5.1 Growth Inducement

CEQA Guidelines Section 15126(d) requires a discussion of a proposed program's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The Housing Plan's growth inducing potential would be considered significant if reasonably foreseeable induced growth could result in significant physical effects in one or more of the issue areas:

- Population growth;
- Economic growth; or
- Removable obstacles to growth.

These issue areas are discussed in Section 5.1.1 through Section 5.1.3.

5.1.1 Population Growth

The State requires that all local governments adequately plan to meet the housing needs of their communities (HCD 2021). The Housing Plan would implement the guidance established in the 6th Cycle Housing Element to meet the City's housing need. The projected population increase in Santa Barbara is not anticipated to exceed the long-term regional population growth anticipated by the Santa Barbara County Association of Governments' 2050 Regional Growth Forecast (2050 RGF). The 2050 RGF estimates a population of 99,900 by 2035; an increase of 13,309 people. The Housing Plan would not induce substantial unplanned population growth in the City, as necessary to meet State housing law requirements.

Given that the State is in an ongoing housing crisis due to an insufficient housing supply, new residential growth under the Housing Plan would contribute to addressing the crisis and meeting the existing and future housing needs of the City. Furthermore, the 6th Cycle Housing Element was certified by HCD in February 2024, demonstrating that proposed programs within the Housing Element would adequately address the housing needs and demands of the City. Approval by the City and certification by HCD ensures that population and housing growth under the Housing Plan would not be substantial or unplanned.

The Housing Plan is intended specifically to guide growth and development in Santa Barbara such that infill development would be prioritized. As described in Section 4.9, *Transportation and Circulation*, Section 4.10, *Utilities and Service Systems*, and Section 4.11.8, *Public Services*, the Housing Plan would not cause substantial growth such that vehicle miles traveled in Santa Barbara would substantially rise, would not require unplanned utility infrastructure, and would not result in substantial environmental effects related to the provision of public service infrastructure. By its

nature, the project is intended to reduce the potential for uncontrolled growth and associated environmental impacts. For the reasons discussed above, residential growth facilitated by the Housing Plan would not lead to such impacts.

5.1.2 Economic Growth

The Housing Plan would result in new temporary employment opportunities during construction of new residential developments. Because construction workers would be expected to be primarily drawn from the existing regional work force, construction would not be growth-inducing from a temporary employment standpoint. The Housing Plan would allow for mixed-use development in the city but would not be expected to result in a direct increase in commercial development. The provision of additional housing in Santa Barbara could lead to an influx of residents and an improved jobs/housing balance, which could indirectly promote economic expansion.

The Regional Housing Needs Allocation (RHNA) designated 44 percent of total housing needs for very-low and low-income residents, as shown in Table 3-1 in Section 3, *Project Description*, and the Housing Plan includes programs, such as amending the City's density bonus program, to encourage development of affordable housing. Therefore, the Housing Plan would promote the development of housing for a range of incomes and minimize the potential for substantial displacement of existing people or housing. As a result, the Housing Plan would not induce substantial economic expansion to the extent that direct physical environmental effects would result.

5.1.3 Removal of Obstacles to Growth

The Housing Plan would prioritize urban infill areas where existing roads, water, and sewer and other utilities are in place and is not anticipated to facilitate unplanned utility extensions. As discussed in Section 4.10, *Utilities and Service Systems*, the Housing Plan would not require major infrastructure extensions into areas not already served by existing facilities. It is possible that site-specific development may require the replacement or upgrade of aging facilities and enhancement of existing infrastructure in key locations. However, the residential growth under the Housing Plan is planned and any required improvements to infrastructure or utilities would not remove obstacles to unplanned growth within Santa Barbara.

5.2 Irreversible Environmental Effects

The CEQA Guidelines require that EIRs contain a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the project.

As discussed in detail in Chapter 3, *Project Description*, the Housing Plan would primarily facilitate infill residential development on developed and underdeveloped sites in the City of Santa Barbara. Construction and operation of new residential development facilitated by the Housing Plan would require an irreversible commitment of construction materials and non-renewable energy resources. Future development would involve the use of building materials and energy, some of which are non-renewable resources, to construct new residential buildings and associated infrastructure and landscaping. However, consumption of these resources would occur with any new development in the region and are not unique to the Housing Plan.

Development facilitated by the Housing Plan would also irreversibly increase local demand for non-renewable energy resources such as petroleum products and natural gas. However, increasingly efficient building design would offset this demand to some degree by reducing energy demands associated with new development. New residential development facilitated by the project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, *California's Energy Efficiency Standards for Residential and Nonresidential Buildings*) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated residential buildings, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture. Consequently, development facilitated by the Housing Plan would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and renewable resources would be less than significant.

Additional vehicle trips associated with residential growth would incrementally increase local traffic and regional air pollutant emissions, and GHG emissions. As discussed in Section 4.2, *Air Quality*, development facilitated by the project would generate air quality emissions; however, the Housing Plan would be consistent with the 2022 Ozone Plan. As discussed in Section 4.5, *Greenhouse Gas Emissions*, development facilitated by the Housing Plan would result in a less than significant impact because the Housing Plan is consistent with the growth assumptions utilized within the City's Climate Action Plan. Section 4.9, *Transportation*, of this EIR concludes that long-term impacts related to additional vehicle miles traveled in Santa Barbara would not exceed regional thresholds and therefore would result in a less than significant impact.

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6 Alternatives

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines provides guidance for the identification and evaluation of project alternatives in an environmental impact report (EIR). CEQA Guidelines Section 15126.5 states: “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The Housing Plan evaluated by this Program Environmental Impact Report (Program EIR) includes programs that would implement the adopted and certified 6th Cycle Housing Element. Alternatives have been selected for analysis based on their ability to reduce or avoid potentially significant impacts of the Housing Plan while still meeting most of the basic project objectives. The Housing Plan would result in potentially significant impacts to air quality, biological resources, cultural and tribal cultural resources, hazards and hazardous materials, and noise that would be mitigated to less than significant levels of impact. As such, this Program EIR examines reasonable alternatives consistent with the requirements of CEQA Guidelines Section 15126.6.

6.1 Alternatives Development and Screening Process

In selecting a range of potential reasonable alternatives to the project, the lead agency shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially reduce one or more of the significant effects. Among the factors that a lead agency may use to eliminate alternatives from detailed consideration are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6[c]).

Unlike a site development project or an update to the general plan initiated by a local agency, the Housing Plan is the implementation plan for the City’s 6th Cycle Housing Element, which was adopted in response to the State-mandated 6th Cycle Regional Housing Needs Assessment (RHNA) that identified a specific number of new housing units the City is required to plan for and accommodate during the 8-year planning period from 2023-2031. As described in Section 3.1, *6th Cycle Housing Element Background*, regional housing needs are determined by the California Department of Housing and Community Development, which decides the numerical housing targets for each regional council of governments, including the Santa Barbara County Association of Governments (SBCAG). Each regional council of governments across the State then allocates the regional housing number (known as the RHNA) to every city and county within its jurisdiction. For the 6th Cycle Housing Element, SBCAG determined that the City’s RHNA is 8,001 housing units.

The RHNA is a targeted housing number; cities and counties are required by State housing law to plan for the RHNA and show that under applicable land use and development standards, there is capacity to accommodate this number of new dwelling units. If the California Department of Housing and Community Development determines that a Housing Element fails to substantially comply with State housing law, there are potentially serious consequences for the public, including limited access to State funding and potential for lawsuits. The City’s Housing Plan is the implementation plan and therefore is integral to ensure the City’s 6th Cycle Housing Element facilitates housing development in compliance with State law. Nevertheless, pursuant to the

requirements of CEQA, alternatives to the Housing Plan were identified and either retained for further analysis or eliminated, as described below.

A screening process to identify the selection of EIR alternatives was completed to determine which alternatives could avoid or reduce significant effects and also feasibly meet the Project Objectives described in Section 3.2 of this Program EIR. The alternatives selection process consisted of the following steps:

- **Step 1:** Review the environmental effects that could occur with the implementation of the Housing Plan and identify possible alternatives to avoid or reduce such impacts. As described in detail in Section 4, no significant and unavoidable impacts have been identified for the Housing Plan.
- **Step 2:** Evaluate each alternative in the context of the following criteria:
 - The extent to which the alternative would avoid or substantially reduce one or more of the identified environmental effects of the Housing Plan;
 - The extent to which the alternative would accomplish most of the Project Objectives described in Section 3.2, *Project Objectives*; and
 - The feasibility of the alternative, taking into account factors such potential to demonstrate the ability to meet the City's RHNA; availability of infrastructure; and consistency with applicable plans, policies, and regulatory limitations such as the SBCAG 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).
- **Step 3:** Determine the suitability of the proposed alternatives for full analysis in the Program EIR based on Steps 1 and 2 above. In the final phase of the screening analysis, the environmental advantages and disadvantages of the remaining alternatives were carefully weighed with respect to their potential for overall environmental advantage, technical feasibility, and consistency with the Project Objectives. Alternatives that did not clearly offer the potential to reduce significant environmental impacts, would not achieve all or most Project Objectives, and/or would not be feasible were rejected from further consideration and analysis. For the Housing Plan, characteristics used to eliminate alternatives from further consideration included:
 - Inability to feasibly implement;
 - Inability to reduce environmental impacts associated with the Housing Plan, and;
 - Inability to meet all or most of the Project Objectives.

As stated in Section 3, *Project Description*, the CEQA objectives for the Housing Plan, are as follows:

- Meet the State-mandated 6th Cycle RHNA for the City.
- Locate housing close to jobs, transit, and services.
- Increase production of deed-restricted affordable housing, and housing for special needs households.
- Streamline and increase predictability in the residential development approval process.
- Implement processes and procedures to comply with state housing laws and regulations.
- Facilitate a variety of housing types and equitable housing access in areas that historically excluded diverse housing opportunities.
- Protect historic, cultural, biological, and other environmental resources.
- Provide financial resources and supportive services for members of the community who need housing assistance.

- Maintain and improve the physical condition of existing housing at all affordability levels.
- Promote greater housing stability for tenants.
- Prioritize permanent housing over other uses where possible.

6.1.1 Alternatives Evaluated in this Program EIR

Included in this analysis are two alternatives, including the CEQA-required “no project” alternative. In addition to the alternatives selected for detailed analysis, other alternatives were considered by the City but ultimately rejected either because they were infeasible or failed to satisfy the basic objectives of the project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project
- Alternative 2: Additional Housing

Table 6-1 provides a summary comparison of the potential development characteristics of the Housing Plan and each of the alternatives considered. It is noted here that Alternative 1, the required “no project” alternative, is not legally feasible for the reasons discussed below. This alternative is analyzed herein solely for the purpose of comparison to the proposed Housing Plan. Detailed descriptions of the alternatives are included in the impact analysis for each alternative. Each alternative is analyzed in Section 6.2 and Section 6.3 to determine whether environmental impacts would be similar to, less than, or greater than those of the preferred scenario in the Housing Plan in Sections 6.2 and 6.3. As required by CEQA, Section 4 includes a discussion of the “environmentally superior alternative” among those studied.

Table 6-1 Comparison of Residential Growth Assumptions for each Project Alternative

Feature	Project: Proposed Housing Plan	Alternative 1: No Project	Alternative 2: Additional Housing
Dwelling Units	8,001	2,760	8,808
Population ¹	99,900	92,284 ²	106,376 ²

¹ Growth assumptions for all alternatives are based on scenarios for projected residential growth between the years 2020 and 2035.

² Population is calculated by multiplying the anticipated dwelling units by the Department of Finance’s estimated average persons per household size of 2.33 for the City of Santa Barbara and summing the calculated value with the City’s population of 85,853 estimated by the Department of Finance for January 1, 2023.

6.1.2 Alternatives Considered but Rejected

The CEQA Guidelines state that an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii), infeasibility, or (iii) inability to avoid significant environmental impacts. (CEQA Guidelines Section 15126.6[a][c].)

Alternatives considered included alternate locations and a range of different potential residential growth scenarios in comparison to the proposed Housing Plan. Several potential alternatives have been rejected on the basis that they are practically infeasible or would fail to accomplish the basic project objectives. Environmental and feasibility constraints, such as historic resources, fire hazard severity zones, and biological resources were considered during the development of the proposed

Housing Plan as well as project alternatives. Alternatives that analyze residential development outside of the City limits or alternatives that evaluate an extended development period horizon are not feasible because the California Department of Housing and Community Development requires the 6th Cycle Housing Element, on which the proposed Housing Plan is based, to accommodate the RHNA assigned to the City of Santa Barbara within the 6th Cycle Housing Element timeframe. Therefore, alternative locations were rejected from further consideration. Reduced potential residential buildout in comparison to the proposed Housing Element were also considered as alternatives; however, alternatives with reduced potential residential growth would not meet the City's RHNA allocation and thus would fail to plan for potential future residential development in Santa Barbara consistent with State housing law.

CEQA Guidelines Section 15126.6(a) states that "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need only examine in detail those that the Lead Agency determines could feasibly attain most of the basic objectives of the Housing Plan. Other alternatives can be considered but are not required to satisfy the requirements of CEQA. Therefore, with the exception of the "no project" alternative described in Section 6.2, this EIR does not consider reduced levels of residential growth in comparison to the proposed Housing Plan and 6th Cycle Housing Element.

6.2 Alternative 1: No Project Alternative

6.2.1 Description

Section 15126.6(e) of the *CEQA Guidelines* requires a "no project" alternative be evaluated in an EIR to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. *CEQA Guidelines* Section 15126.6(e)(3) describes the two general types of no project alternative: (1) when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no project alternative would be the continuation of that plan; and (2) when the project is not a land use/regulatory plan, such as a specific development on an identifiable property, the no project alternative is the circumstance under which that project is not processed (i.e., no development occurs). Because the project is a plan to implement programs in the adopted and certified 6th Cycle Housing Element, the No Project Alternative would result in not implementing the programs within the proposed Housing Plan that are necessary to meet the City's obligations under State housing law, including the requirement to plan for and accommodate the City's RHNA allocation. Therefore, for the purposes of this Program EIR, the No Project Alternative comprises existing development standards and policies contained in the City of Santa Barbara General Plan, Zoning Ordinance, and Coastal Land Use Plan.

Residential development growth under this alternative is anticipated to be generally similar to the existing growth rate of residential development in much of the city but would not implement the programs within the Housing Plan that are necessary to meet the housing needs of current and future City residents.

Growth projected under the No Project Alternative was estimated using the City's 2015-2022 permitting data, which shows an average of 230 housing units have been permitted annually from 2015-2022. For the purposes of this analysis, the number of residential units under the No Project

Alternative is assumed to be equivalent to the average housing units permitted annually from 2015-2022. Accordingly, the increase in residential units from 2023 to 2035 in Santa Barbara would be 2,760. The No Project Alternative would be expected to increase the City's population by approximately 7.5 percent. As a result, the overall rate of residential development and anticipated population growth under the No Project Alternative would be similar to the existing rate of housing production, but would not result in as much housing as the proposed Housing Plan (refer to Table 6-1).

6.2.2 Impact Analysis

a. Aesthetics and Visual Resources

The No Project Alternative would result in a lower rate of residential development than the Housing Plan. Residential development forecasted in accordance with the No Project Alternative would adhere to pre-existing City General Plan, Local Coastal Program, and Municipal Code requirements which regulate building height, setbacks, and lighting, minimizing impacts to aesthetics and visual resources. However, if the State rescinded the City's Housing Element compliance, the No Project Alternative's impact on aesthetics and visual resources would be greater in comparison to the project because applicants could propose development that is inconsistent with General Plan and Zoning regulations. Therefore, the No Project Alternative would result in greater impacts to aesthetics and visual resources than the Housing Plan. Potential impacts to aesthetics and visual resources, while speculative, would have the potential to be significant and unavoidable.

b. Air Quality

The No Project Alternative would result in a lower rate of residential development than the Housing Plan. Potential residential development under the No Project Alternative would be consistent with anticipated population growth in Santa Barbara County Association of Government (SBCAG) 2050 Connected – Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)¹ and the Santa Barbara County Air Pollution Control District (SBCAPCD) 2022 Ozone Plan². Accordingly, the No Project Alternative would not result in a cumulatively considerable net increase of a criteria pollutant for which the South Central Coast Air Basin is in non-attainment because the No Project Alternative would be consistent with the 2022 Ozone Plan. The No Project Alternative would result in reduced impacts for criteria pollutants in comparison to the Housing Plan due to a lower level of anticipated new residential development and associated population growth.

The construction and operation of new residential development under the No Project Alternative would continue to be subject to SBCAPCD'S regulations which would continue to minimize the potential for development to substantially impact sensitive receptors. However, the No Project Alternative would not be required to implement Mitigation Measure AQ-1 and therefore would not require the construction of large residential projects to utilize California Air Resources Board (CARB) Tier 3 or higher equipment. Therefore, the No Project Alternative would result in greater impacts to sensitive receptors, and these impacts would be significant and unavoidable.

¹ Population forecast of 99,900 in 2035.

