



COUNTY OF SANTA BARBARA

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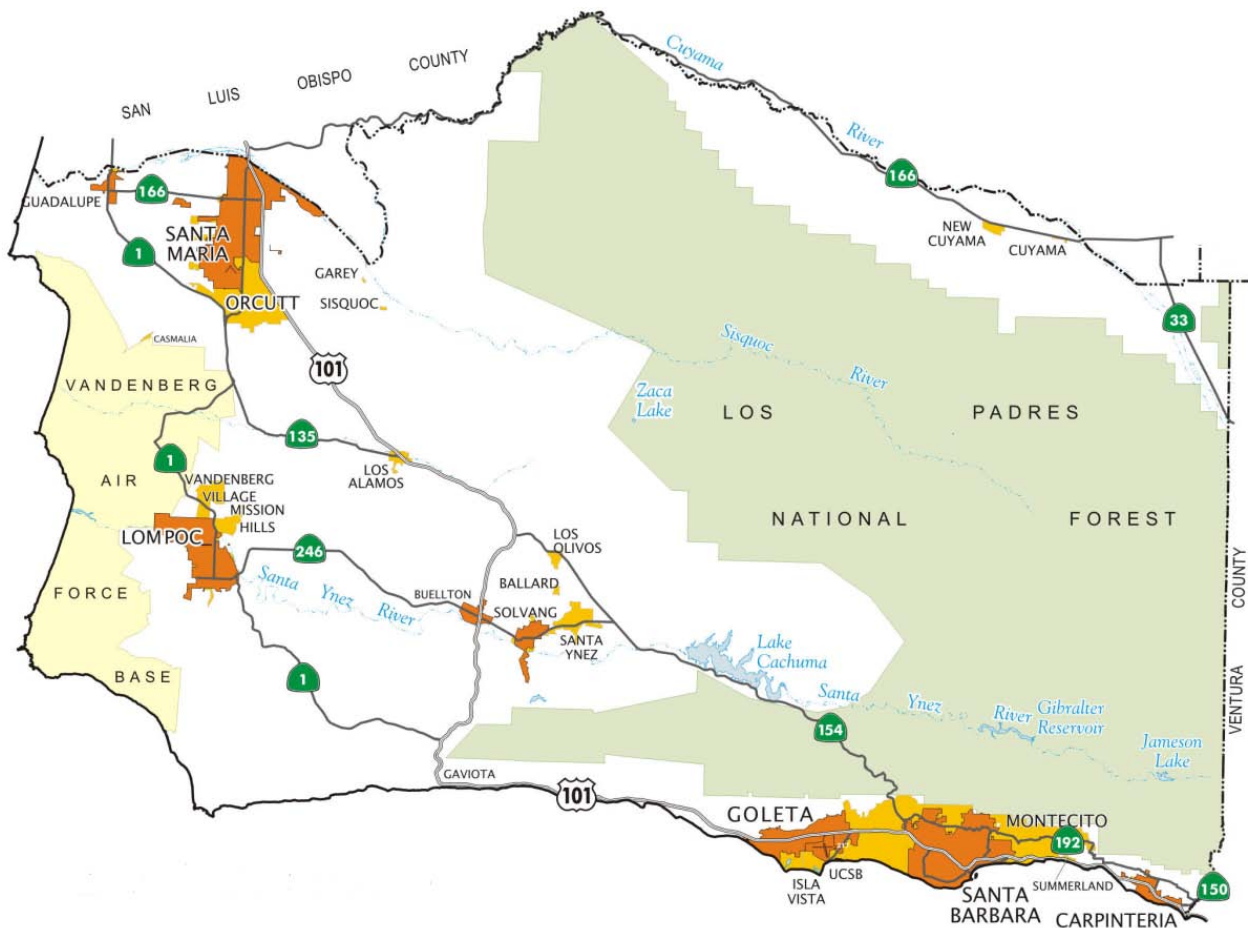
Draft Negative Declaration

10GPA-00000-00003

10NGD-00000-00015

2009-14 Housing Element Update

July 6, 2010



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

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1.0 REQUEST/PROJECT DESCRIPTION

The proposed project (Case Number 10GPA-00000-00003) includes an update to the County’s Comprehensive General Plan Housing Element for the 2009-14 planning period. The purpose of the update is to both keep the County’s Housing Element in compliance with State law and to provide an improved set of housing goals, policies, and programs intended to address the County’s housing needs for the five year period from 2009 until 2014.

Of the seven state-required elements of the Comprehensive General Plan, the Housing Element is the most regulated and reviewed, underscoring the state-wide importance of providing adequate housing opportunities for residents of all economic levels, including individuals with special needs.

The Housing Element is updated every five years to identify current demographic and employment trends that may affect existing and future housing demand, to refine programs and policies that support the State’s housing goals, and to address barriers that result in market failures and ineffective planning. This update focuses particular attention to the housing needs of extremely low, very low, low, moderate, and workforce income households, as well as special needs groups (such as the homeless, disabled, and elderly).

The proposed Housing Element’s policy structure and action items are located in *Chapter 5: Housing Goals, Policies, and Programs (included as Attachment A of this document)*; this chapter includes five housing goals, five housing policies, and 29 housing programs. This goal, policy, and implementation framework is structured as follows:

Goal 1: Enhance the Diversity, Quantity, and Quality of the Housing Supply	
	Policy 1.1: Promote new housing opportunities adjacent to employment centers, and the revitalization of existing housing to meet the needs of all economic segments of the community, including extremely low income households, while bolstering the County’s rural heritage and supporting each unincorporated community’s unique character.
	Programs 1.1 through 1.13
Goal 2: Expand Housing for Special Needs Groups	
	Policy 2.1: Encourage housing that meets the requirements of special needs households, as identified per State law, and promotes housing diversity (i.e., size, type, tenure, location, and affordability levels).
	Programs 2.1 through 2.5
Goal 3: Provide Fair Access to Housing	
	Policy 3.1: Promote equal housing opportunities for all persons in all housing types (ownership and rental, market-rate and assisted).
	Programs 3.1 and 3.2
Goal 4: Preserve the Affordable Housing Stock and Cultivate Financial Resources	
	Policy 4.1: Preserve the affordable housing stock, maintain its affordability, improve its condition, and prevent future deterioration and resident displacement. Participate in available Federal and State housing subsidy and assistance programs and use the County’s own resources in order to leverage maximum funding for the provision of affordable housing.
	Programs 4.1 through 4.5
Goal 5: Form Cooperative Relationships and Efficient Government	
	Policy 5.1: Form collaborative professional working relationships with the public and providers of housing; and assist with the process of accessing and/or providing affordable housing opportunities. Identify and, where feasible, eliminate or reduce governmental constraints to the development of housing.
	Programs 5.1 through 5.5

The County's Housing programs are the primary vehicle by which the County would take action to facilitate the development of housing. These actions are primarily intended to streamline the County's land use permitting processes, prioritize funding distribution, and ensure that County regulations are consistent with State law; the actions would not result in direct physical impacts. For instance the County's proposed Housing Element includes five new major housing programs as described below:

Program 1.1: *Promote housing opportunities adjacent to employment centers through regional and local planning efforts.*

This program is intended to encourage the use of community plans as a regional vehicle to address housing needs. Addressing each community's housing needs on an individual basis will help ensure that community values are preserved, commute pressures and vehicle trips are reduced, rural areas are protected, fiscal and economic interests are upheld, and adequate housing is provided for each jurisdictions' workforce.

Program 1.2: *Increase the effectiveness of the Inclusionary Housing Program by establishing an IHP ordinance and relocating all IHP programmatic details from the Housing Element to the Land Use and Development Code (LUDC).*

Program 1.2 is intended to improve the function of the County's existing Inclusionary Housing Policy (IHP), which can be found in Appendix A of the Draft 2009-14 Housing Element. The County's IHP requires developers to provide a portion of their project as affordable housing, or use alternative means such as land donation and fee payment to facilitate the development of affordable housing elsewhere. Improving the IHP will be addressed as a two phase process: 1) relocate the IHP from the Housing Element to an ordinance, and 2) Review the IHP and revise policies as necessary to encourage best management practices which will improve the IHP's effectiveness. By relocating the IHP to an ordinance the Board of Supervisors can exert greater flexibility in the application of the IHP. This is particularly important as the effectiveness of any affordable housing program is highly dependent on the status of the real estate and financial markets. As the real estate market goes down and market rate housing becomes more affordable, the deed restrictions associated with IHP units can actually become a burden rather than a benefit to the homeowner. Giving the Board greater flexibility to compensate for these market factors would greatly improve the program.

Program 1.10: *Amend applicable County regulations to comply with the provisions of State Density Bonus Law.*

State Density Bonus Law (SDBL) is intended to provide developers with various incentives to provide onsite affordable housing as part of their projects. These incentives not only include bonus density, but can include other incentives or concessions such as increased building height, reduced setbacks, or reduced parking requirements. While SDBL gives some discretion to local jurisdictions on how the law is administered, the primary tenets of the law (including minimum density bonuses and maximum parking requirements) are universally applicable statewide, regardless of conflicting local ordinances. Since the State recently amended SDBL (in 2005) some local County ordinances may be inconsistent with State law if they have not been properly updated. Where local ordinances and State law conflict, SDBL would be the superseding authority. Such conflicts between local ordinances and SDBL could add to applicant confusion and delayed processing. Therefore, proposed housing Program 1.10 would ensure that all County ordinances are updated as necessary to provide a regulatory framework which is consistent with SDBL and facilitate a smoother land use permitting process.

Program 2.3: Amend the County's Land Use and Development Code (LUDC) to be consistent with Health and Safety Code Sections 17021.5 and 17021.6 regarding farmworker housing developed by State-licensed agricultural operators.

Similar to the SDBL discussion provided above, the State recently amended the Health and Safety Code to require a distinct permit process for the development of farmworker housing by State-licensed agricultural operators. Currently, the County's local zoning ordinances provide permit procedures for farmworker housing which is developed by the general public; these ordinance do not include any separate process unique to State-licensed applicants. As previously stated, where local ordinance differs from State law, State law is the superseding authority. Therefore, the implementation of Program 2.3 would amend the County's local ordinances to be consistent with this new State requirement.

Program 2.4: Provide opportunities for administrative relief for housing projects that accommodate the needs of persons with disabilities and their families.

