



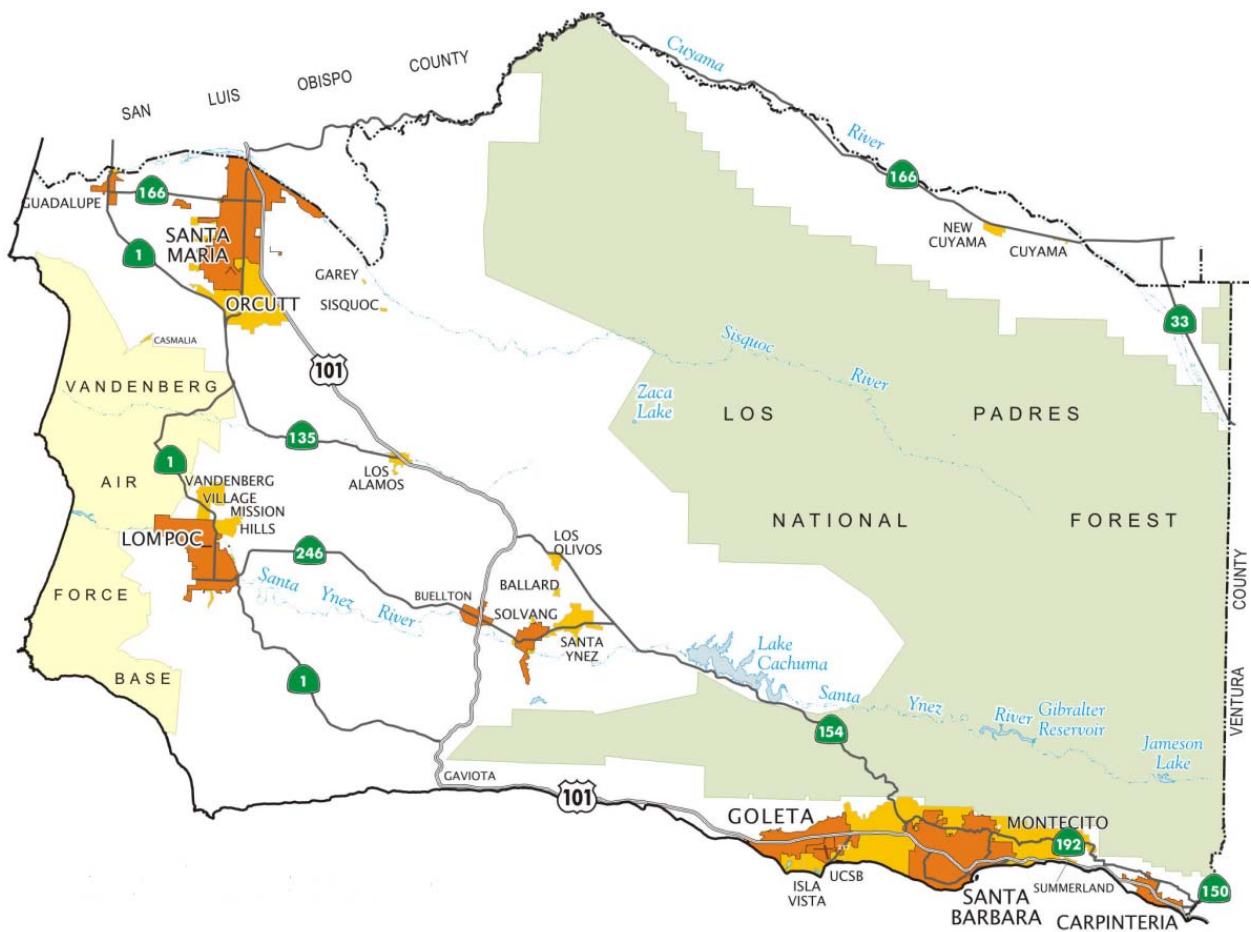
COUNTY OF SANTA BARBARA

Planning and Development

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Final Negative Declaration

**Update to the County's Seismic Safety and Safety
Element, Land Use Element, and Conservation Element
June 11, 2010**



**County of Santa Barbara
Office of Long Range Planning
30 East Figueroa Street
Santa Barbara, CA 93101**

For More Information Contact Nathan Eady, Senior Planner, (805) 568-2019

LOCATION AND CUSTODY OF DOCUMENTS

Copies of this document and other materials upon which assisted in the production of this environmental document are in the custody of the Secretary of the Santa Barbara County Planning Commission, Ms. Dianne Black, Planning and Development, located at 123 East Anapamu Street, Santa Barbara, CA 93101.

PUBLIC REVIEW

A Mitigated Negative Declaration (10NGD-00000-00010) was prepared to analyze environmental impacts of the project under requirements of the California Environmental Quality Act (CEQA). The Draft Mitigated Negative Declaration was circulated for a 30-day public review and comment period from March 14, 2010 to April 14, 2010. No special Environmental Hearing was held in regards to the proposed project. Either a copy of the Draft Negative Declaration or a Notice of Availability was sent all interested parties contained within the County’s Master Distribution List for environmental documents. The Draft Negative Declaration was also submitted to the State Clearinghouse, which distributed copies of the environmental document to all applicable State agencies.

During the public review period, five comments (four written, one oral) were received from:

- California Department of Transportation
- California Energy Commission
- County of Ventura
- Santa Barbara County Air Pollution Control District
- Santa Ynez Band of Chumash Indians

Complete records of these public comments have been included below as an attachment to the environmental document (see Appendix B). The comments received have been considered, however none of the comments warranted specific revisions to either the Negative Declaration or the proposed General Plan amendments. A summarization of Staff responses to the public comments are included below.

Commenting Agency/Party	Issue Summary	Staff Response
California Department of Transportation (CalTrans)	<p>CalTrans appreciates the County’s emphasis on flooding impacts upon State Route (SR) 166 within Section 3.16 (Water Resources/Flooding) of the Negative Declaration. Caltrans requests that the County:</p> <ul style="list-style-type: none"> • Acknowledge that Highway 166 maintenance may need to occur within the banks of the Cuyama River in order to preserve the highway’s integrity. • Provide river management goals and actions which would support flood hazard protection policies that include an aggressive prevention program targeting scour potential 	<p>The County recognizes the importance of maintaining functioning circulation systems including State Routes and Highways. The County will support maintenance activities associated with SR 166 through the adoption of <i>Flood Protection Policy 3</i> which states that:</p> <p><i>The County shall maintain the structural and operational integrity of essential public facilities during flooding pursuant to Government Code §65302(3)(g)(2)(iii).</i></p> <p>The County will also continue to work cooperatively with CalTrans to ensure the continued operation of SR 166 through the adoption of <i>Flood Protection Policy 5</i>, which states that:</p>

	to SR 166 facilities and other ancillary infrastructure.	<i>The County shall establish cooperative working relationships among public agencies with responsibility for flood protection pursuant to Government Code §65302(3)(g)(2)(v).</i>
California Energy Commission (CEC)	The CEC would like to assist in reducing the energy usage associated with the project by drawing attention to Appendix F of the California Environmental Quality Act and by providing access to the CEC's <i>Energy Aware Planning Guide</i> .	The County has an established track record of reducing energy consumption related to development through the continued application of Title 24 regulations and the availability of the County's Innovative Building Review Program (IBRP). The proposed update to the Safety, Land Use, and Conservation Elements is intended to provide compliance with AB 162 and incorporate up-to-date fire hazard information. These revisions to the County's General Plan are not expected to result in any substantive change to local and/or regional energy consumption. However, the County will continue to pursue possibilities for reducing energy consumption through its development of a Climate Action Strategy and other associated efforts.
County of Ventura	Due to the fact that multiple water courses cross the jurisdictional boundary between Ventura and Santa Barbara counties, the County of Santa Barbara should notify Ventura County staff of development projects and/or capital improvements which affect these natural resources.	The County of Santa Barbara routinely notifies adjacent jurisdictions of projects which may have an effect on regional resources and infrastructure. This cooperative process will continue and be further emphasized by the proposed adoption of <i>Flood Protection Policy 5</i> , which states that: <i>The County shall establish cooperative working relationships among public agencies with responsibility for flood protection pursuant to Government Code §65302(3)(g)(2)(v).</i>
Santa Barbara County Air Pollution Control District (SBCoAPCD)	SBCoAPCD has reviewed the associated Negative Declaration and has no formal comments at this time.	Comment noted, no action taken.
Santa Ynez Band of Chumash Indians (via staff contact with Mr. Romero on May 5, 2010)	Representatives of the Tribe have reviewed the proposed project and have no objections at this time.	Comment noted, no action taken.

REVISIONS TO THE DRAFT NEGATIVE DECLARATION

As required by Senate Bill 97 the County is currently in the process of developing environmental thresholds for purposes of establishing significant impacts to global climate change as a result of Green House Gas (GHG) emissions. Due to the complexity of this issue and the amount of analysis required the County has yet to develop and adopt a comprehensive set of GHG emission thresholds and corresponding mitigation measures. However, the County has developed an interim guidance document which is intended to assist in the disclosure and mitigation of GHG emissions until such time as the County can adopt an official environmental threshold. The interim guidance document was developed with the assistance of the GHG thresholds and mitigation measures previously developed by the Bay Area Air Quality Management District (BAAQMD). For the methodology used to establish the applicability of BAAQMD standards within the context of the County of Santa Barbara please refer to Appendix C of this document. Since this interim guidance document was not developed until after the public circulation of the *Draft Negative Declaration for the Updates to the Safety, Land Use, and Conservation Elements* (10NGD-10), Section 3.3 (Air Quality) of this document has been revised to include the newly available GHG emission information. Ultimately, the proposed update to the County's Safety, Land Use, and Conservation Elements will not produce any significant additional GHG emissions and the project will not have a significant impact on the County's Air Quality. The availability of the new interim guidance document for evaluation of GHG emissions has not changed the "no impact" conclusion of the air quality analysis. Therefore, pursuant to CEQA guidelines the proposed Negative Declaration was not recirculated to the public.

All revisions to the document since the public circulation of the Draft Negative Declaration are reflected in underlined text for language which has been added and ~~strikeout text~~ for language which has been deleted.

1.0 REQUEST/PROJECT DESCRIPTION

The proposed project includes an update to the County's Comprehensive General Plan Seismic Safety and Safety Element (Safety Element), Conservation Element, and Land Use Element. The primary purpose of the update is to provide compliance with new State laws, including Assembly Bill 162 (AB 162), and to provide updated information needed to protect the residents and property of Santa Barbara County from various natural hazards.

AB 162 was signed into law by the Governor of California on October 7, 2007 and the requirements of the bill have since been codified as Government Code Section 65302. The law states that when a local jurisdiction updates its Housing Element on or after January 1, 2009, a jurisdiction also must:

Update its Safety Element to:

Identify, among other things, information regarding flood hazards and to establish a set of comprehensive goals, policies, and objectives, based on specified information for the protection of the community from, among other things, the unreasonable risks of flooding.

Update its Conservation Element to:

Identify rivers, creeks, streams, flood corridors, riparian habitat, and land that may accommodate floodwater for purposes of groundwater recharge and stormwater management.

In response, the proposed project includes updates to the County's Safety and Conservation Elements to establish compliance with AB 162, as well as revisions to the Land Use Element which are intended to keep the County's General Plan internally consistent. These proposed General Plan updates are summarized below within the context of each individual element.

Seismic Safety and Safety Element Updates:

The draft Safety Element has been updated to include required information or references related to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs), High Fire Hazard Areas and Maps, fire protection Responsibility Areas, Tsunami Inundation Zones, Flood Control goals and policies, and other information necessary to comply with State law (specifically AB 162 and Government Code §65302). Some updates have been made to the County's Safety Element which exceed the requirements AB 162. For instance, due to the increasing threat of wildfires, the draft Safety Element update also includes a new set of Fire Protection policies and implementation measures. Although AB 162 does not require revisions to the Geologic Hazard section of the Safety Element, the conclusions and recommendations portion of this section has been revised to create a document format which is consistent with new Fire and Flood Hazard sections. The draft Safety Element update has removed outdated information regarding various hazards which is no longer considered pertinent or scientifically accurate. This information often dated back to the original adoption of the Safety Element in 1979 and no longer comports with the modern theories of hazard reduction and avoidance. The newly proposed hazard reduction goals, policies, and implementation measures are included in the tables below. The policy language is divided into three specific hazard areas: Geologic and Seismic Protection, Fire Protection, and Flood Protection.

Goals: Geologic and Seismic Hazard Protection		
Geologic and Seismic Goal 1	Protect the community to the extent feasible from risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche and dam failure; slope instability leading to mudslides and landslides; subsidence, liquefaction and other seismic hazards pursuant to Government Code §65302(g)(1), Chapter 7.8 (commencing with Section 2690) of Division 2 of the Public Resources Code, and other geologic hazards known to the legislative body.	
Policies	Geologic and Seismic Protection	Implementation Measures
Geologic and Seismic Protection Policy 1	The County shall minimize the potential effects of geologic, soil, and seismic hazards through the development review process.	Geologic and Seismic Protection Implementation Measure 1- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code
		Geologic and Seismic Protection Implementation Measure 2- Maintain and Enforce County Code Chapter 10-Building Regulations
		Geologic and Seismic Protection Implementation Measure 3- Enforce the Alquist-Priolo Earthquake Fault Zoning Act
		Geologic and Seismic Protection Implementation Measure 5- Maintain and Enforce County Code Chapter 14-Grading, Erosion and Sediment Control
		Geologic and Seismic Protection Implementation Measure 7- Enforce the Seismic Hazards Mapping Act
		Geologic and Seismic Protection Implementation Measure 8- Enforce the Surface Mining and Reclamation Act (SMARA)
		Geologic and Seismic Protection Implementation Measure 9- Enforce the California Coastal Act
		Geologic and Seismic Protection Implementation Measure 10- Maintain and enforce County Code Chapter 35-1-Land Use Development Code (LUDC); <u>35-2-Montecito Land Use Development Code</u> ; Article II Coastal Zoning Ordinance
Geologic and Seismic Protection Policy 2	To maintain consistency, the County shall refer to the California Building Code, the Land Use Development Code, County Ordinances, the Coastal Land Use Plan, and the	Geologic and Seismic Protection Implementation Measure 1- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code
		Geologic and Seismic Protection Implementation Measure 2- Maintain and Enforce County Code Chapter 10-Building Regulations
		Geologic and Seismic Protection Implementation Measure 5- Maintain and Enforce County Code Chapter 14-Grading, Erosion and Sediment Control

	<p>Comprehensive General Plan when considering the siting and construction of structures in seismically hazardous areas.</p>	<p>Geologic and Seismic Protection Implementation Measure 10- Maintain and enforce County Code Chapter 35-1-Land Use Development Code (LUDC); <u>35-2-Montecito Land Use Development Code</u>; Article II Coastal Zoning Ordinance</p>
<p>Geologic and Seismic Protection Policy 3</p>	<p>The County shall ensure compliance with State seismic and building standards in the evaluation, design, and siting of critical facilities, including police and fire stations, school facilities, hospitals, hazardous material manufacture and storage facilities, bridges, large public assembly halls, and other structures subject to special seismic safety design requirements pursuant to the California Code of Regulations, Title 24, Part 2 California Building Code.</p>	<p>Geologic and Seismic Protection Implementation Measure 1- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code</p> <hr/> <p>Geologic and Seismic Protection Implementation Measure 2- Maintain and Enforce County Code Chapter 10-Building Regulations</p>
<p>Geologic and Seismic Protection Policy 4</p>	<p>The County Office of Emergency Services (OES) shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.</p>	<p>Geologic and Seismic Protection Implementation Measure 6- Maintain and Enforce County Code Chapter 12-Civil Defense and Disaster</p> <hr/> <p>Geologic and Seismic Protection Implementation Measure 4- Enforce the California Emergency Services Act</p>
<p>Geologic and Seismic Protection Policy 5</p>	<p>Pursuant to County Code Section 21-7(d)(4) and (5), the County shall require a preliminary soil report prepared by a qualified civil engineer be submitted at the time a tentative map is submitted. This requirement may be waived by the Planning Director if he/she determines that</p>	<p>Geologic and Seismic Protection Implementation Measure 5- Maintain and Enforce County Code Chapter 14-Grading, Erosion and Sediment Control</p>

	no preliminary analysis is necessary. A preliminary geological report prepared by a qualified engineering geologist may also be required by the Planning Director.	
Geologic and Seismic Protection Policy 6	The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from seismic activity to property and lives.	Geologic and Seismic Protection Implementation Measure 11- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan (MJHMP)

Goals: Fire Protection and Prevention		
Goal 1	Protect the community from unreasonable risks associated with the effects of wildland and urban fires pursuant to Government Code 65302 (g)(1).	
Policies	Fire Protection	Implementation Measures
Fire Policy 1	Continue to pursue and promote County fire prevention programs and control measures.	Fire Implementation Measure 1- Maintain and Enforce Fire Prevention Programs and Plans
		Fire Implementation Measure 2- Continue Development Review Process
		Fire Implementation Measure 3- Enforce Title 24 of the California Code of Regulations, Part 9 California Fire Code
		Fire Implementation Measure 4- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code
		Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10-Building Regulations
		Fire Implementation Measure 6- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan
		Fire Implementation Measure 8- Maintain and Enforce County, <u>Carpinteria</u> , and <u>Montecito</u> Fire Department Development Standards where applicable.
		Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention
Fire Policy 2	The County shall use California	Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10-Building Regulations

	Department of Forestry and Fire Protection-Fire Hazard Severity Zones to determine appropriate construction materials for new buildings in State Responsibility Areas (SRA), local agency Very-High Fire Hazard Severity Zones and designated Wildland-Urban Interface areas pursuant to the California Code of Regulations Title 24, Part 2, California Building Code.	Fire Implementation Measure 4- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code
		Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention
Fire Policy 3	Fire Hazard Severity Zone Maps, as maintained by the California Department of Forestry and Fire Protection, shall be used to illustrate the official areas of Very High Fire Hazard Severity Zones (VHFHSZ) in the Local and State Responsibility Areas.	Fire Implementation Measure 7- Enforce County of Santa Barbara maps for Very High Fire Hazard Severity Zones (VHFHSZ).
		Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10 Building Regulations
		Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention
Fire Policy 4	To reduce the potential for fire damage, the County shall continue to require consistency with County Fire Department Development Standards pursuant to the California Fire Code, Public Resource Code §4291, and Government Code §51175-51188.	Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10 Building Regulations
		Fire Implementation Measure 8- Maintain and Enforce County, <u>Carpinteria, and Montecito</u> Fire Department Development Standards <u>where applicable.</u>
		Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention
Fire Policy 5	The County shall continue to require defensible space	Fire Implementation Measure 8- Maintain and Enforce County, <u>Carpinteria, and Montecito</u> Fire Department Development Standards <u>where applicable.</u>

	clearance around all structures in unincorporated Local Responsibility Areas pursuant to Public Resource Code §4291, and Government Code §51175-51188.	Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention
Fire Policy 6	The County should continue to collaborate with the California Department of Forestry and Fire Protection in the revision of Fire Hazard Severity Zone Maps.	Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10-Building Regulations
		Fire Implementation Measure 7- Enforce County of Santa Barbara maps for Very High Fire Hazard Severity Zones (VHFHSZ).
Fire Policy 7	The County should strive to maintain partnerships with tribal governments, state, local, and federal agencies to identify, prioritize, and implement fire prevention and protection measures in the County.	Fire Implementation Measure 12- Continue to Encourage Interagency Agreements
Fire Policy 8	The County Office of Emergency Services (OES) shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.	Fire Implementation Measure 12- Continue to Encourage Interagency Agreements
		Fire Implementation Measure 13- Maintain and Enforce County Code Chapter 12- Civil Defense and Disaster
		Fire Implementation Measure 14- Enforce the California Emergency Services Act
Fire Policy 9	The County shall minimize the potential effects of fire hazards through the development review process pursuant to State law.	Fire Implementation Measure 2- Continue Development Review Process
		Fire Implementation Measure 3- Enforce Title 24 of the California Code of Regulations, Part 9 California Fire Code
		Fire Implementation Measure 4- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code

		Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10-Building Regulations
		Fire Implementation Measure 6- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan
		Fire Implementation Measure 8- Maintain and Enforce County, <u>Carpinteria, and Montecito</u> Fire Department Development Standards where applicable.
		Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention
Fire Policy 10	The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from fire-related activity to property and lives.	Fire Implementation Measure 6- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan

Goal: Flood Protection		
Flood Goal 1	Protect the community from unreasonable risks of flooding pursuant to government code §65302(g) et. Seq.	
Flood Objective 1	Pursuant to <i>County Code Chapter 15A-Flood Plain Management</i> , promote the public, health, and general welfare, and minimize public and private losses due to flood conditions.	
Policies	Flood Protection	Implementation Measures
Flood Policy 1	The County shall avoid or minimize risks of flooding to development through the development review process pursuant to Government Code §65302(3)(g)(2)(i).	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses
		Flood Implementation Measure 5- Continue P&D Development Review Process
Flood Policy 2	The County shall evaluate whether development should be located in flood hazard zones, and identify construction methods or other methods to minimize damage if development is located in flood hazard zones pursuant to Government Code	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses
		Flood Implementation Measure 5- Continue P&D Development Review Process

	§65302(3)(g)(2)(ii).	
Flood Policy 3	The County shall maintain the structural and operational integrity of essential public facilities during flooding pursuant to Government Code §65302(3)(g)(2)(iii).	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses
Flood Policy 4	The County shall locate, when feasible, new essential public facilities outside of flood hazard zones, including hospitals and health care facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities or identify construction methods or other methods to minimize damage if these facilities are located in flood hazard zones pursuant to Government Code §65302(3)(g)(2)(iv).	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses
		Flood Implementation Measure 5- Continue P&D Development Review Process
Flood Policy 5	The County shall establish cooperative working relationships among public agencies with responsibility for flood protection pursuant to Government Code §65302(3)(g)(2)(v).	Flood Implementation Measure 3- Maintain and Implement the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan
		Flood Implementation Measure 4- Encourage and Coordinate Interagency Agreements
		Flood Implementation Measure 11- Continue Participation in the Public Works Mutual Aid Agreement (PWMAA)
Flood Policy 6	The County shall review current National Flood Insurance Program maps and state and local sources of information on a regular basis and utilize the data to assure that measures are taken to reduce potential risks from flooding pursuant to the National Flood Insurance Program of 1968.	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses
		Flood Implementation Measure 6- Comply with the National Flood Insurance Program

Flood Policy 7	All proposed surface mining operations shall demonstrate that they will not exacerbate or significantly alter the floodplain in which they are located. For projects that cannot meet this standard, a Letter of Map Amendment or Letter of Map Revision shall be obtained from FEMA prior to construction pursuant to the Surface Mining and Reclamation Act of 1975.	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses
		Flood Implementation Measure 5- Continue P&D Development Review Process
Flood Policy 8	The County Public Works Department should continue working with the County Office of Emergency Services in updating flood information in the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan.	Flood Implementation Measure 3- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan
Flood Policy 9	The County shall utilize information on areas included in wildfires to determine areas subject to increased risk of flooding, including mudslides and flash flooding.	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses
		Flood Implementation Measure 5- Continue P&D Development Review Process
		Flood Implementation Measure 9- Maintain and Update County Land Use Development Code
Flood Policy 10	The County should review the floodplain improvement projects identified in the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan annually for progress and necessary revisions.	Flood Implementation Measure 6- Maintain and Implement the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan
Flood Policy 11	The County Office of Emergency Services (OES) shall continue	Flood Implementation Measure 7- Maintain and enforce County Code Chapter 12-Civil Defense and Disaster

	coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.	Flood Implementation Measure 8- Enforce California Emergency Services Act
Flood Policy 12	The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from flood-related activity to property and lives.	Flood Implementation Measure 3- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan

Finally, the proposed project also includes the adoption of the County’s Multi-jurisdictional Hazard Mitigation Plan (MJHMP) as an addendum to the Safety Element. This action would help to further integrate the Safety Element as a consolidated source for information regarding the potential natural hazards that may occur in the County and what actions the County will take to reduce the risks of these hazards. The County’s current MJHMP was adopted as an independent document in 2005 and provides risk assessments for various natural hazards similar to the Safety Element.

Land Use Element Updates:

The draft Land Use Element update includes revisions to the “Flood Hazard Area Policies” section; these revisions are intended to provide consistency with the new flood hazard information included in the Safety Element update. As discussed above, new flood information includes references to FEMA Flood Insurance Rate Maps, new or slightly revised flood policies, and other pertinent information regarding flood hazards.

Conservation Element Updates:

As required by AB 162, the draft Conservation Element update includes a new map of areas which can support groundwater recharge. The draft Conservation Element update also includes a summation of the resources the County uses (such as FEMA FIRMs, California Emergency Management Agency [CAL EMA] flood hazard and dam failure inundation maps, and U.S. Army Corps of Engineers flood hazard maps) during the development review process to ensure that new development avoids and mitigates flood hazards. Lastly, revisions to the Conservation Element’s discussion of mineral extraction activities have also been provided. These revisions have been made to recommendations for policy adoption which were included in the original adopted Conservation Element. One of these recommendations stated that the County should consider adopting a policy stating that:

“No mineral resource extraction should be permitted in the County if significant impacts to air, water, or land environment would result, if flooding and erosion problems would be increased, or if polluting emissions likely to be generated directly or indirectly by the activity in question would result in adopted federal or State environmental quality standards being exceeded.” (Conservation Element, Page 169)

Ultimately, the County never adopted such a policy and has, in limited circumstances, approved mining operations which result in significant environmental impacts (Class I). Since this recommendation is inconsistent with current County administrative practice it is proposed for elimination. Instead the following recommendation would be included within the Conservation Element:

“In addition to the relevant policies within this Element, all proposed surface mining operations shall be required to be consistent with the policies contained in the other elements of the Santa Barbara County Comprehensive General Plan, all relevant sections of the Santa Barbara County Code, and all relevant sections of State law.”

2.0 PROJECT LOCATION/ENVIRONMENTAL SETTING

Santa Barbara County, located approximately 100 miles northwest of Los Angeles and 300 miles south of San Francisco, was established in February, 1850. The County occupies 2,774 square miles, of which more than one-third are located in the Los Padres National Forest. Bordered on the west and south by the Pacific Ocean, the County has 110 miles of coastline. The U.S. Census (American Community Survey, 2005-2007) reported the population of Santa Barbara County to be 402,968, including the eight incorporated cities: Santa Barbara, Goleta, Santa Maria, Lompoc, Carpinteria, Guadalupe, Solvang, and Buellton.

The County boasts a variety of unincorporated communities with substantial diversity within its boundaries. Communities along the southern portions of the County are located adjacent to the Pacific Ocean and are characterized by breathtaking views and world-class beaches. These southern communities are sought after for vacation homes, and tourism plays a substantial role in the coastal portion of the economy. The unincorporated communities in this region include Hope Ranch, Montecito, Summerland, Toro Canyon, Mission Canyon, the Eastern Goleta Valley, and Isla Vista. The University of California, Santa Barbara (UCSB) campus is located adjacent to Isla Vista and is the County’s single largest employer, providing over 9,000 jobs.

The picturesque Santa Ynez Valley lies in the heart of the County’s thriving wine country. The communities of Ballard, Los Olivos, and Santa Ynez are clustered in this part of the County. These areas are rural in character and have some constraints for new development given the lack of public facilities, infrastructure, and distance from employment centers.

Unincorporated communities in the northern sections of the County include Mission Hills, Mesa Oaks, and Vandenberg Village, which make up the unincorporated area surrounding Lompoc. Los Alamos, Guadalupe, and Orcutt surround the Santa Maria area. These communities reflect the agricultural heritage of the County and are also influenced by the presence of Vandenberg Air Force Base. Small, more isolated townships located in the northern portions of the County include Garey, Sisquoc, and Casmalia.

The eastern portion of Santa Barbara County is largely composed of the 637,000-acre Los Padres National Forest with the Cuyama valley on the eastern edge of the County. Los Padres National Forest accounts for approximately forty percent of the total land in Santa Barbara County and is complemented by over 760,000 acres of land dedicated to agriculture.

3.0 POTENTIALLY SIGNIFICANT EFFECTS CHECKLIST

The following checklist indicates the potential level of impact and is defined as follows:

Potentially Significant Impact: A fair argument can be made, based on substantial evidence in the file, that an effect may be significant.

Less Than Significant Impact with Mitigation: Incorporation of mitigation measures has reduced an effect from a Potentially Significant Impact to a Less Than Significant Impact.

Less Than Significant Impact: An impact is considered adverse but does not trigger a significance threshold.

No Impact: There is adequate support that the referenced information sources show that the impact simply does not apply to the subject project.

Reviewed Under Previous Document: The analysis contained in a previously adopted/certified environmental document addresses this issue adequately for use in the current case and is summarized in the discussion below. The discussion should include reference to the previous documents, a citation of the page(s) where the information is found, and identification of mitigation measures incorporated from the previous documents.

3.1 AESTHETICS/VISUAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. The obstruction of any scenic vista or view open to the public or the creation of an aesthetically offensive site open to public view?				X	
b. Change to the visual character of an area?				X	
c. Glare or night lighting which may affect adjoining areas?				X	
d. Visually incompatible structures?				X	

Setting:

The unincorporated County contains a myriad of natural and man-made visual resources, including rugged coastlines, mountainous wilderness areas, chaparral covered hills, expansive vineyards & grazing pastures, and developed urban cores such as Orcutt & Isla Vista. Visual resource policies in the County’s Land Use Element and the regional Boards of Architectural Review (BAR) ensure that development in visually sensitive areas of the County protect these visual resources. Additional visual resources are addressed in the County’s Scenic Highways Element, which was adopted in 1975. Scenic Highways are defined by the State Department of Transportation as follows:

- a) “The Rural Designated Scenic Highway is a route that traverses a defined visual corridor within which all natural scenic resources and aesthetic value are protected and enhanced.”
- b) “The Urban Designated Scenic Highway is a route that traverses a defined visual corridor which offers an unhindered view of attractive and exciting urban scenes.”

Currently, there are two State highways in Santa Barbara County which have been officially designated “State Scenic Highways.” They are: State Highway 1 from its intersection with State Highway 101 at Las Cruces north to the southerly city limits of Lompoc; and the entire length of State Highway 154.

Portions of other State highways traversing the County are in the State’s Master Plan of highways eligible for “Scenic Highway” designation. The eligible highways are:

- a) State Highway 33 from the junction of State Highway 166 south into Ventura County,
- b) State Highway 166 from the junction of State Highway 33 west through Santa Barbara and San Luis Obispo Counties to its junction with State Highway 101,
- c) State Highway 101, its entire length in Santa Barbara County, and
- d) State Highway 150.

County Environmental Thresholds:

The County’s Visual Aesthetics Impact Guidelines classify coastal and mountainous areas, the urban fringe, and travel corridors as “especially important” visual resources. A project may have the potential to create a significantly adverse aesthetic impact if (among other potential effects) it would impact important

visual resources, obstruct public views, remove significant amounts of vegetation, substantially alter the natural character of the landscape, or involve extensive grading visible from public areas. The guidelines address public, not private views.

Impact Discussion:

(a-d) No Impact. The proposed update to the County's Safety, Land Use, and Conservation Elements is primarily composed of new background information regarding recent fire activity, references to new hazard identification maps, and the incorporation of new geologic, flood, and fire policies. The update also includes measures for the implementation of the new policies contained within the Safety and Land Use Element updates. These implementation measures have been designed to mirror and provide consistency with existing County, State and Federal requirements or are redundant to requirements already effectuated by local ordinances. For instance, Safety Element Fire Protection Policy 5 requires the use of defensible space as a mechanism to reduce the likelihood of structural damage during wildfires. In certain instances, establishment of this defensive space necessitates the thinning and/or removal of vegetation. It is possible that such vegetation removal could affect the area's overall visual character. However, as discussed in greater detail within Appendix A (Impact Assessment of New Implementation Measures) of this document, Fire Policy 5 along with the remainder of the new policies are based upon requirements already included in other County ordinances or are activities required by State and/or federal law. Specifically, the new fire policies are derived from the previously adopted County Code Chapters 10 (Building Code) and 15 (Fire Prevention). The Safety Element's newly proposed flood hazard protection policies consist of select portions of the previously adopted County Code Chapters 15A (Flood Plain Management) and 15B (Development Along Watercourses). As a result, no new physical impacts to visual resources would result from the adoption of the new Safety Element and Land Use Element geologic, fire, and flood protection policies because these actions are already required by County Code Chapters 10, 14, 15, 15A, and 15B. The adoption of these Safety Element policies will not allow or require activities which result in physical impacts beyond those which are already allowed under existing County ordinances. Instead, the incorporation of these policies into the County's Comprehensive General Plan will establish compliance with State law (specifically Government Code §65302) and will provide a single, integrated source for information regarding the avoidance and mitigation of natural hazards.

As previously discussed in Section 1.0 (Project Description) of this document, the project also includes the replacement of a policy recommendation within the Mineral Resources portion of the Conservation Element. As this existing language was only a recommendation, and not an adopted policy, the County is not legally required to enforce the recommended action nor has the County chosen to voluntarily enforce the recommendation. Therefore, the proposed revisions would not result in additional physical impacts to the environment as the County's existing administrative practice is not expected to change as a result of the project. The existing policy recommendation stated that the County should not approve mineral resource extraction projects if such projects would result in significant (Class I) impacts to the environment. While the County strives to limit environmental impacts (especially Class I impacts) which result from land use activities, it is sometimes necessary to approve such projects if overriding considerations for the greater good of the community warrant such an action. As these decisions relate to mineral extraction; large mining facilities often result in significant impacts to air quality (due to the gaseous emissions from heavy equipment) and aesthetics/geology (due to the inherent need to significantly alter existing landforms during excavation). However, the County needs operating mines to provide raw materials which are used in maintaining the County's infrastructure and building stock. For instance, local gravel mines provide the material necessary to make road aggregate and concrete. In recognition of the importance that mining plays in the region the County's Conservation Element states that:

Mineral resource extraction in the County makes a relatively important contribution to the local, state, and national economies, and, as such, should be encouraged. (Conservation Element, Page 169)

Absent these local mines, the County would still need gravel to maintain County roads and to build new structures. In order for such mines to financially compete with other facilities in the region they are often required to extract large amounts mineral resources. The transportation of this aggregate from the mining site to various customers requires the use of heavy trucks which quickly exceed the County’s air quality threshold. If, as the aforementioned recommendation states, the County refused to permit such mines locally the gravel would have to be trucked in from other jurisdictions. These expanded travels distances would only serve to further exacerbate the corresponding air quality impacts. As a result, the refusal to permit mining facilities within the County would reduce local environmental impacts at the cost of creating greater regional impacts. Therefore, the County has continued to occasionally permit mining projects with significant impacts and has never adopted the policy recommendations which prohibit such an action. Thus, the proposed project will amend this policy recommendation to provide consistency with the County’s existing administrative practice.

As discussed in greater detail above, the proposed update to the County’s Safety, Land Use, and Conservation Elements would not result in significant impacts to the County’s visual resources.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

The proposed Safety Element, Conservation Element, and Land Use Element updates are not anticipated to result in any substantial change in the aesthetic character of the County, either individually or cumulatively. Therefore, the project would not cause a cumulatively significant effect on aesthetics.

3.2 AGRICULTURAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Conversion of prime agricultural land to non-agricultural use, impairment of agricultural land productivity (whether prime or non-prime), or conflict with agricultural preserve programs?				X	
b. An effect upon any unique or other farmland of State or Local Importance?				X	

Setting:

Agricultural lands play a critical economic and environmental role in Santa Barbara County. Agriculture continues to be Santa Barbara County’s major producing industry with a gross production value of over \$1 billion (Santa Barbara County 2007 Crop Production Report). In addition to the creation of food, jobs, and economic value, farmland provides valuable open space and maintains the County’s rural character. As a result of the ongoing importance of agriculture in the County, approximately 86% of unincorporated lands (excluding the Los Padres National Forest and Vandenberg Air Force Base) are zoned for agricultural uses.

County Environmental Thresholds:

The County’s Agricultural Resources Guidelines (approved by the Board of Supervisors, August 1993) provide a methodology for evaluating agricultural resources. These guidelines utilize a weighted point system to serve as a preliminary screening tool for determining significance. The tool assists planners in identifying whether a previously viable agricultural parcel could potentially be subdivided into parcels that are not considered viable after division. A project which would result in the loss or impairment of agricultural resources would create a potentially significant impact. The Point System is primarily intended to assess the impacts of site specific development and/or subdivision and is not structured for larger programmatic actions such as the Housing Element update process.

Impact Discussion:

(a-b) *No Impact.* The proposed updates to the County’s Safety, Land Use, and Conservation Elements would not affect the region’s agricultural resources. The update provides reference information regarding various natural hazards (such as flooding, wildfire, or geologic failure) and new geologic, flood, and fire protection policies. These policies are redundant to requirements already effectuated by local ordinances such as County Code Chapters 10, 14, 15, 15A, and 15B. Therefore, as discussed in greater detail within Appendix A (Impact Assessment of New Implementation Measures) of this document, the project would not result in new direct physical impacts. Additionally, none of these policies or updated documentation contained within the aforementioned draft Comprehensive General Plan Elements would exempt individual projects from being analyzed for site specific agricultural impacts. These future development projects would still be responsible for the avoidance and mitigation of significant agricultural impacts whenever feasible.

As previously discussed in Section 1.0 (Project Description) of this document, the project also includes the replacement of a policy recommendation within the Mineral Resources portion of the Conservation Element. As this existing language was only a recommendation, and not an adopted policy, the County is not legally required to enforce the recommended action nor has the County chosen to voluntarily enforce the recommendation. Therefore, the proposed revisions would not result in additional physical impacts to the environment as County’s existing administrative practice is not expected to change as a result of the project.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

The proposed project is intended to update the County’s Comprehensive General Plan with information and policies necessary to protect the County’s residents and property from natural hazards where feasible. Ultimately these new policies reinforce what is already required by existing County ordinances and will not allow or require new physical impacts beyond which is already considered by existing regulations. Therefore, no cumulatively significant impacts to agricultural resources would result from the project.