² Countywide population growth rate from 2018 to 2035 of 11%, using Department of Finance data, similar to SBCAG's Regional Growth Forecast.

c. Biological Resources

The No Project Alternative would result in a lower level of residential development than the Housing Plan. However, due to the absence of objective resource protection standards for certain biological resources for the inland areas of the City in the City's Municipal Code, residential projects outside of the Coastal Zone and subject solely to ministerial review and approval or objective standards per State housing law would continue to have the potential to substantially adversely affect creek and riparian habitats, nesting birds, and oak woodlands. The No Project Alternative would not implement Mitigation Measures BIO-1, BIO-2, and BIO-3 requiring measurable and objective creek protection requirements, riparian vegetation buffers, tree protection standards, and pre-construction bird surveys. The No Project Alternative would have the potential to result in greater impacts to biological resources than the Housing Plan. In the absence of mitigation to reduce these impacts, the No Project Alternative's impact on biological resources would be significant and unavoidable.

d. Cultural and Tribal Cultural Resources

Although the No Project Alternative would result in a lower level of residential development than the Housing Plan, new residential development would continue to occur, including potential development in Santa Barbara's historic districts. Residential development would continue to be subject to State law and the City's Municipal Code requirements, which are intended to minimize impacts to historical resources, Historic Districts, and Landmark Districts. Based on existing policy, future residential development may cause a substantial adverse change in the significance of the City's historic resources. With adoption of AB 130 (2025) and ministerial and streamlined housing approvals under state law, unevaluated structures may be redeveloped without the City's determination of historic significance. While the No Project Alternative would result in a lower level of residential development than the Housing Plan, this alternative would not implement Mitigation Measure CUL-1 to identify potential historic resources, and the No Project Alternative would result in greater impacts to historic resources compared to the Housing Plan. Impacts would be significant and unavoidable.

Under the No Project Alternative, new residential development outside of the Coastal Zone and subject solely to ministerial review and approval are not subject to the City's MEA Guidelines for Archaeological Resources. This development would continue to have the potential to result in disturbance of subsurface archaeological resources due to ground-disturbing activities such as grading and construction. The No Project Alternative would not implement Mitigation Measures CUL-2 and CUL-3 to require review of projects within a City-delineated archaeological sensitivity area prior to ground disturbing activities, including completion of a Phase I Archaeological Resources Report, if applicable, and tribal consultation. As a result, the No Project Alternative would have greater potential impacts to archaeological resources than the Housing Plan. In the absence of mitigation to reduce this impact, the No Project Alternative's impact on archaeological resources would be significant and unavoidable.

As described above, the No Project Alternative would not implement Mitigation Measures CUL-2 and CUL-3; therefore, projects subject solely to ministerial review and approval or objective standards could result in the disturbance of tribal cultural resources because no tribal consultation processes are required unless specifically required in State housing law. As a result, the No Project Alternative would have greater potential impacts to tribal cultural resources than the Housing Plan. In the absence of mitigation to reduce this impact, the No Project Alternative's impact on tribal cultural resources would be significant and unavoidable.

e. Greenhouse Gas Emissions

The No Project Alternative would result in a lower level of residential development than the Housing Plan, which would reduce potential greenhouse gas emissions from construction and residential operational activities. Similar to the proposed project, the No Project Alternative does not propose any changes in land use to meet the City's RHNA allocation and therefore would be consistent with the existing land use designations and zoning implemented by the City. Therefore, the No Project Alternative would meet the criteria presented within the *Master Environmental Assessment Guidelines for Greenhouse Gas Emissions Analysis*, for consistency with the CAP's analysis of communitywide GHG emissions. However, if projected housing growth is not met within Santa Barbara under the No Project Alternative, it is anticipated GHG emissions from vehicle travel would increase as residential populations would commute to work and school in Santa Barbara from longer distances if they are unable to secure housing within the city. As a result, the No Project Alternative would have incrementally greater GHG impacts compared to the Housing Plan, but this impact would be expected to remain less than significant.

f. Hazards and Hazardous Materials

Similar to the Housing Plan, due to the presence of Clean Up Program sites, sites containing potentially contaminated artificial fill material, and sites with building materials containing hazardous materials throughout the city, the No Project Alternative would have potential to result in the release of hazardous materials to the environment. Unlike the Housing Plan, the No Project Alternative would not implement Mitigation Measures HAZ-1 through HAZ-3 and therefore would not implement requirements for Phase I Environmental Site Assessments, implementation of standard procedures for the inadvertent discovery of contamination, and implementation of standard procedures for inadvertent discovery of oil wells. Accordingly, the No Project Alternative would result in a greater risk of release of hazardous materials and contamination. Therefore, the No Project Alternative would have greater impacts compared to the Housing Plan. Potential impacts associated with hazardous materials and contamination, while speculative, would have the potential to be significant and unavoidable.

g. Noise

The No Project Alternative would result in a lower level of residential development than the Housing Plan, resulting in less construction noise and groundborne vibration. However, the No Project Alternative would not implement Mitigation Measures N-1, N-2 or N-3. Therefore, the No Project Alternative would not include policies requiring implementation of construction noise management plans or vibration control plans. As a result, the No Project Alternative would have the potential to result in greater impacts than the Housing Plan related to construction noise and groundborne vibration. Potential impacts from construction noise and groundborne vibration, while speculative, would have the potential to be significant and unavoidable.

As a result of the reduced residential development associated with the No Project Alternative, this alternative would result in less potential for noise from HVAC equipment, hauling trucks, outdoor activities, and traffic noise. Therefore, the No Project Alternative would have fewer potential impacts on operational noise compared to the Housing Plan. These impacts would remain less than significant.

h. Schools

The No Project Alternative would result in a lower level of residential development than the Housing Plan, which would result in less student population growth. Therefore, the No Project Alternative would have fewer impacts on schools than the Housing Plan. New residential development would continue to be required to pay school impact fees which, pursuant to Senate Bill 50 (1998), reduce potential impacts associated with the future development of individual residential projects to a less than significant level. Therefore, the No Project Alternative's impact on public school facilities would remain less than significant.

i. Transportation and Circulation

The No Project Alternative would result in a lower level of residential development than the Housing Plan. The No Project Alternative would be expected to increase the City's population by approximately 7.5 percent while the Housing Plan would have the potential to increase the City's population by approximately 16 percent. Accordingly, the No Project Alternative would result in fewer vehicle trips within the City compared to the Housing Plan. Vehicle Miles Traveled (VMT) is a transportation analysis metric that represents all trips beginning or ending in the city. If the projected housing growth is not met within the city, it is anticipated that regional VMT will increase as residential populations would commute to work and school from longer distances. Although trip lengths under the No Project Alternative are anticipated to result in a higher VMT than the Housing Plan, the overall per capita VMT is expected to remain below the threshold of significance identified in the Housing Plan. Although the No Project Alternative may result in increased per capita VMT in comparison to the Housing Plan, this impact would remain less than significant.

j. Utilities and Service Systems

The No Project Alternative would result in a lower level of residential development than the Housing Plan, which would reduce the demand on utilities and service systems. The No Project Alternative would result in fewer utility connections, lower water demand, lower wastewater infrastructure demand, lower electricity demand, and reduced telecommunications needs. As a result, the No Project Alternative would result in fewer potential utilities and service systems impacts. The No Project Alternative's impacts on utilities and service systems would remain less than significant.

6.3 Alternative 2: Additional Housing

6.3.1 Description

This alternative assumes the implementation of the Housing Plan increases density and results in more residential development than anticipated under the Housing Plan as proposed in Section 3, *Project Description*, (up to 807 additional dwelling units; refer to discussion below and Table 6-1). The accelerated housing production assumed under this alternative would result in the growth of 8,808 residential units by the horizon year 2035. This includes the City's RHNA Allocation with an 11 percent buffer. The Additional Housing Alternative accounts for additional growth that would result from expansion of programs HE-1: Facilitate Conversion of Nonresidential Buildings to Housing, HE-10: Multi-Unit Housing Program, and HE-12: Prioritize Deed-Restricted Affordable Housing, as described below. This alternative would provide the opportunity to increase the percentage of affordable units along with a moderate increase in the number of housing units overall. In addition,

this alternative assumes that the City would pursue additional measures to facilitate additional housing, including the following:

- **Require Minimum Density.** Currently, areas zoned for medium high and high density can be developed at lower densities. The City could adopt a minimum density requirement to require minimum densities for residential development.
- **Increase Density.** Currently, the density range in the AUD Program Medium-High Density tier is 15-27 dwelling units per acre (du/ac). The City would increase this to 20-27 du/ac or higher. The state deems 20 units per acre as the “default density” for the City of Santa Barbara to accommodate housing for lower income households.
- **Increase Density in Targeted Areas.** The City would change densities in areas such as State Street from Arrellaga St to Mission St, De la Vina St from Constance to State Street, and State Street from De la Vina to Calle Real from Medium High Density Residential (15-27 du/ac) to High Density Residential (28-36 du/ac).

Additional measures may be needed in order to attain the projected additional housing units under this Alternative.

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.

6.3.2 Impact Analysis

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.

a. Aesthetics and Visual Resources

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan, which could alter the visual character of the city. Similar to the Housing Plan, new residential development within transit priority areas may be exempt from a significant impact determination under CEQA pursuant to Public Resources Code Section 21099 and would continue to be subject to review by the City's Design Review boards and commissions. New residential development would still be subject to development standards within the Santa Barbara Municipal Code, such as building heights and setbacks, and transitional height requirements. 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.

In order to facilitate the construction of increased units consistent with state mandates, there may need to be changes in standards that could allow for buildings with greater massing or other design changes, which could result in more visual change to neighborhoods in Santa Barbara in comparison to the Housing Plan. 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. In addition, due to the increase in residential development under the Additional Housing Alternative, this alternative would introduce more sources of light and glare in comparison to the Housing Plan. Although individual development projects would be required to comply with City design standards and lighting requirements, which would reduce the potential for visual incompatibility or light or glare to affect surrounding areas, the Additional Housing Alternative would result in a greater amount of visual changes and an increase in overall ambient lighting than the Housing Plan. Therefore, the Additional Housing Alternative would result in greater impacts than the Housing Plan, though impacts would remain less than significant.

b. Air Quality

The Additional Housing Alternative is anticipated to result in residential development of 8,808 residential units, which could increase the total City population to 106,376 people in 2035. Unlike the Housing Plan, the population increase from the Additional Housing Alternative would not be consistent with SBCAG's 2050 Regional Growth Forecast, and therefore would not be consistent with the 2022 Ozone Plan. 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. As a result, the Additional Housing Alternative would result in a greater impact than the Housing Plan. As with the Housing Plan, the potential for the Additional Housing Alternative to result in a cumulatively considerable net increase of criteria pollutants in the South Central Coast Air

Basin (SCCAB) is evaluated based on the Additional Housing Alternative's consistency with the 2022 Ozone Plan. 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. Accordingly, the Additional Housing Alternative would have the potential to result in a cumulatively considerable net increase of a criteria pollutant for which the SCCAB is in non-attainment because the Additional Housing Alternative would not be consistent with the 2022 Ozone Plan. This impact would be significant and unavoidable. 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.

The Additional Housing Alternative's higher residential buildout potential would result in increased localized emissions compared to the Housing Plan. However, similar to the Housing Plan, construction and operation of development forecasted under the Additional Housing Alternative would be subject to SBCAPCD regulations which would continue to minimize the potential for development to substantially impact sensitive receptors. In addition, the Additional Housing Alternative would be required to implement Mitigation Measure AQ-1 and, therefore, would require large residential projects to utilize CARB Tier 4 equipment during construction as feasible. Therefore, the Additional Housing Alternative's impacts on sensitive receptors would remain less than significant with mitigation incorporated.

c. Biological Resources

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan. As a result, this alternative may result in more residential development in proximity to creek habitat, riparian habitat, nesting bird habitat, oak woodland, or other biologically sensitive locations. Therefore, the Additional Housing Alternative would result in incrementally greater impacts to biological resources than the Housing Plan. Similar to the Housing Plan, the Additional Housing Alternative would be required to implement Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 to reduce potential impacts to creek habitat, riparian habitat, nesting birds, and oak woodland. Similar to the Housing Plan, these mitigation measures would reduce the Additional Housing Alternative's impact on biological resources to a less than significant level.

d. Cultural and Tribal Cultural Resources

The Additional Housing Alternative would have a higher level of residential development than the Housing Plan; some of which would be concentrated downtown, which includes El Pueblo Viejo Landmark District. Residential development would continue to be subject to State law and the City's Municipal Code requirements, which are intended to minimize impacts to historical resources, Historic Districts, and Landmark Districts. The Additional Housing Alternative would result in incrementally greater impacts on historical resources compared to the Housing Plan, but these impacts would remain less than significant.

The Additional Housing Alternative would be expected to result in more ground-disturbing activity than the Housing Plan; however, the residential development would occur in areas subject to previous disturbance, which would lower the potential for the Additional Housing Alternative to disturb subsurface archaeological resources. Residential development subject to discretionary review and approval must comply with the City's Master Environmental Assessment (MEA) Guidelines which requires review of projects located in a City-delineated archaeological sensitivity

area prior to ground-disturbing activities. Similar to the Housing Plan, the Additional Housing Alternative would be required to implement Mitigation Measures CUL-1, CUL-2, and CUL-3 to identify potential historic resources and amend the Municipal Code with requirements applicable to all projects within a City-delineated archaeological sensitivity area; this may include completion of a Phase I Archaeological Resources Report and tribal consultation, if applicable. With implementation of Mitigation Measures CUL-1, CUL-2, and CUL-3, the Additional Housing Alternative's impacts on archaeological and tribal cultural resources would remain less than significant.

e. Greenhouse Gas Emissions

The Additional Housing Alternative would have a higher level of residential development than the Housing Plan, which would increase potential greenhouse gas emissions from construction and operation of individual residential projects. As a result, the Additional Housing Alternative would result in incrementally higher greenhouse gas emissions than the Housing Plan. The increased housing constructed by the Additional Housing Alternative may require increased residential densities exceeding existing maximum allowed densities. 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, which would be a significant and unavoidable impact.

f. Hazards and Hazardous Materials

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan, resulting in more construction activity and use of household hazardous materials. Accordingly, the Additional Housing Alternative would have a higher likelihood of resulting in impacts related to the accidental release of hazardous materials. Similar to the Housing Plan, new residential development would be subject to federal, State, and local requirements that minimize the risk of exposure to hazardous materials, ensure adequate emergency access is provided, and minimize fire risk. In addition, the Additional Housing Alternative would implement Mitigation Measures HAZ-1 through HAZ-3 requiring Phase I Environmental Site Assessments, implementation of standard procedures for the inadvertent discovery of contamination, and implementation of standard procedures for inadvertent discovery of oil wells. Because the Additional Housing Alternative would result in increased use of hazardous materials, this alternative would have the potential to result in greater impacts compared to the Housing Plan, but these impacts would remain less than significant with mitigation incorporated.

g. Noise

The Additional Housing Alternative would result in more construction noise and groundborne vibration than the Housing Plan due to the increased residential development under this alternative. Therefore, the Additional Housing Alternative would have greater impacts related to construction noise and groundborne vibration than the Housing Plan. Similar to the Housing Plan, the Additional Housing Alternative would be required to implement Mitigation Measures N-1, N-2, and N-3 to reduce construction noise. With implementation of Mitigation Measures N-1, N-2, and N-3, the Additional Housing Alternative's impact on construction noise and groundborne vibration would remain less than significant.

The increased number of housing units and increased population under the Additional Housing Alternative would lead to more operational noise associated with HVAC equipment, hauling trucks, outdoor activities, traffic noise, and other sources of ambient noise in the urban environment. Noise from stationary equipment and noise from outdoor activities would be subject to Municipal Code requirements which would limit the potential for stationary equipment and outdoor activities associated with residences to result in a substantial permanent increase in ambient noise levels. Increased delivery trucks and trash hauling trucks would be required to abide by existing State law which limits the noise these vehicles can generate. The Additional Housing Alternative would not result in a doubling of traffic compared to existing conditions and therefore would not result in a perceptible noise increase of 3 dBA or more. As a result, the Additional Housing Alternative's impacts related to operational noise would remain less than significant.

h. Schools

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan, and would therefore generate a greater number of students within the City's school districts. This alternative would result in a student population growth of approximately 2,809 students (based on a student generation factor of 0.3189 students per household and a projected 8,808 new housing units) which is 258 more students anticipated under the Housing Plan. 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.

While the Additional Housing Alternative would place a greater number of students into schools serving Santa Barbara, which would increase operational strain on some districts, new residential development would continue to be required to pay developer impact fees. 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. Therefore, the Additional Housing Alternative's impact on public school facilities would be less than significant, as they are for the Housing Plan.

i. Transportation and Circulation

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan. The Additional Housing Alternative would increase the City's population by approximately 24 percent while the Housing Plan would increase the City's population by approximately 16 percent. The Additional Housing Alternative would increase overall VMT in the City compared to the Housing Plan due to the increased population. However, based on VMT modeling results for the Housing Plan (Appendix F) and anticipated increased residential densities under the Additional Housing Alternative, per capita VMT for this alternative would be slightly lower than the Housing Plan due to reductions in trip lengths that result from a more balanced ratio of residents to local employers and increased residential density in proximity to existing commercial areas. The overall per capita VMT is expected to remain below the threshold of significance identified for the Housing Plan. Therefore, the Additional Housing Alternative is anticipated to result in less per capita VMT impacts, and these impacts would remain less than significant.

j. Utilities and Service Systems

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan, which would increase the demand on utilities and service systems. The Additional Housing Alternative would result in more utility connections, increased water demand, increased wastewater generation, increased electricity demand, and increased telecommunications needs in comparison to the Housing Plan. As a result, the Additional Housing Alternative would result in greater potential utilities and service systems impacts in comparison to the Housing Plan. Using the City's multi-family water demand factor, the Additional Housing Alternative would result in increased water demand of approximately 913 acre-feet per year above 2035 demand projected in the Enhanced Urban Water Management Plan (refer to water demand factors in Table 4.10-4). However, supply projections in the EUWMP support the City's ability to meet these additional demands (Hoffenberg 2023). Consistent with the wastewater generation rates presented in Section 4.10, *Utilities and Service Systems*, wastewater generation is assumed to be approximately 87 percent of total increased water demand. Accordingly, the Additional Housing Alternative is also anticipated to increase wastewater generation in the City by an additional 1.1 million gallons per day which would not exceed the design capacity of El Estero Water Resource Center. Although the Additional Housing Alternative would have a greater impact on utilities and service systems than the Housing Plan, the Additional Housing Alternative's impact would remain less than significant.