State law requires that local jurisdictions provide limited exceptions to local zoning regulations for persons with disabilities who need modifications to their home for purposes of access or other necessities¹. These accommodations often include exceptions to setbacks for installing handicap ramps. The County has an existing Reasonable Accommodation Procedure in its adopted 2003-08 Housing Element. As part of the proposed Draft 2009-14 Housing Element the County has provided an improved Reasonable Accommodation Procedure which includes applicability, application requirements, review authority, the review procedure, and findings that will serve as the basis for the decision to grant or deny requests for reasonable accommodation. This greater specificity will assist both the applicant and County staff in applying this procedure more efficiently and consistently.

These previously listed and described programs represent only five of the County's 30 proposed housing programs (refer to Attachment A of this document for a complete list of the County's proposed housing goals, policies, and programs). This description is intended to provide a summation of the most substantive programs and illustrate that these County initiatives are primarily intended to provide a regulatory structure that is consistent with State law and cost project applicants' less time and money in the land use review process. Therefore, these programs are not expected to result in direct physical impacts and for such actions which may result in potentially significant impacts, subsequent environmental review would be required. The remaining 25 housing programs have not been included in this document for purposes of brevity and clarity. Furthermore, these additional programs primarily stipulate possible funding sources and internal County operations which will facilitate the development of housing. Accordingly the programs are not anticipated to have direct physical impacts on the environment and are not considered "projects" as defined by CEQA. Therefore, they are not analyzed in this document as part of the project.

Lastly, the proposed Housing Element update addresses the County's Regional Housing Needs Assessment (RHNA). The County's RHNA is a mandatory minimum capacity for the development of more housing units. A local jurisdiction's individual RHNA is determined by the State and then delegated to the local jurisdiction via the applicable Metropolitan Planning Organization (MPO). The County's applicable MPO is the Santa Barbara County Association of Governments (SBCAG). Through this process the County was assigned a RHNA of 1,017 housing units for the 2007-14 planning period. Within the 2009-14 Housing Element the County is required prove that there is adequate zoning capacity to accommodate these housing units. This analysis is provided in the 2009-14 Housing Element Land Inventory (Appendix D of the draft Element). Ultimately, the County has sufficient capacity to satisfy its current RHNA, without the need to rezone any additional property at this time.

¹ Government Code Section 65583(c)(3)

The conclusions within County's Land Inventory analysis assume that approximately 552 units of housing inventory exist within identified Isla Vista Master Plan sites, and that these sites can reasonably be assumed to redevelop within the planning period. In accordance with proposed Housing Program 1.13, the County will annually review housing production within the IVMP area to assess whether or not actual housing production is keeping pace with the estimated housing inventory.

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. Land costs are typically less expensive here than on the South Coast, and housing market issues differ substantially from those of South Coast communities.

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 manmade 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 from the County’s Land Use Element and the use of regional Boards of Architectural Review (BAR) provide the conduit by which development can occur in areas of the County which are sensitive to 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,
- d) State Highway 150

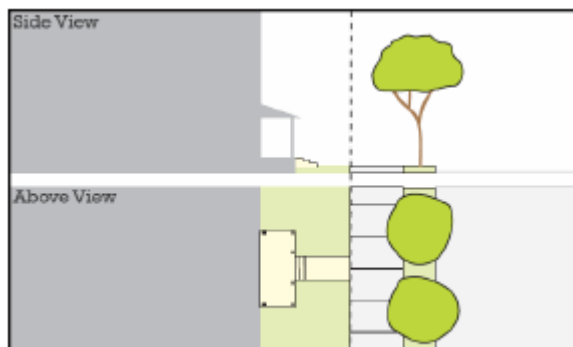
County Environmental Thresholds:

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 2009-14 Housing Element update would not result in significant environmental effects on the County's visual resources because the updated element does not include any imminent rezones or similar action which would result in direct physical impacts to the environment. Furthermore, Policy 1.1 and Program 1.3 in the proposed 2009-14 Housing Element stress the importance of using the County's established community planning process to facilitate housing development which is sensitive to the character and setting of each unincorporated community. Policy 1.1 specifically recommends, "bolstering the County's rural heritage and supporting each unincorporated community's unique character." This effort would be supported by Program 1.3 which includes the implementation of, "community enhancement and revitalization tools, where warranted, through the community planning process." The implementation of this housing program has already partially begun as the County is currently in the process of updating five community plans (in Los Alamos, Eastern Goleta, Summerland, Mission Canyon, and Orcutt) and recently adopted a community plan update for the Santa Ynez Valley. Each community plan contains its own unique vehicle for encouraging aesthetically appropriate residential construction. This often consists of design guidelines for housing development; these guidelines establish parameters for the appropriate bulk, scale, and style of residential development. For example, the Summerland community plan update currently includes the establishment of residential design guidelines which specify the appropriate height, floor area ratio, and further guidance for the County's Southern Board of Architectural Review (BAR). Subsequent to the recently adopted update, the Santa Ynez Valley Community Plan now includes a design overlay for properties in visually sensitive areas and as an additional action item of the plan will establish design guidelines for the townships of Los Olivos and Santa Ynez. The new design overlay triggers review by the County's Central BAR for all projects located on the identified parcels, with limited exceptions for some agricultural structures and projects which cannot be seen from public view. Another example of how community plans can guide the visual design of residential construction includes the proposed form based code which will be applied along the Bell Street Corridor in Los Alamos. This form based code provides examples of and strict specifications for appropriate building and façade design along the most prominent public view corridor in the township. For illustration purposes a section of this form based code has been provided below.

Figure 1: Example Vignette from Bell Street Corridor Form Based Code



Porch: The main facade of the building has a small setback from the frontage line. The resulting front yard is typically very small and can be defined by a fence or hedge. The porch can encroach into the setback to the point that the porch extends to the frontage line. A minimum depth of 6 feet clear is required within the development standards to ensure usability. On downslope lots the setback is typically minimized to improve the developability of the lot and on upslope lots it is maximized to reduce visual impact of the building on the streetscape.

Each of these mechanisms for ensuring quality residential design that is sensitive to neighborhood character and natural landscapes, has been developed with direct participation from the members of the local community and their appointed Planning Advisory Committee (PAC). Furthermore, each of these design solutions undergoes environmental review as part the community plan update process. For areas of

the County which lack community plan design guidelines, the proposed 2009-14 Housing Element includes *Quality Housing Design Recommendations* in Appendix F. The *Design Recommendations* were included in the 2003-08 Housing Element, but as part of the update process have been relocated into an appendix to increase the efficiency of their implementation. With the implementation of the aforementioned *Design Recommendations* and design guidelines or similar mechanism via the community planning process, further residential development in the County should be appropriately sensitive to the County's visual resources.

Mitigation and Residual Impact:

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

Cumulative Impacts:

The 2009-14 Housing Element update is 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 2009-14 Housing Element update would not result in significant environmental effects on the County's agricultural resources. The proposed Housing Element Policy 1.1 and Program 1.3 are intended to encourage a new smarter planning paradigm. This new planning strategy facilitates the preservation of agriculture and open space by focusing development towards infill and mixed-use opportunities. This growing priority is exemplified at the State level as well; recent additions to Housing Law (such as SB 375 and AB 32) have changed the process by which housing is allocated to local jurisdictions. A greater portion of housing is now allocated to incorporated cities so that new

housing will be located in close proximity to existing workforce centers and transit facilities. As a result, the unincorporated County's allocation fell from 36% of the regional housing capacity in the prior planning cycle (2003-08) to approximately 9% of the regional housing capacity in the current cycle (2009-14). This new balance in housing distribution between counties and cities has allowed the County to design a housing policy framework to protect agriculture and encourages housing development in urban cores such as Isla Vista and Orcutt. As a result, the County's Housing Element Land Inventory (Appendix D of the draft Element) includes a list of approximately 370 sites which together can more than accommodate the County's housing allocation. None of these aforementioned sites are located in the County's designated *Rural* areas, nor are any of these sites currently agriculturally zoned. Furthermore, as illustrated in the table below the Land Inventory contains sufficient sites that have already undergone environmental review or redevelopment sites which lack any agriculturally viability to address the County's 1,017 unit Regional Housing Needs Allocation (RHNA).

Table 1: Redevelopment and Approved Housing Sites

Housing Type	Total Units
Projects Already Approved or Built	247
Orcutt Keysites 3 & 30	372
Isla Vista Redevelopment Sites	552
Subtotal	1,171
RHNA	1,017
Inventory Surplus	154

These sites are either located in the highly urbanized area of Isla Vista, which has no agriculturally viable land, or have already undergone environmental review. Sites, such as Orcutt Keysite 3 and 30, have already been the subject of environmental review as part of the Focused Rezone Process and any impacts to agricultural resources were already mitigated or overridden. This clearly illustrates that the County's efforts to provide sufficient housing capacity will not result in significant impacts to agricultural resources. Furthermore, the County has included actions which may benefit agriculture such as Program 2.3 which would streamline the permitting requirements for farm employee dwellings. The provision of additional housing for agricultural housing could directly assist with the cultivation of land within the County.

Mitigation and Residual Impact:

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

Cumulative Impacts:

The County's 2009-14 Housing Element includes policies which encourage infill and mixed-use development, rather than development in rural and/or agricultural areas of the County. These policies would assist in the continuation of agriculture as a viable industry in the County. 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 stationary sources during long-term operations?				X	
e. Emissions equivalent to or greater than 1,100 MT of CO ₂ e per year or 4.6 MT CO ₂ e/Service Population (residents + employees) per year from non-stationary sources during long-term operations?				X	
f. Emissions equivalent to or greater than 6.6 MT CO ₂ e/Service Population (residents + employees) per year for plans (General Plan Elements, Community Plans, etc.)?				X	

Setting:

General Air Quality: Santa Barbara County is located within the South Central Coast Air Basin (SCCAB), which includes the counties of San Luis Obispo, Santa Barbara, and Ventura. The Santa Barbara County portion of SCCAB 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. Emissions of reactive organic compounds (ROC) and oxides of nitrogen (NO_x) are regulated because they are precursors to ozone, which is a non-attainment pollutant. 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. The County is currently classified as non-attainment for the state PM₁₀ standard.

Greenhouse Gases & Global Climate Change: Greenhouse gases (GHGs) include, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), 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 (NOx) 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. 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. This 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. Further justification for the local use of this interim approach is provided in Attachment B of this document.