3.3 AIR QUALITY

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. The violation of any ambient air quality standard, a substantial contribution to an existing or projected air quality violation, or exposure of sensitive receptors to substantial pollutant concentrations (emissions from direct, indirect, mobile and stationary sources)?				X	
b. The creation of objectionable smoke, ash or odors?				X	
c. Extensive dust generation?				X	
Greenhouse Gas Emissions	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
d. Emissions equivalent to or greater than 25,000 metric tons of CO ₂ per year from both stationary and mobile sources during long term operations? Emissions equivalent to or greater than 10,000 metric tons of CO ₂ per year from <u>stationary sources</u> during long-term operations?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
e. <u>Emissions equivalent to or greater than 1,100 MT of CO₂e per year or 4.6 MT CO₂e/Service Population (residents + employees) per year from non-stationary sources during long-term operations?</u>				<u>X</u>	
f. <u>Emissions equivalent to or greater than 6.6 MT CO₂e/Service Population (residents + employees) per year for plans (General Plan Elements, Community Plans, etc.)?</u>				<u>X</u>	

Setting:

General Air Quality: Santa Barbara County is located within the South Central Coast air basin, which is classified as an attainment area for the federal 8-hour ozone (O₃) standard and the State 1-hour ozone standard, and is classified as a non-attainment area for the state 8-hour ozone standard. Reactive organic compounds (ROC) and nitrogen oxides (NO_x), which are precursors to ozone, are considered to be non-attainment pollutants. The major sources of ozone precursor emissions in the County are motor vehicles, the petroleum industry, and solvent use. Sources of PM₁₀ include grading, road dust, and vehicle exhaust.

Greenhouse Gases & Global Climate Change: Greenhouse gases (GHGs) include ~~water vapor~~, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ~~and other compounds~~ hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃). Combustion of fossil fuels constitutes the primary source of GHGs. GHGs accumulate in the atmosphere, where these gases trap heat near the Earth’s surface by absorbing infrared radiation. This effect causes global warming and climate change, with adverse impacts on humans and the environment. Potential effects include reduced water supplies in some areas, ecological changes that threaten some species, reduced agricultural productivity in some areas, and increased coastal flooding.

County Environmental Thresholds:

General Air Quality: Chapter 5 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (as amended in 2006) addresses the subject of air quality. The thresholds provide that a proposed project will not have a significant impact on air quality if operation of the project will:

- Emit (from all project sources, mobile and stationary), less than the daily trigger (55 pounds per day) for offsets for any pollutant; and
- emit less than 25 pounds per day of oxides of nitrogen (NO_x) or reactive organic compounds (ROC) from motor vehicle trips only; and
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone); and
- not exceed the APCD health risk public notification thresholds adopted by the APCD Board; and
- be consistent with the adopted federal and state Air Quality Plans.

No thresholds have been established for short-term impacts associated with construction activities. However, the County’s Grading Ordinance requires standard dust control conditions for all projects involving grading activities. Long-term/operational emissions thresholds have been established to address mobile emissions (i.e.,

motor vehicle emissions) and stationary source emissions (i.e., stationary boilers, engines, paints, solvents, and chemical or industrial processing operations that release pollutants).

Greenhouse Gases & Global Climate Change: The County’s methodology to address Global Climate Change in CEQA documents is evolving. ~~Until appropriate regulatory entities develop CEQA thresholds for GHGs, only relatively large GHG emitters will be considered to have cumulatively significant effects on the environment. Projects that are estimated to emit the equivalent of 25,000 metric tons of CO₂ emissions from direct and indirect, long-term operational sources would be considered to have a cumulatively significant impact on greenhouse gas emissions.¹ Projects below these levels remain unclassifiable until more evidence becomes available. The County is currently working to develop an inventory of GHG emissions and a Climate Action Strategy and Climate Action Plan based on this data. Until County-specific data becomes available and significance thresholds applicable to GHG emissions are developed and formally adopted, the County will follow an interim approach to evaluating GHG emissions. These interim approach will look to standards proposed by the Bay Area Air Quality Management District (BAAQMD), summarized below, for guidance on determining significance of GHG emissions.~~

Significance Determination Criteria	
GHG Emission Source Category	Operational Emissions
<u>Non-stationary Sources</u>	<u>1,100 MT of CO₂e/yr</u> <u>OR</u> <u>4.6 MT CO₂e/SP/yr (residents + employees)</u>
<u>Stationary Sources</u>	<u>10,000 MT/yr</u>
<u>Plans</u>	<u>6.6 MT CO₂e/SP/yr (residents + employees)</u>

The BAAQMD does not suggest any guidelines for construction-related emissions.

Impact Discussion:

(a-c) No Impact. The proposed update to the County’s Safety, Land Use, and Conservation Elements is primarily composed of new background information regarding recent fire activity, references to new hazard identification maps, and the incorporation of new geologic, flood, and fire policies. The update also includes measures for the implementation of the new policies contained within the Safety and Land Use Element updates. These implementation measures have been designed to mirror and provide consistency with existing County, State and Federal requirements or are redundant to requirements already effectuated by local ordinances. For instance, Safety Element Fire Protection Policy 5 requires the use of defensible space as a mechanism to reduce the likelihood of structural damage during wildfires. In certain instances, establishment of this defensive space necessitates the thinning and/or removal of vegetation. It is possible that the use of equipment (such as small tractors, gas powered tools, or controlled burning) could result in additional emissions of known pollutants. However, Fire Policy 5 along with the remainder of the new geologic, fire, and flood policies are redundant to requirements already included in other County ordinances or are already required by State and/or federal law. Specifically, the new fire policies are derived from the previously adopted County Code Chapters 10 (Building Code) and 15 (Fire Prevention). The Safety Element’s newly proposed flood hazard protection policies consist of select portions of the previously adopted County Code Chapters 15A (Flood Plain Management) and 15B (Development Along Watercourses). As a result, no new physical impacts would result from the adoption of the new Safety Element and Land Use Element geologic, fire, and flood protection policies because the corresponding physical impacts are already required by County Code Chapters 10, 14, 15, 15A, and 15B. Therefore, as discussed in greater detail within Appendix A (Impact Assessment of New Implementation Measures) of this document, adoption of these Safety and Land Use Element policies will not allow or require activities which result in physical impacts beyond which is already included in existing

¹ California Air Resources Board Resolution 07-54 establishes 25,000 metric tons of GHG emissions as the threshold for identifying the largest stationary emission sources in California for purposes of requiring the annual reporting of emissions. This threshold is just over 0.005% of California’s total inventory of GHG emissions for 2004.

County ordinances or State and/or Federal law. The incorporation of these policies into the County's Comprehensive General Plan will establish compliance with State law (specifically Government Code §65302) and will provide a singular source which development review planners and members of the public can refer to for information regarding the avoidance and mitigation of natural hazards.

As previously discussed in Section 1.0 (Project Description) of this document, the project also includes the replacement of a policy recommendation within the Mineral Resources portion of the Conservation Element. As this existing language was only a recommendation, and not an adopted policy, the County is not legally required to enforce the recommended action nor has the County chosen to voluntarily enforce the recommendation. Therefore, the proposed revisions would not result in additional physical impacts to the environment as County's existing administrative practice is not expected to change as a result of the project.

As discussed in greater detail above, the proposed update to the County's Safety, Land Use, and Conservation Elements would not result in significant impacts to the County's air quality.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As mentioned above, the proposed project would not result in any new direct physical impacts that would significantly affect air quality in a negative manner. Therefore, no cumulatively significant impacts to air quality would result from the project.

(d-f) No Impact. As the proposed project would not result in any GHG emissions, the significance criteria would not be met and no impact would result.

3.4 BIOLOGICAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
Flora					
a. A loss or disturbance to a unique, rare or threatened plant community?				X	
b. A reduction in the numbers or restriction in the range of any unique, rare or threatened species of plants?				X	
c. A reduction in the extent, diversity, or quality of native vegetation (including brush removal for fire prevention and flood control improvements)?				X	
d. An impact on non-native vegetation whether naturalized or horticultural if of habitat value?				X	
e. The loss of healthy native specimen trees?				X	
f. Introduction of herbicides, pesticides, animal life, human habitation, non-native plants or other factors that would change or hamper the existing habitat?				X	
Fauna					
g. A reduction in the numbers, a restriction in the range, or an impact to the critical habitat of any unique, rare, threatened or endangered species of animals?				X	
h. A reduction in the diversity or numbers of animals onsite (including mammals, birds, reptiles, amphibians, fish or invertebrates)?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
i. A deterioration of existing fish or wildlife habitat (for foraging, breeding, roosting, nesting, etc.)?				X	
j. Introduction of barriers to movement of any resident or migratory fish or wildlife species?				X	
k. Introduction of any factors (light, fencing, noise, human presence and/or domestic animals) which could hinder the normal activities of wildlife?				X	

Setting:

Santa Barbara County has a wide diversity of habitat types, including chaparral, oak woodlands, wetlands, and beach dunes. These are complex ecosystems and many factors are involved in assessing the value of the resources and the significance of project impacts. The County’s Environmental Thresholds and Guidelines Manual provides additional information regarding these differing biological resources in the form of “Habitat-Specific Impact Assessment Guidelines.”

County Environmental Thresholds:

Santa Barbara County’s Environmental Thresholds and Guidelines Manual includes guidelines for assessing impacts on biological resources. The Thresholds require both an evaluation of the plant and animal species and habitats on the project site and an evaluation of project impacts according to a series of assessment factors listed in the Thresholds. According to those Thresholds, disturbances to habitats or species are considered to be significant if they substantially impact resources in any of the following ways:

1. Conflict with adopted environmental plans and goals of the community where it is located.
2. Substantially affect a rare or endangered species of animal, plant, or the habitat of the species.
3. Interfere substantially with the movement of any resident or migratory fish or wildlife species.
4. Substantially diminish habitat for fish, wildlife, or plants.

In addition to these general guidelines, there are habitat-specific guidelines for habitats such as wetlands, riparian areas, native grasslands, and oak woodlands.

Impact Discussion:

(a-k) *No Impact.* The proposed update to the County’s Safety, Land Use, and Conservation Elements is primarily composed of new background information regarding recent fire activity, references to new hazard identification maps, and the incorporation of new geologic, flood, and fire policies. The update also includes measures for the implementation of the new policies contained within the Safety and Land Use Element updates. These implementation measures have been designed to mirror and provide consistency with existing County, State and Federal requirements or are redundant to requirements already effectuated by local ordinances. For instance, Safety Element Fire Protection Policy 5 requires the use of defensible space as a mechanism to reduce the likelihood of structural damage during wildfires. In certain instances, establishment of this defensive space necessitates the thinning and/or removal of vegetation. It is possible that such vegetation removal could result in the destruction of sensitive plant species or loss of habitat for sensitive animal species. However, Fire Policy 5 along with the remainder of the new geologic, fire, and flood policies are redundant to requirements already included in other County ordinances, State law, or federal law. Specifically, the new fire policies are derived from the previously adopted County Code Chapters 10 (Building Code) and 15 (Fire Prevention). The Safety Element’s newly proposed flood hazard protection policies consist of select portions of the previously adopted County Code Chapters 15A (Flood Plain Management) and 15B (Development Along Watercourses). As a result, there would be no new physical impacts as a result of the adoption of the new Safety Element and Land Use Element geologic, fire, and flood protection policies because the physical activities which would

result from these policies is already required by County Code Chapters 10, 14, 15, 15A, and 15B or by State and/or federal law. As discussed in greater detail within Appendix A (Impact Assessment of New Implementation Measures) of this document, the adoption of these Land Use and Safety Element policies will not allow or require activities which result in physical impacts beyond which is already included in existing County ordinances. Instead, the incorporation of these policies into the County’s Comprehensive General Plan will establish compliance with State law (specifically Government Code §65302) and will provide a singular source which development review planners and members of the public can refer to for information regarding the avoidance and mitigation of natural hazards.

As previously discussed in Section 1.0 (Project Description) of this document, the project also includes the replacement of a policy recommendation within the Mineral Resources portion of the Conservation Element. As this existing language was only a recommendation, and not an adopted policy, the County is not legally required to enforce the recommended action nor has the County chosen to voluntarily enforce the recommendation. Therefore, the proposed revisions would not result in additional physical impacts to the environment as County’s existing administrative practice is not expected to change as a result of the project.

As discussed in greater detail above, the proposed update to the County’s Safety, Land Use, and Conservation Elements would not result in significant impacts to the County’s biological resources.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As mentioned above, the proposed Comprehensive General Plan update would not result in any direct physical impacts that would significantly affect biological resources in a negative manner. Therefore, no cumulatively significant impacts to biological resources would result from the project.

3.5 CULTURAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
Archaeological Resources					
a. Disruption, alteration, destruction, or adverse effect on a recorded prehistoric or historic archaeological site (note site number below)?				X	
b. Disruption or removal of human remains?				X	
c. Increased potential for trespassing, vandalizing, or sabotaging archaeological resources?				X	
d. Ground disturbances in an area with potential cultural resource sensitivity based on the location of known historic or prehistoric sites?				X	
Ethnic Resources					
e. Disruption of or adverse effects upon a prehistoric or historic archaeological site or property of historic or cultural significance to a community or ethnic group?				X	
f. Increased potential for trespassing, vandalizing, or sabotaging ethnic, sacred, or ceremonial places?				X	
g. The potential to conflict with or restrict existing religious, sacred, or educational use of the area?				X	

Setting:

For at least the past 10,000 years, the area that is now Santa Barbara County has been inhabited by Chumash Indians and their ancestors. In accordance with the archaeological record, large Chumash settlements tended to exist along the County's coastline, on the Channel Islands, and in close proximity to creeks and rivers.

County Environmental Thresholds:

The County Environmental Thresholds and Guidelines Manual contains guidelines for identification, significance determination, and mitigation of impacts to important cultural resources. Chapter 8 of the Manual, the *Archaeological Resources Guidelines: Archaeological, Historic and Ethnic Element*, specifies that if a resource cannot be avoided, it must be evaluated for importance under CEQA. CEQA Section 15064.5 contains the criteria for evaluating the importance of archaeological and historical resources. For archaeological resources, the criterion usually applied is: (D), "Has yielded, or may be likely to yield, information important in prehistory or history". If an archaeological site does not meet any of the four CEQA criteria in Section 15064.5, additional criteria for a "unique archaeological resource" are contained in Section 21083.2 of the Public Resource Code, which states that a "unique archaeological resource is an archaeological artifact, object, or site that: 1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; 2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person. A project that may cause a substantial adverse effect on an archaeological resource may have a significant effect on the environment.

Impact Discussion:

(a-g) No Impact. The proposed update to the County's Safety, Land Use, and Conservation Elements is primarily composed of new background information regarding recent fire activity, references to new hazard identification maps, and the incorporation of new geologic, flood, and fire policies. The update also includes measures for the implementation of the new policies contained within the Safety and Land Use Element updates. These implementation measures have been designed to mirror and provide consistency with existing County, State and Federal requirements or are redundant to requirements already effectuated by local ordinances. For instance, projects which are designed to comport with the County's flood control policies may require substantial amounts of ground disturbance. These ground disturbance activities typically include the development of raised building pads, construction of earthen berms, or the excavation of stormwater detention basins. Such ground disturbance could have the potential to significantly affect previously undiscovered cultural resources. However, the new geologic, fire, and flood policies are redundant to requirements already included in County ordinances, or are already required by State and federal laws. Specifically, the Safety Element's newly proposed flood hazard protection policies consist of select portions of the previously adopted County Code Chapters 15A (Flood Plain Management) and 15B (Development Along Watercourses). As a result, no new physical impacts would result from the adoption of the new Safety Element and Land Use Element geologic, fire, and flood protection policies which are not already allowed/required by County Code Chapters 10, 14, 15, 15A, and 15B, or State and federal law. As discussed in more detail within Appendix A (Impact Assessment of New Implementation Measures) section of this document, the adoption of these Land Use and Safety Element policies will not allow or require activities which result in physical impacts beyond which is already included in existing County ordinances. Instead, the incorporation of these policies into the County's Comprehensive General Plan will establish compliance with State law (specifically Government Code §65302) and will provide a singular source which development review planners and members of the public can refer to for information regarding the avoidance and mitigation of natural hazards.

As previously discussed in Section 1.0 (Project Description) of this document, the project also includes the replacement of a policy recommendation within the Mineral Resources portion of the Conservation Element. As this existing language was only a recommendation, and not an adopted policy, the County is not legally required to enforce the recommended action nor has the County chosen to voluntarily enforce the recommendation. Therefore, the proposed revisions would not result in additional physical impacts to

the environment as County's existing administrative practice is not expected to change as a result of the project.

As discussed in greater detail above, the proposed update to the County's Safety, Land Use, and Conservation Elements would not result in significant impacts to the County's air quality.

Furthermore, the proposed Comprehensive General Plan update will not alleviate developers and property owners from completing site specific surveys as required by the County's existing Environmental Thresholds. The County's environmental review process requires archaeological research and/or survey activity commensurate with the anticipated probability of impact on cultural resources. During the review of specific development applications, proposed project sites undergo the following process to reduce the likelihood of impact to cultural resources. Although for illustration purposes this process is listed in sequential steps, sites which are anticipated to have a high potential for sensitive resources may be subject to higher levels of survey work without the completion of intervening preliminary investigation. Such determinations are subject to the review and approval of the County archaeologist.

Archaeological Review Process

Preliminary Map and Record Search: The Development Review Planner reviews County maps and/or requests a UCSB data search to confirm whether or not the proposed project site has been previously surveyed for archaeological resources. If the site was been previously surveyed and no evidence of cultural resources were found, then the project proceeds with no anticipated impact. If the site was never surveyed, or a survey was conducted and found some possibility of onsite resources, then additional Phased surveys may be required.

Phase 1 Archaeological Survey: If research performed as part of Step 1 results in the likelihood of onsite cultural resources, at a minimum a Phase 1 Archaeological Survey is typically required. A Phase 1 Survey consists of a visual surface survey conducted by a qualified archaeologist. The archaeologist walks the site in parallel transects, examines areas of disturbed earth (eroded gullies, rodent burrows, etc.), and possibly surface scrapes detritus to uncover other visible artifacts. If the Phase 1 fails to uncover any potential resources then the project proceeds with no anticipated impact. If the survey resulted in the discovery of potentially significant cultural resources, further detailed surveys may be required.

Extended Phase 1 Archaeological Survey: Dependent upon the results of the Phase 1 Survey, or if preliminary records research indicated a high probability of cultural sensitivity, an Extended Phase 1 Survey may be required. An Extended Phase 1 Survey requires all the same elements of the Phase 1 (if they have not already been conducted) but also includes more invasive excavation in the form trenching, test pits, etc. If the Extended Phase 1 fails to uncover any potential resources then the project proceeds with no anticipated impact. If the survey resulted in the discovery of potentially significant cultural resources, further detailed surveys may be required.

Phase 2 Study: If an archaeological site documented by the Phase 1 Survey is within the proposed project area and cannot be avoided, a Phase 2 study is required to gather the data necessary to evaluate the significance of the resource, determine direct and indirect impacts to the resource, and determine feasible mitigation measures. Site significance is based on site integrity, research potential, and potential for public appreciation as defined in CEQA. For archaeological sites, a Phase 2 study usually consists of controlled subsurface testing and analysis of results, but may also involve analysis of previously collected site materials. Native American consultation and participation is also required. The research design of a Phase 2 study must be approved by P&D before it is implemented. The excavation, analysis and reporting must conform to County Cultural Resource Guidelines.

Phase 3 Study: When an archaeological site has been determined to be significant, and cannot be avoided or capped, then a Phase 3 study is required to mitigate impacts to the resource through some kind of data recovery. Native American consultation and participation is also required. The work must be preceded by an explicit research design approved by P&D, and the excavation, analysis and reporting must conform to County Cultural Resource Guidelines.

Irrespective of the current update process, the cultural resource investigation and analysis described above will be completed, as required, on specific development projects. The proposed update to the County’s Comprehensive General Plan does not alleviate the need for developers and property owners to undergo this site investigation process; therefore the proposed project will not result in any new significant impacts to cultural resources.

In accordance with SB 18² the County has sent written notices to the Chumash Tribe notifying them of the County’s intention to update its Safety, Land Use, and Conservation Elements and offering an opportunity for consultation. As of the date of publication of this document the Tribe has not requested such a consultation.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As previously mentioned above, the proposed Comprehensive General Plan update would not result in any direct physical impacts that would significantly affect cultural resources in a negative manner. Therefore, no cumulatively significant impacts to cultural resources would likely result from the project.

