County of Santa Barbara

Calle Real Photovoltaic Project

Final Mitigated Negative Declaration

April 2011

rincon

Environmental Scientists Planners Engineers

COUNTY OF SANTA BARBARA

General Services Department

Final
Mitigated Negative Declaration
Calle Real Photovoltaic Project

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Santa Barbara County

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Assessor's Parcel Number
059-140-029

Calle Real Photovoltaic Project

Final
Mitigated Negative Declaration

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TABLE OF CONTENTS

Page

List of Tables

List of Figures

Attachments

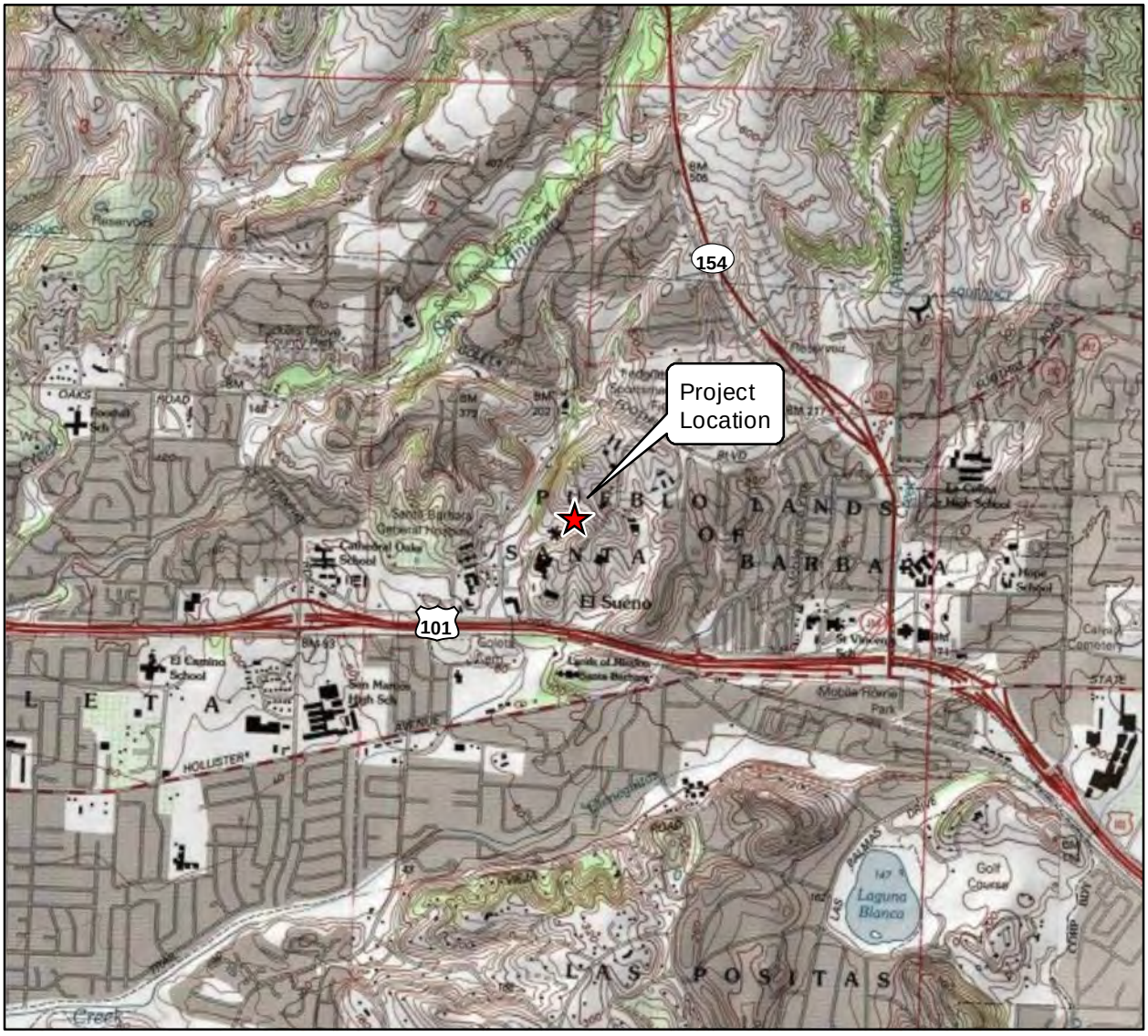
1.0 REQUEST/PROJECT DESCRIPTION

The proposed project involves the construction and operation of a photovoltaic system on an approximately 5-acre hillside site adjacent to the County Jail at 4434 Calle Real in Santa Barbara (refer to Figure 1, *Project Vicinity*). The project objectives are to reduce the County's carbon footprint and reduce costs paid for electricity through use of solar power. The project is a photovoltaic system that will produce approximately one megawatt (MW) of electricity to help power the County Jail facility and other nearby County facilities (Sheriff Administration, 911 Call Center, Public Health Hospital, Public Health Administration, Mental Health Hospital, Mental Health Administration, Agriculture Commission, Environmental Health, Veteran Hospital, Elections Office, Clerk Recorder Assessor, and others). The selection of the make and model of solar panels, and the precise arrangement of panel clusters would be refined during the final engineering, but is assumed to be similar to the following description.

Approximately ~~5,000~~4,500 individual solar panels would be installed on a portion of the hillside behind (to the northeast of) the existing County Jail buildings, as shown on Figure 2, *Conceptual Site Plan*. Each photovoltaic panel would be approximately six feet by three feet in size and mounted in clusters or rows of panels, with a mosaic of several panels per mounting unit. An example of pole-mounted panel arrays is shown on Figure 3. The photovoltaic panels would be ground mounted on poles or a similar anchoring system and distributed throughout a portion of the 5-acre site. The maximum height of each panel cluster would be approximately 6 feet above ground surface, and the mounting units would be driven/screwed into the ground to a depth of approximately 5 to 10 feet. The system is not anticipated to cover the entire 5-acre site; however, full coverage has been analyzed to represent reasonable maximum impact. The proposed project would occupy approximately ~~75~~81,000 square feet or ~~1.72~~2 acres. Consequently, the proposed project would cover approximately ~~1/3~~2/5 of the 5-acre project site.