Significance Determination Criteria	
GHG Emission Source Category	Operational Emissions
<u>Non-stationary Sources</u>	1,100 MT of CO ₂ e/yr OR 4.6 MT CO ₂ e/SP/yr (residents + employees)
<u>Stationary Sources</u>	10,000 MT/yr
<u>Plans</u>	6.6 MT CO ₂ e/SP/yr (residents + employees)

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

Impact Discussion:

(a-f) No Impact. The proposed 2009-14 Housing Element update would not result in significant environmental effects on the County’s air quality. Although the proposed 2009-14 Housing Element does not include any imminent rezones, and therefore would not substantially change the intensity or location of new housing development, proposed Policy 1.1 and Program 1.3 encourage the development of infill and mixed-use housing. Furthermore, the County’s Land Inventory provides adequate zoning capacity to satisfy the current RHNA requirement, without including any parcels from the County’s designated *Rural* areas. By encouraging the development of housing within close proximity to jobs, commuting distances and air quality emissions related to vehicle trips would be reduced. Specifically, in accordance with data derived from the air emissions modeling software program Urbemis 9.2.4, which is used by the County’s Air Pollution Control District to calculate the various air quality impacts of land use development, the average trip length for a resident’s daily commute differs as follows:

Table 2: Urban and Rural Residential Commute Distances

Location of Residence	Type of Residence	Trip Type	Average Trip Distance
Urban Area	Single-family	Home-Work Commute	10.8 miles
Rural Area	Single-family	Home-work Commute	16.8 miles

As indicated in Table 2, by locating housing in the County’s *Urban* areas rather than *Rural* areas, the average commute distance from home to work is reduced by six miles per day. This reduction in the average trip length for daily commuters, in turn reduces the quantity of daily air emissions produced by County residents. This estimated reduction in air emissions was quantified using Urbemis and the results are provided in Table 3 below. The calculation was performed assuming the trip distances listed in Table 2.

Table 3: Vehicle Emissions from Average Daily Commute Trips (Pounds per Day)

	ROG	NO _x	CO	PM10	PM2.5	CO ₂
Rural Trip	0.15	0.22	1.94	0.28	0.05	144.15
Urban Trip	0.11	0.15	1.34	0.18	0.03	93.87
Net Reduction	0.04	0.07	0.60	0.10	0.02	50.28

Based upon the results provided in Table 3, the transition of housing from Rural to Urban areas will reduce vehicle emissions as expected. Most noticeably, the estimated amount of CO₂ emissions drops by approximately 35%. Furthermore, the proposed Housing Element also includes Programs 1.8 and 1.9, which encourage the use of various opportunities to increase the energy efficiency of the County’s housing stock. These methods include the continuation of the County’s existing Innovative Building Review Program, the adoption of a Climate Action Strategy, and the possible implementation of a Solar Financing District. The implementation of these efforts would result in the reduction of fossil fuel emissions as related to the operation of coal burning power plants that in part supply electricity to the County’s housing stock. The reduction of such fossil fuel emissions would improve overall air quality and marginally mitigate the effects of climate change. Additional information regarding the County’s efforts to create a more efficient building stock provided in Section 3.6 of this document.

Mitigation and Residual Impact:

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

Cumulative Impacts:

As discussed above, the 2009-14 Housing Element update would not result in any direct physical impacts that would significantly affect air quality in a negative manner. However, the proposed Housing Element policies would assist in reducing fossil fuel emissions from vehicle trips and power generation. Therefore, no cumulatively significant impacts to air quality would result from the project.

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	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
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	
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.

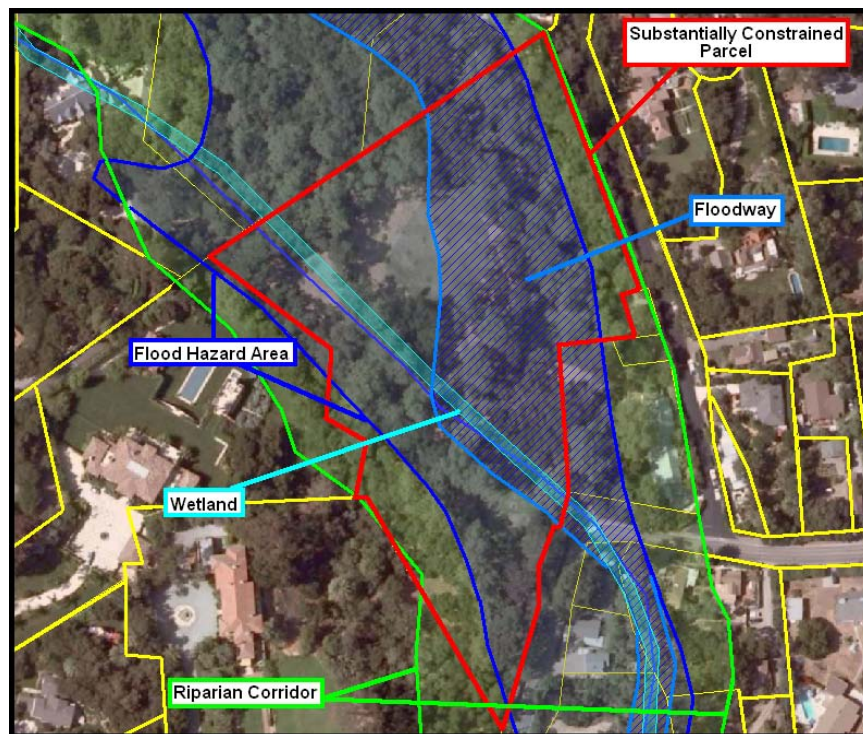
In addition to these general guidelines, there are habitat-specific guidelines for habitats such as wetlands, riparian areas, native grasslands, and oak woodlands.

Impact Discussion:

(a-k) *No Impact.* The proposed 2009-14 Housing Element update would not result in significant environmental effects on the County’s biological resources. The primary reason why the project would not result in impacts to these resources is because the update process does not include any proposed rezone or site specific development proposals which would result in increased physical impacts to the environment. Instead, the updated Housing Element simply quantifies the County’s capacity for

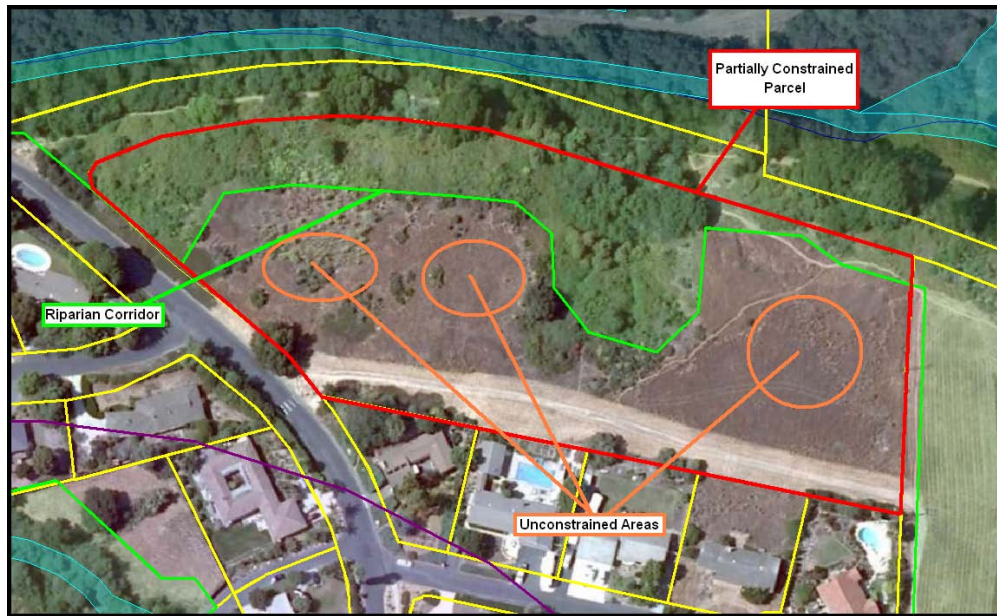
additional residential development based on its existing zoning and land use designations. No imminent rezones are proposed as part of the Housing Element update process. Therefore, the 1,752 units of net residential capacity designated in the County's Land Inventory could be physically constructed regardless of whether or not the Housing Element update is approved. Secondly, as previously discussed in Section 3.2 of this document, the 2009-14 Housing Element includes a policy framework that encourages infill housing development in urban cores. This development pattern would assist in limiting the impacts of residential projects on biological resources because urban cores generally contain a reduced quantity and quality of such resources. For example, the proposed 2009-14 Housing Element Land Inventory (located in Appendix D of the draft Housing Element) includes several redevelopment sites within the Isla Vista area. These sites are already developed with low intensity residential or commercial uses, and are therefore predominantly devoid of any sensitive flora or fauna. Beyond the Isla Vista sites, the entire Land Inventory has been restricted to include only sites which are located in designated *Urban* areas of the County and a Constraints Analysis (located in Appendix D of the draft Housing Element) was conducted before an overall zoning capacity was established. Where sites were found to be constrained with biological resources (such as riparian corridors, wetlands, or butterfly nesting sites) the site was either eliminated from the inventory completely or its realistic build out was reduced. Graphics representing typical examples of this process have been provided below. The site included in Figure 2 shows a vacant residential parcel which is constrained with wetlands, riparian corridors, and flood hazard areas. Due to the substantial level of natural constraints, this parcel was removed from the County's Land Inventory entirely, despite the fact that it is vacant land with residential zoning.

Figure 2: Heavy Constrained Parcel- Removed from the Land Inventory



The parcel shown in Figure 3 is partially constrained by a riparian corridor and therefore the site's maximum density was reduced to allow for a reasonable development potential without the need to significantly impact sensitive biological resources.

Figure 3: Partially Constrained Parcel- Residential Capacity Reduced



With the application of this constraint analysis, the County’s Land Inventory now includes a conservative estimate of how much housing can be developed without the need to significantly impact sensitive resources. Ultimately, further project specific environmental review would still be required for future residential developments as warranted by County ordinances and pursuant to CEQA Guidelines. The approval of the proposed Housing Element update would not specifically exempt any of these future projects from this more detailed environmental review process.

Mitigation and Residual Impact:

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

Cumulative Impacts:

As mentioned above, the 2009-14 Housing Element update would not result in any direct physical impacts that would significantly affect biological resources in a negative manner. However, the proposed Housing Element policies encourage the development of infill and mixed-use housing in already established urban areas which are largely devoid of significant biological resources. 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	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
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 2009-14 Housing Element update would not result in significant environmental effects on the County’s cultural resources. As previously discussed in Section 3.2 of this document, the proposed housing policy framework encourages the use of infill and mixed-use housing to satisfy the County’s housing needs, rather than the development of rural, agricultural, or open space areas. This should result in a reduced likelihood of impacts to cultural resources as most *Urban* areas have already been surveyed for cultural resources or such resources have already been disturbed. Regardless, as required by the County’s existing Environmental Thresholds each residential project must address potential cultural impacts on a site specific basis. 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 purposed 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 Housing Element update process, the cultural resource investigation and analysis described above will be completed, as required, on specific housing projects. The Housing Element does not alleviate the need for developers to undergo this site investigation process; therefore the Housing Element 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 Housing Element and offering an opportunity for consultation. As of the date of publication of this document the Tribe has not requested such a consultation.

