

## 7.0 Other CEQA Mandated Sections

This chapter addresses other issues for which CEQA Guidelines Section 15126 requires analysis beyond the environmental topical areas discussed in Chapter 4. In this chapter, the additional possible impacts of the proposed Gaviota Coast Plan (proposed Plan or Plan) are analyzed, including growth inducement, economic growth, population growth, significant environmental effects that cannot be avoided, and significant irreversible environmental changes.

In addition, pursuant to CEQA Guidelines Section 15128, this chapter includes a discussion of possible significant effects of the project that were determined not to be significant and therefore were not discussed in detail in the Environmental Impact Report (EIR).

### 7.1 Growth-inducing Effects

Pursuant to the 2014 CEQA Guidelines, an EIR shall “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment...it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

As previously discussed in Chapter 2, the Plan Area currently supports approximately 234 single-family residences. Growth within the Plan Area has been slow over the years with an average of 2.08 residences units constructed annually. Growth has historically been much less within the Cojo-Jalama area, closer to 0.3 residences per year. The anticipated growth in the Plan Area over the 20-year Plan horizon is a total of 167 units. Therefore, the projected number of residential units in the Plan Area at horizon year buildout would be 329.

The Plan serves as a comprehensive, long-term plan for physical development of the Plan Area and, by definition, is intended to manage and address future growth. The Plan would accommodate growth primarily within existing legal lots and areas that can be subdivided based on parcel size and/or prior entitlement, such as the anticipated development of the Naples Township. The Plan adopts land use designations, development standards, policies, and actions to ensure development within the Plan Area is subordinate to the rural agricultural environment and is protective of natural resources and views.

Although the proposed Plan does not increase buildout projections, the Plan considers additional policies and programs specific to the Plan Area that consider the existing environment, both natural and built, to determine where and how development occurs in the future and within the watersheds of the Gaviota Coast. Although determined to be less than significant, other potential environmental impacts associated with population growth in the Plan Area (e.g., transportation/traffic, air quality, noise, greenhouse gas emissions) are addressed in the relevant sections of this EIR. Overall, the Plan is not growth inducing, because it provides

additional resource protections and refines zoning, where necessary, that, among other key objectives, protect agricultural lands, habitat areas, and preserve important scenic areas of the valley, mountains, and coastal open spaces. Finally, the Plan ensures public infrastructure is scaled to the rural setting of this community.

## **7.2 Significant Environmental Effects that Cannot be Avoided if the Project is Implemented**

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to below a level of significance despite the willingness to implement all feasible mitigation measures, must be identified in the EIR. These are referred to as Class I impacts within the County of Santa Barbara (County). Implementation of the Plan, including Parks, Recreation, and Trails, would result in significant, unavoidable impacts on the following resources: biological, cultural, and agricultural.

These resources would remain significant and unavoidable effects under the Plan (refer to Chapter 4 of this EIR for further detail). All other significant impacts identified in Chapter 4, Environmental Impact Analysis, of this EIR can be reduced to below a level of significance with implementation of the Plan policies, objectives, and programs included as Programmatic Mitigation, and additional mitigation measures needed to further minimize, reduce, or avoid these adverse environmental effects. Significant impacts are also minimized or avoided through compliance with existing regulations and Comprehensive Plan policies.

## **7.3 Significant Irreversible Environmental Changes that Would be Caused by the Proposed Project Should It be Implemented**

Section 15126.2(c) of the CEQA Guidelines requires an evaluation of significant irreversible environmental changes that would occur following Plan implementation. Examples of possible irreversible changes include:

- Primary impacts such as the use of nonrenewable resources during the initial and continued phases of buildout of the Plan;
- Secondary impacts such as highway improvements that provide access to previously inaccessible areas; and
- Environmental accidents potentially associated with buildout of the Plan.

Section 15126.2(c) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of such resources is justified.