The project would require the installation of power inverter equipment, which would be enclosed in an inverter shelter building of approximately 500 square feet in size and approximately 10 to 12 feet in height. This inverter shelter ~~would~~ may be located on the lower portion of the site near the existing County Jail facilities, but the exact location would be determined during the final engineering. Solar electricity would be transferred from the ground-mounted panels to the inverters and from the inverters to the jail facility through underground conduit that would be installed underground in trenches. Two main trenches would be required, both of which would be approximately one foot wide and four feet deep. One trench would be for the conduit run from the photovoltaic array to the inverter shelter, and a second trench would be for the conduit run from the inverter shelter to an existing electrical vault box on the southwest side of the main County inmate housing facility. A total of approximately 1,200 feet of trenching would be required for these main conduit runs, and boring may be used in place of trenching for certain sections of the conduit run. Once installed, the conduit would be protected by a layer of concrete and then backfilling of the trench. The proposed project would meet all interconnectivity standards as set forth by Southern California Edison, and the distribution of electricity from the existing vault box to surrounding County facilities would remain the same.

The entire 5-acre site, including the solar array and the inverter building, would be enclosed by a six- to twelve-foot high chain link fence with a barbed-wire top. The total fence height would be approximately seven to thirteen feet. A security system would be installed to monitor the array. Installation of the solar array, inverter building, and associated appurtenant equipment is estimated to require 500 cubic yards of grading to be balanced on site. Minor grading activities for the construction of water diversion brow-ditches above the photovoltaic array and slope stabilization may also be required, subject to the recommendations of a soils report.



0 0.25 0.5 Miles

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Project Location

Project Vicinity

Figure 1

Conceptual Site Plan

Figure 2

Example Photovoltaic Pole-Mount Arrays, View 1.
This photo shows a photovoltaic system with pole-mounted panels arranged on a rack. This system has been designed in rows of contiguous arrays.

Example Photovoltaic Pole-Mount Arrays, View 2.
This photo shows the arrays spaced at offset intervals to accommodate for the topography of the site. The arrays can be arranged in contiguous rows or in isolated clusters of panels as necessary to accommodate the space and topography of a site.