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 2009-14 Housing Element update is a policy level action and would not result in any direct physical impacts that would significantly affect cultural resources in a negative manner. However, the proposed Housing Element policies encourage the development of infill and mixed-use housing in already established urban areas where existing cultural resources have already been disturbed. 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 2009-14 Housing Element update would not result in significant environmental effects on the County’s energy capacity or infrastructure. The proposed Housing Element update includes Programs 1.8 and 1.9 which encourage the continuation of existing programs or the creation of new programs which would increase the energy efficiency of the County’s housing stock. Examples would include the continuation of the Innovative Building Review Program (IBRP) and the possible establishment of a Solar Financing District in accordance with Assembly Bill 811 (AB 811). As part of the feasibility analysis and EECBG grant application conducted as part of the development of Solar Financing District, County staff has estimated the potential energy savings which will result from the implementation of such a program. In basic terms, a Solar Financing District (which is operated within the requirements of AB 811) provides property owners with government backed, low interest loans to be used for the improvement of existing structures with more energy efficient materials (insulation, windows, HVAC systems, etc.) and the addition of solar power generating systems. The program requirements mandate that participating parties must achieve a minimum of 10% increased energy efficiency from these improvements. As demonstrated in Table 4 below, the program is expected to achieve significant electricity and natural gas savings. Using a modeling exercise based on various types of buildings, using data from North and South County, estimates show that an average residential or commercial project funded by a contractual assessment of \$30,000 will include both energy efficiency improvements and solar installation and will result in a reduction of 8,636 kWh³ and 194 therms⁴. The program

³ kWh is an abbreviation for “Kilowatt hour”. A Kilowatt hour is a unit of energy equal to 1000 watt hours or 3.6 megajoules and is the standard measurement of electricity used in most residential energy bills.

⁴ The therm is a unit of heat energy equal to 100,000 British thermal units (BTU). It is approximately the energy equivalent of burning 100 cubic feet (often referred to as 1 Ccf) of natural gas.

is projected to finance 400 residential or commercial projects each year, which would result in a reduction of 3,454,400 kWh and 77,600 therms annually, and 37,998,400 kWh and 853,600 therms by 2020.

Table 4: Estimated Energy Savings Resulting from AB 811 Solar Financing District

	Average Project Cost	Per Unit/Year		Total Program/Year		Total Program by 2020	
		Electricity Savings (kWh)	Natural Gas Savings (Therm)	Electricity Savings (kWh)	Natural Gas Savings (Therm)	Electricity Savings (kWh)	Natural Gas Savings (Therm)
Energy Efficiency Improvements and Installation of a PV Solar System	\$30,000	8,636	194	3,454,400	77,600	37,998,400	853,600

As exemplified by the energy savings shown in Table 4, the implementation of energy efficiency improvements included as part of Housing Element Programs 1.8 and 1.9 will help to decrease the energy usage of the County’s existing housing stock and in some cases allow for the installation of photovoltaic solar systems which create residential units that are completely self-sufficient in terms of energy usage. Additionally, as previously discussed the Element’s new policy framework encourages the use of infill and mixed-use development to satisfy the County’s housing needs. The establishment of compact development areas would decrease the need to transport water within the County, according to a study conducted by the California Energy Commission in 2005 as much as 19% of the State’s power consumption is used to treat and transport water.

Mitigation and Residual Impact:

No impacts are identified; therefore, no mitigation measures are required. **Cumulative Impacts:**

As previously mentioned above, the proposed 2009-14 Housing Element update would not result in any direct physical impacts that would significantly affect energy resources in a negative manner. However, the proposed Housing Element policies encourage the development of infill and mixed-use housing which would result in a reduced need to transport water throughout the County (a major use of energy within the State). Furthermore, additional Housing Element policies encourage the use of the County’s IBRP and other programs to create a more energy efficient housing stock. 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 is not adequately met.

Impact Discussion:

(a-e) No Impact. The proposed 2009-14 Housing Element update would not result in significant environmental effects from fire hazards. As previously discussed, the proposed Housing Element Policy 1.1 and Program 1.3 encourages infill and mixed-use housing development. These project types are typically located in urban cores which are buffered from large open spaces and high fuel loads. By concentrating new residential development in these urban areas rather than on the fringes of national forest and open space, exposure to fire hazards should be minimized. Additionally, the constraint analysis performed as part of the development of the County’s Land Inventory (and discussed previously in Section 3.4 of this document) has identified parcels which are located in any of the County’s High Fire Hazard Areas. Although the constraint analysis assumes that hazardous fire areas do not necessarily preclude or reduce the potential development of a parcel, additional Building Code requirements apply in these areas. These fire resistive construction materials and development requirements 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 application of these requirements, combined with vegetation clearance, sprinkler systems, and the distribution of fire hydrants and water tanks where necessary helps to protect residential development from fire hazards as feasible. 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. Proposed Housing Program 1.9 recommends the use of tools such as a Climate Action Strategy (CAS) to minimize the effects of such climate change induced hazards.

Mitigation and Residual Impact:

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

Cumulative Impacts:

As previously mentioned above, the proposed 2009-14 Housing Element update would not result in any direct physical impacts that would significantly affect public safety by creating new fire hazards. However, the proposed Housing Element policies encourage the development of infill and mixed-use housing which is located in existing urban cores. These existing urban areas are generally buffered from large open space and high fuel load areas. 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 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 2009-14 Housing Element update would not result in significant environmental effects on the County’s natural geologic processes. The proposed Housing Element policies do not recommend or allow development in geologically sensitive areas, beyond which is already allowed under the County’s current policies. Therefore, the project would not result in any new exposure of the public to geologic hazards. Furthermore, the proposed Housing Element policies encourage infill and mixed-use development in established urban areas. Development in these areas generally requires less land alteration than the expansion of housing into previously undisturbed lands.

Mitigation and Residual Impact:

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

Cumulative Impacts:

As previously mentioned above, the proposed 2009-14 Housing Element update would not result in any direct physical impacts that would create new geologic hazards or land form alterations. However, proposed Housing Element Policy 1.1 and Program 1.3 encourage the development of infill and mixed-use housing which is located in existing urban cores. These existing urban areas have generally already experienced significant grading activity and therefore redevelopment or intensification of development in these areas would typically result in less grading activity than housing development in previously undisturbed areas. 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	
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 2009-14 Housing Element update would not result in significant environmental effects from the release or upset of hazardous materials. Residential land uses tend to generate smaller amounts and lower risk hazardous materials than competing land uses such as heavy industry. Therefore, the encouragement of housing development would not result in significant new impacts from hazardous materials.

Mitigation and Residual Impact:

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

Cumulative Impacts:

As previously mentioned above, the 2009-14 Housing Element update would not result in any direct physical impacts that would create new significant impacts from hazardous materials. Additionally, residential land uses tend to generate low levels of hazardous material in comparison to other industrial and commercial land uses. 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	
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 2009-14 Housing Element update would not result in significant environmental effects on the County’s historic resources. None of the potential housing sites included in the County’s Land Inventory contain a designated *Historic Landmark* or *Place of Historic Merit*. Additionally, the County’s Land Inventory primarily contains housing sites which are completely vacant. The few examples of inventory sites which contain existing structures are limited to the community of Isla Vista and a single site in Orcutt which contains an existing golf course facility. None of the structures located on these “underutilized” sites contain identified historic resources. As a result, development on the potential housing sites included in the County’s Land Inventory would be unlikely to impact any structures with exception of housing sites in Isla Vista. Although redevelopment in Isla Vista would require the demolition of substantial numbers of existing structures these sites have already been identified for redevelopment and any potential impacts associated with historic resources has already been analyzed under the Isla Vista Master Plan EIR. Finally, the proposed Housing Element update would not change the County’s existing procedures for the preservation of historic resources. Any future housing project would be subject to the County’s existing regulatory process for the evaluation and preservation of existing historic resources. Therefore, the Housing Element update 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 2009-14 Housing Element update would not result in any direct physical impacts that would create new significant impacts to historic resources. Additionally, the Housing Element 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	
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	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
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 2009-14 Housing Element update 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 Housing Element Land Inventory (refer to Housing Element Appendix D) includes a constraints analysis for airport safety zones. Any project site located in an airport safety zone had its estimated realistic build out reduced as necessary. Therefore, the project would not result in conflicts with designated airport approach or over-flight zones.

Physical Impacts from Economic and Social Effects: The Housing Element update is a policy level document which would not result in any direct physical impacts. The proposed Housing Element does not contain any policies or actions which would result in economic or social effects that would produce physical impacts.

Housing and Resident Displacement: Since the primary goal of the Housing Element is to facilitate the development of new housing, including affordable housing, the project would not result in the displacement of large numbers of individuals.

Land Use Compatibility: The proposed Housing Element update does not include imminent changes to any of the County’s existing land use designations or rezoning of land. The Housing Element update does include some minor programs (Programs 2.3 and 2.4) which would require revisions to the County’s Land Use and Development Code (LUDC). These revisions are required to bring the LUDC into compliance with State law regarding the permitting of farm employee housing and reasonable accommodations for disabled persons. Each of these implementation programs would be subject to their own environmental review process prior to their implementation later in the planning period. As a result, no introduction of incompatible land uses would result from the project. Additionally, the 2009-14 Housing Element contains several *Quality Housing Design Recommendations* (refer to Appendix F of the Draft 2009-14 Housing Element) which in part provide design recommendations for creating new housing that is compatible with existing neighborhoods.

Open Space: The proposed Housing Element Policy 1.1 and Program 1.3 encourage the development of infill and mixed-use housing in existing urban cores. By focusing on further development in these urban areas, the County’s rural open space lands can be preserved for recreational activity, agricultural cultivation, and biological diversity. Therefore, no cumulatively significant impacts to County open space would result from the proposed project.

Population & Infrastructure: The Housing Element update does not include any imminent changes in land use designations or rezones, therefore the Housing Element update would not directly result in a substantial increase in population. However, since the primary goal of the Housing Element is to provide additional housing for families of all income levels and individuals with special needs, updating housing policies would facilitate the construction of additional housing. Each of these future housing developments, and any associated impacts from population increase or infrastructure expansion, would be subject to their own environmental review in accordance with CEQA.