6.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse environmental impacts associated with the project or program. The Lead Agency is not, however, obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives and/or is infeasible (CEQA Guidelines Section 15126.6[a], [c] and [f]). In

many cases, the No Project alternative would have the fewest or least intense impacts. However, the CEQA Guidelines Section 15126.6(e)(2) states that “[i]f the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

For the implementation of a planning program such as the Housing Plan, there may not be a clear Environmentally Superior Alternative. Selection of the Environmentally Superior Alternative may be difficult, especially when the differences between the impacts of the alternatives involve trade-offs between types of impacts. An alternative may reduce environmental impacts to certain resource areas and increase impacts to other resource areas as compared to the proposed project, while another alternative may reduce different environmental impacts. Although CEQA does not provide specific guidance in this matter, where an alternative is anticipated to result in reduced impacts for a majority of resource areas and/or substantially reduced impacts in especially critical resource areas, this can support a finding that the alternative is environmentally superior. In such instances, the EIR may disclose the differences between the alternatives and identify how each alternative may be superior. The Lead Agency retains the authority to identify the Environmentally Superior Alternative based on the evidence in the EIR, agency and public input, Lead Agency standards and policies, and the Lead Agency’s independent decision-making.

Table 6-2 indicates whether each alternative’s environmental impact is greater than, less than, or similar to that of the Housing Plan for each of the issue areas studied. Based on the alternatives analysis provided in Section 6.2.2 and Section 6.3.2, the Housing Plan would be the environmentally superior to either of the two evaluated project alternatives. The Housing Plan would result in the fewest impacts to air quality, biological resources, archaeological resources, tribal cultural resources, operational GHG emissions, hazardous materials, noise, and VMT compared to other alternatives. The Housing Plan’s potentially significant impacts to air quality, biological resources, archaeological resources, tribal cultural resources, hazards and hazardous materials, and noise would be mitigated to less than significant levels of impact. Ultimately, the Housing Plan would result in an overall reduction in the severity of impacts in comparison to the two evaluated project alternatives.

Unlike the Housing Plan, the No Project Alternative would not implement mitigation measures designed to reduce impacts from residential development to air quality, biological resources, archaeological and tribal cultural resources, hazardous materials, and noise. Therefore, the No Project Alternative would result in greater impacts on these environmental issue areas compared to the Housing Plan. The No Project Alternative also would not implement programs designed to meet Santa Barbara’s affordable housing needs, discourage conversion of housing to non-residential uses, or provide programmatic CEQA analysis for future environmental review of projects. Furthermore, the No Project Alternative would not be consistent with the City’s 6th Cycle Housing Element, which was adopted to demonstrate the City’s ability to meet its RHNA allocation; therefore, the No Project Alternative would fail to plan for growth in Santa Barbara in compliance with state housing law.

The Additional Housing Alternative is a potential version of the Housing Plan that would provide additional measures and incentives to increase housing production to build up to 8,808 units by 2035. This includes the City’s RHNA Allocation with an 11 percent buffer recommended by the California Department of Housing and Community Development. Aside from additional programs and incentives to increase housing production, the Additional Housing Alternative would include the same programs as the Housing Plan and therefore would meet the project objectives of the Housing Plan. 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. The Additional Housing Alternative would increase adverse environmental effects in nine of the ten issue areas evaluated in this discussion, including potentially significant impacts to air quality and greenhouse gas emissions due to the Additional Housing Alternative's higher residential buildout potential than the Housing Plan.

Therefore, the Housing Plan is identified as the environmentally superior alternative that would fulfill all the project objectives among all project alternatives evaluated in this EIR.

Table 6-2 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: (No Project)	Alternative 2: (Additional Housing)
Aesthetics and Visual Resources	Less than Significant	Significant and Unavoidable ↑	Less than Significant ↑
Air Quality	Less than Significant with Mitigation Incorporated	Significant and Unavoidable ↑	Significant and Unavoidable ↑
Biological Resources	Less than Significant with Mitigation Incorporated	Significant and Unavoidable ↑	Less than Significant with Mitigation Incorporated ↑
Cultural and Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	Significant and Unavoidable ↑	Less than Significant with Mitigation Incorporated ↑
Greenhouse Gas Emissions	Less than Significant	Less than Significant ↑	Significant and Unavoidable ↑
Hazards and Hazardous Materials	Less than Significant with Mitigation Incorporated	Significant and Unavoidable ↑	Less than Significant with Mitigation Incorporated ↑
Noise	Less than Significant with Mitigation Incorporated	Significant and Unavoidable ↑	Less than Significant with Mitigation Incorporated ↑
Schools	Less than Significant	Less than Significant ↓	Less than Significant ↑
Transportation and Circulation	Less than Significant	Less than Significant ↑	Less than Significant ↓
Utilities and Service Systems	Less than Significant	Less than Significant ↓	Less than Significant ↑

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7.2 List of Preparers

This EIR was prepared by the City of Santa Barbara, with the assistance of Rincon Consultants, Inc. Consultant staff involved in the preparation of the EIR are listed below.

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8 Responses to Comments on the Draft EIR

This section includes comments received during the circulation of the Draft Program Environmental Impact Report (EIR) prepared for the implementation of the Housing Plan programs (Housing Plan).

The Draft Program EIR was circulated for a 45-day public review period that began on January 30, 2026 and ended on March 17, 2026. The City of Santa Barbara held a public comment hearing for the Draft Program EIR during a noticed Planning Commission hearing on March 12, 2026. The City received four comment letters on the Draft EIR, in addition to the comments made during the Planning Commission Draft Program EIR Public Comment Hearing, and notes submitted by one Planning Commission member.

The comments and the page number on which each letter or discussion item appears are listed below.

Letter Number and Commenter		Page Number
1	Steve Johnson	8-2
2	Anne Hubbard, Ed.D, Superintendent, Hope Elementary School District	8-4
3	Emily Waddington, Air Quality Specialist, Santa Barbara County Air Pollution Control District	8-10
4	City of Santa Barbara Planning Commission Minutes, March 12, 2026	8-15
5	Brian Barnwell, Planning Commissioner, City of Santa Barbara	8-25
6	Baron Barrera, acting for Heather A. Pert, Environmental Program Manager, South Coast Region, Department of Fish and Wildlife	8-41

The comment letters and responses follow. Each item has been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

Page 4.9-18: “Consistency with RHNA”

A sentence in the middle of paragraph 2 starts with:

“Therefore, the Housing Plan’s **consistency** with SBCAG’s RHNA allocation plan,”

In fact, the Housing Plan is **inconsistent** with RHNA’s allocation plan.

The RHNA allocation for moderate income housing is 1441 units.

Progress to the end of 2024 is 14 units (all deed restricted).

1.1

The EIR should note the inconsistency, and identify a primary cause:

zoning which disfavors moderate income housing. The EIR should further note that the Housing Element fails to accept the recommendation of the Land Use Element (page 11):

“ .. the Priority Housing Overlay could allow additional units above the High Density incentive program if built at 600 square feet”.

The EIR should also note a consequence:

20,000+ commuters 5 days per week, contrary to the goals of the 2050 RTP-SCS.

1.2

Letter 1, Steve Johnson

Commenter: Steve Johnson

Date: February 1, 2026

Response 1.1

The commenter states that the Draft EIR incorrectly implies that the Housing Plan is consistent with the Regional Housing Needs Allocation (RHNA) and notes that the City is not meeting moderate-income RHNA targets. The commenter also requests that the EIR acknowledge zoning as a primary cause, and notes that the Housing Element does not include the Land Use Element suggestion regarding the Priority Housing Overlay and 600-square-foot units.

The City acknowledges the commenter's concern regarding progress toward meeting the moderate-income RHNA category. The Draft EIR reference to "consistency with [Santa Barbara County Association of Governments (SBCAG)] RHNA" refers to the Housing Plan's ability to provide adequate zoning capacity to accommodate the City's RHNA across all income categories, including moderate-income households, consistent with State Housing Element law. This is separate from the rate of actual housing production. Housing production is influenced by factors beyond zoning, including market conditions, construction costs, financing availability, and developer response.

The commenter also references the Land Use Element discussion of the Priority Housing Overlay and potential incentives for 600-square-foot units. City Council ultimately adopted a maximum average unit size larger than 600 square feet for the Priority Housing Overlay with the Average Unit-Size Density Incentive Program Ordinance, although this does not preclude developers from proposing smaller units. Adoption, modification, or rejection of specific policy tools including unit size incentives is a legislative decision of the City Council and is addressed in the Housing Element rather than in the EIR.

To improve clarity, the Final EIR revises the referenced sentence in Section 4.9, *Transportation and Circulation*, Impact TRA-1, to clarify that RHNA consistency is based on adequate sites, zoning capacity, and programs to accommodate housing needs across all income categories rather than realized development outcomes. These clarifications do not change the EIR impact conclusions.

Response 1.2

The commenter states that the EIR should acknowledge that more than 20,000 people commute into the City five days per week, which the commenter believes conflicts with the SBCAG 2050 Regional Transportation Plan-Sustainable Communities Strategy (RTP-SCS).

The City acknowledges the commenter's concern regarding regional commuting patterns. The Final EIR expands discussion in Section 4.9, *Transportation and Circulation*, Impact TRA-1, on regional travel patterns. The Housing Plan concentrates the majority of the new housing units in the Downtown, putting residents closer to major employment centers, and along high transit corridors. Thus, the Housing Plan meets the general objectives of the RTP-SCS. This clarification does not change the EIR impact conclusions.

Letter 2

From: [Anne Hubbard](#)
To: [Housing EIR](#)
Cc: [HSD Board of Trustees](#)
Subject: Public Comment - Draft Housing Plan Program EIR
Date: Tuesday, February 10, 2026 12:09:10 PM
Attachments: [Screenshot 2026-02-10 at 10.06.53 AM.png](#)

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The following is provided as public comment for the Draft Housing Plan Program EIR. The section the comment pertains to is noted in *italics* and identified by page number(s). The public comments are in [blue](#).

(4.8-1) HESD maintains approximately 100 staff and is comprised of three elementary (TK-6) school sites: Monte Vista Elementary, Viejas Valley Elementary, and Hope Elementary.

[HESD currently has 183 staff members, excluding substitutes.](#)

(4.8-2) Between school years 2011-2012 and 2021-2022, the number of students enrolled in the Hope Elementary School District declined by approximately 16.5 percent from 1,001 to 836 (CDE 2023a).

Table 4.8-2 2011-2012 Student Enrollment Comparison

School	2011-2012 Enrollment	Percentage Difference from 2022-2023 Enrollment
Santa Barbara Unified School District	15,326	-9.4%
Hope Elementary School District	1,187	-35.2%
Cold Spring School District	152	21.7%
Montecito Union School District	438	-11.6%

Source: CDE 2023e; SBUSD 2023a; schoolwork 2022; Cold Spring School District 2023; Montecito School District 2022; Hope Elementary School District 2024

[The two figures are different for the 2011-12 year. The verbiage states "1001," but the chart shows "1187." The CDE notes the 2011-12 enrollment as 1001. Current enrollment for the 2025-26 year \(as of 2/10/26\) is 870.](#)

[To use 2021-22 when enrollment was severely impacted by COVID and TK was just being implemented with only 25% of 4-year-olds eligible provides a false picture of enrollment trends. Using 1001 \(CDE reported figure\) and current enrollment of 870, the percentage difference of enrollment is significantly less, only 13.1%. This is a much more accurate representation of enrollment trends. We have been seeing an increase of enrollment with the implementation of full TK and expect it to continue as TK enrollment normalizes. We have already opened enrollment for the 2026-27 year and are seeing a higher enrollment rate for TK than our current TK enrollment.](#)

(4.8-2) Districts retain the ability to transfer students among schools to best utilize the existing physical capacity available in the City.

(4.8-5) Developer Fees (2019)

(4.8-8) Impact SCH-1 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. IMPACTS TO SCHOOLS WOULD BE LESS THAN SIGNIFICANT.

(4.8-8 and 4.8-9) If individual school facilities within a district experience overcrowding, 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 48,001 housing units x 0.3189 (local student generation rate) = 2,551 students. 4.8-8 Environmental Impact Analysis 4.8 Schools Barbara School Board policies. Due to current declining enrollment and the ability to balance enrollment between school facilities, it is not anticipated that the gradual increase in the number of students following implementation of the Housing Plan would exceed the total citywide enrollment capacity of existing public school facilities.

2.3
cont.

Hope School District respectfully disagrees with the City's finding in the Housing Element Environmental Impact Report (EIR) that implementation of the Housing Plan would have "no significant impact" on schools. As a small elementary district serving transitional kindergarten through sixth grade across three campuses, we face unique operational limitations that must be acknowledged in planning efforts of this magnitude.

1. Interdistrict Transfer Constraints Are Ignored

The EIR's assumption that students generated by the proposed housing developments can be absorbed without significant impact is not consistent with the enrollment realities in Santa Barbara. All local districts, including Hope, are community-funded (Basic Aid) and enforce strict interdistrict transfer policies. Transfers are typically only granted for children of employees. This effectively means new students generated within our boundaries must be served by Hope School District, without the ability to redirect overflow elsewhere.

2. Developer Fees Do Not Adequately Mitigate Impact

While the EIR states that developer fees would sufficiently offset any enrollment-related impacts, this is a significant oversimplification. Developer fees are limited in scope and do not generate the level of funding required to construct the additional classrooms or school buildings needed to accommodate growth. For example, the current statutory developer fees would not come close to funding new construction or modernization costs in today's construction climate. Without the projected student growth from new housing developments, Hope School District would plan to retire and demolish outdated portable classrooms that no longer meet long-term educational or safety standards. However, anticipated enrollment increases would require the district to invest in replacing these aging structures with permanent buildings—an unfunded capital obligation not addressed by developer fees or considered in the EIR's impact analysis.

2.4

Furthermore, developer fees do not cover recurring operational costs, such as:

- Hiring and retaining credentialed teachers and support staff
- Expansion of multipurpose facilities (cafeterias, libraries, activity spaces)
- Increased demand for student services (e.g., special education, English learner support)
- Additional parking and traffic circulation needs for staff and parents

3. Compounding Strain on Facilities and Services

Additional enrollment would directly impact student-teacher ratios, specialized instruction space, and essential services. For example, new students would necessitate expanded services in areas such as health, counseling, and nutrition, none of which are funded through developer fees or acknowledged in the EIR's mitigation assumptions.

2.5

Recommendation

We urge the City to revise the EIR's findings in Section 4.8 to reflect that the proposed Housing Plan **would** result in **potentially significant impacts** to local school districts, particularly small, community-funded districts like Hope. A more thorough analysis of actual school capacity, facility limitations, and transfer restrictions must be conducted. Additionally, mitigation strategies beyond basic developer fees—such as direct school impact agreements or capital investment commitments—should be explored and required.

2.6

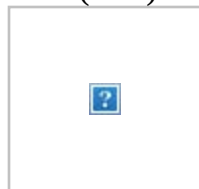
Hope School District is committed to serving all children within our community but cannot do so effectively without thoughtful coordination and support from our city planning partners.

Sincerely,

Dr. Anne Hubbard, Superintendent
Dr. Frann Wageneck, Board President
Mr. Joe Selzler, Board Clerk
Mr. Dan Cunnison, Board Member
Dr. Kelly Keogh, Board Member
Erik Vasquez, Board Member

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Anne Hubbard, Ed.D.
Superintendent
Hope Elementary School District
Office: (805) 682-2564
Fax: (805) 687-7954



Letter 2, Hope Elementary School District

Commenter: Anne Hubbard, Ed.D, Superintendent, representing Hope Elementary School District

Date: February 10, 2026

Response 2.1

The commenter, Hope Elementary School District (HESD), states that the Draft EIR includes inaccurate staffing information and provides updated information that the District currently has 183 staff members.

The City appreciates the updated information, and the Final EIR updates the text and tables to reflect the current total staffing numbers in Section 4.8, *Schools*, Table 4.8-1 and 4.8.1, Environmental Setting. This updated data does not change the EIR impact conclusions.

Response 2.2

HESD states that the Draft EIR does not fully represent enrollment trends by relying on 2021–2022 data, due to factors affected by the COVID-19 pandemic and implementation of transitional kindergarten (TK). HESD provides updated enrollment information and notes that current enrollment is 870 students as of February 2026.

The City appreciates the updated information. The Draft EIR had relied on the most recent, publicly available data at the time of EIR preparation. The Final EIR updates the data in Section 4.8, *Schools*, 4.8.1, Environmental Setting, with the more recent district-reported enrollment numbers provided in the comment. This updated information does not change the EIR impact conclusions.

Response 2.3

HESD expresses concern with the Draft EIR’s conclusion that impacts to schools would be less than significant. The commenter also notes that the Draft EIR analysis may not fully reflect enrollment practices within community funded (Basic Aid) districts such as HESD, where restrict interdistrict transfers are limited except in certain circumstances, such as children of employees.

The City acknowledges HESD’s concern regarding increased student enrollment generation under the Housing Plan. Under CEQA, school impacts are evaluated based on whether a project or program would require the construction or expansion of physical school facilities that could cause significant environmental impacts, rather than on school operational challenges. Impact SCH-1 within Section 4.8, *Schools*, is revised to acknowledge that the Housing Plan would incrementally increase student enrollment across school districts serving the City and explains that the less-than-significant conclusion is based on physical environmental impacts related to the need for new or expanded school facilities. The Final EIR also updates Section 4.8, *Schools*, to more clearly describe the basis for the EIR’s conclusion and avoid implying that school capacity is uniformly available for all school districts. The Final EIR also clarifies that enrollment policies and student assignment practices vary among districts and may influence how growth is accommodated over time.