3.6 ENERGY

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Substantial increase in demand, especially during peak periods, upon existing sources of energy?				X	
b. Requirement for the development or extension of new sources of energy?				X	

Setting:

Private electrical and natural gas utility companies, such as Pacific Gas and Electric (PG&E), provide service to customers in Central and Southern California, including the unincorporated areas of Santa Barbara County. The County also facilitates the development of sustainable energy sources such as the recent approval of the Lompoc Wind Farm and the ongoing permitting of ground or building mounted solar panel arrays.

County Environmental Thresholds:

The County has not identified significance thresholds for electrical and/or natural gas service impacts (Thresholds and Guidelines Manual).

Impact Discussion:

(a-b) No Impact. The proposed update to the County’s Safety, Land Use, and Conservation Elements is intended to provide a greater resource of information and consolidated location for policies which will assist the County and its residents in avoiding or mitigating the effects of natural hazards. None of these policies are expected to affect development in a manner which would require use of increased levels of energy.

² Senate Bill 18 is a State law that requires local jurisdictions to contact, and offer an opportunity for consultation with, local Native American Tribes when said jurisdictions are amending or updating their General Plan.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As previously mentioned above, the proposed Comprehensive General Plan update would not result in any direct physical impacts that would significantly affect energy resources in a negative manner. Therefore, no cumulatively significant impacts to energy resources would result from the project.

3.7 FIRE PROTECTION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Introduction of development into an existing high fire hazard area?				X	
b. Project-caused high fire hazard?				X	
c. Introduction of development into an area without adequate water pressure, fire hydrants or adequate access for fire fighting?				X	
d. Introduction of development that will hamper fire prevention techniques such as controlled burns or backfiring in high fire hazard areas?				X	
e. Development of structures beyond safe Fire Dept. response time?				X	

Setting:

The County contains substantial areas of open space and national forest land which include high fuel loads. These fuel loads, combined with arid weather, drought, and/or high winds can create significant fire hazards. In an effort to address the hazards the County has designated certain regions as “High Fire Hazard Areas.” New development in these hazard areas are subject to a heightened level of staff review and design requirements.

County Environmental Thresholds:

The following County Fire Department standards are applied in evaluating impacts associated with the proposed development:

- The emergency response thresholds include Fire Department staff standards of one on-duty firefighter per 4000 persons (generally 1 engine company per 12,000 people, assuming three firefighters per engine). The emergency response time standard is approximately 5-6 minutes.
- Water supply thresholds include a requirement for 750 gpm at 20 psi for all single family dwellings.
- The ability of the County’s engine companies to extinguish fires (based on maximum flow rates through hand held line) meets state and national standards assuming a 5,000 square foot structure. Therefore, in any portion of the Fire Department’s response area, all structures over 5,000 square feet are an unprotected risk (a significant impact) and therefore should have internal fire sprinklers.
- Access road standards include a minimum width (depending on number of units served and whether parking would be allowed on either side of the road), with some narrowing allowed for driveways. Cul-de-sac diameters, turning radii, and road grade must meet minimum Fire Department standards based on project type.
- Two means of egress may be needed and access must not be impeded by fire, flood, or earthquake.

A potentially significant impact could occur in the event any of these standards are not adequately met.

Impact Discussion:

(a-e) No Impact. The proposed Safety Element update provides a substantial amount of new information regarding the historic wildfire activity in the County, potential sources of wildfire ignition, and indicates where the most up-to-date maps of the County's High Fire Hazard Areas can be referenced. Additionally, the Safety Element update delineates which agencies are responsible for fire protection in the County and summarizes what actions these agencies typically utilize to limit the potential for destructive wildfires. Finally, the update includes new fire protection policies which reinforce the requirements already in effect as part of County Code Chapters 10 (Building Code) and 15 (Fire Protection). The implementation of these policies would assist in mitigating the threat which wildfires pose to the County's residents and structural development. These measures include, but are not limited to, the establishment of defensible space, the development of appropriate infrastructure for emergency ingress/egress, and the use of fire resistive construction materials and development requirements include, such as:

- The installation of Class A or B roof coverings,
- the use of 1-hour fire rated materials for eaves and unenclosed roof coverings,
- the use of heavy timber for exposed columns, and
- the covering of attic ventilation openings with ¼-inch corrosion-resistant wire mesh.

The application of these requirements, combined with vegetation clearance, sprinkler systems, and the distribution of fire hydrants and water tanks where necessary helps to protect development from fire hazards as feasible. As a result, the new information and policies provided in the County's Safety Element would not have any significant negative effects which would create new fire hazards, and in fact would likely result in the reduction of hazardous fire conditions throughout the County.

Predictions about the long-term effects of global climate change in California include increased incidence of wildfires and a longer fire season, due to drier conditions and warmer temperatures. Any increase in the number or severity of wildfires has the potential to impact resources to fight fires when they occur, particularly when the State experiences several wildfires simultaneously. Such circumstances place greater risk on development in high fire hazard areas. The County is currently developing a Climate Action Strategy (CAS) to minimize the effects of such climate change induced hazards.

As previously discussed in Section 1.0 (Project Description) of this document, the project also includes the replacement of a policy recommendation within the Mineral Resources portion of the Conservation Element. As this existing language was only a recommendation, and not an adopted policy, the County is not legally required to enforce the recommended action nor has the County chosen to voluntarily enforce the recommendation. Therefore, the proposed revisions would not result in additional physical impacts to the environment as County's existing administrative practice is not expected to change as a result of the project.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As previously mentioned above, the proposed Comprehensive General Plan update would not result in any direct negative physical impacts that would significantly affect public safety by creating new fire hazards. Therefore, no cumulatively significant impact would result from increased fire hazards as a result of the project.

3.8 GEOLOGIC PROCESSES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Exposure to or production of unstable earth conditions such as landslides, earthquakes, liquefaction, soil creep, mudslides, ground failure (including expansive, compressible, collapsible soils), or similar hazards?				X	
b. Disruption, displacement, compaction or overcovering of the soil by cuts, fills or extensive grading?				X	
c. Exposure to or production of permanent changes in topography, such as bluff retreat or sea level rise?				X	
d. The destruction, covering or modification of any unique geologic, paleontologic or physical features?				X	
e. Any increase in wind or water erosion of soils, either on or off the site?				X	
f. Changes in deposition or erosion of beach sands or dunes, or changes in siltation, deposition or erosion which may modify the channel of a river, or stream, or the bed of the ocean, or any bay, inlet or lake?				X	
g. The placement of septic disposal systems in impermeable soils with severe constraints to disposal of liquid effluent?				X	
h. Extraction of mineral or ore?				X	
i. Excessive grading on slopes of over 20%?				X	
j. Sand or gravel removal or loss of topsoil?				X	
k. Vibrations, from short-term construction or long-term operation, which may affect adjoining areas?				X	
l. Excessive spoils, tailings or over-burden?				X	

Setting:

Santa Barbara County contains a wide variety of geologic conditions and some of these conditions constitute a hazard to public health and safety. Such geologic hazards include, but are not limited to: seismic activity, landslides, liquefaction, soil creep, high groundwater, expansive soils, and compressible/collapsible soils. The County’s Seismic Safety and Safety Element contains countywide and regionally specific maps of areas which are prone to exhibit the aforementioned geologic hazards. Based on an analysis of the geographic distribution of these hazards, the County has been divided up into five areas which are categorized with different geologic *Problem Ratings*. Each *Problem Rating* category has recommended levels of development based on the inherent risks to property, as well as, risks to public health and safety. These recommendations are not intended to indicate that areas with geologic hazards cannot, or should not be developed; they are instead intended to caution prospective developers, decision makers, and members of the public that safely developing land in certain parts of the County may require relatively greater levels of engineering and cost.

Geologic Problem Ratings from the Seismic Safety and Safety Element (Page 239):

Category I- Low Hazard Level: These areas have relatively minor problems (except possibly seismic shaking) and would be suitable for all types of development.

Category II- Low-moderate Hazard Level: These areas have relatively minor to moderate problems (except possibly seismic shaking) and would be suitable for all types of development.

Category III- Moderate Hazard Level: These areas have relatively moderate problems, but would generally be suitable for all types of development.

Category IV- Moderate-severe Hazard Level: These areas have relatively moderate to severe problems. These areas might be left undeveloped or developed - depending on the future requirements for urban land. It should be noted in this regard that low density zoning is not necessarily the answer for all such areas - even though it is generally recommended. For example, areas of large landslides may require substantial sums for correction, which could be economically feasible only if moderately dense development were permitted. Generally speaking, different types of construction (commercial vs. residential, for example) would have no distinct advantage or disadvantage compared to one another in areas in this category, except that commercial or industrial development would generally result in less landscape water entering the soil than medium density residential development.

Category V- Severe Hazard Level: These areas have relatively severe problems. These areas should be given primary consideration for minimum development and use. They could be planned as natural areas, or for recreational, cultivated agriculture, or grazing agricultural use. If development is permitted, it should generally be of low density.

County Environmental Thresholds:

Pursuant to the County's Adopted Thresholds and Guidelines Manual, impacts related to geological resources may have the potential to be significant if the proposed project involves any of the following characteristics:

1. The project site or any part of the project is located on land having substantial geologic constraints, as determined by the County's Planning & Development or Public Works Departments. Areas constrained by geology include parcels located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion. "Special Problems" areas designated by the Board of Supervisors have been established based on geologic constraints, flood hazards, and other physical limitations to development.
2. The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5 horizontal to 1 vertical.
3. The project proposes construction of a cut slope over 15 feet in height as measured from the lowest finished grade.
4. The project is located on slopes exceeding 20% grade.

Impact Discussion:

(a-1) No Impact. The proposed update to the County's Safety, Land Use, and Conservation Elements is primarily composed of new background information regarding recent fire activity, references to new hazard identification maps, and the incorporation of new geologic, flood, and fire policies. The update also includes measures for the implementation of the new policies contained within the Safety and Land Use Element updates. These implementation measures have been designed to mirror and provide consistency with existing County, State and Federal requirements or are redundant to requirements already effectuated by local ordinances. For instance, projects which are designed to comport with the County's geologic hazard policies may require substantial amounts of ground disturbance. These ground disturbance activities typically include the compaction of soil or the construction of retaining walls. Such ground disturbance could have the potential to significantly affect the County's existing land forms but would ultimately result in a reduction of existing geologic hazards. However, the new geologic hazard reduction policies are redundant with requirements already included in other County ordinances or State law. Specifically, the Safety Element's newly proposed geologic hazard protection policies consist of select portions of the previously adopted County Code Chapters 10 (Building Code) and 14 (Grading, Erosion,

and Sediment Control). As a result, no new physical impacts would result from the adoption of the new Safety Element and Land Use Element policies. As previously discussed in greater detail within Appendix A (Impact Assessment of New Implementation Measures) of this document, the adoption of these Land Use and Safety Element policies would not allow or require activities which result in physical impacts beyond which is already allowed under existing County ordinances or State law. Instead, the incorporation of these policies into the County’s Comprehensive General Plan will establish compliance with State law (specifically Government Code §65302) and will provide a singular source which development review planners and members of the public can refer to for information regarding the avoidance and mitigation of natural hazards.

As previously discussed in Section 1.0 (Project Description) of this document, the project also includes the replacement of a policy recommendation within the Mineral Resources portion of the Conservation Element. As this existing language was only a recommendation, and not an adopted policy, the County is not legally required to enforce the recommended action nor has the County chosen to voluntarily enforce the recommendation. Therefore, the proposed revisions would not result in additional physical impacts to the environment as County’s existing administrative practice is not expected to change as a result of the project.

As discussed in greater detail above, the proposed update to the County’s Safety, Land Use, and Conservation Elements would not result in significant impacts to the County’s geologic processes.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As previously mentioned above, the proposed Comprehensive Plan update would not result in any direct physical impacts that would create new geologic hazards or land form alterations. Therefore, no cumulatively significant impact would result from increased geologic hazards or the disturbance of existing land forms.

3.9 HAZARDOUS MATERIALS/RISK OF UPSET

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. In the known history of this property, have there been any past uses, storage or discharge of hazardous materials (e.g., fuel or oil stored in underground tanks, pesticides, solvents or other chemicals)?				X	
b. The use, storage or distribution of hazardous or toxic materials?				X	
c. A risk of an explosion or the release of hazardous substances (e.g., oil, gas, biocides, bacteria, pesticides, chemicals or radiation) in the event of an accident or upset conditions?				X	
d. Possible interference with an emergency response plan or an emergency evacuation plan?				X	
e. The creation of a potential public health hazard?				X	
f. Public safety hazards (e.g., due to development near chemical or industrial activity, producing oil wells, toxic disposal sites, etc.)?				X	
g. Exposure to hazards from oil or gas pipelines or oil well facilities?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
h. The contamination of a public water supply?				X	

Setting:

The County contains various sources of hazardous waste/materials; these sources commonly include: industrial facilities, landfills, mineral extraction facilities, gas stations, and produce coolers which utilize anhydrous ammonia. Residential households can also generate small amounts of hazardous waste in the form of paint, cleaning solutions, and batteries.

County Environmental Thresholds:

The County’s safety threshold addresses involuntary public exposure from projects involving significant quantities of hazardous materials. The threshold addresses the likelihood and severity of potential accidents to determine whether the safety risks of a project exceed significant levels. This threshold is a color coded system ranging from Red (high probability of significant risk to the public from hazardous materials upset) to Green (low probability). This ranking system is primarily applied to land uses which utilize large quantities of hazardous materials. Such land uses commonly located in the County are produce cooling facilities (which utilize potentially hazardous amounts of anhydrous ammonia) and petroleum extraction facilities (which sometimes produce hazardous amounts of hydrogen sulfide, also known as sour gas). No such hazardous material is typically associated with residential development.

Impact Discussion:

(a-h) *No Impact.* The proposed update to the Safety, Land Use, and Conservation Elements would not result in significant environmental effects from the release or upset of hazardous materials. The County adopted an addendum to its Safety Element known as the *Safety Element Supplement* in 2000. This supplemental document directly provides goals, policies, and objectives regarding the use and storage of hazardous materials, the permitting and approval of hazardous facilities, and the development of gas pipelines. The project does not include any proposed changes to the *Safety Element Supplement* or any goals, policies, and objectives regarding the use and storage of hazardous materials, the permitting and approval of hazardous facilities, and the development of gas pipelines. Therefore, the project will not result in any new environmental effects from the use or storage of hazardous materials.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As previously mentioned above, the Comprehensive Plan update is a policy level action and would not result in any direct physical impacts that would create new significant impacts from hazardous materials. Therefore, no cumulatively significant impact would result from hazardous material production or risk of upset.

3.10 HISTORIC RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Adverse physical or aesthetic impacts on a structure or property at least 50 years old and/or of historic or cultural significance to the community, state or nation?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
b. Beneficial impacts to an historic resource by providing rehabilitation, protection in a conservation/open easement, etc.?				X	

Setting:

The County contains numerous resources of significant age, some of which are recognized as being of special historic importance. Within the County of Santa Barbara, the most notable of these resources can be designated as either *Historic Landmarks* or *Places of Historic Merit*. Currently there are 46 Historic Landmarks and 22 Places of Historic Merit within the County. The County’s Historic Landmarks Advisory Commission (HLAC) is the responsible review authority for reviewing any proposed work which affect these resources and for making recommendations to the Board of Supervisors as to which, if any, additional resources should be landmarked.

County Environmental Thresholds:

Historic Resource impacts are determined through use of the County’s Cultural Resources Guidelines. A significant resource a) possesses integrity of location, design, workmanship, material, and/or setting; b) is at least fifty years old, and c) is associated with an important contribution, was designed or built by a person who made an important contribution, is associated with an important and particular architectural style, or embodies elements demonstrating outstanding attention to detail, craftsmanship, use of materials, or construction methods.

Impact Discussion:

(a-b) *No Impact*. The proposed update to the County’s Safety, Land Use, and Conservation Elements would not result in significant environmental effects on the County’s historic resources. The proposed updates are intended to provide more information regarding the danger of natural hazards and the feasibility of mitigating or avoiding such hazards. The new policies provided for geologic, fire, and flood protection purposes are derived from existing County ordinances, or are already required by State and federal law, and would not change how the County preserves historic structures. Future development projects would still be subject to individual environmental review for their potential impact to historic resources. Therefore, the proposed project would not result in significant impacts to historic resources.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As mentioned above, the proposed Comprehensive Plan update would not result in any direct physical impacts that would create new significant impacts to historic resources. Additionally, the update does not propose any changes to the County’s existing regulatory process for the evaluation and preservation of historic resources. Therefore, no cumulatively significant impacts to historic resources would result from the proposed project.

3.11 LAND USE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Structures and/or land use incompatible with existing land use?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X	
c. The induction of substantial growth or concentration of population?				X	
d. The extension of sewer trunk lines or access roads with capacity to serve new development beyond this proposed project?				X	
e. Loss of existing affordable dwellings through demolition, conversion or removal?				X	
f. Displacement of substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X	
g. Displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X	
h. The loss of a substantial amount of open space?				X	
i. An economic or social effect that would result in a physical change? (i.e. Closure of a freeway ramp results in isolation of an area, businesses located in the vicinity close, neighborhood degenerates, and buildings deteriorate. Or, if construction of new freeway divides an existing community, the construction would be the physical change, but the economic/social effect on the community would be the basis for determining that the physical change would be significant.)				X	
j. Conflicts with adopted airport safety zones?				X	

Setting:

Santa Barbara County encompasses approximately 1,634,000 acres of land. Federal landholdings account for 748,000 acres, most of which are in the Los Padres National Forest (637,000 acres) and Vandenberg Air Force Base (91,000 acres). The State, including the University of California, owns another 18,000 acres, and incorporated cities account for 42,000 acres. The County has regulatory jurisdiction over most of the remaining 826,000 acres.

County Environmental Threshold:

The Thresholds and Guidelines Manual contains no specific thresholds for land use. Generally, a potentially significant impact can occur if a project as proposed is potentially inconsistent with policies and standards adopted by an agency for the purposes of environmental protection or would result in substantial growth inducing effects.

Impact Discussion:

(a-j) *No Impact.* The proposed update to the County's Safety, Land Use, and Conservation Elements would not result in significant environmental effects from changes in existing land use patterns or conditions. Specific issue areas are described as follows:

Airport Safety Zones: The proposed updates to the County's Safety, Land Use, and Conservation Elements do not affect the County's existing Airport Safety Zones nor do they change the land uses allowed in such zones. The Safety Element is primarily focused on providing information and policies regarding natural hazards such as flooding and wildfires, rather than manmade hazards such as airport over-flight areas. The exception is the Safety Element Supplement which addresses hazardous materials; however, changes to the Supplement are not included in the proposed project. Therefore, the project would not result in conflicts with designated airport approach or over-flight zones.