Mitigation and Residual Impact:

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

Cumulative Impacts:

The 2009-14 Housing Element update would not result in any direct physical impacts that would create new significant land use impacts. Additionally, the Housing Element update does not propose any changes to the County’s existing land use designations or rezoning of land. 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 2009-14 Housing Element update would not result in significant environmental effects from new significant noise generators. Short term impacts from construction of housing are already mitigated by the County’s standard limitation of construction hours. Residential land uses are not considered long term noise generators.

Mitigation and Residual Impact:

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

Cumulative Impacts:

As previously mentioned above, the 2009-14 Housing Element update would not result in any direct physical impacts that would create new significant impacts from significant noise generation. Additionally, residential land uses are not considered significant noise generating sources in comparison to mines, airports, and major roadways. 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 2009-14 Housing Element update is a policy level document and 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. The proposed Housing Element update does not change the County’s existing requirements for development impact (DIM) fees. DIM fees are the primary means by which the County offsets the impact of new development upon County facilities. The approval of new housing projects would still be subject to applicable development mitigation fees such as school and parks fees.

In addition, as part of the Housing Element analysis the County surveyed applicable service providers to determine whether or not they could accommodate the full build-out of the County’s housing allocation. This information is provided in the Table 5. As clearly indicated by the data derived from local service provider surveys, there is adequate water and wastewater capacity to serve all allocated housing units in the relevant County communities. Therefore, no significant impact to public facilities is anticipated to occur.

**Table 5: Water and Sanitation Infrastructure Status
 Unincorporated Santa Barbara County**

District Name (District Type)	Current Service Capacity	Current Usage Level	Number of New Units District Could Serve ¹	Net Units from Site Inventory
South Coast HMA				
Water Districts				
La Cumbre Mutual Water Company	1,500 units	1,433 units	67 units	0 units
Carpinteria Valley Water District	8,006 units	6,491 units	1,515 units	15 units
Montecito Water District ²	4,815 units	4,250 units	565 units	141 units
Goleta Water District	16,795 units	14,860 units	1,935 units	761 units
Sanitation Districts				
Summerland Sanitary District	946 units	473 units	473 units	12 units
Carpinteria Sanitary District	10,417 units	3,850 units ³	6,567 units	15 units
Montecito Sanitary District	5,836 units	3,369 units	2,467 units	141 units
Goleta Sanitary District	30,389 units	14,185 units	16,204 units	761 units
Goleta West Sanitary District	24,800 units	10,400 units	14,400 units	
Santa Ynez HMA				
Water District				
SY River Water Conservation Improvement District No. 1 ⁴	4,235 units	2,480 units	1,755 units	19 units
Los Alamos Community Services District	1,607 units	497 units	1,110 units	98 units
Sanitation District				
Santa Ynez Community Services District	916 units	678 units	238 units	19 units
Los Alamos Community Services District	910 units	500 units	410 units	98 units
Lompoc HMA				
Water Districts				
Vandenberg Village Community Services District	3,600 units	2,684 units	916 units	60 units

Mission Hills Community Services District	2,700 units	1,274 units	1,426 units	0 units
Sanitation Districts				
Vandenberg Village Community Services District	4,785 units	2,684 units	2,101 units	60 units
Mission Hills Community Services District	2,700 units	1,274 units	1,426 units	0 units
Santa Maria HMA				
Water Districts				
Golden State Water Company ⁵	26,488 units	6,780 units	19,708 units	627 units
Sanitation Districts				
Laguna County Sanitation District	13,603 units	11,487 units	2,116 units	627 units

Sources: County Service District Surveys and Urban Water Management Plans

¹ This number is estimated based on the assumption that all excess capacity is used towards residential units.

² These numbers are based on projections given in the Montecito Water District's 2005 Urban Water Management Plan

³ Approximate residential accounts as of 2005. Some accounts have multiple units.

⁴ These numbers are based on projections given in the Santa Ynez River Water Conservation District's 2000 Urban Water Management Plan

⁵ These numbers are based on projections given in the Golden State Water Company's 2005 Urban Water Management Plan

Mitigation and Residual Impact:

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

Cumulative Impacts:

As mentioned above, the 2009-14 Housing Element update would not result in any new significant impacts to the County's public facilities. Additionally, while the Housing Element contains policies which may influence the rate of production, type of unit design, and affordability level of housing, the Housing Element does not require any imminent 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 updated Housing Element would not generate a substantial new population burden on County facilities. Therefore, no cumulatively significant impacts to public 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 2009-14 Housing Element update would not result in significant environmental effects on the County’s recreation facilities/opportunities. The proposed Housing Element update does not change the County’s existing requirements for development impact fees. Therefore, new housing 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 Housing Element contains policies which may influence the rate of production, type of unit design, and affordability level of housing; however, the Housing Element does not require any imminent 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 updated Housing Element would not generate a substantial new population burden on County parks. Furthermore, the updated Housing Element policies encourage the development of infill and mixed-use housing in existing urban cores. By focusing on further development in these urban areas, the County’s rural open space lands can be preserved for recreational purposes. 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) No Impact. The proposed 2009 – 14 Housing Element update is not anticipated to produce any significant increases in traffic generation or changes in distribution patterns because it is a refinement in policy designed to encourage infill and mixed use development within existing urban areas. Specific projections of site specific traffic impacts are speculative given the policy nature of the proposed update. At such time as specific development proposals are submitted, site-specific traffic analysis of anticipated impacts would be conducted as a part of the initial study process for such development.

(b) No Impact: The proposed update does not envision or propose any improvements to the circulation system because of the policy nature of the Housing Element update. No specific sites are designated for changes in land use or an intensification of use. Therefore no public or private road maintenance or construction is contemplated.

(c) *No Impact:* Given the policy nature of the proposed update, no impacts would occur to existing parking facilities nor would the Element’s implementation result in any new parking demands. Existing County land use requirements and the zoning code prescribe that all future site-specific development proposals provide sufficient onsite parking to meet anticipated demands.

(d) *No Impact:* While the proposed 2009 – 14 Housing Element update would encourage infill and mixed use development within existing urban cores, no significant impacts upon transit systems is anticipated to result because no site-specific rezoning or land use changes are proposed by the update. At such time as new site-specific development proposals occur, the transit demands and infrastructure needs of these proposals would be evaluated and consultations with transit providers would take place such that impacts to those transit providers would be evaluated in light of site specific development proposals.

(e) *No Impact:* The proposed 2009 – 14 Housing Element does not propose any changes or alterations to waterborne, rail or air traffic. Therefore no impacts are anticipated to occur.

(f) *No Impact:* Increases in traffic hazards are related to site-specific conditions and project-induced changes in the amount and distribution of traffic. Because no imminent changes in zoning or land use designations are proposed by the 2009–14 Housing Element update, no increases in traffic hazards are anticipated to occur as a result of the proposed project.

(g) *No Impact:* The evaluation of sight distance is predicated upon site specific development proposals and their traffic generation in relationship to roadway alignment conditions in proximity to such developments. Because the proposed 2009–14 Housing Element update does not prescribe specific rezoning or development, no impacts upon sight distance relative to ingress/egress, road capacity or emergency access can be identified.

(h) *No Impact:* The County’s Congestion Management Plan identifies specific highway segments and programs to mitigate highway congestion, including transportation demand management. The proposed 2009-14 Housing Element update would not result in significant environmental effects on the County’s transportation infrastructure. The County’s proposed Housing Element contains Policy 1.1 and Program 1.3 which encourage infill and mixed-use development within existing urban cores. Facilitating development in this manner would produce housing in closer proximity to jobs and therefore decrease the commute distances and traffic loads.

Mitigation and Residual Impact:

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

Cumulative Impacts:

As mentioned above, the 2009-14 Housing Element update would not result in any direct physical impacts that would significantly affect the County’s transportation infrastructure. However, the proposed Housing Element policies would assist in reducing length and quantity of vehicle trips by facilitating the development of housing in close proximity to large workforce centers. 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	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
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	
l. 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 uses⁵ 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.

⁵ 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.

Impact Discussion

(a-1) No Impact. The proposed 2009-14 Housing Element update would not result in significant 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: In reference to the quantity of water resources available, the Housing Element does not require any imminent rezone or similar action which would increase the County's overall zoning capacity. The Housing Element update would not result in a population increase, and therefore would not result in additional groundwater draw, beyond which is already allowed by the County's existing zoning. Furthermore, the updated Housing Element contains policies which encourage the development of infill and mixed-use housing in urban areas. The development of such higher density, multifamily housing reduces the need for landscape irrigation and thereby reduces water consumption per capita. Lastly, as previously discussed in Section 3.13 of this document, all public and private water purveyors located within the County have sufficient capacity to serve the housing capacity listed in the County's Land Inventory. These water providers use either ground water or State Water to service residential development. In accordance with the regulatory requirements these service providers operate in accordance with approved Urban Water Management Plans which limit the quantity of groundwater pumping to sustainable levels.

Quality of Water: As previously mentioned the updated Housing Element contains Policy 1.1 and Program 1.3 which encourage infill and mixed-use housing development in urban cores. Development of housing in these areas would reduce the need for additional roads and other impervious surfaces which contribute to the degradation of water quality.

Flood Hazards: The updated Housing Element does not include any changes to existing County regulations regarding the avoidance of flood hazards. Proposed housing developments would still be required to avoid flood hazards associated with FEMA mapped floodways and floodplains as required by the County's Public Works Department. As a result, the constraints analysis conducted as part the County's Land Inventory (refer to Housing Element Appendix D) included a consideration of potential land constraints from flooding. Where sites were found to have potential flood hazards the site was either removed from the Land Inventory entirely, or its realistic build out was reduced proportionate to its level of constraint. Refer to Figure 2 in Section 3.4 (Biological Resources) of this document for a graphical example of this constraints analysis.

Mitigation and Residual Impact:

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

Cumulative Impacts:

As previously mentioned above, the proposed 2009-14 Housing Element update would not result in any direct physical impacts that would significantly affect the County's water resources, nor would it result in new significant flood hazards. However, the proposed Housing Element policies encourage the development of infill and mixed-use housing. Development of such housing requires less landscaping irrigation and therefore reduced water usage per capita, as well as, reduced need for new road infrastructure and other impervious surfaces which contribute to stormwater runoff and other sources of water quality degradation. The updated Housing Element would have no affect on the County's existing policies regarding the avoidance of 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, Parks, Environmental Health, Agricultural Commissioner's Office

4.2 Comprehensive General Plan:

<input checked="" type="checkbox"/>	Seismic Safety/Safety Element	<input 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 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

Aesthetics/Visual Resources: The project would not have any significant short-term, long-term, or cumulative impacts on the County's visual resources. The proposed 2009-14 Housing Element update stresses the importance of using community plan design guidelines and the County's *Quality Housing Design Recommendations* to develop new residential opportunities which are sensitive to the existing natural and built environments. The *Design Recommendations* were included in the former 2003-08 Housing Element, but have been relocated into Appendix F of the proposed 2009-14 Housing Element, to increase the efficiency of their implementation.