Example Pole-Mount Photovoltaic Arrays

Figure 3

Construction would require approximately 3-6 months and would be limited to weekdays between 7 AM and 5 PM. Construction equipment would include a back-hoe, a small tractor or bobcat, heavy trucks, and laborer or contractor work trucks. During peak construction activity, a labor force of approximately 20 people would be required. It should also be noted that non-utility grade solar projects are exempt from the planning permit process per the Land Use and Development Code, Section 35.30.160 (B).

2.0 PROJECT LOCATION, SURROUNDING USES, ACCESS, AND SERVICES

The project site is Assessor's Parcel Number 059-140-029, located at 4434 Calle Real within the Goleta Community Plan Area, in Santa Barbara, California.

Table 1 Site Information

Comprehensive Plan Designation	Institutional/Government Facility
Zoning District	Recreation (REC)
Site Size	Approximately 5 acres
Present Use & Development	Undeveloped area adjacent to existing County Jail facilities
Surrounding Uses/Zoning	North: Institutional Government Facility / Recreation (REC) South: Institutional Government Facility / Recreation (REC) East: Institutional Government Facility / Recreation (REC) West: Multiple Family Residential/Design Residential (DR-8)
Access	Honor Farm Road
Public Services	Water Supply: Goleta Water District Sewage: Goleta Sanitary District Fire: Santa Barbara County Fire Department Electric: Southern California Edison

3.0 ENVIRONMENTAL SETTING

The project site is located at 4434 Calle Real in the Goleta Community Plan (GCP) area. It is a 5-acre site, located on an undeveloped portion of a 61.81-acre parcel.

The project site is surrounded by County facilities to the north, east, and south, and residential uses to the west and northwest. The Santa Barbara County Transfer Station is located to the north and east of the project site, and the Santa Barbara County Jail and Sheriff's Department are located south of the project site. These areas have land use designations of Institutional/Government Facility and zoning designations of Recreation (REC). Parcels to the west are designated Residential Multiple and are zoned Design Residential – 8 units/acre (DR-8). The project site is accessed via Honor Farm Road, extending off of Calle Real. The site is served by the Santa Barbara County Fire Department, the Santa Barbara County Sheriff, the Goleta Water District, Goleta Sanitary District, and Southern California Edison.

The GCP Eastern Goleta Valley Environmentally Sensitive Habitat and Riparian Corridor Overlay Map shows the project site located within an Environmentally Sensitive Habitat (ESH) area. In addition, the GCP Eastern Goleta Valley Existing Vegetation Map identifies the project site as within a Coastal Sage Scrub zone.

It should be noted that the GCP is currently in the process of being updated and an Administrative Draft has been completed. While the document has not yet been adopted, the goals and policies are generally more stringent compared to the existing 1993 GCP. This Initial Study/Mitigated Negative Declaration complies with the existing 1993 GCP, but additionally complies with the current Administrative Draft

GCP update (Administrative Draft GCP). Because the Administrative Draft GCP contains more stringent environmental goals and policies, it is referred to throughout this document in place of the 1993 GCP.

4.0 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 the 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.

4.1 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 project site is located on the hillside to the north and east of the existing County Jail facility. The general topography of the area consists of foothills, which extend north toward the Santa Ynez Mountains. There are no public views from the project site, as it is not publicly accessible. According to the Goleta Community Plan Area Land Use Overlay Designations Map, the project site is not located within a designated view corridor. However, the project site is briefly visible from the U.S. 101, which is a state-designated Scenic Highway. Existing glare and night lighting in the area is typical of suburban uses, including residences to the west and the County facilities to the north, south, and west.

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 alter

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, b, c. Less Than Significant. The proposed project involves the construction of a one-megawatt photovoltaic system on an approximately 5-acre site within an existing County-owned Jail Facility property. Assuming the use of photovoltaic panels measuring 3 feet by ~~5~~6 feet, each panel would be ~~15~~18 square feet lying flat. ~~Fifteen~~Eighteen square feet would be a conservative estimate of site coverage since the panels would be installed at an angle. Therefore, assuming ~~5,000~~4,500 panels to achieve one megawatt, the proposed project would occupy approximately ~~75~~81,000 square feet or ~~1.72~~2 acres. Consequently, the proposed project would cover approximately ~~1/3~~2/5 of the 5-acre project site.