The City also appreciates the commenter’s clarification of local enrollment policies and the operational characteristics of Basic Aid school districts. The Final EIR clarifies in Section 4.8, *Schools* in 4.8.1, Environmental Setting, to note that Basic Aid districts, including HESD, typically restrict interdistrict transfers except for limited circumstances, such as children of district employees. While

local operational factors provide important context, the clarifications do not change the EIR impact conclusions regarding school facility impacts under CEQA.

Response 2.4

HESD expresses concern that statutory developer fees do not fully fund classroom construction or modernization needs, and that the Draft EIR oversimplifies the relationship between student generation and facility costs. HESD states that developer fees do not fund operational costs such as staffing, program expansion, or ancillary facility operations.

The City acknowledges that school districts face a range of funding and operational challenges related to future growth and that developer fees do not fully fund all construction and operational costs. However, the EIR analysis of school impacts is prepared consistent with CEQA and Government Code Sections 65995–65998, which specify that mitigation for school facility impacts under CEQA is limited to the payment of statutory developer impact fees. The fee amount is established by the State, and fees are designed to contribute toward the cost of accommodating new students generated from development but are not intended to fund the full cost of school facility construction or modernization. The adequacy of developer fees are outside the control of the City of Santa Barbara and the Housing Plan.

To provide additional context, the Final EIR expands discussion in Section 4.8, *Schools*, Impact SCH-1, to acknowledge that developer fees cover only a portion of capital costs and do not fund ongoing operations, and that school districts may require other funding mechanisms to address operational or programmatic needs. This contextual information does not change the EIR impact conclusions.

Response 2.5

HESD notes that increased enrollment would affect student-teacher ratios, specialized instruction space, and services such as counseling, nutrition, and health, which are not funded through developer fees or addressed in the EIR.

The City recognizes that changes in student enrollment present administrative, operational, and fiscal challenges. Under CEQA, the focus of EIR analysis is on physical environmental impacts. While operational considerations, staffing ratios, and educational service needs are important aspects of school operations, they must be addressed outside of the CEQA process. The Final EIR clarifies this distinction between operational considerations and physical facility impacts in Section 4.8, *Schools*, Impact SCH-1, and provides additional information regarding school operations for context. This contextual information does not change the EIR impact conclusions.

Response 2.6

HESD requests that Section 4.8, *Schools*, be revised to determine that the Housing Plan would result in potentially significant impacts to local school districts and include a more detailed capacity analysis, as well as additional mitigation measures such as direct school impact agreements or capital investment commitments.

The City acknowledges HESD's concerns regarding the ability of the school district to accommodate future enrollment growth associated with housing development under the Housing Plan. The EIR evaluates impacts to schools consistent with the CEQA framework and Government Code Sections 65995–65998, which focus on whether implementation of the Housing Plan would result in the need for new or physically altered school facilities that could cause significant environmental effects. The

EIR concludes that existing school facilities across the affected school districts are generally available and the Housing Plan would not result in construction or expansion of new facilities that could cause environmental impacts.

With respect to mitigation, the City understands HESD's concerns regarding long-term school facility funding and the limitations of statutory developer fees. However, state law does not allow the City to impose mitigation beyond what is authorized by Government Code Sections 65995–65998. Accordingly, the EIR does not include additional mitigation measures. Nonetheless, the City recognizes the importance of continued coordination with local school districts through planning processes outside of CEQA.



air pollution control district
SANTA BARBARA COUNTY

Letter 3

March 5, 2026

Julia Pujo
City of Santa Barbara
Community Development Department
630 Garden Street, P.O. Box 1990
Santa Barbara, CA 93102

Sent Via Email: HousingEIR@SantaBarbaraCa.gov

**Re: Santa Barbara County Air Pollution Control District Comments on the Draft Program
Environmental Impact Report for the City of Santa Barbara Housing Plan, SCH 2022040209**

Dear Julia Pujo:

The Santa Barbara County Air Pollution Control District (District) has reviewed the Draft Program Environmental Impact Report (EIR) for the referenced project, which consists of the implementation of 32 programs in the adopted 6th Cycle Housing Element, including ongoing programs, procedural changes, municipal code amendments, and other actions for the City of Santa Barbara to meet state housing requirements and accommodate the City Regional Housing Needs Allocation (RHNA) of 8,001 new housing units. The Housing Element's goals include locating housing close to jobs, transit, and services; streamlining the residential development approval process; and protecting environmental resources, among other objectives. The Housing Plan does not propose any changes in land use to meet the City's RHNA allocation. The Housing Element applies citywide in the City of Santa Barbara.

3.1

The District offers the following comments on the Draft EIR:

1. **Construction Equipment Emission Standards:** *Mitigation Measure AQ-1 Construction Equipment Exhaust Control Measures* require certain projects to use off-road heavy-duty diesel engines that meet CARB-certified Tier 3 or higher emissions standards or employ CARB-certified Level 3 diesel particulate filters. Tier 3 engine standards are no longer considered to be the most health protective. The District's current recommendation for off-road heavy-duty diesel engines is to meet CARB Tier 4 emission standards and, where available, to use zero-emission off-road equipment. Please see the attached *Construction Diesel Particulate and NOx Emission Reduction Measures* for the District's most current recommendations and consider updating Mitigation Measure AQ-1.
2. **Permitted Facilities Map:** The *Sensitive Receptors* subsection on page 4.2-16 discusses the placement of residential receptors near potential sources of air contaminants and strategies to reduce land use conflicts. To help identify existing sources of air pollution, the District maintains a Permitted Facilities Map¹ that identifies the location of all facilities permitted and regulated by the District, such as dry cleaners, diesel engines, and gas stations. A variety of information is available for download including active District permits, annual reports of usage and operational

3.2

3.3

¹ Available at <https://map.ourair.org/>

data, compliance history, emissions, inspections, and notices of violation. Please note this map does not identify other non-permitted sources of air pollution such as freeways, distribution centers, and railways.

3.3 cont.

3. **Land Use Compatibility and Impacts to Sensitive Receptors:** The District is supportive of the City's efforts to provide much needed housing and meet the State's RHNA requirements. However, during project-specific review of new projects, the City should be mindful of the potential air quality and health impacts associated with the placement of sensitive land uses (e.g. residential, childcare facilities, schools, senior living communities) proximate to existing land uses that emit toxic air contaminants. The California Air Resources Board (CARB)'s Air Quality and Land Use Handbook² includes recommendations and siting criteria for land development projects and encourages land use agencies to use their planning processes to ensure the appropriate separation from air pollution sources and sensitive land uses. The handbook includes minimum setback recommendations for various sources of toxic air contaminants. Prior to approving projects that involve residential and other sensitive uses, we encourage the City to consider CARB's general guidance and siting recommendations when evaluating new projects that may expose people who will live and occupy a new project area to existing sources of air pollution. Any feasible project changes to avoid, eliminate or reduce adverse impacts on public health should be implemented into project design and/or conditioning.

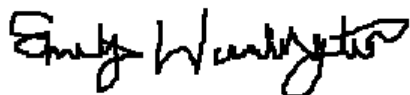
3.4

4. **CalEEMod Report:** CalEEMod was run to estimate the project's maximum daily emissions as displayed in *Table 4.2-3 Estimated Operational Criteria Air Pollutant Emissions (lbs/day)* on page 4.2-14. Please include the CalEEMod report for the modeling that was completed so that the resulting emissions can be confirmed.

3.5

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 979-8334 or via email at WaddingtonE@sbcapcd.org.

Sincerely,



Emily Waddington,
Air Quality Specialist
Planning Division

Attachment: Construction Diesel Particulate and NOx Emission Reduction Measures

cc: Planning Chron File

² Available at: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf



CONSTRUCTION DIESEL PARTICULATE AND NO_x EMISSION REDUCTION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is a list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- **Portable Engines:** All portable diesel-powered construction equipment greater than 50 brake horsepower (bhp) shall be registered with the state's portable equipment registration program (PERP)¹ OR shall obtain an APCD permit.
- **Off-Road Equipment:** Fleet owners of diesel-fueled mobile construction equipment greater than 25 hp are subject to the California Air Resource Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation². All off-road vehicles subject to this regulation must use renewable diesel fuel, with some limited exceptions.
- **Diesel Trucks:** Fleet owners of on-road diesel-fueled heavy-duty trucks and buses are subject to CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), the Statewide Truck and Bus Regulation, and the Advanced Clean Fleets Regulation to reduce emissions from trucks and buses.³
- **Idling:** Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.⁴ Idling restrictions for off-road equipment are set forth in CARB's In-Use Off-road Diesel-Fueled Fleets Regulation.

The following measures are recommended:

- At a minimum, off-road diesel equipment should be equipped with engines compliant with, or certified to meet or exceed, CARB Tier 4 emission standards. Where available, off-road construction equipment should be zero-emission. Alternative/renewable fuels such as compressed natural gas (CNG), liquefied natural gas (LNG), or propane should be utilized to the maximum extent feasible when zero-emission is not available. Electric auxiliary power units should be used. The Lead Agency should require commitments to Tier 4 and/or zero-emission equipment in applicable bid documents, purchase orders, and contracts; successful contractors should demonstrate the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- On-road heavy-duty equipment with model year 2014 or newer engines, or powered by zero- or near zero-emission technology, should be used whenever feasible.
- All portable generators should be powered by a source other than diesel or gasoline (i.e., battery, natural gas, propane, etc.)
- All construction equipment should be maintained in tune per the manufacturer's specifications.
- The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Proposed truck routes should minimize impacts to residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes to buildings, air conditioners, and windows. Construction activity schedules and hours should be planned and adjusted as feasible to maximize distance from existing sensitive receptors and minimize exposure to air pollution.

Prior to grading/building permit issuance and/or map recordation, all measures required by the Lead Agency shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout grading and construction periods. The contractor shall retain onsite the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles and have it available for inspection. The Lead Agency shall ensure measures are on project plans and/or recorded with maps and ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

¹ <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>

² <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation>

³ <https://ww2.arb.ca.gov/our-work/programs/truckstop-resources/truckstop>

⁴ <https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about>

Letter 3, Santa Barbara County Air Pollution Control District

Commenter: Emily Waddington, Air Quality Specialist, Santa Barbara County Air Pollution Control District

Date: March 5, 2026

Response 3.1

The commenter, the Santa Barbara County Air Pollution Control District (APCD), provides a summary of the Draft Program EIR and notes that the Housing Plan consists of implementation programs intended to facilitate compliance with the City's Regional Housing Needs Allocation (RHNA), without proposing specific land use changes, and that the Housing Element applies citywide. The City notes that commenter's summary accurately describes the intent and structure of the Housing Plan.

Response 3.2

APCD recommends revising Mitigation Measure AQ-1 to require CARB Tier 4—certified off-road diesel engines or zero-emission equipment where available, noting that Tier 3 engines are no longer the most health-protective option. APCD also provides the District's current Construction Diesel Particulate and NOx Emission Reduction Measures for reference.

The City acknowledges the APCD's updated recommendations and recognizes that air quality control technology and regulatory standards for off-road construction equipment continue to evolve. In response, Mitigation Measure AQ-1 within Section 4.2, *Air Quality*, is revised in the Final EIR to require as feasible, the use of Tier 4 or zero-emission off-road equipment consistent with the District's most current guidance. The revisions to Mitigation Measure AQ-1 do not change the EIR impact conclusions, as the updated mitigation measure would result in equal or greater emissions reductions than assumed in the Draft EIR.

Response 3.3

APCD notes that Section 4.2, *Air Quality*, discusses sensitive receptors and encourages the City to view the APCD's Permitted Facilities Map, which identifies locations of permitted stationary sources such as dry cleaners, diesel engines, and gas stations.

The City appreciates this resource as an available tool for future project-level review. The Final EIR adds a reference to the APCD Permitted Facilities Map in Section 4.2, *Air Quality*, b. Sources of Air Pollution. The addition of this reference does not change the EIR impact conclusions.

Response 3.4

APCD encourages the City to consider CARB's *Air Quality and Land Use Handbook* during project-specific review, especially for housing or other sensitive uses located near existing sources of toxic air contaminants. APCD states that minimum setback recommendations from sources of toxic air contaminants should be considered, and feasible measures to avoid or reduce public health impacts should be incorporated.

The City acknowledges APCD's recommendation and agrees that land use compatibility between sensitive receptors and sources of air pollution requires careful consideration. The Final EIR discusses in Section 4.2, *Air Quality*, Impact AQ-2, that project-specific review will continue to apply CARB's handbook guidance, APCD recommendations, and other applicable best practices. The clarification does not change the EIR impact conclusions.

Response 3.5

APCD requests that the CalEEMod output files used to estimate operational emissions in Table 4.2-3 be included so results can be confirmed.

The City notes that full CalEEMod output files for the EIR air quality analysis are within Appendix B of the EIR, which is available on the State Clearinghouse website at:
<https://ceqanet.lci.ca.gov/2022040209/2>.



City of Santa Barbara
PLANNING COMMISSION
MINUTES
MARCH 12, 2026

1:00 P.M.
City Hall, Council Chambers
735 Anacapa Street
SantaBarbaraCA.gov

COMMISSION MEMBERS:

Lucille Boss, *Chair*
Donald DeLuccio, *Vice Chair*
Brian Barnwell
John M. Baucke
Benjamin Peterson
Devon Wardlow
Lesley Wiscomb

CITY COUNCIL LIAISON:

Mike Jordan

STAFF:

Tava Ostrenger, Chief Assistant City Attorney
Megan Arciniega, Senior Planner
Jasper Carman, Commission Secretary

CALL TO ORDER

Chair Boss called the meeting to order at 1:00 p.m.

I. ROLL CALL

Chair Lucille Boss, Vice Chair Donald DeLuccio, Commissioners Brian Barnwell, John M. Baucke, Devon Wardlow, and Lesley Wiscomb

Absent: Commissioner Benjamin Peterson

STAFF PRESENT

Tava Ostrenger, Chief Assistant City Attorney
Rosie Dyste, Principal Planner
Megan Arciniega, Senior Planner
Jessica Grant, Supervising Transportation Planner
Julia Pujo, Environmental Analyst
Christopher Bell, City TV Production Supervisor
Janet Ahern, City TV Production Specialist
Jasper Carman, Commission Secretary

II. PRELIMINARY MATTERS

A. Requests for continuances, withdrawals, postponements, or addition of ex-agenda items:

No requests.

B. Announcements and appeals:

Ms. Arciniega announced that the General Plan Annual Progress Report will be heard by City Council on Tuesday, March 17, 2026 and we encourage the public and the Commission to review this report and submit public comment.

Chair Boss additionally recommended that the Commission should review the Annual Progress Report and provide public comment if desired.

C. Comments from members of the public pertaining to items not on this agenda:

Public comment opened at 1:02 p.m., and as no one wished to speak, it closed.

III. ENVIRONMENTAL HEARING

ACTUAL TIME: 1:03 P.M.

PUBLIC REVIEW OF THE DRAFT HOUSING PLAN PROGRAM ENVIRONMENTAL IMPACT REPORT

Application Number: PLN2022-00108

Applicant: City of Santa Barbara

The purpose of this hearing is to receive comments from the Planning Commission and the public on the adequacy and completeness of the Draft Housing Plan Program Environmental Impact Report (EIR). All comments on the Draft EIR will be responded to in the Final EIR. No action on the Draft EIR or project approval will be taken at this hearing.

4.1

Julia Pujo, Environmental Analyst, and Chris Bersbach, Rincon Consultants, gave the Staff presentation. Rosie Dyste, Principal Planner, and Jessica Grant, Supervising Transportation Planner, were available to answer questions.

Public comment opened at 1:21 p.m., and the following individual spoke:

1. Steve Johnson

Public comment closed at 1:23 p.m.

Commission comments:

1. The Commission found the report to be very thorough and the knowledge content was strong. 4.2
2. Consider what would happen if underground storage tanks are discovered that weren't previously accounted for. 4.3
3. Consider alternatives and impacts if we were to exceed 8,001 units and how mitigation measures may change. Alternative 2 discussion should be expanded. 4.4
4. Include a general acknowledgement of policy limitations due to state law and its potential impacts as it applies to transportation, schools, and building size, bulk, and scale. 4.5
5. Include an explanation of timing and implementation of mitigation measures in the EIR. 4.6
6. Consider including a second set of pagination that continues consecutively through the PDF for ease of reference and navigation. 4.7

- | | |
|--|------|
| 7. Reference to Chapter 4.1 Aesthetics, Page 4.1-1, third paragraph; surface parking lots and upper stories of buildings do not provide openness and views nor mitigate for the loss of views. | 4.8 |
| 8. If the City cannot require parking for buildings due to state law, the EIR should acknowledge the effect loss of parking has on the Downtown and El Pueblo Viejo. | 4.9 |
| 9. Reference to Chapter 4.1 Aesthetics, Page 4.1-4, regarding light and glare conditions; permits may not be required for some types of lighting. How is it being monitored? | 4.10 |
| 10. Reference to Chapter 4.1 Aesthetics, Page 4.1-7; discussion should be expanded to acknowledge that state regulations have taken some authority away from local control and it's not always true that approved development is appropriately sized and scaled. | 4.11 |
| 11. Reference to Page 4.1-17 regarding Shoreline Drive, the EIR should provide a timeline. | 4.12 |
| 12. Height limitation should be characterized differently throughout the EIR to acknowledge recent changes to state law. | 4.13 |
| 13. Reference to Chapter 4.3 Biological Resources, Page 4.3-7; the EIR should explain how the nearshore marine is measured and monitored. Nearshore marine and kelp habitat has been eroded over time. | 4.14 |
| 14. Regarding Chapter 4.8, Schools, students within one district are not allowed to move to another district. The increase of enrollment generated by development within the Hope School District should be acknowledged, even if the City can't do anything about it. | 4.15 |
| 15. Reference to Chapter 4.9, Transportation, Page 4.9-7, states the Santa Barbara Metropolitan Transit District provides fixed bus routes; however, bus routes are not fixed. Where does the utility users tax go to? | 4.16 |
| 16. Reference to Chapter 4.10, Utilities, Page 4.10-5; Tajiguas Landfill will close in 2036; the need for long term solid waste management should be acknowledged. | 4.17 |
| 17. Referring to Page 2-10, the Pie Chart identifies single unit residential uses. Acknowledge that single unit residential is no longer a single unit due to ADU laws, and explain how this use is separated from other uses due to the City's pyramid zoning. | 4.18 |

IV. ADMINISTRATIVE AGENDA

ACTUAL TIME: 2:10 P.M.