### 7.3.1 Non-renewable Resources

The future development of the Plan Area would involve an irreversible commitment to the use of non-renewable resources in the form of water, natural gas, and electricity primarily derived from fossil fuels. Fossil fuels, such as gasoline and oil, are used by construction vehicles and equipment, agricultural equipment, as well as in lighting, heating, cooling, and other operational uses associated with future residential and agricultural development in the Plan Area. As described in Chapter 5 of the EIR, the Plan includes policies aimed at minimizing impacts on natural resources and protecting agricultural land. The Plan includes energy policies that address renewable energy production in the Plan Area and encourage siting of energy facilities to avoid adverse impacts and support prioritizing renewable energy technologies through streamlined planning and processing, rules and other incentives. Energy policies also encourage new development to use small-scale renewable energy facilities to offset energy requirements. The Plan includes an infrastructure policy addressing the Tajiguas Landfill that supports resource recovery projects/ programs prior to or concurrent with, any plans to expand solid waste disposal capacity through landfilling. These policies would serve to reduce irreversible water, energy, and building materials consumption associated with construction and occupation of structures in the Plan Area.

Construction of future development implemented in accordance with the Plan would require consumption of non-renewable resources. These resources would include certain types of lumber and other forest products; aggregate materials used in concrete and asphalt (e.g., sand, gravel, and stone), metals (e.g., steel, copper, and lead), petrochemical construction materials (e.g., plastics and asphalt), and water. The resources that were determined to be significant and unavoidable under buildout conditions (biological, cultural, and agricultural) are discussed in Section 7.2. These resources would also represent irreversible environmental effects.

The Public Resource Code Section 21100(b)(3) and CEQA Guidelines Section 15126.4 require EIRs to analyze energy use and conservation and, if necessary, associated mitigation as it is applicable to the project, and in particular to describe any wasteful, inefficient, and unnecessary consumption of nonrenewable energy caused by a project. Thus, this analysis focuses not on total energy consumed but more on the efficiency of the electricity, natural gas, and fuel (diesel and gasoline) consumption.

CEQA Guidelines, Appendix F, Energy Conservation, also provides guidance for EIRs regarding potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. The California State Resources Agency amended Appendix F to make it clear that an energy analysis is mandatory. However, the California State Resources Agency also clarified that the energy analysis is limited to effects that are applicable to the project (Final Statement of Reasons for Regulatory Action [2009]). Appendix F is not a threshold for determining the significance of impacts. Appendix F merely seeks inclusion of information in the EIR to the extent relative and applicable to the project. However, for determining the significance of an impact in this EIR, implementation of

the Plan would have significant energy impacts if it resulted in the wasteful and inefficient use of nonrenewable resources during construction activities and long-term Plan buildout.

Grading and construction activities consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. At the program-level, it is too speculative to quantify total construction-related energy consumption of future development, either in total or by fuel type. Energy used during future construction of the planned land uses is not considered significant given the low level of development proposed and short-term nature of the energy consumption. Additionally, the Energy and Climate Action Plan require the use of Best Management Practices (BMPs) for construction equipment operations (County of Santa Barbara 2014c). Examples of BMPs include reduced equipment idling, use of alternative fuels or electrification of equipment, or proper maintenance and labeling of equipment. Although exact details of the development projects implemented in accordance with the Plan are not known at this time, there are no conditions in the Plan Area that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, the Plan would not result in a wasteful and inefficient use of nonrenewable resources during the construction of future development, and impacts would be less than significant.