Glare from the panels may be visible from surrounding uses. However, photovoltaic panels innately use glare-reducing materials to maximize absorption of sunlight, rather than reflect it. In addition, the panels would be generally angled toward the south, minimizing the potential for glare that would affect sensitive viewsheds of residences to the west of the project site. No night lighting would result from the proposed project.

The introduction of a system of photovoltaic panels would result in a change to the visual character of the project site. About ~~1.7~~2 acres of the undeveloped hillside would be replaced with the photovoltaic panels. Visual simulations were prepared for the proposed project and the viewpoints that were considered reflect the two locations at which the project site is the most visible (refer to Figure 4a). The project site is briefly visible from a point along U.S. Highway 101 near the Turnpike on- and off-ramps (refer to Figure 4b). Views from Oak Glen Drive are shown in Figure 4c. This viewpoint shows the proposed project from the residences to the west. Other views of the proposed project are limited by the rolling hillsides and existing vegetation.

The magnitude of the change in visual character would be reduced as the panels would cover approximately ~~one-third~~2/5 of the site, rather than the 100% of the site depicted in the photo-simulations.[1] Furthermore, existing landscaping provides screening for the lower portions of the site, and the site is not visually pristine, given the existing government facilities to the south and the north of the project site. The proposed project would require the removal of existing vegetation, which is predominantly groundcover that has been highly disturbed. Given the recurrent ground disturbance in this area and the overall character of the project site as a government facility, the removal of vegetation from a portion of the project site would not be significant. The removal of existing vegetation is further discussed in Section 4.4, *Biological Resources*. Finally, there is limited visibility to the project site from public corridors. While the visual character of the project site would change, the change to the visual character of the project vicinity would not be significant because of the site's low visibility.

The project would not obstruct any scenic vistas or public views. The views of the Santa Ynez Mountains are the primary visual resource in the vicinity of the project site, and the project would not obstruct these views. Views of the Santa Ynez Mountains would remain to provide scenic value as the backdrop for the project site. While the proposed solar panels would be partially visible from public viewpoints as depicted in the photo-simulations as well as from some of the private residences in the Oak Glen Drive

[1] *The post-project simulations cover a substantially larger area than would be required and represents a worse case coverage scenario. The modeling of full 5-acre coverage of the site was conducted to depict what the project would look like in all potential areas of the project site and provide for flexibility in location of the arrays.*

Source: Robert Carr, 2011.

Map of Visual Simulation Viewpoints

Figure 4a

Existing View

Post-Project View

**Note: Simulation assumes full site coverage to depict the photovoltaic system at any location within the project site. However, it should be noted that the system would not require site coverage of this magnitude.*

Viewpoint 1: U.S. Highway 101
Looking East-Northeast

Figure 4b

Existing View

Post-Project View

**Note: Simulation assumes full site coverage to depict the photovoltaic system at any location within the project site. However, it should be noted that the system would not require site coverage of this magnitude.*

Viewpoint 2: Oak Glen Drive
Looking East

Figure 4c

neighborhood, because of the intermittent nature of these views and preservation of the Santa Ynez Mountains backdrop, impacts to views would not be significant.

d. No Impact. The proposed project would not be incompatible with surrounding structures. Surrounding structures are predominantly urban and the site itself is designated Institutional/Government Facility. The proposed photovoltaic system would occupy approximately 2 acres directly adjacent to the County Jail facility. The proposed project would be visually compatible with the existing government facility structures, which occupy the majority of the project area. Therefore, there would be no impact to visual compatibility of structures.

Cumulative Impacts:
Implementation of the proposed project is not anticipated to result in any significant change in the aesthetic character of the area since the project would not significantly affect the site's visual character or views from public vantage points. The proposed solar panels would be in an area where there is already substantial existing development for County institutional/ governmental facilities. Furthermore, there would be no significant impacts with respect to glare. Thus, the project would not result in a considerable contribution to cumulative changes in aesthetic conditions.

Mitigation and Residual Impact:
While the project would not result in significant impacts, Mitigation Measure AES-1 is recommended to further reduce impacts to the visual character of the project area.