A. Committee and Liaison Reports:

1. Staff Hearing Officer Liaison Report

Vice Chair DeLuccio reported on the Staff Hearing Officer meeting of March 4, 2026.

2. Other Committee and Liaison Reports

- a. Vice Chair DeLuccio reported on the March 11, 2026 meeting of the Historic Landmarks Commission.

B. Discussion on Subcommittees and Workshops

Discussion held.

V. ADJOURNMENT

Chair Boss adjourned the meeting at 2:20 p.m.

Submitted by,

Jasper Carman, Commission Secretary

DRAFT

Letter 4, City of Santa Barbara Planning Commission

Commenter: City of Santa Barbara Planning Commission Minutes

Date: March 12, 2026

An environmental hearing was held before the Planning Commission on March 12, 2026, to receive comments from the Planning Commission and the public on the adequacy and completeness of the Draft Housing Plan Program EIR. During the hearing, the City received one verbal comment from a member of the public, Mr. Steve Johnson, and verbal comments from the Planning Commission, which are summarized within the City of Santa Barbara Planning Commission Minutes for March 12, 2026. A video recording and full transcript of all verbal comments are available at: <https://santabarbaraca.gov/planning-commission>.

Response 4.1

Mr. Steve Johnson provided verbal comments regarding the recent production rate of moderate-income units, as well as land use considerations related to maximum density and average unit sizes. The commenter implies that housing production is not meeting RHNA targets for the moderate-income category. The verbal comments are similar to the comment letter Mr. Johnson submitted on February 1, 2026. Please refer to Comment Response 1.1 and 1.2 for a detailed response to these issues. These comments do not change the EIR impact conclusions.

Response 4.2

The Planning Commission provided verbal comments stating that the report was found to be very thorough and the knowledge content was strong. The City appreciates the comment and thanks the Planning Commission.

Response 4.3

The Planning Commission provided verbal comments requesting the consideration of impacts in the event previously unaccounted underground storage tanks (USTs) are discovered.

The City notes that Section 4.6, *Hazards and Hazardous Materials* of the EIR evaluates the possibility that unknown USTs may be encountered during ground-disturbing activities on infill and redevelopment sites. The EIR includes Mitigation Measure HAZ-2, which establishes procedures for work to be stopped if contamination or a UST is discovered, and requires investigations and remediation activities in accordance with current regulatory standards. In addition, the discovery of any USTs is subject to applicable federal, state, and local regulatory requirements, including oversight by Santa Barbara County Environmental Health Services (EHS) and, as appropriate, the California Regional Water Quality Control Board (RWQCB). With inclusion of Mitigation Measure HAZ-2, along with existing regulatory requirements, potential impacts associated with the unexpected discovery of USTs would be reduced to a less than significant level. No revisions to the EIR are necessary.

Response 4.4

The Planning Commission provided verbal comments requesting consideration of potential impacts if actual housing production were to exceed the 8,001 units assumed in the Housing Plan EIR, and how mitigation measures might change under such a scenario. The Planning Commission also requested that the discussion of Alternative 2 be expanded.

In response to the Planning Commission's comment, discussion within the Final EIR in Section 6.3, *Alternative 2: Additional Housing*, has been expanded. 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 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 Housing Plan 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 may continue to be subject to further environmental review as required by CEQA, at the time specific development projects are proposed.

The expanded discussion of the Additional Housing Alternative does not result in any changes to the EIR impact conclusions.

Response 4.5

The Planning Commission provided verbal comments requesting a general acknowledgement of policy limitations due to state law and its potential impacts as it applies to transportation, schools, and building size, bulk, and scale.

In response to the Planning Commission's comment, a statement in the Final EIR has been included within Section 2, *Environmental Setting*, to acknowledge that the implementation of the Housing Plan occurs within 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 and parking demand, school enrollment distribution, and building form, including size, bulk, and scale. While the City retains authority over objective design standards, certain aspects of project approvals are governed by State law and may limit local discretion authority.

Response 4.6

The Planning Commission provided verbal comments requesting an explanation of timing and implementation of mitigation measures.

The City notes that a Mitigation Monitoring Reporting Program (MMRP) has been developed that specifies for each mitigation measure in the EIR, the relative responsibilities of various City departments for various aspects of administering and implementing measures, and the projected timing of implementation. Please refer to the MMRP for implementation and timing for specific mitigation measures. Annual reporting of the status of each mitigation measure will be included in the Annual Report of the General Plan, required pursuant to Government Code Section 65400.

Response 4.7

The Planning Commission provided verbal comments requesting a second set of pagination that continues consecutively through the EIR. In response to the Planning Commission's request, a second set of page numbers has been added to the Final EIR.

Response 4.8

The Planning Commission provided verbal comments noting that surface parking lots and upper stories of buildings do not provide openness or views, nor do they mitigate for the loss of views.

The City acknowledges the Planning Commission's concern regarding the characterization of visual openness and views in the EIR. The Final EIR revises Section 4.1, *Aesthetics and Visual Resources*, Important Visual Resources and Views, to clarify that lower scale development and underdeveloped lots contribute to varying degrees of openness through the downtown area and may provide limited views of the Santa Ynez Mountains, hillsides, and the Riviera, but are not considered public open space resources. This clarification does not change the EIR impact conclusions.

Response 4.9

The Planning Commission provided verbal comments noting that the City cannot require parking for buildings due to state law and requests acknowledgement of the effect that loss of parking has on the Downtown and El Pueblo Viejo (EPV) Design District.

The City notes that while CEQA no longer considers parking impacts to be a significant environmental effect, implementation of Housing Plan programs could incrementally increase on-street parking demand in the Downtown area. To acknowledge the issue, the Final EIR expands discussion in Section 4.9, *Transportation and Circulation*, in Assembly Bill 2097 (AB 2097) and in Impact TRA-1. The addition of this discussion does not change the EIR impact conclusions.

Response 4.10

The Planning Commission provided verbal comments inquiring how light and glare impacts would be monitored if permits are not required for certain types of lighting.

The City acknowledges that some residential lighting improvements may not trigger discretionary review or permitting requirements. The Final EIR revises text within Section 4.1, *Aesthetics and Visual Resources*, d. Light and Glare Conditions, to clarify that 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. This clarification does not change the EIR impact conclusions.

Response 4.11

The Planning Commission provided verbal comments recommending expansion of discussion to acknowledge that state regulations have taken some authority away from local control and it is not always true that approved development is appropriately sized and scaled.

The City acknowledges that recent State housing laws have modified local authority over certain development standards and approval processes for qualifying housing projects. Section 4.1, *Aesthetics and Visual Resources*, 4.1.3 Impact Analysis, of the Final EIR has been revised to acknowledge that 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. The addition of this discussion does not change the EIR impact conclusions.

Response 4.12

The Planning Commission provided verbal comments requesting that the EIR include a timeline related to the potential designation of Shoreline Drive as a scenic route.

The City notes that the EIR discussion regarding the potential designation of Shoreline Drive is intended to describe planning and policy direction rather than identify committed capital improvements. Any potential designation of Shoreline Drive as a scenic route would be considered through a separate future discretionary process, which would determine the timing, independent of the Housing Plan. Section 4.1, *Aesthetics and Visual Resources*, City of Santa Barbara General Plan, of the Final EIR has been revised for clarification. This clarification does not change the EIR impact conclusions.

Response 4.13

The Planning Commission provided verbal comments recommending that references to “height limitations” be revised throughout the EIR to acknowledge recent changes to state law.

The City acknowledges that recent State housing laws have modified the extent to which local development standards, including building height limits, may be applied to certain qualifying housing projects. Where relevant, the EIR has been reviewed and updated to ensure that references to height standards are consistent with current state law and accurately describe the interplay between state requirements and local development regulations. These clarifications are informational in nature and do not change the EIR impact conclusions.

Response 4.14

The Planning Commission provided verbal comments requesting clarification in Section 4.3, *Biological Resources*, regarding how nearshore marine habitat is measured and monitored, and notes that nearshore marine and kelp habitat has changed over time.

In response to the Planning Commission’s comment, the Final EIR clarifies in Section 4.3, *Biological Resources*, that nearshore marine habitats, including kelp beds, are generally characterized and monitored using a combination of remote sensing data, field surveys, and long-term regional monitoring programs conducted by resource agencies and scientific institutions; these data sources document changes in habitat extent and condition over time. This clarification does not change the EIR impact conclusions.

Response 4.15

The Planning Commission provided verbal comments noting that students within one district are not allowed to move to another district and requests that the EIR should acknowledge that development within the Hope School District could increase enrollment within that district.

The City recognizes that new housing development would increase student enrollment within school districts serving the City, including the Hope School District. The Final EIR clarifies in Section 4.8, *Schools* in Impact SCH-1, that interdistrict transfers are typically restricted except for limited circumstances, such as children of district employees. The Final EIR also clarifies that enrollment policies and student assignment practices vary among districts and may influence how growth is accommodated over time. These clarifications do not change the EIR impact conclusions.

Response 4.16

The Planning Commission provided verbal comments noting that bus routes are not fixed and asks where the utility users tax is allocated.

The City acknowledges that MTD periodically evaluates and modifies routes, schedules, and service patterns in response to ridership demand, operational considerations, funding availability, and community needs. The Final EIR clarifies in Section 4.9, *Transportation and Circulation*, c. Public Transit, that routes and service levels are subject to periodic adjustments based on operational needs and service planning. The reference to “fixed-route bus service” is intended to describe scheduled transit service operated along established routes, as opposed to demand-responsive service.

With respect to the Utility Users Tax, revenues may support other City programs and services as determined through future budget decisions. These clarifications do not change the EIR impact conclusions.

Response 4.17

The Planning Commission provided verbal comments noting that Tajiguas Landfill is anticipated to close in 2036 and requests acknowledgement of long-term solid waste management needs.

The City acknowledges that the anticipated closure of the Tajiguas Landfill presents a long-term planning consideration for regional solid waste management. The County of Santa Barbara, in coordination with other regional partners, is evaluating alternatives for future solid waste disposal, in line with state guidance. Discussion has been expanded in Section 4.10, *Utilities and Service Systems*, e. Solid Waste Management, to acknowledge that while the Tajiguas Landfill is currently anticipated to reach capacity in 2038, 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. This contextual information does not change the EIR impact conclusions.

Response 4.18

The Planning Commission provided verbal comments noting that the pie chart on Page 2-10 identifies single-unit residential uses and requested clarification in light of accessory dwelling unit (ADU) laws and zoning structure.

The City notes that the land use pie chart is intended to summarize existing land use categories based on City zoning and land use designations. While state ADU laws allow additional dwelling units on single family residential lots, ADUs are considered accessory uses and do not change the primary land use classification. For example, a single family house with an ADU is classified as a single family residential land use. The Final EIR clarifies in Section 2, *Environmental Setting* that 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 classification in accordance with applicable regulations. This clarification does not change the EIR impact conclusions.

Notes on Draft Report:

Commissioner Barnwell

1. Executive Summary

OVERALL

I think **Implementation and/or timing** should be addressed here. How and when does all this happen.

5.1

Alternative # 2 may need more explanation.

5.2

Page ES-6 — Top-of-Bank Setback

Commissioner Wiscombe addressed this. I concur. A bit wider explanation of needing to develop an absolute “top-of-bank” setback standard.

5.3

Page ES-7 — Biological Study Scope

I did not mention this but it would be nice to expand what we feel are the wildlife species maybe explicitly recognize additional wildlife species, esp Possums, Raccoons, and Coyotes

5.4

- Current study appears **incomplete in its recognition of common urban wildlife.**

Page ES-15 — Schools / Transportation Impact

- Statement regarding schools: **Not accurate.**
- Comment on **Impact TRA-3**:
 - The report claims the City can **limit hazardous design features.**
 - This is **no longer correct** due to **California AB 2097**, which restricts local authority in this area.

5.5

5.6

2. Section 4 — Aesthetics and Visual Resources

Page 4-12 — Parking Garages

- The report suggests **surface parking lots and the tops of buildings provide visual open space ??**
- Comment: This characterization is questionable and should be clarified. Private bldgs. don't provide public viewing space.

5.7

Legislative Strategy (Related Policy Issue)

I did not mention this but I think it would be an excellent idea to explore state legislation (through Assemblymember Greg Hart) to allow cities to circumvent AB 2097 by creating defined districts in which height and size, bulk and scale can be locally controlled, to [preserve the very important character of the town and its history (a cultural resource)]. Esp:

5.8

- Potential application:
 - **Historic Downtown / Paseo Nuevo area.**

Page 4.1-4 — Lighting and Glare Conditions

The report states that **night lighting impacts are minimized** because:

- Outdoor lighting must match residential zones.
- Lighting must be compatible with neighborhood standards.

5.9

Question:

- Are backyard patios **required to obtain permits for lighting?**
- If patios are **not regulated**, then the statement about minimized lighting may be misleading.

Page 4-17 — General Plan Statement

The report states:

“We enhance the community’s character with appropriately sized and scaled buildings.”

Comment:

- This is **no longer be accurate** due to **AB 2097**, which limits the City’s authority over certain development standards.

5.10

Seems like we need to begin to reflect current planning limitations that have been put on us by State law. We cannot limit size, bulk, and scale and yet we use verbiage from our policies of long ago that do not apply any more.

The same issue applies to:

- **Building size**
- **Bulk**
- **Scale standards**

Page 4-17 — Scenic Highways / Shoreline Drive

The report states that the City will:

- Enhance Shoreline Drive
- Add planters
- Lower speed limits

5.11

Comment:

- **When will these improvements occur?**
- The report does not specify implementation.

Page 4.1-8 — City Charter

- The report references **City Charter authority over building heights**.
- Comment: This statement may **no longer be accurate** due to AB 2097.

5.12

Page 4-19 — Municipal Code Height Restrictions

Repeat (ad infinitum): The report states that **municipal code height restrictions apply**.

5.13

- Comment:
 - These restrictions may **no longer function as described due to AB 2097**.

3. Section 4.3 — Biological Resources

(User intends to examine this section in depth.)

Page 4-36 — Wildlife Species

I did not mention this in the meeting but

The report lists:

- Bird species
- Waterfowl
- Amphibians
- Reptiles
- Foraging and nesting birds

5.14

However, it **does not mention common urban mammals**, including:

- Possums
- Raccoons
- Coyotes

Comment:

- The biological survey appears **incomplete**.

Page 4-37 — Nearshore Marine Environment

The report references the **nearshore marine environment**.

Questions:

- **How is the health of this environment measured?**
- Does the City **monitor runoff impacts from creeks entering the ocean?**

5.15

Comment:

- The report appears to **assume conditions rather than measure them**.

4. Schools

Page 48-1 — Hope Elementary School

5.16

- The description **does not mention that the school will serve the La Cumbre Plaza housing developments**.

Page 48-2 — Student Transfers

The report states that districts may **transfer students among schools to best utilize facilities**.

Correction:

5.17

- Transfers may occur **within a district (intra-district)**.
- Transfers **cannot occur across district lines (inter-district)**.

Page 48-6

- Again references **transfers between districts**.

5.18

Comment:

- This is **incorrect**.

Page 48-7 — Environmental Impact from School Expansion

The report concludes that **housing development will not require new school facilities.**

Comment:

- This conclusion appears **to be insufficiently studied**, particularly given incorrect assumptions about **inter-district transfers. HOWEVER**, As per the meeting, there is little the City can do because it is a State issue **BUT** we might want to mention that we cannot do it, Then we don't look like we are shirking our duty.

5.19

Page 48-8 — Mitigation Recommendation

The report suggests **inter-district transfers** as a mitigation strategy.

Comment:

- This is **not legally permissible.**

5.20

Page 48-9 — Development Fees as Mitigation

Second paragraph states:

Payment of development fees is considered full mitigation.

Comment:

This is **state law**, but **may not adequately mitigate impacts in this case**. If it doesn't, and we can't do anything about it because it is a state issue, we should nonetheless motion it and why.

Third paragraph states:

Housing plan would not result in environmental impacts from new school facilities.

Comment:

- This conclusion may be **unsupported due to flawed assumptions.**

5.21

5.22

5. Section 4.9 — Transportation and Circulation

Page 49-1 — Density and Mixed-Use Development

The report suggests that **higher density housing and mixed-use development in the downtown area is positive.**

5.23

Comment:

- This assumption should be **examined more critically**, vis a vis AB 2097 etc..

Page 49-7 — Transit Service

The report states:

Metropolitan Transit District provides fixed-route bus service.

5.24

Comment:

- This statement appears **incorrect**. They are not “fixed” routes. The MTD can and does change them frequently.

Page 49-7 — Utility Transfer Tax

- The report states the **Utility Users Tax is 6%**, with **half allocated to street capital maintenance**.

5.25

Question:

- **Where does the remaining half go?**

49-12 Will AB 2097 Really decrease traffic? We have not studied that. That assumption appears to be possibly flawed. Eliminating parking does not causally eliminate cars.

5.26

4.10-5 UTILITIES

Tajiguas land fill will close in Jan 2026. This report is effective through 2025. It might be misleading to not even mention that solid waste will become/may become a vvery large issue and mitigation is iffy.

5.27

2-10 Environmental Setting

The circle with land use zoning designation percentages. Are those numbersd correct, considering ADU's and pyramid zoning

5.28

4.7-10 We have golf courses but I don't think we have "gold" courses. (ha!)