Long-term operational energy use associated with the Plan includes electricity and natural gas consumption by residents and agricultural operations, energy consumption related to obtaining water, and fuel consumption of vehicles. The Plan contains Policy TEI-11 and Action TEI-6 that supports renewable energy resources as a priority for energy generation in the Plan Area.. This Policy and Action would promote renewable energy generation in the Plan Area and minimize the potential use of non-renewable energy resources. Additionally, future development under the Plan would be required to implement the most current Title 24 Green Building Standards. The California Code of Regulations, Title 24, Part 6 is the Energy Efficiency Standards or California Energy Code (Energy Code). This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is periodically updated to incorporate and consider new energy-efficiency technologies and methodologies as they become available. Incentives in the form of rebates and tax breaks are provided on a sliding scale for buildings achieving energy efficiency above the minimum standards. The most recent version of Title 24 is the 2013 Energy Code (2013 Title 24), which became effective on July 1, 2014 (California Energy Commission [CEC] 2013a). According to the CEC, the minimum 2013 Title 24 standards will reduce energy consumption by 25 percent for lighting, heating, cooling, ventilation, and water heating over the 2008 Title 24 standards (CEC 2013b). Therefore, the Plan would not result in the wasteful or inefficient use of natural gas or electricity during the course of Plan buildout.

The provision of potable water to residences consumes large amounts of energy through its supply, treatment, and distribution. However, only a portion of the eastern Plan Area would obtain potable water that is not sourced locally. Most of the Plan Area would rely on locally sourced groundwater or surface waters from either private wells or small mutual water systems.

The eastern portion of the Plan Area is served by the Goleta Water District. Provision of potable water in this area would be associated with significant energy consumption associated with the supply, treatment, and distribution processes. The Plan includes Action TEI-8, which would support water reuse through adoption of State updates to Title 24, Part 5, Chapter 16A, Part I – Non-potable Water Reuse Systems. Action TEI-9 would also support water conservation and alternative waste disposal systems. Additionally, new development is required to be constructed in accordance with the California Green Building Standards Code, which requires a 20 percent increase in water efficiency. Therefore, water needs associated with Plan buildout would not result in the wasteful or inefficient use of water, and associated energy consumption.

Energy in the form of hydrocarbon fuels (gasoline and diesel) is consumed by vehicles and agricultural equipment within the Plan Area. The Plan maintains existing development potential to support the low density, rural character of the Plan Area. This approach minimizes the amount of growth in the Plan Area, in favor of growth closer to populated areas near employment centers, outside of the Plan Area. This pattern of development is consistent with goals of reducing sprawl and directing new housing in areas in proximity to transit and other available alternative transportation modes. In addition, various federal and state regulations on vehicle and fuel manufacturing would likely result in the substantial reduction of future vehicle fuel consumption. Specifically, the Corporate Average Fuel Economy standards, Low Carbon Fuel Standard, Pavley, and Low Emission Vehicle III regulations are anticipated to improve the fuel economy of vehicles. Therefore, the Plan would not result in the wasteful or inefficient use of fuel from operational vehicle use.

By implementing BMPs for construction equipment operations, implementing the most current Title 24 Green Building Standards, reducing water consumption by 20 percent, and maintaining rural levels of development in the Plan Area, the Plan would not result in the wasteful and inefficient use of nonrenewable resources associated with construction activities or long-term buildout of the Plan.

### **7.3.2 Secondary Impacts**

The Plan does not increase development potential within the Plan Area and its policies focus on protection of agricultural and environmental resources and provision of recreational facilities. The Plan would not support growth that requires a significant enhancement of public services, transportation infrastructure, or other public services. As a result, significant irreversible environmental changes resulting from secondary impacts are not anticipated.

### **7.3.3 Environmental Accidents**

The County has safety measures that would be implemented for projects within the Plan Area to minimize the potential for hazardous materials risk and public safety impacts (see Sections 4.9, 4.11, and 4.12). Within the Plan Area, the risk for wildfires is highest in areas of natural, unmaintained open space, and as development occurs adjacent to these areas, the risk increases.