Physical Impacts from Economic and Social Effects: The proposed update to the County's Safety, Land Use, and Conservation Elements is primarily composed of new background information regarding recent fire activity, references to new hazard identification maps, and the incorporation of new geologic, flood, and fire policies. The update also includes measures for the implementation of the new policies contained within the Safety and Land Use Element updates. These implementation measures have been designed to mirror and provide consistency with existing County, State and Federal requirements or are redundant to requirements already effectuated by local ordinances. For instance, Safety Element Fire Protection Policy 5 requires the use of defensible space as a mechanism to reduce the likelihood of structural damage during wildfires. However, Fire Policy 5 along with the remainder of the new geologic, fire, and flood policies implement requirements which are redundant to existing County ordinances and State or federal law. As a specific example, the new fire policies are derived from the previously adopted County Code Chapters 10 (Building Code) and 15 (Fire Prevention). The Safety Element's newly proposed flood hazard protection policies consist of select portions of the previously adopted County Code Chapters 15A (Flood Plain Management) and 15B (Development Along Watercourses). Finally, the new geologic hazard policies are derived from County Code Chapters 10 (Building Code) and 14 (Grading, Erosion, and Sediment Control). A more detailed policy by policy evaluation of this new material is included in Appendix A (Impact Assessment of New Implementation Measures) of this document. As a result of the new policies being redundant with existing ordinances and laws already in effect, no new physical impacts would result from the adoption of the new Safety Element and Land Use Element geologic, fire, and flood protection policies beyond which is already allowed under existing County ordinances.

Housing and Resident Displacement: The proposed update to the Safety, Land Use, and Conservation Elements provides additional information and policies regarding the avoidance and mitigation of natural hazards such as flooding and wildfires. As previously discussed in this document, these policies are primarily intended to reinforce existing County regulations which are already effectuated by local ordinances. As a result, there are no new policies which will result in the reduction of housing or displacement of residents. Instead, the information provided as part of the update will assist County staff and property owners in encouraging the development of residential units which are specifically sited and designed to avoid the effects of natural hazards. This may in turn prevent the future displacement of residents as a consequence of evacuation orders or property damage associated with common natural disasters.

Land Use Compatibility: The proposed Comprehensive Plan update does not include changes to the County's existing zoning or land use designations. The update to the County's Safety, Land Use, and Conservation Elements primarily consists of new background information regarding recent fire activity, references to new hazard identification maps, and the incorporation of new flood and fire policies and implementation measures. Specifically, new fire policies such as those derived from County Code Chapters 10 (Building Code) require special building materials and design within high fire hazard areas. Such special design considerations include, but are not limited to:

- The installation of Class A or B roof coverings,
- the use of 1-hour fire rated materials for eaves and unenclosed roof coverings,
- the use of heavy timber for exposed columns, and
- the covering of attic ventilation openings with ¼-inch corrosion-resistant wire mesh.

The use of such specialized materials and design techniques could potentially result in the development of structures which are visually inconsistent with existing development that was developed prior to the enactment of such requirements. Refer to Section 3.1 (Visual Resources) of this document for a more detailed discussion of this impact area.

Open Space: The proposed update to the Safety, Land Use, and Conservation Elements would not result in significant negative impacts to the County’s open space areas. The new policies proposed as part of the project would serve to reinforce County requirements already effectuated as part of local ordinances such as County Code Chapters 10, 15, 15A, and 15B. The continued application of flood control policies may in fact result in the protection of additional open space areas as the avoidance of floodways and coastal inundation areas can sometimes preclude development in floodways, coastal areas subject to inundation, riparian corridors and wetlands.

Population & Infrastructure: The proposed Comprehensive Plan update does not increase the County’s zoning capacity or propose other land use changes which would substantially affect the County’s population. The additional information and policies provided as part of the project may provide County staff and developers the additional knowledge necessary to site and design County infrastructure in a manner which will allow such development to withstand the hazards of potential natural disasters.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

The proposed Comprehensive Plan update is a policy level action and would not result in any direct physical impacts that would create new significant land use impacts. Therefore, no cumulatively significant land use impacts would result from the proposed project.

3.12 NOISE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Long-term exposure of people to noise levels exceeding County thresholds (e.g. locating noise sensitive uses next to an airport)?				X	
b. Short-term exposure of people to noise levels exceeding County thresholds?				X	
c. Project-generated substantial increase in the ambient noise levels for adjoining areas (either day or night)?				X	

Setting:

The County includes several significant noise generators including airports, major highways, and industrial facilities. Due to their linear nature, major highways with substantial traffic volumes, such as Highway 101, Highway 246, and Highway 154, have the most widespread noise generation.

County Environmental Thresholds:

Noise is generally defined as unwanted or objectionable sound which is measured on a logarithmic scale and expressed in decibels (dB(A)). The duration of noise and the time period at which it occurs are important values in determining impacts on noise-sensitive land uses. The Community Noise Equivalent Level (CNEL) and Day-Night Average Level (L_{dn}) are noise indices which account for differences in intrusiveness between day- and night-time uses. County noise thresholds are: 1) 65 dB(A) CNEL maximum for exterior exposure, and 2) 45 dB(A) CNEL maximum for interior exposure of noise-sensitive uses. Noise-sensitive land uses include: residential dwellings; transient lodging; hospitals and other long-term care facilities; public or private educational facilities; libraries, churches; and places of public assembly.

Impact Discussion:

(a-c) No Impact. The proposed update to the Safety, Land Use, and Conservation Elements would not result in significant environmental effects from new significant noise generators. The proposed update would not result in any substantial changes to the distribution of significant noise generating land uses. Future development projects would still be subject to the County’s existing regulations and thresholds regarding noise exposure. Short term impacts from construction will continue to be mitigated by the County’s standard limitation of construction hours.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As previously mentioned above, the proposed Comprehensive Plan update is a policy level action and would not result in any direct physical impacts that would create new significant impacts from significant noise generation. As previously mentioned, standard County policy already limits construction hours as mitigation of noise impacts associated with short term construction activities. Therefore, no cumulatively significant impacts from new major noise generating sources would result from the proposed project.

3.13 PUBLIC FACILITIES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. A need for new or altered police protection and/or health care services?				X	
b. Student generation exceeding school capacity?				X	
c. Significant amounts of solid waste or breach any national, state, or local standards or thresholds relating to solid waste disposal and generation (including recycling facilities and existing landfill capacity)?				X	
d. A need for new or altered sewer system facilities (sewer lines, lift-stations, etc.)?				X	
e. The construction of new storm water drainage or water quality control facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X	

Setting:

The County’s major public facilities include parks, schools, police & fire stations, camp grounds, and specialized facilities such as landfills and jails. The County currently owns and operates 21 day use parks, 16 fire stations, and 9 sheriff substations. Additionally, refer to Table 5 below for a comprehensive list of the County’s water and wastewater service providers.

County Environmental Thresholds:

Schools: Impacts to County schools are generally considered significant when a project would generate sufficient students to require an additional classroom.

Solid Waste: A project is considered to result in significant impacts to landfill capacity if it would generate 196 tons per year of solid waste. This volume represents 5% of the expected average annual increase in waste generation, and is therefore considered a significant portion of the remaining landfill capacity. In addition, construction and demolition waste from remodels and rebuilds is considered significant if it exceeds 350 tons. A project which generates 40 tons per year of solid waste is considered to have an adverse cumulative effect on solid waste generation, and mitigation via a Solid Waste Management Plan is recommended.

Impact Discussion:

(a-e) No Impact. The proposed update to the County’s Safety, Land Use, and Conservation Elements would not result in direct physical changes to the built environment, nor would it result in significant environmental effects on the County’s public facilities. In fact, the Safety Element update provides information and policies in regards to the development of critical County infrastructure. These policies encourage the County to development facilities in a manner which will allow them to continue operation during or after significant natural disasters. In some cases, these policies are already being implemented as the County is currently pursuing the development of an Emergency Operations Center and seismically retrofitting its historic structures, such as the courthouse in downtown Santa Barbara. However, the project would not allow for additional development beyond which is already allowed under existing County ordinances. Therefore, no additional need for emergency services, healthcare facilities, schools, waste disposal infrastructure, or similar public improvement would result from the project. The proposed project also does not change the County’s existing requirements for development impact fees. The approval of new housing projects would still be subject to applicable development mitigation fees such as school and parks fees.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As mentioned above, the Comprehensive Plan update would not result in any new significant impacts to the County’s public facilities. Therefore, no cumulatively significant impacts to pubic facilities would result from the proposed project.

3.14 RECREATION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Conflict with established recreational uses of the area?				X	
b. Conflict with biking, equestrian and hiking trails?				X	
c. Substantial impact on the quality or quantity of existing recreational opportunities (e.g., overuse of an area with constraints on numbers of people, vehicles, animals, etc. which might safely use the area)?				X	

Setting:

The Santa Barbara County Parks Department maintains more than 900 acres of parks and open spaces, as well as 84 miles of trails and coastal access easements. In accordance with the County’s Environmental Thresholds discussed below, based on the County’s unincorporated population of 130,878 (2000 Census data) a minimum of 615 acres of parks would be required Countywide. Current public facilities exceed this minimum ratio. Additionally, the County

contains a 637,000 acre portion of the Los Padres National Forest. This forest land contains numerous trails, rivers, and campgrounds which provide various recreational opportunities beyond those activities allowed in typical parks.

County Environmental Thresholds:

The Thresholds and Guidelines Manual contains no threshold for park and recreation impacts. However, the Board of Supervisors has established a minimum standard ratio of 4.7 acres of recreation/open space per 1,000 people to meet the needs of a community.

Impact Discussion:

(a-c) No Impact. The proposed update to the Safety, Land Use, and Conservation Elements would not result in significant environmental effects on the County’s recreation facilities/opportunities as the project involves policy changes relating to geologic, fire, and flood hazard protections that would not result in direct physical changes to the built environment. The proposed project does not change the County’s existing requirements for development impact fees. Therefore, new development projects would continue to be subject to County’s parks fees which are used to mitigate impacts to the County’s existing recreational infrastructure.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

The proposed project does not include any proposed rezones or changes in General Plan land use designations. As a result, the County’s overall capacity for new housing would remain constant and the update would not generate a substantial new population burden on County parks. Therefore, no cumulatively significant impacts to County recreational facilities would result from the proposed project.

3.15 TRANSPORTATION/CIRCULATION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Generation of substantial additional vehicular movement (daily, peak-hour, etc.) in relation to existing traffic load and capacity of the street system?				X	
b. A need for private or public road maintenance, or need for new road(s)?				X	
c. Effects on existing parking facilities, or demand for new parking?				X	
d. Substantial impact upon existing transit systems (e.g. bus service) or alteration of present patterns of circulation or movement of people and/or goods?				X	
e. Alteration to waterborne, rail or air traffic?				X	
f. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians (including short-term construction and long-term operational)?				X	
g. Inadequate sight distance?				X	
ingress/egress?				X	
general road capacity?				X	
emergency access?				X	
h. Impacts to Congestion Management Plan system?				X	

Setting:

The unincorporated County contains over 1,668 lane miles of major roads and local streets. This infrastructure is maintained by the County’s Public Works Department. This County infrastructure includes over 112

bridges, 15,000 street trees, 48 signalized intersections, and 20,000 street signs. The County also includes several major State routes and highways, such as Highway 1, Highway 101, Highway 154, Highway 166, and Highway 246. These roadways are regulated and maintained by the California Department of Transportation (CalTrans).

County Environmental Thresholds:

According to the County’s Environmental Thresholds and Guidelines Manual, a significant traffic impact would occur when:

- a. The addition of project traffic to an intersection increases the volume to capacity (V/C) ratio by the value provided below, or sends at least 15, 10, or 5 trips to an intersection operating at Level of Service D, E, or F respectively.

LEVEL OF SERVICE (including project)	INCREASE IN VOLUME/CAPACITY GREATER THAN
A	0.20
B	0.15
C	0.10
	Or the addition of:
D	15 trips
E	10 trips
F	5 trips

- b. Project access to a major road or arterial road would require a driveway that would create an unsafe situation, or would require a new traffic signal or major revisions to an existing traffic signal.
- c. Project adds traffic to a roadway that has design features (e.g., narrow width, road side ditches, sharp curves, poor sight distance, inadequate pavement structure) or receives use which would be incompatible with substantial increases in traffic (e.g. rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use, etc.) that will become potential safety problems with the addition of project or cumulative traffic. Exceeding the roadway capacity designated in the Circulation Element may indicate the potential for the occurrence of the above impacts.
- d. Project traffic would utilize a substantial portion of an intersection(s) capacity where the intersection is currently operating at acceptable levels of service (A-C) but with cumulative traffic would degrade to or approach LOS D (V/C 0.81) or lower. Substantial is defined as a minimum change of 0.03 for intersections which would operate from 0.80 to 0.85 and a change of 0.02 for intersections which would operate from 0.86 to 0.90, and 0.01 for intersections operating at anything lower.

Impact Discussion:

(a-h) No Impact. The proposed update to the County’s Safety, Land Use, and Conservation Elements would not result in significant environmental effects on the County’s transportation infrastructure. The additional information and policies regarding avoidance and mitigation of natural hazards would not allow for additional development, beyond that which is already allowed in the County. The proposed project would not generate new vehicle trips or create additional burden on the County’s transportation infrastructure. As individual development projects are considered in the future, such projects would still be subject to the County’s existing environmental thresholds for acceptable levels of service on County roads. In this manner the proposed Comprehensive Plan update would have no significant negative effects on the County’s circulation elements. However, the proposed project contains some information and resources regarding the establishment of evacuation plans and reinforces existing fire department requirements for

appropriate emergency ingress and egress routes. The establishment of emergency evacuation plans would not affect traffic because such plans would not result in physical changes to existing roads. Instead, evacuation plans specify guidelines for the route, sequence, and management of traffic flows on existing roads during certain emergency circumstances. Therefore, the proposed project may provide information which will result in improvements to the County’s emergency evacuation procedures but no physical effects on infrastructure.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As mentioned above, the proposed Comprehensive Plan update is a policy level action and would not result in any direct physical impacts that would significantly affect the County’s transportation infrastructure. Therefore, no cumulatively significant impacts to air quality would result from the project.

3.16 WATER RESOURCES/FLOODING

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters?				X	
b. Changes in percolation rates, drainage patterns or the rate and amount of surface water runoff?				X	
c. Change in the amount of surface water in any water body?				X	
d. Discharge, directly or through a storm drain system, into surface waters (including but not limited to wetlands, riparian areas, ponds, springs, creeks, streams, rivers, lakes, estuaries, tidal areas, bays, ocean, etc) or alteration of surface water quality, including but not limited to temperature, dissolved oxygen, turbidity, or thermal water pollution?				X	
e. Alterations to the course or flow of flood water or need for private or public flood control projects?				X	
f. Exposure of people or property to water related hazards such as flooding (placement of project in 100 year flood plain), accelerated runoff or tsunamis, sea level rise, or seawater intrusion?				X	
g. Alteration of the direction or rate of flow of groundwater?				X	
h. Change in the quantity of groundwater, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or recharge interference?				X	
i. Overdraft or over-commitment of any groundwater basin? Or, a significant increase in the existing overdraft or over-commitment of any groundwater basin?				X	
j. The substantial degradation of groundwater quality including saltwater intrusion?				X	
k. Substantial reduction in the amount of water otherwise available for public water supplies?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
I. Introduction of storm water pollutants (e.g., oil, grease, pesticides, nutrients, sediments, pathogens, etc.) into groundwater or surface water?				X	

Setting:

Water Resources: The County (including incorporated cities) contains fifteen groundwater basins. All of these groundwater basins are in various levels of overdraft except for the Santa Ynez River Riparian basin. The County also includes four major rivers: the Santa Ynez River; Cuyama River; Sisquoc River; and Santa Maria River. On average the County receives approximately 15 inches of rainfall annually.

Flooding Hazards: The County’s Public Works Department summarizes the County’s various primary flooding hazards as follows:

South Coast - South Coast Watersheds are steep and have short times of concentration. Conditions may change rapidly with high intensity rain, particularly with wet watersheds.

Santa Ynez River - Significant flooding is generally not a concern until seasonal rainfall exceeds 15 inches in the upper watershed and Cachuma Lake is full.

Santa Maria River (which includes the Sisquoc and Cuyama watersheds) - The levee protecting the City of Santa Maria and surrounding area is a concern at flows as low as 4,500 cubic feet per second. Flows greater than this threshold may jeopardize the integrity of the levee and potentially result in flooding across northern portions of the Santa Maria Valley. However, the US Army Corps of Engineers is currently proceeding with a project to substantially rehabilitate and improve the levee so that it can withstand larger storm events.

Cuyama River – The primary concern is the potential washout of Highway 166.

County Environmental Thresholds:

Water Resources Thresholds:

A project is determined to have a significant affect on water resources if it would exceed established threshold values which have been set for each overdrafted groundwater basin. These values were determined based on an estimation of a basin’s remaining life of available water storage. If the project’s net new consumptive water use [total consumptive demand adjusted for recharge less discontinued historic use] exceeds the threshold adopted for the basin, the project’s impacts on water resources are considered significant.

A project is also deemed to have a significant effect on water resources if a net increase in pumpage from a well would substantially affect production or quality from a nearby well.

Water Quality Thresholds:

A significant water quality impact is presumed to occur if the project:

- Is located within an urbanized area of the County and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;
- Increases the amount of impervious surfaces on a site by 25% or more;
- Results in channelization or relocation of a natural drainage channel;

- Results in removal or reduction of riparian vegetation or other vegetation (excluding non-native vegetation removed for restoration projects) from the buffer zone of any streams, creeks, or wetlands;
- Is an industrial facility that falls under one or more categories of industrial activity regulated under the National Pollutant Discharge Elimination System (NPDES) Phase I industrial storm water regulations (facilities with effluent limitation; manufacturing; mineral, metal, oil and gas, hazardous waste, treatment or disposal facilities; landfills; recycling facilities; steam electric plants; transportation facilities; treatment works; and light industrial activity);
- Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB) Basin Plan or otherwise impairs the beneficial uses³ of a receiving water body;
- Results in a discharge of pollutants into an "impaired" water body that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
- Results in a discharge of pollutants of concern to a receiving water body, as identified by the RWQCB.

Impact Discussion

(a-1) No Impact. The proposed update to the Safety, Land Use, and Conservation Elements would not result in significant negative environmental effects on the County's water resources or water quality and would not result in significant new flooding hazards. Specific issue areas are discussed as follows:

Quantity of Water: The proposed project provides additional information regarding potential natural hazards within the County and how these hazards may be avoided and/or mitigated where feasible. This additional information and policy language does not allow for additional development, beyond which is already allowed in the County, which would in turn create additional burden on the County's water supply. As individual development projects are considered in the future, such projects will still be subject to the County's existing groundwater use thresholds which guard against excessive groundwater overdraft. Additionally, it is sometimes possible that projects intended to limit the effects of hazardous flooding conditions also result in increased water supply or vice versa. For instance, flood control detention basins provide the opportunity for greater groundwater recharge and some reservoirs (like Lake Cachuma) provide some flood protection for downstream properties. In this manner, if projects abide by the new Safety Element policies, which are consistent with current County ordinances, it may result in marginally greater amounts of groundwater recharge.

Quality of Water: The proposed project provides additional information regarding potential natural hazards within the County and how these hazards may be avoided and/or mitigated where feasible. This additional information and policy language does not allow for additional development or changes in development patterns, beyond which is already allowed in the County. Therefore, no additional degradation in the County's water quality is expected to result from the project. However, flood control and hazard mitigation techniques may, as a secondary benefit, marginally improve the County's water quality. Examples could include the desiltation provided by some stormwater detention basins and the lessening of water contamination that results when development is appropriately setback from or located above floodways and floodplains.

³ Beneficial uses for Santa Barbara County are identified by the Regional Water Quality Control Board in the Water Quality Control Plan for the Central Coastal Basin, or Basin Plan, and include (among others) recreation, agricultural supply, groundwater recharge, fresh water habitat, estuarine habitat, support for rare, threatened or endangered species, preservation of biological habitats of special significance.