5.29

Letter 5, Brian Barnwell, Planning Commissioner

Commenter: Brian Barnwell, Planning Commissioner, City of Santa Barbara

Date: March 12, 2026

Response 5.1

The commenter requests that the Executive Summary include implementation and timing.

The City notes that a Mitigation Monitoring Reporting Program (MMRP) has been developed for the Final EIR that specifies for each mitigation measure in the EIR, the relative responsibilities of various City departments for various aspects of administering and implementing measures, and the projected timing of implementation. Annual reporting of the status of each mitigation measure will be included in the Annual Report of the General Plan, required pursuant to the Government Code Section 65400. The Final EIR updates the Executive Summary to include a summary of the MMRP.

Response 5.2

The commenter requests additional explanation of Alternative 2, Additional Housing Alternative, in the Executive Summary.

The City agrees that additional discussion in the Executive Summary regarding Alternative 2 is helpful for readers. The Final EIR Executive Summary includes an expanded discussion of Alternative 2.

Response 5.3

The commenter supports additional clarification regarding the need to develop an absolute top-of-bank setback standard.

The City acknowledges the commenter's support of a top-of-bank setback standard. The City is currently evaluating approaches to implement a creek setback regulations, which may include the use of a defined top-of-bank setback standard and would implement Mitigation Measures BIO-1 and BIO 2 of the EIR. Creek protection regulations are currently in development and will undergo additional technical analysis, public review, and potential revision. Creek protection requirements will be based on objective and context-sensitive standards that balance resource protection, public safety, and housing objectives while improving predictability and consistency in permit review.

Response 5.4

The commenter recommends expanding the biological resources discussion to explicitly recognize common urban wildlife species, including opossums, raccoons, and coyotes, and notes that the existing discussion may not fully recognize common urban wildlife.

In response to the comment, background information has been added to the Final EIR in Section 4.3, *Biological Resources*, 4.3.1, Environmental Setting. The City recognizes that urban and suburban environments within Santa Barbara support a variety of common wildlife species such as opossums, raccoons, coyotes, and other urban-adapted wildlife. This information does not change the EIR impact conclusions.

Response 5.5

The commenter states that the Executive Summary statement regarding school impacts is not accurate.

In response to comments received during the public review period, the Final EIR updates the impact statement SCH-1 within the Executive Summary and Section 4.8, *Schools*, to more clearly describe the basis for the EIR's conclusion, and to avoid implying that school capacity is uniformly available for all school districts. Revised impact statement SCH-1 acknowledges that the Housing Plan would incrementally increase student enrollment across school districts serving the City and explains that the less-than-significant conclusion is based on physical environmental impacts related to the need for new or expanded school facilities. These revisions provide additional context and clarification and do not change the EIR impact conclusion that impacts to schools would be less than significant.

Response 5.6

The commenter states that Impact TRA-3 should be revised because local authority has changed under recent State law AB 2097.

The City acknowledges that State housing laws have modified aspects of local land use authority in recent years, including limitations on local parking requirements for qualifying residential development. The Final EIR revises text within Section 4.9, *Transportation and Circulation*, Impact TRA-3 to acknowledge that State law may affect certain development standards while recognizing the City's continuing authority to apply applicable health and safety requirements. This clarification does not change the EIR impact conclusions.

Response 5.7

The commenter notes that the discussion Section 4.1, *Aesthetics*, appears to suggest that surface parking lots and the tops of buildings provide visual open space, and recommends clarification that private buildings do not provide public views or open space.

The City acknowledges the commenters concern regarding the characterization of visual openness and views in the EIR. The Final EIR revises text within Section 4.1, *Aesthetics and Visual Resources*, Important Visual Resources and Views, to clarify that lower scale development and underdeveloped lots contribute to varying degrees of openness through the downtown area and may provide limited views of the Santa Ynez Mountains, hillsides, and the Riviera, but are not considered public open space resources. This clarification does not change the EIR impact conclusions.

Response 5.8

The commenter suggests exploring future State legislation that would allow cities to create defined districts to regulate height, size, bulk, and scale.

The City acknowledges the suggestion. The comment concerns potential future legislative actions and policy considerations that are outside the scope of the Program EIR. Nonetheless, comments are included in Final EIR administrative record for the consideration of City decision-makers.

Response 5.9

Regarding light and glare conditions, the commenter questions whether the discussion regarding minimized lighting impacts may be misleading because some forms of lighting, such as backyard patio lighting, may not require permits or planning review.

The City acknowledges that some residential lighting improvements may not trigger discretionary review or permitting requirements. The Final EIR revises text within Section 4.1, *Aesthetics and Visual Resources*, d. Light and Glare Conditions, to clarify that 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. This clarification does not change the EIR impact conclusions.

Response 5.10

The commenter notes that recent State laws have affected local authority over certain development standards, including building size, bulk, and scale, and suggests that some General Plan language may no longer fully reflect the current regulatory environment.

The City acknowledges that recent State housing laws have modified local authority over certain development standards and approval processes for qualifying housing projects. The referenced statement is intended to describe adopted General Plan policy direction. The Final EIR has been revised in Section 4.1, *Aesthetics and Visual Resources*, Section 4.1.3, Impact Analysis, to acknowledge that 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. The City's General Plan includes policies intended to maintain and enhance community character through building design, scale, and neighborhood compatibility. 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. This information is provided for context and does not change the EIR impact conclusions.

Response 5.11

The commenter requests clarification regarding the timing of potential improvements along Shoreline Drive, including streetscape enhancements, planters, and traffic-calming measures.

The City notes that the EIR discussion regarding the potential designation of Shoreline Drive is intended to describe planning and policy direction rather than identify committed capital improvements. Any potential designation of Shoreline Drive as a scenic route would be considered through a separate future discretionary process, which would determine the timing, independent of the Housing Plan. Section 4.1, *Aesthetics and Visual Resources*, City of Santa Barbara General Plan, of the Final EIR has been revised for clarification. This clarification does not change the EIR impact conclusions.

Response 5.12

The commenter states that the discussion referencing City Charter authority over building heights may no longer be accurate due to Assembly Bill (AB) 2097.

The City acknowledges that recent State housing laws have modified the extent to which local development standards, including building height limits, may be applied to certain qualifying housing projects. To provide clarity, the Final EIR has been revised in Section 4.1, *Aesthetics and Visual Resources*, City Charter, to acknowledge that 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. This clarification is informational in nature and does not change the EIR impact conclusions.

Response 5.13

The commenter states that the discussion regarding Municipal Code height restrictions may no longer apply due to recent State housing law.

The City acknowledges that recent State housing laws have modified the extent to which local development standards, including building height limits, may be applied to certain qualifying housing projects. Where relevant, the EIR has been reviewed and updated to ensure that references to height standards are consistent with current state law and accurately describe the interplay between state requirements and local development regulations. These clarifications are informational in nature and do not change the EIR impact conclusions.

Response 5.14

The commenter notes that Section 4.3, *Biological Resources*, identifies various bird species, waterfowl, amphibians, and reptile species but does not mention common urban mammals such as opossums, raccoons, and coyotes, and suggests that the biological survey may therefore be incomplete.

The City recognizes that urban and suburban environments within Santa Barbara support a variety of common wildlife species. The EIR evaluates biological resources at a programmatic level and is not intended to provide an exhaustive inventory of all wildlife that may occur within the city. The omission of specific common urban wildlife species does not indicate that these species are absent from the City's environment. To provide additional context, background information has been added to the Final EIR in Section 4.3, *Biological Resources*, Special Status Species. This information does not change the EIR impact conclusions.

Response 5.15

The commenter inquires how the health of the nearshore marine environment is measured and if the City monitors potential impacts associated with runoff from creeks entering the ocean. The commenter also states that the EIR appears to assume conditions rather than measure them.

In response to the comment, the Final EIR provides additional information in Section 4.3, *Biological Resources*, Nearshore Marine, that describes nearshore marine habitats, including kelp beds, are generally characterized and monitored using a combination of remote sensing data, field surveys, and long-term regional monitoring programs conducted by resource agencies and scientific institutions; these data sources document changes in habitat extent and condition over time. The City also conducts and participates in activities related to stormwater management and water quality protection, including implementation of stormwater permit requirements and the City Storm Water Management Program, which is intended to reduce pollutants entering creeks and downstream receiving waters. Monitoring of creek conditions and coastal water quality occurs

through multiple agencies and programs depending on the resource being evaluated, including the Regional Water Quality Control Board, California Coastal Commission, and California Department of Fish and Wildlife. This information does not change the EIR impact conclusions.

Response 5.16

The commenter notes that the discussion within Section 4.8, *Schools*, does not mention that Hope Elementary School District will serve the La Cumbre Plaza housing developments.

The City acknowledges that future residential development within the La Cumbre Plaza area could contribute to enrollment within the Hope Elementary School District service area. The Final EIR has been revised in Section 4.8, *Schools*, Impact SCH-1 to acknowledge that major housing opportunity sites, including the La Cumbre Plaza area, may contribute to future enrollment within Hope Elementary School District. The EIR's school impact analysis evaluates cumulative student generation and districtwide capacity rather than assigning projected students to individual school sites. This information provides additional context regarding potential sources of future student generation but does not change the EIR impact conclusions.

Response 5.17

The commenter notes that the EIR should distinguish between transfers within a school district and transfers between separate school districts.

In response to comments received, the Final EIR is updated to clarify in Section 4.8, *Schools*, Impact SCH-1, that school districts may manage enrollment and facility utilization through 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. This clarification does not change the EIR impact conclusions.

Response 5.18

The commenter notes that the discussion referencing transfers between districts in Section 4.8, *Schools*, page 4.8-6 is incorrect.

The City acknowledges that the referenced discussion should distinguish between transfers occurring within a school district and those occurring between separate districts. The Final EIR has been updated in Section 4.8, *Schools*, Current Enrollment, to clarify that while limited interdistrict transfer opportunities may exist in certain circumstances and subject to district-specific policies, capacity management generally occurs within individual school districts. This clarification does not change the EIR impact conclusions.

Response 5.19

The commenter states that the conclusion that housing development would not require new school facilities may not be adequately supported because of earlier references to interdistrict transfers. The commenter also notes that the City has limited authority in this area.

In response to this comment and prior comments, Section 4.8, *Schools* of the Final EIR has been revised to clarify that enrollment management generally occurs within individual school districts and that the analysis does not rely on broad assumptions regarding interdistrict transfers. The EIR's

conclusion regarding school impacts is based on districtwide capacity information, enrollment trends, and the projected incremental pace of growth anticipated under the Housing Plan, rather than on the assumption that students could be reassigned across district boundaries.

The City also acknowledges that the mechanisms available to address school facility impacts are established by State law under CEQA and Government Code Sections 65995–65998, where payment of statutory school impact fees constitutes full and complete mitigation for impacts associated with school facilities. The City does not have authority through CEQA to impose additional school facility mitigation beyond that authorized by State law.

To provide additional context, Section 4.8, *Schools* of Final EIR has been revised to clarify the role of State law and the basis for the EIR’s conclusions, acknowledging that 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. These clarifications do not change the EIR impact conclusions.

Response 5.20

The commenter states that the discussion within Section 4.8, *Schools*, suggests interdistrict transfers as a mitigation strategy and notes that such transfers are not permissible as a mechanism for addressing school impacts.

The City acknowledges that interdistrict transfers are governed by district-specific policies and applicable legal requirements and are not generally relied upon as a mechanism for accommodating projected enrollment growth. The EIR discussion is intended to describe examples of enrollment management practices that may occur under certain circumstances. As discussed in responses to related comments, the Final EIR has been revised in Section 4.8, *Schools*, to clarify that the school impact analysis does not rely on assumptions regarding interdistrict transfers. These clarifications do not change the EIR impact conclusions.

Response 5.21

The commenter notes that while payment of development school impact fees is considered full mitigation, such fees may not adequately address all effects associated with enrollment growth and suggests that the EIR acknowledge the City’s limited authority in this area.

The City recognizes the commenter’s concern that the costs associated with accommodating future student enrollment may extend beyond the funding provided through statutory school impact fees. School districts may face broader operational or capital funding needs over time, and the level of funding provided through development fees may not necessarily address all future district needs or expenditures. The Final EIR has been revised in Section 4.8, *Schools* to clarify this distinction and acknowledge both the role of statutory school fees and the City’s limited authority under the CEQA framework. These clarifications do not change the EIR impact conclusions.

Response 5.22

The commenter states that the conclusion that Housing Plan implementation would not result in environmental impacts from new school facilities may be unsupported due to flawed assumptions.

As discussed in responses to related school comments and interdistrict transfer practices, the Final EIR has been revised to clarify aspects of the school analysis, including distinctions between intra-district and inter-district enrollment practices and the basis for projected student accommodation assumptions. The EIR's conclusions are based on districtwide facility capacity information, enrollment trends, projected student generation estimates, and the anticipated incremental pace of development under the Housing Plan. To provide additional clarity regarding the basis for this determination, Section 4.8, *Schools* of the Final EIR has been revised. These clarifications do not change the EIR impact conclusion.

Response 5.23

The commenter states that the discussion within Section 4.9, *Transportation and Circulation* describing higher-density housing and mixed-use development in the downtown area as positive should be examined more critically, particularly in light of recent State laws such as Assembly Bill (AB) 2097.

The discussion in the EIR is intended to describe land use and transportation planning principles regarding the relationship between land use patterns and travel behavior. Higher-density and mixed-use development can support shorter trip lengths, alternative transportation and transit use, and may reduce reliance on vehicle travel. However, the City acknowledges that the effects of increased residential density and mixed-use development can vary depending on location, transportation infrastructure, parking conditions, and implementation of State and local regulations.

Response 5.24

The commenter notes that the EIR's statement that the Santa Barbara Metropolitan Transit District (MTD) provides "fixed-route" service may imply that routes are permanently fixed and not subject to change. The

The City acknowledges that MTD periodically evaluates and modifies routes, schedules, and service patterns in response to ridership demand, operational considerations, funding availability, and community needs. Text within the Final EIR has been revised in Section 4.9, *Transportation and Circulation*, c. Public Transit, to clarify that routes and service levels are subject to periodic adjustments based on operational needs and service planning. The reference to "fixed-route bus service" is intended to describe scheduled transit service operated along established routes, as opposed to demand-responsive service. This clarification does not change the EIR impact conclusions.

Response 5.25

The commenter asks how the remaining portion of utility users tax revenues is used if half is allocated for street capital maintenance.

The City notes that Utility Users Tax revenues are deposited into City funds and support a range of municipal services and programs as determined through the City's budgeting process and applicable City Council actions. Allocation of these revenues may change over time depending on City priorities and funding needs. The Final EIR clarifies this in Section 4.9, *Transportation and Circulation*, Utility User Tax. This clarification does not change the EIR impact conclusions.

Response 5.26

The commenter questions if the EIR assumes that AB 2097 and reductions in parking requirements would decrease traffic and notes that eliminating parking does not causally eliminate cars.

The City acknowledges that the relationship between parking availability, vehicle ownership, and travel demand is complex and can vary depending location, housing type, access to transit, income levels, and available transportation alternatives. The EIR transportation analysis does not rely on an assumption that reduced parking alone would eliminate vehicle trips or substantially reduce traffic impacts. It is noted however, that the AB 2097 transit priority area is already the area of the city with the lowest vehicle miles traveled (VMT) of the city.

The Final EIR has been revised in Section 4.9, *Transportation and Circulation*, Assembly Bill (AB) 2097, to provide additional information regarding the relationship between parking availability and travel behavior. This clarification does not change the EIR impact conclusions.

Response 5.27

The commenter notes the anticipated closure of Tajiguas Landfill and expresses concern that long-term solid waste management could become a large issue during the Housing Plan planning period.

The City acknowledges that the anticipated closure of the Tajiguas Landfill presents a long-term planning consideration for regional solid waste management. The County of Santa Barbara, in coordination with other regional partners, is evaluating alternatives for future solid waste disposal, in line with state guidance. Discussion has been expanded in Section 4.10, *Utilities and Service Systems*, e. Solid Waste Management, to acknowledge that while the Tajiguas Landfill is currently anticipated to reach capacity in 2038, 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. This clarification does not change the EIR impact conclusions.

Response 5.28

The commenter questions whether the land use percentages shown in the figure on Page 2-10 are correct the prevalence of accessory dwelling units (ADUs) and the City's pyramid zoning framework.

The City notes that the land use pie chart is intended to summarize existing land use categories based on City zoning and land use designations. While state ADU laws allow additional dwelling units on single family residential lots, ADUs are considered accessory uses and do not change the primary land use classification. For example, a single family house with an ADU is classified as a single family residential land use. The Final EIR clarifies in Section 2, *Environmental Setting*, that 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 classification in accordance with applicable regulations. This clarification does not change the EIR impact conclusions.

Response 5.29

The commenter notes a typographical error on page 4.7-10, where the text references "gold courses" instead of "golf courses." The City acknowledges the comment and has corrected the error in the Final EIR.



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director



Letter 6

March 20, 2026

Julia Pujo
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102
jpuyo@santabarbaraca.gov

Subject: Draft Programmatic Environmental Impact Report for the Housing Plan Program Project, SCH No. 2022040209, City of Santa Barbara, CA

Dear Julia Pujo:

The California Department of Fish and Wildlife (CDFW) reviewed the City of Santa Barbara's (City) Draft Programmatic Environmental Impact Report (DPEIR) for the Housing Plan Program Project (Project), pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

6.1

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example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law² of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Santa Barbara

Objective: The City of Santa Barbara's Housing Plan consists of programs included in the 6th Cycle Housing Element and associated amendments to the Municipal Code, General Plan, and Local Coastal Program. The Housing Plan provides the framework for meeting state housing requirements and accommodating the City's Regional Housing Needs Allocation.