Agricultural Resources: The project would not have any significant short-term, long-term, or cumulative impacts on the County's agricultural resources. The proposed Housing Element update contains goals and policies which are intended to encourage a new smarter planning paradigm. This new planning strategy facilitates the preservation of agriculture and open space by focusing development towards infill and mixed-use opportunities. This housing distribution would help to protect agriculture and encourages housing development in urban cores such as Isla Vista and Orcutt.

Air Quality: The project would not have any significant short-term, long-term, or cumulative impacts on the County's air quality. The Housing Element update contains policies which encourage the development of infill and mixed-use housing. By encouraging the development of housing within close proximity to jobs, commuting distances and air quality emissions related to vehicle trips would be reduced. The

reduction of such fossil fuel emissions would improve overall air quality and partially mitigate the effects of global warming.

Biological Resources: The project would not have any significant short-term, long-term, or cumulative impacts on the County's biological resources. The proposed 2009-14 Housing Element includes a policy framework that encourages infill housing development in urban cores. This development pattern would assist in limiting the impacts of residential projects on biological resources because urban cores generally contain a reduced quantity and quality of such resources.

Cultural Resources: The project would not have any significant short-term, long-term, or cumulative impacts on the County's cultural resources. The proposed housing policy framework encourages the use of infill and mixed-use housing to satisfy the County's housing needs, rather than the development of rural, agricultural, or open space areas. This should result in a reduced likelihood of impacts to cultural resources as most *Urban* areas have already been surveyed for cultural resources or such resources have already been disturbed.

Energy: The project would not have any significant short-term, long-term, or cumulative impacts on the County's energy capacity. The proposed Housing Element update includes new policies which encourage the continuation of existing programs or the creation of new programs which would increase the energy efficiency of the County's housing stock. Examples would include the continuation of the Innovative Building Review Program (IBRP) and the possible establishment of a Solar Financing District.

Fire Hazards: The project would not have any significant short-term, long-term, or cumulative impacts from increased fire hazards. The proposed Housing Element's new policy framework encourages infill and mixed-use housing development. These project types are typically located in urban cores which are buffered from large open spaces and high fuel loads. By concentrating new residential development in these urban areas rather than on the fringes of the national forest and open space, exposure to fire hazards should be minimized.

Geologic Processes: The project would not have any significant short-term, long-term, or cumulative impacts to existing geologic processes. The proposed Housing Element policies do not recommend or allow development in geologically sensitive areas, beyond which is already allowed under the County's current policies. Therefore, the project would not result in any new exposure of public to geologic hazards.

Hazardous Materials/Risk of Upset: The project would not have any significant short-term, long-term, or cumulative impacts from exposure to or risk of upset of hazardous materials. Residential land uses tend to generate smaller amounts and lower risk hazardous materials than competing land uses such as heavy industry. Therefore, the encouragement of housing development would not result in significant new significant impacts from hazardous materials.

Historic Resources: The project would not have any significant short-term, long-term, or cumulative impacts on the County's historic resources. The proposed Housing Element update would not change the County's existing procedures for the preservation of historic resources. Any future housing project would be subject to the County's existing regulatory process for the evaluation and preservation of existing historic resources. Therefore, the Housing Element update would not result in significant impacts to historic resources.

Land Use: The project would not have any significant short-term, long-term, or cumulative impacts on the County's existing land use patterns. Additionally, the Housing Element update does not propose any imminent changes to the County's existing land use designations or rezoning of land. Therefore, no significant land use impacts would result from the proposed project.

Noise: The project would not have any significant short-term, long-term, or cumulative impacts from excessive noise generation. Residential development is not considered a significant noise generating source. Short term impacts from construction of housing are already mitigated by the County’s standard limitation of construction hours.

Public Facilities: The project would not have any significant short-term, long-term, or cumulative impacts to the County’s public facilities. The proposed Housing Element update 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.

Recreation: The project would not have any significant short-term, long-term, or cumulative impacts on the County’s existing recreational opportunities. The proposed Housing Element update does not change the County’s existing requirements for development impact fees. Therefore, new housing projects would continue to be subject to the County’s parks fees which are used to mitigate impacts to the County’s existing recreational infrastructure.

Transportation/Circulation: The project would not have any significant short-term, long-term, or cumulative impacts on the County’s existing circulation infrastructure. The proposed Housing Element update contains policies which encourage infill and mixed-use development within existing urban cores. Facilitating development in this manner would produce housing in closer proximity to jobs and therefore decrease the commute distances and traffic loads.

Water Resources/Flooding: The project would not have any significant short-term, long-term, or cumulative impacts on the County’s water resources. The proposed Housing Element policies encourage the development of infill and mixed-use housing. Development of such housing requires less landscaping irrigation and therefore reduced water usage per capita, as well as, reduced need for new road infrastructure and other impervious surfaces which contribute to stormwater runoff and other sources of water quality degradation. The updated Housing Element would have no affect on the County’s existing policies regarding the avoidance of flood hazards.

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
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?				X	
2. Does the project have the potential to achieve short-term goals to the disadvantage of long-term environmental goals?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
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 2009-14 Housing Element update would not result in any significant physical impacts to the environment. The County has made a significant effort to include housing policies that both facilitate the production of affordable and special needs housing, but also achieve this goal in an environmentally sustainable manner. This is primarily indicated by the County’s encouragement of infill and mixed-use development in urban cores. Development in these areas would assist in the preservation of various resources, such as agricultural lands and sensitive biological habitats, which are located throughout the County’s rural areas. The location of housing in close proximity to jobs would also result in reduced commute distances, this would both decrease the traffic on County roads and reduce the quantity of vehicular emissions that contribute to air quality degradation and climate change. The adoption of such policies would facilitate the County’s production of adequate housing while also balancing the need of protecting other elements of the human and natural environment.

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 2009-14 Housing Element update 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. Each local jurisdiction is required to update its Housing Element on a regular basis (every 5 to 8 years depending on the local cycle). Therefore, the proposed 2009-14 Housing Element is intended to replace the existing 2003-08 Housing Element upon final adoption by the Board of Supervisors. The proposed 2009-14 Housing Element is consistent with the remaining *elements* of the County’s Comprehensive General Plan.

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 2009-14 Housing Element is consistent with Article II but also contains implementation Program 1.10 which would make minor revisions to the ordinance. This revision includes an increase in the amount of density bonus allowed pursuant to State Density Bonus Law. The future implementation of this program would be subject to additional environmental review pursuant to CEQA, and therefore analysis of impacts associated with this action is not included in this document.

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 requirements include setbacks, height limits, parking regulations, and landscape standards. The proposed 2009-14 Housing Element is consistent with the LUDC but also contains implementation Programs 2.3 and 2.4 which would make minor revisions to the Code. These revisions would include changes to the required permit process for farm employee housing and the incorporation of the County's reasonable accommodation process to facilitate structural retrofits to serve disabled persons. Both of these proposed revisions are required per State Law. The future implementation of these programs would be subject to additional environmental review pursuant to CEQA, and therefore analysis of impacts associated with these actions is not included in this document.

9.0 RECOMMENDATION BY P&D STAFF

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

- 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 Eady

DATE: 7/6/2010

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: [Signature]

INITIAL STUDY DATE: 7/6/10

SIGNATURE: [Signature]

NEGATIVE DECLARATION DATE: 7/6/10

SIGNATURE: _____

REVISION DATE: _____

SIGNATURE: _____

FINAL NEGATIVE DECLARATION DATE: _____

11.0 ATTACHMENTS

Attachment A: 2009-14 Housing Element, Chapter 5 (Housing Goals, Policies, and Programs)

Attachment B: Support for Use of BAAQMD Greenhouse Gas Emissions Standards

**Attachment A: Draft 2009-14 Housing Element, Chapter 5
(Housing Goals, Policies, and Programs)**

5. HOUSING GOALS, POLICIES, AND PROGRAMS

Introduction

Pursuant to State law, the Housing Element must set forth a series of goals and policies to address the maintenance, preservation, improvement, and development of housing.⁶ In addition, the Housing Element must include a program of actions that the County has already implemented, or intends to undertake, to achieve these goals and policies. Public input, economic analysis, and policy studies conducted as a part of this Housing Element update have underscored the importance of three themes that best describe the existing environment to which identified goals, policies, and programs must respond:

- **The current economy has changed the housing market.** The recession that began in 2008 resulted in a broad increase of housing affordability in communities throughout the unincorporated County. Yet, even with a decrease in housing prices, other challenges persist that have kept attainment of decent housing a struggle for some.
- **A new planning paradigm has emerged.** Changes in State housing law and the State's long term planning directive have pushed for a smarter policy framework that emphasizes the need to make the best use of limited land and resources. This new paradigm is one that mirrors many locally held planning traditions—those that help to preserve the County's rural heritage, along with the values expressed in each of the unique community planning areas of the County.
- Ongoing County efforts to increase **customer service** have resulted in the simplification, streamlining, and consolidation of numerous planning documents. Accordingly, the policy framework in the 2003-2008 Housing Element has been evaluated and changes are proposed to consolidate and remove redundant and/or irrelevant program goals, objectives, and policies.

Beyond framing the Housing Element update, these themes have provided the context for a thorough review of the effectiveness of the 2003-08 Housing Element (Appendix C), enabling a transition to a revised and improved set of goals, policies, and programs. Accordingly, the following five goals will guide local housing policy and program development for the duration of the current 2007-2014 Housing Element planning period:

- Enhance the Diversity, Quantity, and Quality of the Housing Supply;
- Provide Housing for Special Needs Groups;
- Provide Fair Access to Housing;
- Preserve the Affordable Housing Stock and Cultivate Financial Resources; and
- Maintain Cooperative Relationships and Efficient Government.

The programs and policies necessary to implement these goals are derived primarily from the 2003-2008 Housing Element, as well as the County's established tradition of community planning. In addition, regulatory updates required by State law are implemented through Housing Element programs.