Flood Hazards: The proposed project includes updated hazard information regarding various natural hazards; however, the primary impetus for the project was to provide compliance with AB 162. As discussed previously in greater detail within the Project Description (Section 1.0) of this document, AB 162 requires that local jurisdictions provide additional flood hazard data and analysis in their respective Safety Elements. Therefore, the proposed project would result in an improved information source for the public and development review planners to reference when planning development that minimizes the negative impacts of flooding.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required.

Cumulative Impacts:

As previously mentioned above, the proposed Comprehensive Plan update is a policy level action and would not result in any direct negative physical impacts that would significantly affect the County’s water resources, nor would it result in new significant flood hazards. Therefore, no cumulatively significant impacts to water resources would result from the project, nor would any new significant flood hazards be created.

4.0 INFORMATION SOURCES

4.1 County Departments Consulted:

Sheriff, Fire, Public Works, Flood Control, Office of Emergency Services, Building and Safety

4.2 Comprehensive General Plan:

<input checked="" type="checkbox"/> Seismic Safety/Safety Element	<input checked="" type="checkbox"/> Conservation Element
<input type="checkbox"/> Open Space Element	<input checked="" type="checkbox"/> Noise Element
<input type="checkbox"/> Coastal Plan and Maps	<input checked="" type="checkbox"/> Circulation Element
<input type="checkbox"/> ERME	<input checked="" type="checkbox"/> Land Use
<input checked="" type="checkbox"/> Scenic Highways	<input checked="" type="checkbox"/> Hazardous Waste
<input type="checkbox"/> Energy	<input checked="" type="checkbox"/> Housing

4.3 Other Sources:

<input type="checkbox"/> Field work	<input type="checkbox"/> Ag Preserve maps
<input checked="" type="checkbox"/> Calculations	<input checked="" type="checkbox"/> Flood Control maps
<input type="checkbox"/> Project plans	<input checked="" type="checkbox"/> Other technical references (reports, survey, etc.)
<input type="checkbox"/> Traffic studies	<input checked="" type="checkbox"/> Planning files, maps, reports
<input checked="" type="checkbox"/> Records	<input checked="" type="checkbox"/> Zoning maps
<input type="checkbox"/> Grading plans	<input type="checkbox"/> Soils maps/reports
<input type="checkbox"/> Elevation, architectural renderings	<input checked="" type="checkbox"/> Plant maps
<input checked="" type="checkbox"/> Published geological map/reports	<input checked="" type="checkbox"/> Archaeological maps and reports
<input type="checkbox"/> Topographical maps	<input type="checkbox"/> Other

5.0 PROJECT SPECIFIC (*short- and long-term*) AND CUMULATIVE IMPACT SUMMARY

The project would not have any significant short-term, long-term, or cumulative environmental impacts. As previously discussed throughout the breadth of this document, the proposed update to the County’s Safety, Land Use, and Conservation Elements is primarily composed of new background information regarding recent fire activity, references to new hazard identification maps, and the incorporation of new geologic, flood, and fire policies. The update also includes measures for the implementation of the new policies contained within the Safety and Land Use Element updates. These implementation measures have been designed to mirror and provide consistency with existing County, State and Federal requirements or are redundant to requirements already effectuated by local ordinances. Specifically, the new fire policies are derived from the previously adopted County Code Chapters 10 (Building Code) and 15 (Fire Prevention). The Safety Element’s newly proposed flood hazard protection policies consist of select portions of the previously adopted County Code Chapters 15A (Flood Plain Management) and 15B (Development Along Watercourses). Lastly, the new geologic policies are derived from County Code Chapters 10 (Building Code) and 14 (Grading, Erosion, and Sediment Control). As discussed in greater detail within Appendix A (Impact Assessment of New Implementation Measures) of this document, no new physical impacts would result from the adoption of the new Safety Element and Land Use Element geologic, fire, and flood protection policies. Instead, the incorporation of these policies into the County’s Comprehensive General Plan will establish compliance with State law (specifically Government Code §65302) and will provide a singular source which development review planners and members of the public can refer to for information regarding the avoidance and mitigation of natural hazards.

As previously discussed in Section 1.0 (Project Description) of this document, the project also includes the replacement of a policy recommendation within the Mineral Resources portion of the Conservation Element. As this existing language was only a recommendation, and not an adopted policy, the County is not legally required to enforce the recommended action nor has the County chosen to voluntarily enforce the recommendation. Therefore, the proposed revisions would not result in additional physical impacts to the environment as County’s existing administrative practice is not expected to change as a result of the project.

As discussed in greater detail above, the proposed update to the County’s Safety, Land Use, and Conservation Elements would not result in significant impacts to the County’s various environmental resources.

6.0 MANDATORY FINDINGS OF SIGNIFICANCE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
<p>1. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, contribute significantly to greenhouse gas emissions or significantly increase energy consumption, or eliminate important examples of the major periods of California history or prehistory?</p>				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
2. Does the project have the potential to achieve short-term goals to the disadvantage of long-term environmental goals?				X	
3. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects and the effects of probable future projects.)				X	
4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X	
5. Is there disagreement supported by facts, reasonable assumptions predicated upon facts and/or expert opinion supported by facts over the significance of an effect which would warrant investigation in an EIR ?				X	

Impact Discussion for Mandatory Findings of Significance: As previously discussed in greater detail for specialized impacts areas (i.e. Air Quality, Biology, Fire), the proposed update to the County’s Safety, Land Use, and Conservation Elements would not result in any significant impacts to the environment. This is primarily the result of the fact that the new policies and implementation measures included as part of the proposed project are intended to reinforce regulatory requirements which are already in effect via the County’s local ordinances. For instance, the new flood hazard protection policies consist of select portions of the previously adopted County Code Chapters 15A (Flood Plain Management) and 15B (Development Along Watercourses). As a result, no new physical impacts would result from the adoption of the new Safety Element and Land Use Element geologic, fire, and flood protection policies. The adoption of these Land Use and Safety Element policies would not allow or require activities which result in physical impacts beyond which is already allowed under existing County ordinances.

As previously discussed in Section 1.0 (Project Description) of this document, the project also includes the replacement of a policy recommendation within the Mineral Resources portion of the Conservation Element. As this existing language was only a recommendation, and not an adopted policy, the County is not legally required to enforce the recommended action nor has the County chosen to voluntarily enforce the recommendation. Therefore, the proposed revisions would not result in additional physical impacts to the environment as County’s existing administrative practice is not expected to change as a result of the project.

7.0 PROJECT ALTERNATIVES

Pursuant to CEQA guidelines, alternatives are only required for projects which would result in significant and unmitigable impacts to the environment (Class I). The proposed update to the County’s Safety, Land Use, and Conservation Elements would not have significant impacts on the environment, therefore no project alternatives are required nor have any been provided.

8.0 INITIAL REVIEW OF PROJECT CONSISTENCY WITH APPLICABLE SUBDIVISION, ZONING, AND COMPREHENSIVE PLAN REQUIREMENTS

Santa Barbara County Comprehensive General Plan: The County's Comprehensive General Plan includes general policies and recommendations regarding land use development. Every local jurisdiction which serves as the lead regulatory agency for land use development is required to adopt a *general plan* pursuant to State Law. These *general plans* include *elements* which are subject specific, such *element* subjects include: land use, agriculture, circulation, housing, etc. As part of this project the County is updating portions of its Seismic Safety and Safety Element, Land Use Element, and Conservation Element. Whenever the County amends an *element* of its *general plan* its staff must ensure the entire general plan stays internally consistent. It is precisely because of this fact that the project includes amendment to multiple elements. The primary purpose of the project was to update the County's Safety Element include additional hazard information and establish compliance with AB 162. However, in order to keep its entire Comprehensive General Plan internally consistent, the project was expanded to include text amendments to the Land Use and Conservation Elements. These edits provide consistent references to flood protection policies and information regarding the Office of Emergency Services across the three Elements.

Article II: The primary regulatory document for various land uses in the County's Coastal Zone is the Article II zoning ordinance. Unlike the Comprehensive General Plan, which provides general land use policies and recommendations that are of a qualitative nature, Article II includes specific and often quantifiable requirements. The requirements include setbacks, height limits, parking regulations, and landscape standards. Article II is intended to be replaced by a consolidated and modernized set of requirements contained in the County's LUDC (see discussion below) at such time as the California Coastal Commission adopts the LUDC. The proposed revisions to the County's Safety, Land Use, and Conservations Elements are consistent with the requirements included in Article II.

Land Use and Development Code: Chapter 35 of the Santa Barbara County Code includes the Land Use Development Code (LUDC) which is the primary regulatory document for various land uses in the inland areas of the County. Much like Article II, the LUDC includes specific and often quantifiable requirements. The proposed revisions to the County's Safety, Land Use, and Conservations Elements are consistent with the requirements included in the County's LUDC.

9.0 RECOMMENDATION BY P&D STAFF

On the basis of the Initial Study, the staff of Planning and Development:

 X Finds that the proposed project WILL NOT have a significant effect on the environment and, therefore, recommends that a Negative Declaration (ND) be prepared.

 Finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures incorporated into the REVISED PROJECT DESCRIPTION would successfully mitigate the potentially significant impacts. Staff recommends the preparation of an ND. The ND finding is based on the assumption that mitigation measures will be acceptable to the applicant; if not acceptable a revised Initial Study finding for the preparation of an EIR may result.

 Finds that the proposed project MAY have a significant effect on the environment, and recommends that an EIR be prepared.

_____ Finds that from existing documents (previous EIRs, etc.) that a subsequent document (containing updated and site-specific information, etc.) pursuant to CEQA Sections 15162/15163/15164 should be prepared.

Potentially significant unavoidable adverse impact areas:

_____ With Public Hearing _____ Without Public Hearing

PREVIOUS DOCUMENT: Not Applicable

PROJECT EVALUATOR: Nathan Early DATE: 4/8/2010

10.0 DETERMINATION BY ENVIRONMENTAL HEARING OFFICER

- I agree with staff conclusions. Preparation of the appropriate document may proceed.
 I DO NOT agree with staff conclusions. The following actions will be taken:
 I require consultation and further information prior to making my determination.

SIGNATURE: _____

INITIAL STUDY DATE: 4/8/2010

SIGNATURE: _____

NEGATIVE DECLARATION DATE: 4/8/2010

SIGNATURE: _____

REVISION DATE: _____

SIGNATURE: _____

FINAL NEGATIVE DECLARATION DATE: 6/11/2010

11.0 APPENDICES

- Appendix A: Impact Assessment of New Implementation Measures
Appendix B: Public Comment Letters
Appendix C: Support for Use of BAAQMD Greenhouse Gas Emissions Standards

Appendix A: Impact Assessment of New Implementation Measures

As previously summarized in the Project Description (Section 1.0) of this document, the proposed project includes a substantial amount of updated information regarding natural hazards. The provision of such information is intended to provide a resource for both public agencies and private citizens to better understand the threat of natural disasters throughout the County. The inclusion of raw information and hazard analysis would not result in any new physical impacts. However, the project also includes new goals, policies, and implementation measures which are intended to minimize the threat of natural hazards such as wildfires, floods, and earthquakes. Since these implementation measures require the County to in some cases take or require a physical action, they could potentially create new environmental impacts as defined by CEQA. However, as defined in more detail within the table below, these implementation measures have been designed to reinforce existing County programs and activities. Therefore, no new impacts are anticipated. In order to provide a comprehensive overview of the potential impacts which may result from the proposed project, a table has been provided below which specifically analyzes the potential for impacts to result from each individual implementation measure. Additional, subject specific (i.e. biology, public facilities, water resources, etc.) impact analysis is provided in Sections 3.1 through 3.16 of this document.

Goals: Geologic and Seismic Hazard Protection			
Geologic and Seismic Goal 1	Protect the community to the extent feasible from risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche and dam failure; slope instability leading to mudslides and landslides; subsidence, liquefaction and other seismic hazards pursuant to Government Code §65302(g)(1), Chapter 7.8 (commencing with Section 2690) of Division 2 of the Public Resources Code, and other geologic hazards known to the legislative body.		
Policies	Geologic and Seismic Protection	Implementation Measures	Potential for New Physical Impact
Geologic and Seismic Protection Policy 1	The County shall minimize the potential effects of geologic, soil, and seismic hazards through the development review process.	Geologic and Seismic Protection Implementation Measure 1-Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code	<i>No New Impact.</i> The County is already required by State law to comply with and enforce Title 24. Therefore, no new physical impact will occur.
		Geologic and Seismic Protection Implementation Measure 2-Maintain and Enforce County Code Chapter 10-Building Regulations	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 10. Therefore, no new physical impacts would occur.
		Geologic and Seismic Protection Implementation Measure 3-Enforce the Alquist-Priolo Earthquake Fault Zoning Act	<i>No New Impact.</i> The County is already required by State law to comply with and enforce the requirements included in the Alquist-Priolo Earthquake Fault Zoning Act. Therefore, no new physical impacts would occur.

		<p>Geologic and Seismic Protection Implementation Measure 5- Maintain and Enforce County Code Chapter 14-Grading, Erosion and Sediment Control</p>	<p><i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 14. Therefore, no new physical impacts would occur.</p>
		<p>Geologic and Seismic Protection Implementation Measure 7- Enforce the Seismic Hazards Mapping Act</p>	<p><i>No New Impact.</i> The County is already required by State law to comply with and enforce the requirements of the Seismic Hazards Mapping Act. Therefore, no new physical impacts would occur.</p>
		<p>Geologic and Seismic Protection Implementation Measure 8- Enforce the Surface Mining and Reclamation Act (SMARA)</p>	<p><i>No New Impact.</i> The County is already required by Federal law to comply with and enforce SMARA. Therefore, no new physical impacts would occur.</p>
		<p>Geologic and Seismic Protection Implementation Measure 9- Enforce the California Coastal Act</p>	<p><i>No New Impact.</i> The County is already required by State law to comply with and enforce the California Coastal Act. Therefore, no new physical impacts would occur.</p>
		<p>Geologic and Seismic Protection Implementation Measure 10- Maintain and enforce County Code Chapter 35-1-Land Use Development Code (LUDC); <u>35-2-Montecito Land Use Development Code</u>; Article II Coastal Zoning Ordinance</p>	<p><i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 35 and Article II. Therefore, no new physical impacts would occur.</p>
<p>Geologic and Seismic Protection Policy 2</p>	<p>To maintain consistency, the County shall refer to the California Building Code, the Land Use Development Code, County Ordinances, the Coastal Land Use Plan, and the Comprehensive General Plan when considering the siting and construction of structures in seismically hazardous areas.</p>	<p>Geologic and Seismic Protection Implementation Measure 1- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code</p>	<p><i>No New Impact.</i> The County is already required by State law to comply with and enforce Title 24. Therefore, no new physical impact will occur.</p>
		<p>Geologic and Seismic Protection Implementation Measure 2- Maintain and Enforce County Code Chapter 10-Building Regulations</p>	<p><i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 10. Therefore, no new physical impacts would occur.</p>
		<p>Geologic and Seismic Protection Implementation Measure 5- Maintain and Enforce County Code Chapter 14-Grading, Erosion and Sediment Control</p>	<p><i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 14. Therefore, no new physical</p>

			impacts would occur.
		Geologic and Seismic Protection Implementation Measure 10- Maintain and enforce County Code Chapter 35-1-Land Use Development Code (LUDC); <u>35-2-Montecito Land Use Development Code</u> ; Article II Coastal Zoning Ordinance	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 35 and Article II. Therefore, no new physical impacts would occur.
Geologic and Seismic Protection Policy 3	The County shall ensure compliance with State seismic and building standards in the evaluation, design, and siting of critical facilities, including police and fire stations, school facilities, hospitals, hazardous material manufacture and storage facilities, bridges, large public assembly halls, and other structures subject to special seismic safety design requirements pursuant to the California Code of Regulations, Title 24, Part 2 California Building Code.	Geologic and Seismic Protection Implementation Measure 1- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code	<i>No New Impact.</i> The County is already required by State law to comply with and enforce Title 24. Therefore, no new physical impact will occur.
		Geologic and Seismic Protection Implementation Measure 2- Maintain and Enforce County Code Chapter 10-Building Regulations	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 10. Therefore, no new physical impacts would occur.
Geologic and Seismic Protection Policy 4	The County Office of Emergency Services (OES) shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.	Geologic and Seismic Protection Implementation Measure 6- Maintain and Enforce County Code Chapter 12-Civil Defense and Disaster	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 12. Therefore, no new physical impacts would occur.
		Geologic and Seismic Protection Implementation Measure 4- Enforce the California Emergency Services Act	<i>No New Impact.</i> The County is already required by State law to comply with and enforce the California Emergency Services Act. Therefore, no new physical impact will occur.
Geologic and Seismic Protection Policy 5	Pursuant to County Code Section 21-7(d)(4) and (5), the County shall require a preliminary soil report prepared by a	Geologic and Seismic Protection Implementation Measure 5- Maintain and Enforce County Code Chapter 14-Grading, Erosion and Sediment Control	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 14. Therefore, no new physical

	<p>qualified civil engineer be submitted at the time a tentative map is submitted. This requirement may be waived by the Planning Director if he/she determines that no preliminary analysis is necessary. A preliminary geological report prepared by a qualified engineering geologist may also be required by the Planning Director.</p>		<p>impacts would occur.</p>
<p>Geologic and Seismic Protection Policy 6</p>	<p>The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from seismic activity to property and lives.</p>	<p>Geologic and Seismic Protection Implementation Measure 11- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan (MJHMP)</p>	<p><i>No New Impact.</i> The County has already adopted its current MJHMP in 2005, and has since been implementing this plan in accordance with State and Federal law. Therefore, no new physical impacts would occur.</p>

Goals: Fire Protection and Prevention			
Goal 1	Protect the community from unreasonable risks associated with the effects of wildland and urban fires pursuant to Government Code 65302 (g)(1).		
Policies	Fire Protection	Implementation Measures	Potential for New Physical Impact
Fire Policy 1	Continue to pursue and promote County fire prevention programs and control measures.	Fire Implementation Measure 1- Maintain and Enforce Fire Prevention Programs and Plans	<i>No New Impact.</i> The County currently enforces several Fire Prevention Programs which vary from public awareness campaigns to the issuance of hot permits for activities which may pose a fire hazard. Fire Implementation Measure 1 only requires that the County continue its current fire prevention programs and does not require the establishment of new programs. Therefore no additional physical impact to the environment would

			result from this implementation measure.
		Fire Implementation Measure 2- Continue Development Review Process	<i>No New Impact.</i> The County routinely exercises its police power to review proposed land use and development projects to ensure adequate protection of public health, safety, and welfare. This process is constantly evolving. However, when the County proposes changes to its development review process appropriate environmental analysis is conducted where necessary. For instance, the County has recently considered changes to its permitting process for Agricultural Structures. As required by CEQA a Mitigated Negative Declaration was prepared to assess the possible environmental effects which would result from this change in land use review process. Therefore, no new physical impact will occur if the County continues to implement its established development review process, and the environmental effects resulting from changes to this process would be addressed in future environmental documents.
		Fire Implementation Measure 3- Enforce Title 24 of the California Code of Regulations, Part 9 California Fire Code	<i>No New Impact.</i> The County is already required by State law to comply with and enforce Title 24. Therefore, no new physical impact will occur.
		Fire Implementation Measure 4- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code	<i>No New Impact.</i> The County is already required by State law to comply with and enforce Title 24. Therefore, no new physical impact will occur.
		Fire Implementation Measure 5- Maintain and Enforce County Code	<i>No New Impact.</i> The County has already adopted and has been actively enforcing

		Chapter 10-Building Regulations	County Code Chapter 10. Therefore, no new physical impacts would occur.
		Fire Implementation Measure 6- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan	<i>No New Impact.</i> The County has already adopted its current MJHMP in 2005, and has since been implementing this plan in accordance with State and Federal law. Therefore, no new physical impacts would occur.
		Fire Implementation Measure 8- Maintain and Enforce County, <u>Carpinteria, and Montecito</u> Fire Department Development Standards <u>where applicable.</u>	<i>No New Impact.</i> The County has already adopted and has been actively enforcing the County’s Fire Department Development Standards as part of County Code Chapters 10 and 15. Therefore, no new physical impacts would occur.
		Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15. Therefore, no new physical impacts would occur.
Fire Policy 2	The County shall use California Department of Forestry and Fire Protection-Fire Hazard Severity Zones to determine appropriate construction materials for new buildings in State Responsibility Areas (SRA), local agency Very-High Fire Hazard Severity Zones and designated Wildland-Urban Interface areas pursuant to the California Code of Regulations Title 24, Part 2, California Building Code.	Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10-Building Regulations	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 10. Therefore, no new physical impacts would occur.
		Fire Implementation Measure 4- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code	<i>No New Impact.</i> The County is already required by State law to comply with and enforce Title 24. Therefore, no new physical impact will occur.
		Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15. Therefore, no new physical impacts would occur.