The proposed Project includes implementation of Housing Plan programs that facilitate housing production, remove governmental constraints, and ensure compliance with state housing laws. These programs include the adoption of an Adaptive Reuse Ordinance, the preparation of a planning framework for the La Cumbre Plaza Planning Area, amendments to the Average Unit-Size Density (AUD) Incentive Program, the adoption of Objective Design and Development Standards, updates to the Accessory Dwelling Unit (ADU) ordinance, and process improvements to streamline permitting. The Project also includes implementation of associated amendments to the Municipal Code, General Plan, and Local Coastal Program to maintain consistency with the Housing Element and State law.

For environmental analysis purposes, this EIR assumes a conservative scenario in which up to 8,001 housing units could be permitted and constructed by 2035, along with associated nonresidential development anticipated under cumulative conditions. These updates do not authorize specific development projects but instead provide the regulatory and policy framework to implement Housing Plan programs. Additionally, no housing is proposed in the Airport area under the Housing Plan, and the Airport, along with offshore areas, is largely excluded from the area of analysis in the DPEIR. The DPEIR also includes two alternatives which are:

Alternative 1 – No Project: This alternative assumes that the Housing Plan programs and associated amendments to the Municipal Code, General Plan, and Local Coastal Program are not adopted or implemented. Existing development standards and policies contained in the City of Santa Barbara General Plan, Zoning Ordinance, and Coastal Land Use Plan would remain in place. Under this alternative, residential development

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² "Take" is defined in section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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would continue at the existing growth rate based on historical permitting trends but would not implement Housing Plan programs necessary to meet the City's obligations under state housing law, including planning for the Regional Housing Needs Allocation. Growth was estimated using the City's 2015–2022 permitting data, which shows an average of 230 housing units permitted annually. For the purposes of this analysis, the No Project Alternative assumes this average rate continues through 2035, resulting in approximately 2,760 new housing units. This alternative would not accomplish most of the Project objectives, including increasing housing opportunities and streamlining development processes, but would maintain existing policies and development patterns.

Alternative 2 – Additional Housing: This alternative assumes implementation of the Housing Plan with additional measures to increase residential density and accelerate housing production beyond what is analyzed for the proposed Project. Under this alternative, housing growth would increase by approximately 450 additional units, resulting in a total of 8,640 residential units by 2035. This total includes the City's Regional Housing Needs Allocation plus an 8 percent buffer. It also assumes the City would adopt additional measures to facilitate housing development, including requiring minimum residential densities, increasing density ranges in the AUD Program, increasing density in targeted areas, and revising zoning regulations to round up density calculations. This alternative would provide the opportunity to increase the percentage of affordable units along with a moderate increase in overall housing supply. However, it would result in greater residential growth than the proposed Housing Plan and could increase associated environmental impacts.

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Location: The Project applies to the entire geographic area within the boundaries of the City of Santa Barbara, which encompasses approximately 19.7 square miles of land area. The City is located on the central coast of California. Bordered by the Pacific Ocean to the south, Santa Ynez Mountains to the north, Eastern Goleta Valley to the west, and Montecito to the east.

Biological Setting: Santa Barbara contains substantial areas of relatively undisturbed natural habitats. These include a wide range of upland habitats, wetlands, riparian areas, streams, and marine areas. Contiguous areas of upland habitats within the City are located in the foothills. Within the upland habitat areas, vegetation communities are primarily dominated by California annual non-native grassland; native perennial grassland; coastal sage scrub; chaparral; coast live oak woodland, savanna, or forest; ornamental trees; and invasive species.

Habitats within the City limits include riparian corridors, wetlands and marshes, the Goleta Slough, and nearshore marine habitat. Riparian habitat ranges from low-growing herbaceous and scrub areas to major woodlands. Riparian habitat supports native species such as willows (*Salix spp.*), mulefat scrub (*Baccharis salicifolia*), California sycamore (*Platanus racemosa*), cottonwoods (*Populus spp.*), oaks, alders, bay laurels, lower-growing shrubs, and herbs.

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Freshwater wetlands are limited to vernal and perennial depressions, at springs, and along the margins of slow-moving streams such as lower Arroyo Burro Creek. Brackish marshes are found at coastal estuaries or lagoons such as the mouth of Mission Creek, Arroyo Burro Creek, Sycamore Creek, the Andr  e Clark Bird Refuge, and Goleta Slough. The City's creeks and associated riparian and estuarine habitats in the Coastal Zone are considered Environmentally Sensitive Habitat Areas (ESHA) and could support special-status species. These include the Arroyo Burro Creek, Arroyo Honda Creek, Mesa Creek, Goleta Slough, Lighthouse Creek, Mission Creek, Laguna Creek, and Sycamore Creek, all of the creek mouth estuaries/coastal lagoons, and other minor tributaries.

Fourteen special-status plant species have a high potential to occur in the Project area. While some are not federally or state-listed, they have a California Rare Plant Rank (CRPR). A CRPR of 1B, 2A, and 2B indicates species that are rare throughout their range, endemic to California, and are seriously or moderately threatened in California. All plants constituting CRPR 1A, 1B, 2A, and 2B legally meet the definitions of "endangered" or "threatened" under CESA, and are eligible for state listing (CNPS 2020). These species include: Gambel's water cress (*Nasturtium gambelii*; Endangered Species Act (ESA) listed and CESA-listed; 1B.1); Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*; 1B.2), Coulter's saltbush (*Atriplex coulteri*; 1B.2); Davidson's saltscale (*Atriplex serenana* var. *davidsonii*; 1B.2); Santa Barbara morning-glory (*Calystegia sepium* ssp. *binghamiae*; 1A); Santa Ynez false lupine (*Thermopsis macrophylla*; 1B.3); Nuttall's scrub oak (*Quercus dumosa*; 1B.1); white-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*; 1B.3); late-flowered mariposa-lily (*Calochortus fimbriatus*; 1B.3); Ojai fritillary (*Fritillaria ojaiensis*; 1B.2); umbrella larkspur (*Delphinium umbraculorum*; 1B.3); mesa horkelia (*Horkelia cuneata* var. *puberula*; 1B.1); black-flowered figwort (*Scrophularia atrata*; 1B.2); and Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*; 2B.2).

Twenty-five special-status wildlife species have potential to occur in the Project area. These species include: California red-legged frog (*Rana draytonii*; CESA listed; California Species of Special Concern (SSC)); coast range newt (*Taricha torosa*; SSC); white-tailed kite (*Elanus leucurus*; State Fully Protected); western snowy plover (*Charadrius nivosus nivosus*; ESA listed; SSC); common loon (*Gavia immer*; SSC); bank swallow (*Riparia riparia*; CESA threatened); California least tern (*Sternula antillarum browni*; ESA and CESA listed); California brown pelican (*Pelecanus occidentalis californicus*; fully protected); yellow rail (*Coturnicops noveboracensis*; SSC); California black rail (*Laterallus jamaicensis coturniculus*; CESA listed); olive-sided flycatcher (*Contopus cooperi*; SSC); tidewater goby (*Eucyclogobius newberryi*; ESA-listed and SSC); steelhead - southern California DPS (*Oncorhynchus mykiss irideus* pop. 10; ESA and CESA-listed); monarch – California overwintering population

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(*Danaus plexippus plexippus* pop. 1; Precluded³ ESA-listed); Crotch’s bumble bee (*Bombus crotchii*; CESA candidate listed); big free-tailed bat (*Nyctinomops macrotis*; SSC); southern sea otter (*Enhydra lutris nereis*; ESA-listed; State Fully Protected); southern California ringtail (*Bassariscus astutus octavus*; State Fully Protected); Townsend’s big-eared bat (*Corynorhinus townsendii*; SSC); Northern California legless lizard (*Anniella pulchra*; SSC); California legless lizard (*Anniella* spp. SSC); coast patch-nosed snake (*Salvadora hexalepis virgulata*; SSC); southwestern pond turtle (*Actinemys pallida*; Proposed ESA listed); two-striped garter snake (*Thamnophis hammondi*; SSC); and coast horned lizard (*Phrynosoma blainvillii*; SSC).

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COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions are also included to improve the document.

COMMENT # 1: Impacts to ESHAs and Wildlife Connectivity Areas

Issue: Future projects that tier from the DPEIR, especially those in or adjacent to ESHAs, have the potential to impact and degrade riparian habitats, upland linkages, and other sensitive areas throughout the City. These habitats not only support aquatic and riparian functions but may also serve as critical connectivity corridors for wildlife. Impacts to both stream systems and non-riparian upland habitats (such as grasslands, oak woodlands, and coastal sage scrub) could reduce habitat permeability, fragment wildlife populations, and impair long-term ecological functions.

6.2

Specific impact: The DPEIR does not sufficiently define areas slated for development in relation to sensitive habitat areas, including riparian, wetlands, and/or other aquatic features that provide essential ecological functions for numerous special-status species. 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. Projects proposed within or adjacent to ESHAs have the potential to result in substantial adverse impacts on these systems, including habitat loss, functional degradation, and increased fragmentation.

In addition to riparian and aquatic systems, the DPEIR should also characterize non-stream habitat linkages, including upland open space areas, native grasslands, oak woodlands, and coastal sage scrub, which serve as critical movement corridors and

³ The United States Fish and Wildlife Service has determined the species needs protection under the Endangered Species Act (ESA) but listing it is being delayed because other species are at higher risk and require immediate attention. The species becomes a candidate for listing and is added to the candidates list. These “warranted but precluded” findings require subsequent 12-month findings on each succeeding anniversary of the petition until they either undertake a proposal or make a “not warranted” finding.

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refugia for terrestrial wildlife. These habitats support ecological connectivity by allowing species to migrate, disperse, and forage. The DPEIR should assess potential impacts on these broader landscape connections and incorporate conservation strategies that maintain or enhance regional habitat permeability beyond stream-centered systems.

Why impact would occur: Without comprehensive mapping and characterization of sensitive natural communities/ESHAs within or adjacent to development areas, the City cannot ensure that future projects tiering from this DPEIR will effectively avoid, minimize, and mitigate impacts to these resources. This is despite the DPEIR stating that the “majority of residential development facilitated by the Housing Plan is anticipated to be infill development within urban areas and on previously developed sites.” Figure 4.3-1 of the DPEIR shows the Habitats within Santa Barbara but this information is insufficient to provide a comprehensive baseline of impacts from future development. The DPEIR should include a quantitative baseline of riparian and upland habitats to allow meaningful assessment of cumulative impacts at a regional scale (CEQA Guidelines, §§15125, 15126.2(a)(1), 15126.4(a)(1), 15130). Multiple studies, including Stein et al. (2014), have documented the widespread loss and fragmentation of California’s riparian vegetation due to urbanization, agriculture, water diversions, and other anthropogenic disturbances. These impacts have contributed to the decline of sensitive species and the impairment of critical ecosystem functions. Additionally, fragmentation or loss of non-stream habitat linkages in upland habitats, especially in foothill and montane zones, can isolate wildlife populations, reduce genetic diversity, and undermine the long-term viability of special-status species.

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Moreover, site-specific analyses for individual projects within the City alone risk overlooking critical linkages that maintain landscape connectivity and enable wildlife to adapt to environmental changes. Without a broader-scale assessment, the cumulative impacts of development on wildlife corridors may be underestimated, leading to habitat fragmentation and loss of biodiversity. Assessing wildlife connectivity at a regional scale is essential because many species rely on large, interconnected habitats for movement, breeding, and survival. CDFW recommends that the final CEQA document identify the significance of these impacts (CEQA Guidelines, §§ 15065 and 15380).

The DPEIR lacks a sufficient environmental baseline and fails to provide an adequate impact assessment necessary to inform meaningful avoidance, minimization, or mitigation measures for riparian and/or other sensitive habitats/linkages citywide. CDFW recommends that the DPEIR provide a spatially explicit baseline of sensitive habitats and species distributions to support impact assessment and mitigation planning.

Evidence impact may be significant: The Project area may support a variety of special status species. CEQA Guidelines, section 15065(a)(1) and section 15380 require that a finding of significance is mandatory where a project has the potential to substantially reduce the number or restrict the range of rare, threatened, or endangered species. CEQA Guidelines, section 15126.4(a)(1) emphasizes that mitigation should be designed to avoid impacts whenever feasible, and that reliance on future project-level

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biological assessments does not eliminate the need for meaningful programmatic safeguards. Impacts to special-status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Further, CEQA Guidelines, section 15126.4(a)(3) specifies that compensatory mitigation, when necessary, must be measurable, enforceable, and maintained over the long term.

The DPEIR states the City will develop regulatory guidelines for Creek Protection Requirements (BIO-1), Riparian Vegetation Protection (BIO-2), and Oak Woodland Protection (BIO-4). These mitigation measures are not sufficiently specific and detailed (i.e., responsible party, timing, specific actions, and location) to ensure that they are fully enforceable and capable of successful implementation through a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). Pursuant to CEQA Guidelines, section 15126.4, an environmental document shall describe feasible measures which could mitigate impacts below a significant level under CEQA. Mitigation measures must be feasible, effective, implementable, and fully enforceable by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). Mitigation measures that depend on the future creation of regulatory guidelines are not adequate under CEQA, as they are neither presently feasible nor enforceable. Because these guidelines have not yet been developed, the lead agency cannot implement or impose them.

6.2 cont.

Habitat fragmentation and loss of connectivity constitute significant impacts under CEQA because they restrict wildlife movement, reduce genetic exchange, and impair the long-term viability of sensitive populations. Loss of riparian areas within the City may result in substantial adverse direct, indirect, and cumulative effects, 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 CDFW or the United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

To adequately reduce potential impacts to riparian habitats, upland linkages, and sensitive biological resources, ensure consistency with CEQA Guidelines, sections 15065, 15126.4, and 15380, and provide sufficient avoidance, minimization, and mitigation measures to support sustainable land use planning, CDFW recommends the following mitigation measures and analyses be incorporated into the final CEQA document:

Mitigation Measure #1: Analysis of Impacts to ESHAs and Sensitive Habitat

Linkages: Prior to identifying specific project sites outside of previously developed/urban areas, the City shall conduct a Project-wide Habitat and Connectivity Constraints Analysis to inform site selection and ensure the avoidance of riparian habitat, upland habitat linkages, and other sensitive biological resources, including critical habitat corridors and ecological connectivity areas. A Habitat and Connectivity

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Constraints Analysis is a landscape-scale assessment that identifies riparian and upland habitats, wildlife movement corridors, and areas of high conflict between development and ecological resources. It provides a spatially explicit baseline to guide project siting, determine buffers and set-asides, and evaluate cumulative impacts at the regional scale.

This analysis shall support impact assessment and mitigation planning by mapping sensitive habitats and species. Buffers and set-asides shall be determined based on site-specific analyses and cumulative landscape needs. The analysis shall evaluate how land use changes and/or development will affect riparian habitat along creek corridors, associated drainages, upland habitat, regional wildlife movement corridors, and the Goleta Slough. The analysis shall also explicitly evaluate cumulative impacts to riparian and sensitive habitats from past, present, and reasonably foreseeable projects, consistent with CEQA Guidelines, section 15130.

The analysis shall:

- a) Be conducted by qualified biologists and landscape ecologists and be applied citywide. It shall include a minimum 300-foot buffer around the riparian corridors and associated ephemeral drainages. Buffers should also include key upland habitat areas and linkage zones critical for terrestrial species movement and connectivity.
- b) Identify and map high conflict areas (e.g., sensitive riparian habitat, upland habitat cores, and essential connectivity blocks for wildlife movement) that shall be removed from further consideration for development. CDFW recommends the following resources for connectivity data:
 - i) Wildlife Movement Barriers - CDFW 2024 [ds2867]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2867_fnu/FeatureServer
 - ii) Terrestrial Connectivity - ACE [ds2734]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2734_fpu/FeatureServer
 - iii) Fish Passage Priorities - CDFW - 2021 [ds2970]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2970_fmu/FeatureServer
 - iv) Wildlife Crossing Database- Caltrans [ds3074]
 - v) Essential Connectivity Areas - California Essential Habitat Connectivity (CEHC) [ds620]
 - vi) Natural Landscape Blocks - California Essential Habitat Connectivity (CEHC) [ds621]
- c) Assess areas that would most benefit acquisition and permanent preservation, enhancement of existing habitat (both aquatic and upland), and/or installation of

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wildlife crossings and structures with consideration to past, present, and reasonably foreseeable future projects.

- d) Be completed and adopted prior to the approval of any site-specific project and updated at least every five years or as new biological and landscape connectivity data becomes available.

The recommended Habitat Connectivity and Constraints Analysis should be used to supplement and refine the environmental baseline, not replace it, ensuring that cumulative, indirect, and long-term impacts are appropriately considered.

Mitigation Measure #2: No Net Loss of Riparian and ESHA Habitats: For all projects under the DPEIR, if riparian/ESHA impacts are determined to be unavoidable, the project shall ensure no net loss of riparian habitat acreage, function, or value through on-site restoration or off-site compensatory mitigation. Compensatory mitigation shall be based on habitat quality and function, as verified by a qualified biologist and approved by the City and CDFW.

- a) Riparian Buffer and Setback Requirements: All projects shall incorporate unobstructed vegetated buffers and setbacks from the outer edge of riparian vegetation or top of bank, whichever is greater
 - i) Minimum 300-foot buffer;
 - ii) Buffers shall be vegetated with native species, free from development, fencing, lighting, or grading activity, and managed to support habitat and connectivity functions.
 - iii) Buffers and set-asides shall be designed based on site-specific analyses and cumulative landscape needs, including connectivity to adjacent these areas.
- b) Site-Specific Adjustment: Buffer widths shall be increased at the project level where site-specific biological analysis determines that greater setbacks are necessary to maintain habitat function, species movement, or water quality. Reductions to buffer widths shall only be allowed if supported by a site-specific biological assessment, independently peer-reviewed by a City-approved biologist, and approved by CDFW.
- c) Monitoring: The project applicant shall submit a Riparian Mitigation and Monitoring Plan (RMMP) detailing buffer implementation, restoration/enhancement techniques, performance criteria, and monitoring for a minimum of five years post-construction, subject to City and CDFW approval.
- d) Reporting: Annual monitoring reports shall be submitted to the City and CDFW by December 31 of each monitoring year. Reports shall include photo

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documentation, vegetation cover data, and an assessment of whether performance criteria are met.