In total, this policy framework has proven to be an effective means of addressing the housing needs of all economic segments of the unincorporated population, while also upholding local norms and values. In all cases, the County continuously seeks to leverage Federal, State, and

⁶ GC § 65583(b) and (c)

local financial resources to fund affordable housing programs and promote new housing opportunities through a balanced regulatory approach.

Table 5.1 – Proposed Draft Housing Element 2009-2014 Goals, Policies and Programs

Goal 1: Enhance the Diversity, Quantity, and Quality of the Housing Supply	
<p>Policy 1.1: Promote new housing opportunities adjacent to employment centers, and the revitalization of existing housing to meet the needs of all economic segments of the community, including extremely low income households, while bolstering the County's rural heritage and supporting each unincorporated community's unique character.</p>	<p>Program 1.1: Promote housing opportunities adjacent to employment centers through regional and local planning efforts, including the development of a Sustainable Communities Strategy (SCS) and Regional Housing Needs Allocation (RHNA), as facilitated by the Santa Barbara County Association of Governments. This will help ensure that community values are preserved, commute pressures and vehicle trips are reduced, rural areas are protected, fiscal and economic interests are upheld, and adequate housing is provided for each jurisdictions' workforce.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, Redevelopment Agency</p>
	<p>Program 1.2: Increase the effectiveness of the Inclusionary Housing Program by establishing an IHP ordinance and relocating all IHP programmatic details from the Housing Element to the Land Use and Development Code (LUDC). This modification will improve the pre-existing program by: 1) allowing greater flexibility for the Board of Supervisors to modify the IHP when warranted, 2) eliminating the need for a General Plan update when changes to the IHP are required, and 3) allowing for sufficient detail to support a greater understanding of the program by the public and County staff. Based upon public feedback, best-practices, and third-party analysis, programmatic revisions of the IHP ordinance will then be considered. From the adoption of this Housing Element, until such time that the forthcoming IHP ordinance is approved by the Board of Supervisors, the existing IHP, as included in Appendix A – <i>IHP Background, Policy and Implementation</i> of this Housing Element shall apply.</p> <p>Funding Source: General Fund</p> <p>Timeline: Within Two Years of the Adoption of the Element</p> <p>Responsible Agency: Planning & Development, County HCD</p>
	<p>Program 1.3: Implement community enhancement and revitalization tools where warranted through the community planning process using strategies that promote affordability by design such as mixed-use, infill, and adaptive reuse. Currently, five community plan updates are underway in the communities of Los Alamos, Eastern Goleta Valley, Summerland, Mission Canyon, and Orcutt. One community plan, for the Santa Ynez Valley, was recently completed. Through the update process, staff will continue to provide information, analysis, and recommendations regarding how such tools may contribute to achieving the community's expressed goals and vision for housing.</p> <p>The County shall utilize the community planning process to identify new potential housing sites as necessary to continue to</p>

	<p>satisfy its Regional Housing Needs Allocation. As part of the ongoing community planning process, the County shall explore options to address housing needs by considering the use of form-based codes, overlays, or rezones which are compatible with the surrounding community character. In the context of the community planning process, the County should consider rezones or similar actions which would establish housing opportunities which are approximately 10 acres or greater in size and have an effective density of 20 units an acre or greater, if such rezones can be found compatible with surrounding development and serviceable by infrastructure capacity.</p> <p>Funding Source: General Fund</p> <p>Timeline: Schedules for projects as complex as Community Plans are subject to fluctuation, due to uncontrollable variables such as environmental review processes, hearing agendas, and funding limitations. However, the County will attempt to adopt updated community plans within the following estimated timelines, as fiscal and staffing resources allow:</p> <p>Los Alamos Community Plan- December 2010 Eastern Goleta Valley Community Plan- July 2012</p> <p>Responsible Agency: Planning & Development, Redevelopment Agency</p> <hr/> <p>Program 1.4: The following land use tools shall continue to be considered and/or used through the community planning and development review processes, as well as the zoning ordinance, to provide housing opportunities for all economic segments of the population, including extremely low income households:</p> <ol style="list-style-type: none">1) The Affordable Housing Overlay (AHO) zone.2) Policies to encourage the development of unit types that are affordable by design, such as Residential Second Units, Farm Employee Dwellings, infill, and Mixed-use Development.4) Permit streamlining efforts overseen by the Permit Process Improvement Team (PIT), and priority permit processing for projects with affordable units built on site.5) Incentives for special types of housing, as illustrated in Appendix F – <i>Quality Housing Design and Development Incentives</i>.6) Administrative zoning modifications for new development approved via Development Plans.7) Board-approved discretionary reductions of development impact fees for projects with demonstrated public benefits, including the provision of onsite affordable housing. <p>Funding Source: General Fund and Permit Fees</p> <p>Timeline: Ongoing</p>
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	<p>Responsible Agency: Planning & Development</p> <p>Program 1.5: Utilize community plan updates as opportunities to consider and develop solutions for infrastructure constraints, which can be a barrier to the development of housing throughout the unincorporated County. Specifically, when updating a community plan, the future residential development allowed by the plan should be supported by either existing service infrastructure, or the plan should anticipate how this infrastructure can be improved and/or expanded to foster future housing opportunities. Additionally, the County will consider the need for infrastructure expansion when reviewing the future use or sale of County-owned land. Prior to the sale of County-owned land, the subject property shall be evaluated for potential land use conflicts and other constraints that may make the property inappropriate for expansion of service infrastructure. If the property is determined to be appropriate for infrastructure facilities/improvements, the County shall contact applicable public and or private agencies and/or private to determine the level of interest and/or financial feasibility of developing the site with the appropriate level of service infrastructure.</p> <p>Funding Source: General Fund and Permit Fees</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p> <p>Program 1.6: Ensure quality housing design and community compatibility via the continued use of regional BAR and Community Plan Design Guidelines.</p> <p>Funding Source: General Fund and Permit Fees</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p> <p>Program 1.7: Continue working with the Redevelopment Agency to support programs aimed at catalyzing community renewal through: 1) incentivizing investments in underutilized urban property (i.e., parking lots, church sites, commercial property, irregularly shaped lots), 2) infrastructure (i.e., streetscape improvements and parking), and 3) affordable housing, including homeless support infrastructure. Encourage cooperation between County HCD and Redevelopment Agency to provide funding and opportunities for redevelopment and economic enhancement. Continue to support the use of the Isla Vista Master Plan to contribute to the diversity and affordability of the housing stock in the County, adjacent to the County's largest employer, University of California Santa Barbara.</p> <p>Funding Source: General Fund and Redevelopment Funds</p>
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	<p>Timeline: Opportunities to be Reviewed on an Annual Basis Responsible Agency: Planning & Development, Redevelopment Agency</p> <hr/> <p>Program 1.8: Continue to support and expand the use of the Innovative Building Review Program to streamline the permit process for projects meeting energy efficiency requirements. The existing IBRP supplies public information regarding energy efficient construction techniques and allows fast track permitting for projects with energy efficient designs. The program shall continue to be updated in response to changing development trends and technological progress regarding energy efficient building design.</p> <p>Funding Source: Permit Fees Timeline: Ongoing Responsible Agency: Planning & Development</p> <hr/> <p>Program 1.9: Seek opportunities to finance and support energy efficiency and renewable energy improvements for the market-rate and affordable housing stock in the County. Examples to be considered as part of this program include adoption of a Climate Action Strategy as directed by the Board in the Long Range Planning 2009-10 Work Program, implementation of a municipal energy efficiency financing district, and strategies to prioritize County affordable housing resources for projects that encourage energy efficiency improvements.</p> <p>Funding Source: General Fund Timeline: Within Three Years of the Adoption of the Element Responsible Agency: Planning & Development</p>
	<p>Program 1.10: Amend applicable County regulations to comply with the provisions of State Density Bonus Law, which is intended to increase the economic feasibility of affordable housing development for extremely low, very-low and low-income households. Specifically, amend Article II (Local Coastal Plan) to allow up to a 35% density bonus for applicable projects. The current Article II regulations only allow a 25% density bonus.</p> <p>Funding Source: General Fund Timeline: Within Three Years of the Adoption of the Element Responsible Agency: Planning & Development</p>

	<p>Program 1.11: Provide consultations for project applicants who want to incorporate the use of the State Density Bonus Law (SBDL) as part of their housing project. Staff will provide general knowledge on the use and applicability of the SBDL and assist project applicants in utilizing SBDL to enhance their housing project.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p>
	<p>Program 1.12: The County shall continue, and where feasible expand, its partnership with nonprofit housing providers such as the Housing Authority and People’s Self-help Housing. This partnership should be specifically leveraged to provide additional housing opportunities which are affordable at extremely-low income levels. Opportunities such as the use of State Density Bonus Law and the County’s Development Incentives listed in Appendix F should be utilized to encourage the development of such affordable housing. The County shall also consider the use CDBG, Housing Trust Fund, or similar funding sources to support the development of housing which is affordable at extremely-low income levels.</p> <p>Funding Source: CDBG and Redevelopment Funds</p> <p>Timeline: Provide Opportunity for Annual Consultations upon Stakeholder Request</p> <p>Responsible Agency: County HCD and RDA</p>
	<p>Program 1.13: The County shall continue to utilize the Isla Vista Master Plan in combination with redevelopment funds and equivalent resources to promote the creation of additional housing stock within the South Coast housing market area. Specifically, the County shall encourage the development of varied housing types which assist in satisfying the full spectrum of the County’s housing needs, including housing for families (e.g. two-bedroom units or larger) and low income households.</p> <p>Funding Source: CDBG and Redevelopment Funds</p> <p>Timeline: Annually review the effectiveness of the IVMP to provide housing units which satisfy the County’s various housing needs. Specifically, the Annual Report process should evaluate the IVMP’s effectiveness in providing a variety of housing types including housing for families (e.g. two-bedroom units or larger) and low income households. If Annual Reports on housing indicate that the IVMP is continually producing less housing than anticipated in the County’s Land Inventory, or a predominance of a single housing type which fails to meet the housing needs of the community, then additional rezones, overlays, or similar actions for the purpose of creating additional housing opportunities should be considered as part of the community planning process.</p>

