



Housing Plan Final Program EIR

Final Program Environmental Impact Report

SCH #2022040209

prepared by

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July 2026



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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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