Fire Policy 3	Fire Hazard Severity Zone Maps, as maintained by the California Department of Forestry and Fire Protection, shall be used to illustrate the official areas of Very High Fire Hazard Severity Zones (VHFHSZ) in the Local and State Responsibility Areas.	Fire Implementation Measure 7- Enforce County of Santa Barbara maps for Very High Fire Hazard Severity Zones (VHFHSZ).	<i>No New Impact.</i> The revised Draft Safety Element includes references to the County's VHFHSZ as required by State law. Irrespective of the inclusion of these maps in the Draft Safety Element update, the County Fire Department already requires specific development standards for construction projects VHFHSZ as required by State law. Therefore, no new impact will result from the referencing of these maps within the Safety Element.
		Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10 Building Regulations	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 10. Therefore, no new physical impacts would occur.
		Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15. Therefore, no new physical impacts would occur.
Fire Policy 4	To reduce the potential for fire damage, the County shall continue to require consistency with County Fire Department Development Standards pursuant to the California Fire Code, Public Resource Code §4291, and Government Code §51175-51188.	Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10 Building Regulations	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 10. Therefore, no new physical impacts would occur.
		Fire Implementation Measure 8- Maintain and Enforce County, <u>Carpinteria, and Montecito Fire Department Development Standards where applicable.</u>	<i>No New Impact.</i> The County has already adopted and has been actively enforcing the County's Fire Department Development Standards as part of County Code Chapters 10 and 15. Therefore, no new physical impacts would occur.
		Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15. Therefore, no new physical impacts would occur.

Fire Policy 5	The County shall continue to require defensible space clearance around all structures in unincorporated Local Responsibility Areas pursuant to Public Resource Code §4291, and Government Code §51175-51188.	Fire Implementation Measure 8- Maintain and Enforce County, <u>Carpinteria, and Montecito</u> Fire Department Development Standards <u>where applicable</u> .	<i>No New Impact.</i> The County has already adopted and has been actively enforcing the County’s Fire Department Development Standards as part of County Code Chapters 10 and 15. Therefore, no new physical impacts would occur.
		Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15. Therefore, no new physical impacts would occur.
Fire Policy 6	The County should continue to collaborate with the California Department of Forestry and Fire Protection in the revision of Fire Hazard Severity Zone Maps.	Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10-Building Regulations	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 10. Therefore, no new physical impacts would occur.
		Fire Implementation Measure 7- Enforce County of Santa Barbara maps for Very High Fire Hazard Severity Zones (VHFHSZ).	<i>No New Impact.</i> The revised Draft Safety Element includes references to the County’s VHFHSZ as required by State law. Irrespective of the inclusion of these maps in the Draft Safety Element update, the County Fire Department already requires specific development standards for construction projects VHFHSZ as required by State law. Therefore, no new impact will result from the referencing of these maps within the Safety Element.
Fire Policy 7	The County should strive to maintain partnerships with tribal governments, state, local, and federal agencies to identify, prioritize, and implement fire prevention and protection measures in the County.	Fire Implementation Measure 12- Continue to Encourage Interagency Agreements	<i>No New Impact.</i> The County already participates in several reciprocal and compensated aid agreements for the purposes of provided emergency services. For instance, the County has reciprocal aid agreements with Vandenberg Air Force Base and the United States Forest Service for the purposes of emergency fire protection. Additionally, the County has compensated aid agreements for the provision of emergency services for

			the cities of Buellton and Goleta. These interagency agreements allow for the shared use of emergency response personnel and resources during times of natural and manmade disasters. The continuance of existing agreements would not result in new environmental impacts.
Fire Policy 8	The County Office of Emergency Services (OES) shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.	Fire Implementation Measure 12- Continue to Encourage Interagency Agreements	<i>No New Impact.</i> The County already participates in several reciprocal and compensated aid agreements for the purposes of provided emergency services. For instance, the County has reciprocal aid agreements with Vandenberg Air Force Base and the United States Forest Service for the purposes of emergency fire protection. Additionally, the County has compensated aid agreements for the provision of emergency services for the cities of Buellton and Goleta. These interagency agreements allow for the shared use of emergency response personnel and resources during times of natural and manmade disasters. The continuance of existing agreements would not result in new environmental impacts.
		Fire Implementation Measure 13- Maintain and Enforce County Code Chapter 12- Civil Defense and Disaster	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 12. Therefore, no new physical impacts would occur.
		Fire Implementation Measure 14- Enforce the California Emergency Services Act	<i>No New Impact.</i> The County is already required by State law to comply with and enforce the California Emergency Services Act. Therefore, no new physical impact will occur.
Fire Policy 9	The County shall minimize the potential effects of	Fire Implementation Measure 2- Continue Development Review Process	<i>No New Impact.</i> As previously discussed in relation to proposed Fire

<p>fire hazards through the development review process pursuant to State law.</p>	<p>Policy #1, no new physical impact will occur if the County continues to implement its established development review process, and the environmental effects resulting from changes to this process would be addressed in future environmental documents.</p>
	<p>Fire Implementation Measure 3- Enforce Title 24 of the California Code of Regulations, Part 9 California Fire Code</p> <p><i>No New Impact.</i> The County is already required by State law to comply with and enforce Title 24. Therefore, no new physical impact will occur.</p>
	<p>Fire Implementation Measure 4- Enforce Title 24 of the California Code of Regulations, Part 2 California Building Code</p> <p><i>No New Impact.</i> The County is already required by State law to comply with and enforce Title 24. Therefore, no new physical impact will occur.</p>
	<p>Fire Implementation Measure 5- Maintain and Enforce County Code Chapter 10-Building Regulations</p> <p><i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 10. Therefore, no new physical impacts would occur.</p>
	<p>Fire Implementation Measure 6- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan</p> <p><i>No New Impact.</i> The County has already adopted its current MJHMP in 2005, and has since been implementing this plan in accordance with State and Federal law. Therefore, no new physical impacts would occur.</p>
	<p>Fire Implementation Measure 8- Maintain and Enforce County, <u>Carpinteria, and Montecito Fire Department Development Standards where applicable.</u></p> <p><i>No New Impact.</i> The County has already adopted and has been actively enforcing the County's Fire Department Development Standards as part of County Code Chapters 10 and 15. Therefore, no new physical impacts would occur.</p>
	<p>Fire Implementation Measure 15- Maintain and Enforce County Code Chapter 15-Fire Prevention</p> <p><i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15. Therefore, no new physical</p>

			impacts would occur.
Fire Policy 10	The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from fire-related activity to property and lives.	Fire Implementation Measure 6- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan	<i>No New Impact.</i> The County has already adopted its current MJHMP in 2005, and has since been implementing this plan in accordance with State and Federal law. Therefore, no new physical impacts would occur.

Goal: Flood Protection			
Flood Goal 1	Protect the community from unreasonable risks of flooding pursuant to government code §65302(g) et. Seq.		
Flood Objective 1	Pursuant to <i>County Code Chapter 15A-Flood Plain Management</i> , promote the public, health, and general welfare, and minimize public and private losses due to flood conditions.		
Policies	Flood Protection	Implementation Measures	Potential for New Physical Impact
Flood Policy 1	The County shall avoid or minimize risks of flooding to development through the development review process pursuant to Government Code §65302(3)(g)(2)(i).	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15A. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15B. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 5- Continue P&D Development Review Process	<i>No New Impact.</i> As previously discussed in relation to proposed Fire Policy #1, no new physical impact will occur if the County continues to implement its established development review process, and the environmental effects resulting from changes to this process would be addressed in future

			environmental documents.
Flood Policy 2	The County shall evaluate whether development should be located in flood hazard zones, and identify construction methods or other methods to minimize damage if development is located in flood hazard zones pursuant to Government Code §65302(3)(g)(2)(ii).	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15A. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15B. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 5- Continue P&D Development Review Process	<i>No New Impact.</i> As previously discussed in relation to proposed Fire Policy #1, no new physical impact will occur if the County continues to implement its established development review process, and the environmental effects resulting from changes to this process would be addressed in future environmental documents.
Flood Policy 3	The County shall maintain the structural and operational integrity of essential public facilities during flooding pursuant to Government Code §65302(3)(g)(2)(iii).	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15A. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15B. Therefore, no new physical impacts would occur.
Flood Policy 4	The County shall locate, when feasible, new essential public facilities outside of flood hazard zones, including hospitals and health care	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15A. Therefore, no new physical impacts would occur.

	<p>facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities or identify construction methods or other methods to minimize damage if these facilities are located in flood hazard zones pursuant to Government Code §65302(3)(g)(2)(iv).</p>	<p>Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses</p>	<p><i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15B. Therefore, no new physical impacts would occur.</p>
		<p>Flood Implementation Measure 5- Continue P&D Development Review Process</p>	<p><i>No New Impact.</i> As previously discussed in relation to proposed Fire Policy #1, no new physical impact will occur if the County continues to implement its established development review process, and the environmental effects resulting from changes to this process would be addressed in future environmental documents.</p>
<p>Flood Policy 5</p>	<p>The County shall establish cooperative working relationships among public agencies with responsibility for flood protection pursuant to Government Code §65302(3)(g)(2)(v).</p>	<p>Flood Implementation Measure 3- Maintain and Implement the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan</p>	<p><i>No New Impact.</i> The County has already adopted its current MJHMP in 2005, and has since been implementing this plan in accordance with State and Federal law. Therefore, no new physical impacts would occur.</p>
		<p>Flood Implementation Measure 4- Encourage and Coordinate Interagency Agreements</p>	<p><i>No New Impact.</i> The County already participates in several reciprocal and compensated aid agreements for the purposes of provided emergency services. These interagency agreements allow for the shared use of emergency response personnel and resources during times of natural and manmade disasters. The continuance of existing agreements would not result in new environmental impacts.</p>
		<p>Flood Implementation Measure 11- Continue Participation in the Public Works Mutual Aid Agreement (PWMAA)</p>	<p><i>No New Impact.</i> The County already participates in several reciprocal and compensated aid agreements for the purposes of provided emergency services. These interagency agreements allow for the shared use of emergency response</p>

			personnel and resources during times of natural and manmade disasters. The continuance of existing agreements would not result in new environmental impacts.
Flood Policy 6	The County shall review current National Flood Insurance Program maps and state and local sources of information on a regular basis and utilize the data to assure that measures are taken to reduce potential risks from flooding pursuant to the National Flood Insurance Program of 1968.	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15A. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15B. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 6- Comply with the National Flood Insurance Program	<i>No New Impact.</i> The County is required to comply with Federal laws such as the National Flood Insurance Program whether such compliance is stipulated in the County's Safety Element or not. Therefore, the incorporation of the Flood Implementation Measure 6 would simply reiterate the County's continued compliance with Federal law and no impacts would result.
Flood Policy 7	All proposed surface mining operations shall demonstrate that they will not exacerbate or significantly alter the floodplain in which they are located. For projects that cannot meet this standard, a Letter of Map Amendment or Letter of Map Revision shall be obtained from FEMA prior to construction pursuant to the Surface Mining and Reclamation Act of 1975.	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15A. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15B. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 5- Continue P&D Development Review Process	<i>No New Impact.</i> As previously discussed in relation to proposed Fire Policy #1, no new physical impact will occur if the County continues to implement its established

			development review process, and the environmental effects resulting from changes to this process would be addressed in future environmental documents.
Flood Policy 8	The County Public Works Department should continue working with the County Office of Emergency Services in updating flood information in the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan.	Flood Implementation Measure 3- Maintain and Implement the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan	<i>No New Impact.</i> The County has already adopted its current MJHMP in 2005, and has since been implementing this plan in accordance with State and Federal law. Therefore, no new physical impacts would occur.
Flood Policy 9	The County shall utilize information on areas included in wildfires to determine areas subject to increased risk of flooding, including mudslides and flash flooding.	Flood Implementation Measure 1- Maintain and Enforce County Code Chapter 15A-Flood Plain Management	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15A. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 2- Maintain and Enforce County Code Chapter 15B-Development Along Watercourses	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 15B. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 5- Continue P&D Development Review Process	<i>No New Impact.</i> As previously discussed in relation to proposed Fire Policy #1, no new physical impact will occur if the County continues to implement its established development review process, and the environmental effects resulting from changes to this process would be addressed in future environmental documents.
		Flood Implementation Measure 9- Maintain and Update County Land Use Development Code	<i>No New Impact.</i> The County routinely exercises its police power to review proposed land use and development projects to ensure adequate protection of public health, safety, and welfare. The County utilizes its adopted land use code including County Chapter 35 and

			Article II during this review process. However, when the County proposes changes to its development review process appropriate environmental analysis is conducted where necessary. For instance, the County has recently considered changes to its permitting process for Agricultural Structures. As required by CEQA a Mitigated Negative Declaration was prepared to assess the possible environmental effects which would result from this change in land use review process. Therefore, no new physical impact will occur if the County continues to implement its established development review process, and the environmental effects resulting from changes to this process would be addressed in future environmental documents.
Flood Policy 10	The County should review the floodplain improvement projects identified in the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan annually for progress and necessary revisions.	Flood Implementation Measure 6- Maintain and Implement the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan	<i>No New Impact.</i> The County has already adopted its current MJHMP in 2005, and has since been implementing this plan in accordance with State and Federal law. Therefore, no new physical impacts would occur.
Flood Policy 11	The County Office of Emergency Services (OES) shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.	Flood Implementation Measure 7- Maintain and enforce County Code Chapter 12-Civil Defense and Disaster	<i>No New Impact.</i> The County has already adopted and has been actively enforcing County Code Chapter 12. Therefore, no new physical impacts would occur.
		Flood Implementation Measure 8- Enforce California Emergency Services Act	<i>No New Impact.</i> The County is already required by State law to comply with and enforce the California Emergency Services Act. Therefore, no new physical impact will occur.
Flood Policy 12	The County should reference the Santa Barbara County Multi-	Flood Implementation Measure 3- Maintain and Implement the Santa Barbara County Multi-Jurisdictional	<i>No New Impact.</i> The County has already adopted its current MJHMP in 2005,

	Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from flood-related activity to property and lives.	Hazard Mitigation Plan	and has since been implementing this plan in accordance with State and Federal law. Therefore, no new physical impacts would occur.
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Appendix B: Public Comment Letters

Comment Letter from California Department of Transportation

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3329
TDD (805) 549-3259
<http://www.dot.ca.gov/dist05/>



*Flex your power!
Be energy efficient!*

April 28, 2010

Mr. Nathan Eady
Santa Barbara County Long Range Planning
30 East Figueroa St
Santa Barbara, CA 93101

05-SB-166 var
SCH# 2010041048

Subject: Update to Santa Barbara County's Seismic Safety and Safety Element, Land Use Element, and Conservation Element Negative Declaration

Dear Mr. Eady:

Thank you for the opportunity to review the subject negative declaration. In section 3.16 Water Resources / Flooding, page 38, the document identifies that one of the County's primary flooding hazards includes the Cuyama River and its potential washout of Highway 166. District management appreciates the emphasis this recognition reflects. Caltrans asks that the County acknowledges that there are times when work needs to be accomplished within the river high-water area and/or riverbank to preserve the highway's integrity. And that during times of meeting that need both organizations work together in obtaining the required permits from trustee and other jurisdictional agencies.

In addition Caltrans requests that County river management goals and actions which would support flood hazard protection policies include an aggressive prevention program targeting scour potential to SR 166 facilities and other ancillary infrastructure. An effective program could promote infrastructure longevity and reduce the potential for emergency response.

I hope these comments provide your agency a better understanding of Caltrans' perspective for this update. If you have questions about this letter please contact me at (805) 549.3632.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Shaeffer".

Chris Shaeffer
District 5 Planning Group South
Development Review

cc. L. Newland, CT Planning Branch Chief
S. Price, CT Maintenance Chief

Comment Letter from California Energy Commission

STATE OF CALIFORNIA – NATURAL RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



May 5, 2010

Nathan Eady
Santa Barbara County
30 East Figueroa Street
Santa Barbara, CA 93101

Dear Mr. Eady:

The California Energy Commission has received the Santa Barbara County's Negative Declaration titled Update to Santa Barbara County's Seismic Safety and Safety Element, Land Use Element, and Conservation Elements, SCH 2010041065 that was submitted on 4/14/2010 for comments due by 5/13/2010. After careful review, the Energy Commission has found the following:

We would like to assist in reducing the energy usage involved in your project. Please refer to the enclosed Appendix F of the California Environmental Quality Act for how to achieve energy conservation.

In addition, the Energy Commission's *Energy Aware Planning Guide* is also available as a tool to assist in your land use planning. For further information on how to utilize this guide, please visit www.energy.ca.gov/energy_aware_guide/index.html.

Thank you for providing us the opportunity to review/comment on your project. We hope that our comments will be helpful in your environmental review process.

If you have any further questions, please call Gigi Tien at (916) 651-0566.

Sincerely,

A handwritten signature in black ink that reads "Bill Pfanner".

BILL PFANNER
Supervisor, Local Energy & Land Use Assistance Unit
Special Projects Office
Fuels and Transportation Division
California Energy Commission
1516 Ninth Street, MS 23
Sacramento, CA 95814

Enclosure

RECEIVED

MAY 11 2010

**S.B. COUNTY
LONG RANGE PLANNING**

CEQA: California Environmental Quality Act

Appendix F ENERGY CONSERVATION

I. Introduction

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

- (1) decreasing overall per capita energy consumption,
- (2) decreasing reliance on natural gas and oil, and
- (3) increasing reliance on renewable energy sources.

In order to assure that energy implications are considered in project decisions, the California Environmental Quality Act requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.

Energy conservation implies that a project's cost effectiveness be reviewed not only in dollars, but also in terms of energy requirements. For many projects, lifetime costs may be determined more by energy efficiency than by initial dollar costs.

II. EIR Contents

Potentially significant energy implications of a project should be considered in an EIR. The following list of energy impact possibilities and potential conservation measures is designed to assist in the preparation of an EIR. In many instances, specific items may not apply or additional items may be needed.

A. Project Description may include the following items:

1. Energy consuming equipment and processes which will be used during construction, operation, and/or removal of the project. If appropriate, this discussion should consider the energy intensiveness of materials and equipment required for the project.
2. Total energy requirements of the project by fuel type and end use.
3. Energy conservation equipment and design features.
4. Initial and life-cycle energy costs or supplies.
5. Total estimated daily trips to be generated by the project and the additional energy consumed per trip by mode.