	<p>Responsible Agency: County HCD and RDA</p>
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Goal 2: Expand Housing for Special Needs Groups	
<p>Policy 2.1: Encourage housing that meets the requirements of special needs households, as identified per State law, and promotes housing diversity (i.e., size, type, tenure, location, and affordability levels).</p>	<p>Program 2.1: Provide housing consultation services to assist applicants understanding of the regulatory environment, applicable State laws and incentives, and local policies and incentives impacting the development of special needs housing, including the County reasonable accommodation procedure.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p>
	<p>Program 2.2: Continue to facilitate ministerial permit opportunities for emergency shelters and supportive housing, consistent with the provisions of Chapter 633, Statutes of 2007 (SB 2) which amended Government Code Sections 65582, 65583, and 65589.5. Currently, emergency shelters and supportive housing are treated as residential uses, are allowed with a ministerial Land Use Permit, and are subject to the same permitting process as other housing within the C-3 zone. As discussed in Chapter 3 of this Housing Element, adequate sites exist within this zoning designation to accommodate new emergency shelters and permit procedures are in compliance with State housing law.</p> <p>Funding Source: General Fund and Permit Fees</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, County HCD</p>
	<p>Program 2.3: Amend the County's Land Use and Development Code (LUDC) to be consistent with Health and Safety Code Sections 17021.5 and 17021.6 regarding farmworker housing developed by <u>State-licensed</u> agricultural operators. Section 17021.5 requires that any employee housing providing accommodations for six or fewer employees be deemed a single-family structure, while Section 17021.6 requires that employee housing consisting of no more than 36 beds in a group quarters or 12 units or spaces designed for use by a single family or household be deemed an agricultural use. As such, no conditional use permit, zoning variance, or other zoning clearance or business taxes, local registration fees, use permit fees, or other fees shall be subject to these housing types which are not typically subject to uses of the same type in the same zone. The County will amend the necessary LUDC sections through the established Process Improvement Team (PIT) process, with policy assistance provided by the Office of Long Range Planning.</p> <p>Funding Source: General Fund</p> <p>Timeline: Within Four Years of Housing Element Adoption</p> <p>Responsible Agency: Planning & Development</p>

	<p>Program 2.4: The County shall provide increased opportunities for the development of farmworker housing. This should include the provision of funding sources such as the Joe Serna Jr Farmworker Housing Grant Program, where available. Additionally, the County should continue to consider PIT actions which will further streamline the permit process for agricultural employee housing. The County shall also provide opportunities for stakeholder input from growers, ranch owners, and other agricultural operators regarding the need and opportunities for additional farmworker housing.</p> <p>Funding Source: General Fund & Federal and State Housing Funds</p> <p>Timeline: Provide Opportunity for Annual Consultations upon Stakeholder Request</p> <p>Responsible Agency: Planning & Development and County HCD</p>
	<p>Program 2.5: Provide opportunities for administrative relief for housing projects that accommodate the needs of persons with disabilities and their families, consistent with Chapter 671, Statutes of 2001 (SB 520), which amended Government Code Section 65583(c)(3). Subject to Appendix B of this Housing Element, the requirements of applicable County zoning ordinances shall be waived by the Director of Planning & Development (or applicable Review Authority), if necessary, to comply with Federal and/or State fair housing and disability laws relating to reasonable accommodations for persons with disabilities.</p> <p>To increase the effectiveness of this practice, the County "Reasonable Accommodation" procedure shall be incorporated into the County Land Use and Development Code. The procedure will identify applicability, application requirements, review authority, the review procedure, and findings that will serve as the basis for the decision to grant or deny requests for reasonable accommodation. In addition, it will identify the process for appeals of the determination.</p> <p>Funding Source: General Fund</p> <p>Timeline: Within Four Years of the Adoption of the Element</p> <p>Responsible Agency: Planning & Development</p>

Goal 3: Provide Fair Access to Housing	
Policy 3.1: Promote equal housing opportunities for all persons in all housing types (ownership and rental, market-rate and assisted).	Program 3.1: Continue existing programs to provide a referral process and/or contracts with legal services for fair housing issues. The County currently contributes General Fund resources to the City of Santa Barbara for regional fair housing legal services. Additionally, the County will consider contributing additional funding to appropriate private legal service agencies to provide active fair housing legal services countywide. Funding Source: General Fund and CDBG Timeline: Ongoing Responsible Agency: County HCD
	Program 3.2: Bolster support of the existing Fair Housing Public Outreach program by providing increased information via County websites, public pamphlets, informational handouts, and other means. In addition to public outreach conducted by the County, any contract for private fair housing legal services will require a public outreach component. This public outreach program shall be conducted in multiple languages and designed to provide information to community members from all special needs, ethnic, cultural, and economic spectrums. Funding Source: General Fund & CDBG Timeline: Within Three Years of Housing Element Adoption Responsible Agency: County HCD

Goal 4: Preserve the Affordable Housing Stock and Cultivate Financial Resources	
<p>Policy 4.1: Preserve the affordable housing stock, maintain its affordability, improve its condition, and prevent future deterioration and resident displacement. Participate in available Federal and State housing subsidy and assistance programs and use the County's own resources in order to leverage maximum funding for the provision of affordable housing.</p>	<p>Program 4.1: Continue to access HOME, Community Development Block Grant, American Recovery and Reinvestment Act, and other resources provided by Federal, State, or regional entities to increase the efficiency of locally-generated IHP in-lieu fees collected for the express purpose of providing new and preserving existing affordable housing opportunities.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: County HCD</p>
	<p>Program 4.2: The County will consider the need for affordable housing when reviewing the future use or sale of County-owned land. Prior to the sale of County-owned land, the subject property shall be evaluated for potential land use conflicts and other constraints that may make the property inappropriate for residential development. If the property is determined to be appropriate for residential development, the County shall contact applicable departments (such as County HCD and the Redevelopment Agency) as well as private and non-profit affordable housing agencies to determine the level of interest and/or feasibility of developing the site with affordable housing.</p> <p>Funding Source: N/A</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: General Services</p>
	<p>Program 4.3: The County will continue to track affordable rental developments with expiring use restrictions and work with owners to ensure maintained affordability. County HCD will continue to manage a database which tracks the expiration dates of affordable housing covenants and restrictions. Prior to the expiration of these affordability restrictions, County HCD shall explore all opportunities to maintain this affordability. Such opportunities include but are not limited to: provision of rehabilitation funding to the property owner contingent upon an extension of the affordability restrictions, assistance to non-profit housing agencies or any other entities seeking to acquire and maintain government-assisted housing developments at risk of converting to market rate housing, or acquisition of the housing units with available local financing.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: County HCD</p>

	<p>Program 4.4: The County will continue to work with non-profit organizations to implement a housing rehabilitation program for low-income homeowners. County HCD and Redevelopment Agency will continue their existing programs, as funding allows, and partner with local private and non-profit groups to acquire and/or rehabilitate rent-restricted or otherwise affordable housing. As previously discussed in this Housing Element, these programs will support projects similar to the Parkview project in Isla Vista, which rehabilitated 20 low income housing units.</p> <p>Funding Source: CDBG and Redevelopment Funds</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Redevelopment Agency, County HCD</p>
	<p>Program 4.5: Continue to support County and private non-profit programs which provide "soft" second mortgages or other financial tools to assist moderate-income, and in some cases, low-income home buyers. The County has already provided a letter of support to the Santa Barbara County Housing Authority enabling continued participation in its existing "soft" second mortgage program. The County shall continue to explore opportunities to support and secure additional funding for such programs.</p> <p>Funding Source: Various</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, County HCD, Redevelopment Agency</p>

Goal 5: Foster Cooperative Relationships and Efficient Government	
<p>Policy 5.1: Form collaborative professional working relationships with the public and providers of housing; and assist with the process of accessing and/or providing affordable housing opportunities. Identify and, where feasible, eliminate or reduce governmental constraints to the development of housing.</p>	<p>Program 5.1: Work cooperatively and form partnerships with Federal, State, and regional agencies, as well as private and non-profit entities to apply for public funding to support projects demonstrating creative strategies to address affordable housing needs.</p> <p>Funding Source: Various</p> <p>Timeline: Provide Opportunity for Annual Consultations upon Stakeholder Request</p> <p>Responsible Agency: Planning & Development, County HCD, Redevelopment Agency</p>
	<p>Program 5.2: Participate in regional planning and housing programs with incorporated cities, public and private housing agencies such as the Housing Authority, Habitat for Humanity, as well as other stakeholders as appropriate. As part of this effort the County shall pursue further partnership programs such as the 10-year Plan to End Chronic Homelessness.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, County HCD, Redevelopment Agency</p>
	<p>Program 5.3: Facilitate public outreach regarding housing opportunities such as Residential Second Units, Farm Employee Dwellings, and permit streamlining. In addition, the County shall provide information on its website and provide literature detailing the opportunities to develop housing which is affordable by design or with price restrictions.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p>
	<p>Program 5.4: Continue to utilize the County Process Improvement Team (PIT) to streamline the County's permit process and remove regulatory barriers to the development of new housing. The PIT will continue to meet on at least a quarterly basis and incorporate input from community stakeholders and housing developers regarding appropriate streamlining efforts to encourage the permitting of additional housing.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, Process Improvement Team (PIT)</p>

	<p>Program 5.5: Continue to utilize new technology and data to monitor and assess housing development and the affordability of housing. The County shall continue to develop more efficient housing tracking options in its Accela permit tracking system. The County will also provide support to Federal, State, and regional authorities to successfully implement the 2010 Census which will provide valuable information regarding population and housing.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, County HCD</p>
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Attachment B: 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.⁷ 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^{8,9,10, 11}

County	Population (2010)	% Change in Population (2009-2010)	Average Annual Growth Rate (2000 – 2009)	Average Household Size ¹²	Average Commute Time (minutes)	Daily VMT (millions)
Santa Barbara	434,481	1	0.86	2.73	20	9.7
Napa	138,917	0.9	1.13	2.63	24	4.5
Marin	260,651	0.8	0.5	2.36	29	6.2
Solano	427,837	0.5	0.79	2.9	30	7.2
Sonoma	493,285	1.2	0.67	2.53	25	10.6
San Mateo	754,285	1.2	0.61	2.74	25	19.4
San Francisco	856,095	1.1	0.96	2.42	29	12.4
Contra Costa	1,073,005	1.1	1.24	2.76	32	25.7

⁷ Santa Barbara County Operating Plan for 2010-1011

⁸ 2006 -2008 American Communities Survey

⁹ Source Inventory of Bay Area Greenhouse Gas Emissions, BAAQMD, 2010

¹⁰ Vision 2030: SBCAG 2008 Regional Transportation Plan

¹¹ California Department of Finance

¹² 2006 -2008 American Communities Survey

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

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.¹³ 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 result 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 Threshold¹⁴

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

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.¹⁵ 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.

¹³ Source Inventory of Bay Area Greenhouse Gas Emissions, BAAQMD, 2010

¹⁴ CEQA & Climate Change, CAPCOA, 2008

¹⁵ 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.