- e) Adaptive Management. Monitoring and reporting shall include evaluation of cumulative impacts across the City and incorporate adaptive management if mitigation objectives are not met.

CDFW recommends that the final CEQA document identify the significance of these impacts pursuant to CEQA Guidelines, sections 15065 and 15380.

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Recommendation #1: Habitat and Connectivity Constrains Analysis

CDFW recommends the City incorporate the Habitat and Connectivity Constraints Analysis into the DPEIR. The Habitat and Connectivity Constraints Analysis should disclose any new information on the potential impacts to biological resources within the Project area. CDFW recommends the City consult with CDFW on the development of the Habitat and Connectivity Constraints Analysis prior to finalizing the environmental document.

ADDITIONAL COMMENTS

Recommendation #2: Use of Native Plants and Trees.

CDFW recommends the City require that any project involving restoration and/or landscaping under the Project provide a native plant palette. The Project's landscaping plan should be disclosed and evaluated in the Project's environmental document for potential impacts on biological resources such as natural communities adjacent to the project site (e.g., the introduction of non-native, invasive species). CDFW supports the use of native plants for the Project and strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Limited', 'Watch', 'Moderate', or 'High' by the [California Invasive Plant Council](https://www.cal-ipc.org/plants/inventory/)⁴. CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site.

6.3

In addition, CDFW supports planting tree species, such as oaks (*Quercus genus*), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying trees (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting vegetation species with high insect and pollinator value.

Mitigation and Monitoring Reporting Plan.

⁴ <https://www.cal-ipc.org/plants/inventory/>

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CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code, section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

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ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database that may be used to inform subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).). Accordingly, CDFW requests that any special status species and natural communities detected during Project surveys be reported to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](https://wildlife.ca.gov/Data/CNDDDB)⁵ provides guidance regarding the types of information that should be reported and allows on-line submittal of field survey forms. In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit)⁶.

6.4

CDFW recommends that the City ensure all data collected for the preparation of the DPEIR is properly submitted to CNDDDB and the Vegetation Classification and Mapping Program to support accurate environmental review and ongoing species conservation.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

6.5

CONCLUSION

CDFW appreciates the opportunity to comment on the DPEIR to assist the City in identifying and mitigating Project impacts on biological resources. To ensure that significant impacts are adequately avoided or mitigated to a level less than significant,

6.6

⁵ <https://wildlife.ca.gov/Data/CNDDDB>

⁶ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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the feasible mitigation measures described above should be incorporated as enforceable conditions in the DEIR for the Project. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming public hearing dates for the Project (CEQA Guidelines, § 15073(e)).

6.6
cont.

Questions regarding this letter or further coordination should be directed to Felicia Silva⁷, Senior Environmental Scientist (Specialist).

Sincerely,

DocuSigned by:

57FC782AB67942E...
Baron Barrera, acting for
Heather A. Pert
Environmental Program Manager
South Coast Region

ec: California Department of Fish and Wildlife
Baron Barrera, Senior Environmental Scientist (Supervisor)
Felicia Silva, Senior Environmental Scientist (Specialist)
Cindy Hailey, Staff Services Analyst
CEQA Program Coordinator – Sacramento

Office of Land Use and Climate Innovation
State Clearinghouse - State.Clearinghouse@lci.ca.gov

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

⁷ Phone: 562-292-8105; Email: Felicia.Silva@wildlife.ca.gov

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure or Recommendation	Timing	Responsible Party
Mitigation Measure #1: Analysis of Impacts to ESHAs and Sensitive Habitat Linkages Prior to identifying specific project sites outside of previously developed/urban areas, the City shall conduct a Project-wide Habitat and Connectivity Constraints Analysis to inform site selection and ensure the avoidance of riparian habitat, upland habitat linkages, and other sensitive biological resources, including critical habitat corridors and ecological connectivity areas. A Habitat and Connectivity Constraints Analysis is a landscape-scale assessment that identifies riparian and upland habitats, wildlife movement corridors, and areas of high conflict between development and ecological resources. It provides a spatially explicit baseline to guide project siting, determine buffers and set-asides, and evaluate cumulative impacts at the regional scale. This analysis shall support impact assessment and mitigation planning by mapping sensitive habitats and species. Buffers and set asides shall be determined based on site-specific analyses and cumulative landscape needs. The analysis shall evaluate how land use changes and/or development will affect riparian habitat along creek corridors, associated drainages, upland habitat, regional wildlife movement corridors, and the Goleta Slough. The analysis shall also explicitly evaluate cumulative impacts to riparian and sensitive habitats from past, present, and reasonably foreseeable projects, consistent with CEQA Guidelines, section 15130. The analysis shall:	Prior to Project Activities	City of Santa Barbara

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Mitigation Measure or Recommendation	Timing	Responsible Party
a) Be conducted by qualified biologists and landscape ecologists and be applied citywide. It shall include a minimum 300 foot buffer around the riparian corridors and associated ephemeral drainages. Buffers should also include key upland habitat areas and linkage zones critical for terrestrial species movement and connectivity. b) Identify and map high conflict areas (e.g., sensitive riparian habitat, upland habitat cores, and essential connectivity blocks for wildlife movement) that shall be removed from further consideration for development. CDFW recommends the following resources for connectivity data: i) Wildlife Movement Barriers - CDFW 2024 [ds2867] https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2867_fnu/FeatureServer ii) Terrestrial Connectivity - ACE [ds2734] https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2734_fpu/FeatureServer iii) Fish Passage Priorities - CDFW - 2021 [ds2970] https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2970_fmu/FeatureServer iv) Wildlife Crossing Database- Caltrans [ds3074] v) Essential Connectivity Areas - California Essential Habitat Connectivity (CEHC) [ds620] vi) Natural Landscape Blocks - California Essential Habitat Connectivity (CEHC) [ds621] c) Assess areas that would most benefit acquisition and permanent preservation, enhancement of existing habitat (both aquatic and upland), and/or installation of		

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Mitigation Measure or Recommendation	Timing	Responsible Party
wildlife crossings and structures with consideration to past, present, and reasonably foreseeable future projects. d) Be completed and adopted prior to the approval of any site-specific project and updated at least every five years or as new biological and landscape connectivity data becomes available. The recommended Habitat Connectivity Constraints Analysis should be used to supplement and refine environmental baseline, not replace it, ensuring that cumulative, indirect, and long-term impacts are appropriately considered.		
Mitigation Measure #2: No Net Loss of Riparian and ESHAs For all projects under the DPEIR, if riparian/ESHA impacts are determined to be unavoidable, the project shall ensure no net loss of riparian habitat acreage, function, or value through on-site restoration or off-site compensatory mitigation. Compensatory mitigation shall be based on habitat quality and function, as verified by a qualified biologist and approved by the City and CDFW. a) <u>Riparian Buffer and Setback Requirements</u>: All projects shall incorporate unobstructed vegetated buffers and setbacks from the outer edge of riparian vegetation or top of bank, whichever is greater i) Minimum 300 foot buffer; ii) Buffers shall be vegetated with native species, free from development, fencing, lighting, or grading activity, and managed to support habitat and connectivity functions.	During/After Project Activities	City of Santa Barbara

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Mitigation Measure or Recommendation	Timing	Responsible Party
iii) Buffers and set asides shall be designed based on site-specific analyses and cumulative landscape needs, including connectivity to adjacent these areas. b) <u>Site-Specific Adjustment</u>: Buffer widths shall be increased at the project level where site-specific biological analysis determines that greater setbacks are necessary to maintain habitat function, species movement, or water quality. Reductions to buffer widths shall only be allowed if supported by a site-specific biological assessment, independently peer-reviewed by a City-approved biologist, and approved by CDFW. c) <u>Monitoring</u>: The project applicant shall submit a Riparian Mitigation and Monitoring Plan (RMMP) detailing buffer implementation, restoration/enhancement techniques, performance criteria, and monitoring for a minimum of five years post-construction, subject to City and CDFW approval. d) <u>Reporting</u>: Annual monitoring reports shall be submitted to the City and CDFW by December 31 of each monitoring year. Reports shall include photo documentation, vegetation cover data, and an assessment of whether performance criteria are met. e) <u>Adaptive Management</u>. Monitoring and reporting shall include evaluation of cumulative impacts across the City and incorporate adaptive management if mitigation objectives are not met. CDFW recommends that the final CEQA document identify the significance of these impacts pursuant to CEQA Guidelines, sections 15065 and 15380.		

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Mitigation Measure or Recommendation	Timing	Responsible Party
Recommendation #1: Habitat and Connectivity Constrains Analysis CDFW recommends the City incorporate the Habitat and Connectivity Constrains Analysis into the DPEIR. The Habitats and Connectivity Constraints Analysis should disclose any new information on the potential impacts to biological resources within the Project area. CDFW recommends the City consult with CDFW on the development of the Habitat and Connectivity Constraints Analysis prior to finalizing the environmental document.	Prior to Project Activities	City of Santa Barbara
Recommendation #2: Use of Native Plants and Trees CDFW recommends the City require that any project involving restoration and/or landscaping under the Project provide a native plant palette. The Project's landscaping plan should be disclosed and evaluated in the Project's environmental document for potential impacts on biological resources such as natural communities adjacent to the project site (e.g., the introduction of non-native, invasive species). CDFW supports the use of native plants for the Project and strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Limited', 'Watch', 'Moderate', or 'High' by the California Invasive Plant Council⁸. CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting tree species, such as oaks (<i>Quercus genus</i>), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying trees (snags) where possible because snags provide perching and nesting habitat	Prior to Project Activities	City of Santa Barbara

⁸ <https://www.cal-ipc.org/plants/inventory/>

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Mitigation Measure or Recommendation	Timing	Responsible Party
for birds and raptors. Finally, CDFW supports planting vegetation species with high insect and pollinator value.		

Letter 6, California Department of Fish and Wildlife

Commenter: Baron Barrera, acting for Heather A. Pert, Environmental Program Manager, South Coast Region, Department of Fish and Wildlife

Date: March 20, 2026

Although the California Department of Fish and Wildlife (CDFW) comments were received after the formal close of the Draft EIR public review period, the City considered the comments and prepared detailed responses to provide a comprehensive administrative record and facilitate interagency coordination. In addition, City staff met with CDFW representatives on March 25, 2026, to further discuss the recommendations provided within the comment letter.

Response 6.1

The commenter, CDFW, provides background information regarding CDFW's regulatory authority and summarizes applicable State requirements, including the Fish and Game Code, Lake and Streambed Alteration Agreement requirements, CESA, and other biological resource protections that may apply to future development facilitated by the Housing Plan.

The City acknowledges CDFW's role as a Responsible and Trustee Agency and appreciates the detailed information provided regarding biological resources and applicable regulatory requirements. This information supports the biological resource setting described in the EIR. Section 4.3, *Biological Resources*, of the Final EIR has been updated to integrate information from the comment letter for additional context. This background information does not change the EIR impact conclusions.

Response 6.2

CDFW states that the Housing Plan could adversely affect Environmentally Sensitive Habitat Areas (ESHAs) and wildlife connectivity areas. CDFW recommends additional mitigation measures including preparation of a Habitat and Connectivity Constraints Analysis; establishment of riparian buffers and habitat set-asides; no-net-loss habitat mitigation standards; long-term monitoring and adaptive management requirements; and additional mapping and evaluation of wildlife corridors, upland habitat linkages, and ecological connectivity areas.

The City appreciates the opportunity to coordinate with CDFW regarding recommendations for the Housing Plan EIR. In response to CDFW's comment stating that the EIR does not define areas slated for development, the City would like to clarify that Housing Plan programs may facilitate future development on existing residentially zoned parcels across the city. The Housing Plan does not include any rezoning and would not expand the geographic extent of areas where residential development is currently allowed; future housing development would occur only on properties already designated and zoned for residential use.

The City acknowledges CDFW's concerns regarding impacts to ESHA and wildlife connectivity. The EIR recognizes that ESHA and wildlife linkages exist on privately owned, residential zoned parcels which may be developed under Housing Plan programs. Major habitat types and upland biological resources within the city are identified in the EIR, which constitutes the environmental baseline for the Program EIR. This is based on available data and prior biological surveys within the City of Santa Barbara, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service. Section 4.3, *Biological Resources*, of the EIR evaluates potential impacts to ESHA and wildlife connectivity at a

programmatic level and identifies mitigation measures intended to avoid and minimize impacts. The Final EIR has been revised to expand discussion regarding habitat connectivity, wildlife movement functions, upland habitat linkages, and cumulative habitat fragmentation considerations. This information and revisions do not change the EIR impact conclusions.

The City also acknowledges the commenter's recommendation for comprehensive mapping and a quantitative baseline of riparian and upland habitats. However, since residential parcels are privately owned and access is restricted, it is not feasible for the City to comprehensively survey residential areas for biological resources. Because the Housing Plan does not identify specific future development sites or final project designs, preparation of parcel-level habitat mapping and species distribution analysis for all potential future development sites is not feasible or required for programmatic CEQA review.

In response to CDFW comments requesting a Habitat and Connectivity Constraints Analysis, the Final EIR includes a new map in Section 4.3, *Biological Resources*, titled *Suitable Sites and Habitat Connectivity Analysis* (Figure 4.3-2). This figure identifies parcels included in the Housing Element Suitable Sites Inventory in relation to mapped creeks, wetlands, riparian corridors, ESHAs, and other sensitive biological resources using available data from the City, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and prior City biological resource mapping efforts. The Suitable Sites Inventory parcels are located within urbanized infill areas and previously developed sites. As described in the Housing Element, parcels with known significant biological resources were specifically excluded from the Suitable Sites Inventory. City's Housing Element Suitable Sites Inventory is a state-required planning tool used to demonstrate that the City has sufficient residential land inventory and zoning capacity to accommodate its Regional Housing Needs Allocation (RHNA). It is noted, however, that development under Housing Plan may also occur on residentially zoned parcels that are not included on the Suitable Sites Inventory. For this reason, the EIR conservatively assumes residentially zoned parcels containing biological resources could be developed under the Housing Plan. The addition of a new map is provided for context and does not change the EIR impact conclusions.

Regarding CDFW comments that some mitigation measures within the EIR require development of implementing regulations and guidelines, CEQA allows the use of performance-based mitigation measures in programmatic environmental review where specific future projects and site conditions are not yet known, provided that the measures establish clear standards, performance objectives, and enforceable implementation mechanisms. Consistent with CEQA Guidelines Sections 15126.4 and 15097 and Public Resources Code Section 21081.6, Mitigation Measures BIO-1 through BIO-4 establish specific performance standards and implementation requirements, including preparation of Municipal Code amendments, development of biological resource protection standards, incorporation of project-level conditions of approval, and review procedures applicable to future development projects. In response to comments and recommendations provided by CDFW, the Final EIR has been revised to clarify and strengthen criteria for biological resource Mitigation Measures BIO-1 through BIO-4. Some of the specific measures recommended by CDFW, including 300-foot riparian buffers, exclusionary development setbacks, and citywide habitat acquisition requirements, may not be feasible or appropriate in the urbanized context of the city. Such measures are not required to support the adequacy of the programmatic EIR under CEQA. However, Mitigation Measure BIO-2 has been revised in the Final EIR to clarify riparian habitat protection requirements, including incorporation of a no-net-loss standard for riparian habitat function and value and additional monitoring and reporting requirements for projects affecting riparian habitat

areas. These edits are intended to make Mitigation Measures BIO-1 through BIO-4 more effective and do not change the EIR impact conclusions.

Response 6.3

CDFW recommends that development projects involving restoration or landscaping use a native plant palette, avoid invasive species, incorporate locally appropriate native species, and retain habitat features such as snags where feasible to support wildlife, birds, and pollinators. CDFW requests that the EIR include mitigation measures recommended in the comment letter and provides a suggested Mitigation Monitoring and Reporting Program (MMRP) for City consideration.

The City concurs with CDFW's recommendation on the use of native plant species and the avoidance of invasive non-native species. This recommendation is incorporated into Mitigation Measures BIO-2 and BIO-4 of the Final EIR. These edits do not change the EIR impact conclusions.

The Final EIR includes programmatic mitigation measures within a Mitigation Monitoring and Reporting Program (MMRP). Compliance at the project-level will be verified through plan review, conditions of approval, field inspections, technical studies, and project-level biological review.

Response 6.4

CDFW requests that any special-status species, sensitive natural communities, and related biological survey data collected for preparation of the EIR be submitted to the California Natural Diversity Database (CNDDDB).

The City acknowledges CDFW's request. Where special-status species, sensitive natural communities, or other reportable biological resources are identified during surveys, such information will be submitted to CNDDDB and, as applicable, CDFW's Vegetation Classification and Mapping Program in accordance with their established data submission protocols.

Response 6.5

CDFW notes that CDFW environmental document filing fees are required pursuant to Fish and Game Code Section 711.4, Public Resources Code Section 21089, and CEQA Guidelines Section 753.5, and are due upon filing of the Notice of Determination. The City acknowledges this requirement. Payment of any required CDFW filing fee will be handled in accordance with State law.

Response 6.6

The City appreciates CDFW's review of the EIR and its recommendations regarding biological resources. The City will continue to coordinate with CDFW, as appropriate, during implementation of the biological resource mitigation measures and during project-level review to ensure that biological resource protections are effectively applied.