B. Environmental Setting may include existing energy supplies and energy use patterns in the region and locality.

C. Environmental Impacts may include:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, opera-

tion, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

D. Mitigation Measures may include:

1. Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.
2. The potential of siting, orientation, and design to minimize energy consumption, including transportation energy.
3. The potential for reducing peak energy demand.
4. Alternate fuels (particularly renewable ones) or energy systems.
5. Energy conservation which could result from recycling efforts.

E. Alternatives should be compared in terms of overall energy consumption and in terms of reducing wasteful, inefficient and unnecessary consumption of energy.

F. Unavoidable Adverse Effects may include wasteful, inefficient and unnecessary consumption of energy during the project construction, operation, maintenance and/or removal that cannot be feasibly mitigated.

G. Irreversible Commitment of Resources may include a discussion of how the project preempts future energy development or future energy conservation.

H. Short-Term Gains versus Long-Term Impacts can be compared by calculating the energy costs over the lifetime of the project.

I. Growth Inducing Effects may include the estimated energy consumption of growth induced by the project.

Comment Letter from County of Ventura

RESOURCE MANAGEMENT AGENCY

county of ventura

Planning Division

Kimberly L. Prillhart
Director

May 14, 2010

County of Santa Barbara
Planning and Development
Attn.: Nathan Eady
123 E. Anapamu St.
Santa Barbara, CA 93101

E-mail: NEady@co.santa-barbara.ca.us

Subject: Comments on Draft ND for the Proposed Update to the Seismic Safety and Safety Element, Land Use Element and Conservation Element

Dear Mr. Eady:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,



Tricia Maier, Manager
Program Administration Section

Attachment

County RMA Reference Number 10-014





Ventura County
Watershed Protection District
Advanced Planning Section (Floodplain
Management)

MEMORANDUM

DATE: May 5, 2010
TO: Laura Hocking, RMA - Planning Division
FROM: Brian Trushinski, WPD – Floodplain Management
SUBJECT: RMA 10-014 County of Santa Barbara Element Updates

The Advanced Planning Section of the Ventura County Watershed Protection District has reviewed the Environmental Document for the proposed project and offers the following response:

1. The County of Ventura Public Works Agency, Floodplain Management section, would like to be notified of development projects that are proposed adjacent to the County's jurisdictional boundaries.



**VENTURA COUNTY
WATERSHED PROTECTION AGENCY**
PLANNING AND REGULATORY DIVISION
800 South Victoria Avenue, Ventura, California 93009
Robin Jester, Permit Manager – (805) 654-3986

M E M O R A N D U M

Date: May 11, 2010

TO: Laura Hocking - Case Planner
Resource Management Agency, Planning Division

FROM: Robin Jester
Acting Permit Manager

SUBJECT: RMA 10-014 – County of Santa Barbara, Administrative Draft
Negative Declaration for Update to the County's Seismic Safety
and Safety Element, Land Use Element, and Conservation Element

Pursuant to your request, this office has reviewed the submittal of the subject application and has determined the following:

PROJECT DESCRIPTION

The proposed project includes an update to the County's Comprehensive General Plan Seismic Safety and Safety Element (Safety Element), Conservation Element, and Land Use Element. The primary purpose of the update is to provide compliance with new State laws, including Assembly Bill 162 (AB 162), and to provide updated information needed to protect the residents and property of Santa Barbara County from various natural hazards. The law states that when a local jurisdiction updates its Housing Element on or after January 1, 2009, a jurisdiction must also update its Safety Element and Conservation Element.

The update to the Safety Element is to: Identify, among other things, information regarding flood hazards and to establish a set of comprehensive goals, policies, and objectives, based on specified information for the protection of the community from, among other things, the unreasonable risk of flooding.

The update to the Conservation Element is to: Identify rivers, creeks, streams, flood corridors, riparian habitat, and land that may accommodate floodwater for the purposes of groundwater recharge and stormwater management.

In addition to including updates to establish compliance with AB 162 in the various Elements, the revisions are also intended to keep SB County's General Plan internally consistent.

RMA 10-014
May 11, 2010
Page 2 of 2

COMMENTS

The Ventura County Watershed Protection District (District) has reviewed the Administrative Draft Negative Declaration (DND) dated April 8, 2010 for the proposed Update to the Seismic Safety and Safety Element, Land Use Element, and Conservation Element in the County of Santa Barbara for compliance with Assembly Bill 162 and has the following comments on this project.

The Draft Negative Declaration was prepared to discuss impacts resulting from the update and incorporation of policies, codes, and regulations for the County of Santa Barbara (SB County) into various planning documents that guide development in the County. While the District has no comments on the governmental policies that guide and regulate development within SB County's borders, we do want to note that SB County shares a common boundary with the County of Ventura. The District notes that twelve Flood Policies are elaborated upon and implementation measures defined in pages 7 through 11 of the DND to protect the community from unreasonable risks of flooding.

Two watercourses under the regulatory and permitting authority of the District are along the common boundary between the two counties; Rincon Creek in the south-east portion of SB County and the Cuyama River in the northeastern portion of SB County. Rincon Creek meanders in and out of the adjoining counties and is within both counties in some instances. The runoff trend along Rincon Creek is for the SB County drainage to flow in an easterly direction toward Ventura County and the trend in the Cuyama River is also into Ventura County. Development within SB County as well as the codes, policies and regulations that define development could have a direct impact on Ventura County resources. SB County is encouraged to continue to inform and engage Ventura County staff for projects that could impact resources within Ventura County.

End of Text

Comment Letter from Santa Barbara County Air Pollution Control District



**Santa Barbara County
Air Pollution Control District**

Our Vision  Clean Air

April 29, 2010

Nathan Eady
Santa Barbara County Planning & Development
Office of Long Range Planning
30 East Figueroa St., 2nd Floor
Santa Barbara, CA 93101

Re: APCD comments on the MND for the County Update of the Seismic Safety and Safety Element, Land Use Element, and Conservation Element for Compliance with Assembly Bill 162

Dear Mr. Eady:

The Air Pollution Control District (APCD) has reviewed the referenced case, which consists of updates to the Seismic Safety and Safety Element, Land Use Element, and Conservation Element. The Seismic Safety and Safety Element updates will include revised information pertaining to the Federal Emergency Management Agency (FEMA), Flood Insurance Rate Maps (FIRMs), High Fire Hazard maps and other hazard maps, and other information needed for compliance with AB 162. The Land Use Element updates will include revised flood hazard area policies consistent with new FEMA, FIRM and other information. The Conservation Element update will include revised information on groundwater recharge maps, FEMA, FIRM and flood hazard maps, and mineral extraction activities.

The APCD has no comment on this project at this time.

If you or the project applicant have any questions, please feel free to contact me at (805) 961-8893 or via email at edg@sbcapcd.org.

Sincerely,

Eric Gage,
Air Quality Specialist
Technology and Environmental Assessment Division

cc: Project File
TEA Chron File

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LONG RANGE PLANNING

Appendix C: Support for Use of Bay Area Air Quality Management District Greenhouse Gas Emissions Standards

This memorandum discusses factual background and justification for the County's interim reliance on thresholds of significance for GHG emissions developed and proposed by the Bay Area Air Quality Management District (BAAQMD). The County is presently working to develop an inventory of current GHG emissions and a Climate Action Strategy and Climate Action Plan based on this data. Until County-specific data becomes available and significance thresholds applicable to GHG emissions are developed and formally adopted, the County has developed interim procedures that rely on the proposed BAAQMD standards. Santa Barbara is similar to certain Bay Area counties (in particular, Sonoma, Solano, and Marin) in terms of population growth, land use patterns, General Plan policies, and average commute patterns and times. Because of these similarities, the methodology used by BAAQMD to develop its GHG emission significance thresholds, as well as the thresholds themselves, have applicability to Santa Barbara County and represent the best available interim standards for Santa Barbara County.

A. Summary of BAAQMD Methodology

The BAAQMD has developed a methodology and significance thresholds for GHG emissions using the emission reduction goals of AB 32 while taking into account the emission reduction strategies outlined in the Scoping Plan. BAAQMD proposes thresholds for both land use projects (stationary and non-stationary sources) and plans. Using the emission reductions levels required to meet the goals of AB 32, BAAQMD identified two methods and thresholds for land use projects. The first threshold is based on a gap analysis and the second threshold is based on what would be considered a GHG-efficient project. The BAAQMD also established thresholds for land use plans based on the GHG-efficient method. Thresholds for stationary sources were established using a separate method specific to stationary source polluters.

1. Project-Level Thresholds

The Gap Analysis Approach

This approach focuses on a limited set of State mandates that appear to have the greatest potential to reduce land use development related GHG emissions. The BAAQMD's steps in determining the threshold are outlined below.

- 1) Determine growth in emissions attributable to land use driven sectors.
- 2) Estimate the anticipated GHG reductions affecting the same land use-driven emissions sectors associated with the AB 32 Scoping Plan.
- 3) Determine the gap between statewide inventory estimates and the estimated reductions from the adopted AB 32 Scoping Plan. The gap identified represents the additional GHG emissions reductions needed statewide from land use-driven emissions sectors, which represents new land use developments' share of the emissions reductions needed to meet the statewide reduction goals.
- 4) Determine the percent reduction that the gap represents in the land-use driven sectors from the BAAQMD's inventory. Identify the amount of reductions needed to meet this gap.
- 5) Assess historical CEQA documents to determine the frequency distribution trend of project sizes and types that have been subject to CEQA for the past several years.

- 6) Forecast new land use development for the Bay Area through the year 2020.
- 7) Estimate GHG emissions from each land use development project type and size using URBEMIS. Determine the amount of GHG emissions that can reasonable be reduced through current mitigation measures for future development projects subject to CEQA.
- 8) Conduct a sensitivity analysis of the GHG mass emissions threshold needed to achieve the desired reduction identified in Step 4. The mass emissions threshold is what would be needed to achieve the emissions reductions necessary by 2020 to meet the Bay Area's fare share of the statewide gap from land use-driven emissions.

Using these steps BAAQMD identified a significance threshold of 1,100 MT of CO₂e/year for non-stationary sources.

Efficiency-Based Approach

The threshold was determined by dividing the emissions inventory goal for 2020 (for land use-related sectors only) by the estimated 2020 population and employment. The number given by this calculation provides what would be considered a GHG efficient project if its emissions were to remain below that level.

This approach resulted in a significance threshold of 4.6 MT CO₂e/California Service Population/yr (residents + employees) for non-stationary sources and can be applied to both projects and plans.

Stationary Sources

BAAQMD determined a threshold of 10,000 MT CO₂/year for greenhouse gas emissions from stationary sources. This threshold was developed based on estimating CO₂ emissions from projects in the Air District from 2005 – 2007. Only CO₂ emissions were included as they represent the majority of GHG emissions from stationary combustion. Emissions were estimated for the maximum permitted amount. Using this data, BAAQMD determined that a threshold of 10,000 MT CO₂/year would encompass 95% of all GHG emissions from stationary sources. While this threshold would capture 95% of emissions, only 10% of new permits would actually hit this threshold. Thus the threshold captures the large significant polluters.

2. Plan-Level Thresholds

Plans would be considered to have less than significant GHG emissions if they are:

- 1) Consistent with a locally adopted GHG Reduction Plan or Climate Action Plan
- 2) Less than the efficiency threshold identified for project level GHG impacts, 4.6 MT CO₂e/California Service Population/yr (residents + employees).

B. Reasoning for Santa Barbara County Reliance on BAAQMD Standards

Until the County of Santa Barbara has formally adopted thresholds of significance for GHG emissions, the County must look to other jurisdictions with similar characteristics for guidance in the interim. Currently the BAAQMD is the first air quality management district to have formally adopted GHG thresholds. As described above, BAAQMD's thresholds are based on a sound, factually supported methodology. While land use patterns in Santa Barbara County are different from the Bay Area as a whole region, the BAAQMD does contain county jurisdictions very similar to Santa Barbara County. Santa Barbara County and several Bay Area counties have similar demographics, land use patterns, and

behaviors, while other Bay Area counties are quite different in these characteristics. Given that the BAAQMD’s adopted thresholds provide the best and most defensible significance criteria available at this time, the County proposes to refer to the BAAQMD thresholds for determinations of impact significance with respect to GHG emissions as an interim measure. Once data is available on GHG emissions for Santa Barbara County, a locally based analysis will be conducted to update the significance criteria.

To the extent that Santa Barbara County is similar to certain counties in the Bay Area with similar land use patterns and past population growth rates, Santa Barbara County can be expected to continue to grow in a similar fashion to these Bay Area in the future as well. Examining land use policies in General Plans in the two regions, which guide growth in the future, provides support for this conclusion. Given that the two regions would be expected to have similar future growth, the forecast for future land use development in BAAQMD’s gap analysis threshold methodology should also generally apply to Santa Barbara County, such that the BAAQMD thresholds would also be relevant to Santa Barbara County. It should be noted that this methodology also applies in blanket fashion to areas that are very different from Santa Barbara County.

The BAAQMD encompasses all of Alameda, Contra Costa, Marin, San Francisco, San Mateo, Santa Clara, and Napa Counties as well as the southwestern portion of Solano County and southern Sonoma County. While not all of these Counties are analogous to Santa Barbara County in land use characteristics, population growth, etc., three of these counties, Sonoma, Solano, and Marin, are considered to be Benchmark Counties to Santa Barbara County.⁴ Benchmark Counties are considered to have common characteristics including, but not limited to, the following: total population of more than 250,000 but less than 500,000; suburban to rural environments; do not contain a large metropolitan city and are known for their scenic beauty and environmental focus. Table 1 below summarizes the population characteristics and commuter behavior for all Bay Area counties and Santa Barbara County. Sonoma and Solano Counties present a very similar picture to that of Santa Barbara County. The other seven counties show very different characteristics, especially with respect to population size and vehicle miles travelled (VMT). Marin and Napa Counties are smaller counties with slower growth, while the remaining counties contain a much larger populations and corresponding VMT.

Table 1. Bay Area and Santa Barbara County Characteristics^{567 8}

<u>County</u>	<u>Population (2010)</u>	<u>% Change in Population (2009-2010)</u>	<u>Average Annual Growth Rate (2000 – 2009)</u>	<u>Average Household Size⁹</u>	<u>Average Commute Time (minutes)</u>	<u>Daily VMT (millions)</u>
<u>Santa Barbara</u>	<u>434,481</u>	<u>1</u>	<u>0.86</u>	<u>2.73</u>	<u>20</u>	<u>9.7</u>
<u>Napa</u>	<u>138,917</u>	<u>0.9</u>	<u>1.13</u>	<u>2.63</u>	<u>24</u>	<u>4.5</u>
<u>Marin</u>	<u>260,651</u>	<u>0.8</u>	<u>0.5</u>	<u>2.36</u>	<u>29</u>	<u>6.2</u>
<u>Solano</u>	<u>427,837</u>	<u>0.5</u>	<u>0.79</u>	<u>2.9</u>	<u>30</u>	<u>7.2</u>
<u>Sonoma</u>	<u>493,285</u>	<u>1.2</u>	<u>0.67</u>	<u>2.53</u>	<u>25</u>	<u>10.6</u>
<u>San Mateo</u>	<u>754,285</u>	<u>1.2</u>	<u>0.61</u>	<u>2.74</u>	<u>25</u>	<u>19.4</u>
<u>San Francisco</u>	<u>856,095</u>	<u>1.1</u>	<u>0.96</u>	<u>2.42</u>	<u>29</u>	<u>12.4</u>
<u>Contra Costa</u>	<u>1,073,005</u>	<u>1.1</u>	<u>1.24</u>	<u>2.76</u>	<u>32</u>	<u>25.7</u>

⁴ Santa Barbara County Operating Plan for 2010-2011

⁵ 2006 -2008 American Communities Survey

⁶ Source Inventory of Bay Area Greenhouse Gas Emissions, BAAQMD, 2010

⁷ Vision 2030: SBCAG 2008 Regional Transportation Plan

⁸ California Department of Finance

⁹ 2006 -2008 American Communities Survey

<u>Alameda</u>	<u>1,574,857</u>	<u>1.1</u>	<u>0.86</u>	<u>2.75</u>	<u>28</u>	<u>38</u>
<u>Santa Clara</u>	<u>1,880,876</u>	<u>1.3</u>	<u>1.12</u>	<u>2.91</u>	<u>24</u>	<u>40.1</u>

The efficiency-based approach applies to the entire State of California since the threshold which was calculated is based upon the State’s greenhouse gas emissions inventory and population growth and employment data. None of the data used to calculate this threshold was region or county-specific data.

The method used to calculate the threshold which applies to stationary sources is an industry-based threshold rather than land use-based. Some of the stationary sources represented in both regions include oil and gas industry, landfills, electric utilities, cogeneration, and food and agriculture (such as wine fermentation). Oil refineries were found to be the largest source of GHG emissions in the industrial sector in the Bay Area.¹⁰ Data is not yet available for GHG emissions from stationary sources in Santa Barbara County, but the oil and gas industry is the most prominent industrial use in the County.

CAPCOA conducted an analysis of permitting activity to estimate the number of stationary source projects with potentially significant GHG emissions for a given threshold that could be seen in a given year for the four largest air districts. The results of that analysis for a 10,000 MT/yr threshold is presented in Table 2 below.

Table 2. Potential Stationary Source Projects Affected a Given Threshold¹¹

	<u>BAAQMD</u>	<u>Sacramento Metropolitan AQMD</u>	<u>San Joaquin Valley Unified APCD</u>	<u>South Coast AQMD</u>
<u>Applications per year affected at threshold of:</u>	<u>1,499</u>	<u>778</u>	<u>1,535</u>	<u>1,179</u>
<u>10,000 MT/yr</u>	<u>7</u>	<u>5</u>	<u>26</u>	<u>8</u>

CARB has predicted that a threshold of 25,000 MT/year would capture greater than 90% of emissions from stationary sources. If this prediction holds true, then a lower threshold of 10,000 metric tons is likely to capture an even greater percentage of emissions. BAAQMD found that a 10,000 MT/yr threshold would capture 95% of GHG emissions, while SCAQMD found that this same threshold would capture at least 90% of GHG emissions.¹² Table 2 illustrates that the 10,000 MT/yr threshold will capture greater than 90% of GHG emissions from stationary sources while only affecting a small portion of polluters for the four largest air districts. Without a GHG emissions inventory, the percentage of GHG emissions that would be captured from stationary sources in Santa Barbara County by this threshold cannot be determined with specificity.

However, insofar as Santa Barbara County is similar to the four air districts listed in Table 3, this high capture rate should hold true for Santa Barbara County as well. Santa Barbara County is located adjacent to the SCAQMD district, with that district including neighboring Ventura County. Additionally, Santa Barbara County, SCAQMD and BAAQMD are all coastal regions. As discussed above, BAAQMD contains many of the same types of stationary source polluters as Santa Barbara County. Given these factual similarities, the BAAQMD’s rationale for a 10,000-metric ton significance criterion for stationary sources also applies to Santa Barbara County.

¹⁰ Source Inventory of Bay Area Greenhouse Gas Emissions, BAAQMD, 2010

¹¹ CEQA & Climate Change, CAPCOA, 2008

¹² South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA GHG Significance Threshold

C. Conclusion

Given the similar population growth, land use patterns, General Plan policies, and behaviors such as average commute time that exist between these two regions, Santa Barbara County's future land use development can be shown to be similar to the Bay Area counties within the BAAQMD's jurisdiction discussed above. Relying as an interim measure on BAAQMD's gap analysis threshold methodology and significance thresholds for GHG emissions can therefore be justified. Because they are not based on region-specific data, the efficiency-based standards are applicable statewide.