A database search identified 13 hazardous material sites located within the Plan Area; however only the former Shell Oil Hercules Gas Plant site, Cojo Marine Terminal, and the Gaviota Interim Marine Terminal represent an ongoing hazard. The former Shell Oil Hercules Gas Plant site is a designated State Superfund hazardous substances release site and soils and groundwater have been contaminated by Polychlorinated Biphenyls, benzene, and mercury. The Cojo Marine Terminal and the Gaviota Interim Marine Terminal have soil contamination from petroleum hydrocarbons. In addition, ongoing uses within the Plan Area involve the use of hazardous materials including operational oil and gas facilities and agricultural operations. Highway 101 and the rail line are the major corridors utilized to transport hazardous materials through the Plan Area and present a risk of release of hazardous materials to land uses in proximity of the highway corridor and rail line. Existing regulations that address hazardous materials would require future projects to complete site assessments for hazardous materials and, as necessary, the completion of site cleanup or abatement in a manner that prevents impacts on workers, future occupants, and the environment. Regulations also address the safe handling of hazardous substances. As such, projects that include hazardous material use or are adjacent to such uses would be required to include hazardous materials safety measures, as necessary. Implementation of Comprehensive Plan policies, and compliance with applicable regulations would reduce potential impacts from the release of hazardous materials (see Section 4.12, Hazardous Materials/Risk of Upset).

Another potential hazard to all uses within the Plan Area is the release of radon gas. Radon gas is associated with Rincon Formation soils. The Rincon Formation underlies a significant portion of the Plan Area. Grading and development within these soils could result in the release of radon gas during construction and within newly constructed structures. Mitigation is included in this EIR, so that adequate programmatic mitigation would be included in the Plan relative to radon gas impacts for future development.

Based on the analysis provided in Chapter 4, Environmental Impact Analysis, although conditions exist within the Plan Area associated with wildfire risk, hazardous materials, and radon gas exposure, compliance with regulatory requirements in addition to the programmatic mitigation contained in the Plan including policies, programs, and standards would reduce the potential for environmental accidents.

## **7.4 Effects Found not to be Significant**

Pursuant to CEQA Guidelines Section 15128, based upon initial environmental review and as stated in the Environmental Scoping Study distributed in 2014, the County determined that the Plan has the potential to result in adverse effects on most environmental issue areas discussed in the County Environmental Thresholds and Guidelines Manual (2008) and Appendix G of the CEQA Guidelines. Each of the environmental issue areas are discussed in Chapter 4, Environmental Impact Analysis, of this EIR. The exceptions are related to electromagnetic fields (EMF) and population and housing.

According to the County's thresholds, EMFs of primary concern include both extremely low frequencies and higher frequencies. Common sources of low frequency EMF include emissions from facilities such as power lines, electrical appliances, home and commercial building wiring, etc. Common sources of higher radio frequency emissions include equipment used for communications, radar, and microwave equipment. Communications facilities within the Plan Area are limited, as is urban development where appliances and wiring would be more prevalent. The Plan Area is characterized as primarily rural with low-density development. The Project is not introducing new land uses anticipated to have an abundance or excess of facilities associated with EMF. Therefore, this issue was determined to be less than significant.

Based on Appendix G of the CEQA Guidelines, impacts related to population and housing would be significant if the proposed Project would induce substantial population growth in an area, either directly or indirectly and/or displace substantial numbers of existing housing or substantial numbers of people, necessitating the construction of replacement housing elsewhere.

As described in the existing conditions (see Section 3.0), implementation of the proposed Plan would not result in an increased demand for housing within the Plan Area. The Plan is intended to accommodate planned growth and buildout in accordance with existing projections. The Plan does not increase the buildout projections for this area and would therefore not induce substantial population growth. Existing low-density zoning in this area could also reduce the possibility of inducing substantial population growth. The land use policies and ordinances are intended to ensure that future buildout considers the character and setting of this area of the County and provides design considerations to protect views and increases compatibility with existing uses. Because this is a rural area, there are existing protections in place that prevent urban growth and infrastructure. Any planned roadways or new access would need to consider site constraints, environmentally sensitive areas, as well as other conditions. No permanent displacement of housing would occur with implementation of the Plan. Therefore, replacement housing would not be needed. Impacts associated with this issue would be less than significant.

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