AES-1 **Aesthetic Considerations in Project Design**. The proposed project shall be designed to avoid siting panels on the uppermost portions of the project site. Photovoltaic panels shall not be installed within 100 feet of the northeastern border of the project site, which is the uppermost reach.

Plan Requirements and Timing: Building and Safety staff shall review plans for all project components prior to project initiation.

Monitoring: Building and Safety inspectors shall perform periodic spot checks during construction to ensure compliance with this measure.

4.2 AGRICULTURAL and FORESTRY RESOURCES

Will the proposal result in:	Poten Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Convert prime agricultural land to non-agricultural use, impair 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	
c. Result in the loss of forest land or conversion of forest land to non-forest use?				X	

Impact Discussion:
a-c. No Impact. The project site and surrounding areas do not contain any agricultural resources, farmland, forest land or timberland. The California Department of Conservation's Farmland Mapping and Monitoring Program classifies the project site as Urban and Built-Up Land and Other Land, which is defined as land that is not suitable for agricultural activities and that is surrounded on all sides by urban

development. The project would not conflict with a Williamson Act contract. Therefore, implementation of the proposed project would not result in impacts to agriculture or forest resources.

Mitigation and Residual Impact: No significant impacts have been identified. Therefore, mitigation is not necessary.

4.3 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 including, CO hotspots, 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 GASES	**Significant**		**Less Than Significant**		
d. Emissions equivalent to or greater than 10,000 metric tons of CO_2E per year from stationary sources during long-term operations?			X		

Setting:
The project site is located within the South Central Coast Air Basin, and is under the jurisdiction of the Santa Barbara County Air Pollution Control District (APCD). The APCD has a network of 17 stations that monitor air quality in the County. Santa Barbara County is in attainment of the federal eight-hour ozone standard, and for the state one-hour ozone standard. The County does not meet the state eight-hour ozone standard or the state standard for particulate matter less than ten microns in diameter (PM_{10}), but meets the federal PM_{10} standard. The County is classified as "Unclassifiable/Attainment" for $PM_{2.5}$ as there is not yet enough data to determine the attainment status for the state standard for $PM_{2.5}$.

Certain population groups are considered more sensitive to air pollution than others. Children, the elderly, and acutely ill and chronically ill persons, especially those with cardio-respiratory diseases, are particularly vulnerable. Sensitive land uses include those locations where such individuals are concentrated, such as hospitals, schools, and residences. Sensitive receptors in the project area include multiple family residences located approximately 300 feet west of the project site.

Greenhouse Gas/Climate Change Background:
Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHG), in reference to the fact that greenhouses retain heat. Common GHGs include water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O_x), fluorinated gases, and ozone. GHG are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHGs, Earth's surface would be about 34° C cooler (CalEPA, 2006). However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

Global climate change (GCC) is a change in the average weather of the earth that is measured by temperature, wind patterns, precipitation, and storms over a long period of time. The baseline, against which these changes are measured, originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed an unprecedented acceleration in the rate of warming during the past 150 years.

Total U.S. GHG emissions were 7,282 million metric tons (MMT) carbon dioxide equivalent (CO_2E) in 2007 (Department of Energy [DOE], Energy Information Administration [EIA], December 2008), or about 14% of worldwide GHG emissions. Based upon the California Air Resources Board (ARB) *California Greenhouse Gas Inventory for 2000-2008*, California produced 477.7 MMT CO_2E in 2008, making California the second largest contributor of GHGs among U.S. states. The major source of GHGs in California is transportation, contributing 36.5% of the state's total GHG emissions. Electricity generation is the second largest source, contributing 24% of the state's GHG emissions. California emissions are due in part to its large size and large population.

GCC has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. A warming of about 0.2°C (0.36°F) per decade is projected, and there are identifiable signs that GCC could be taking place, including substantial ice loss in the Arctic (IPCC, 2007).

According to the California Environmental Protection Agency's (CalEPA) *Final Climate Action Team Biennial Report* (March 2009), potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Potential effects include reduced water supplies in some areas, ecological changes that threaten some species, reduced agricultural productivity in some areas, increased coastal flooding, and other effects.

County Environmental Thresholds:
The *Santa Barbara County Environmental Thresholds and Guidelines Manual* (October 2008) addresses the subject of air quality. The thresholds indicate that a proposed project would not have a significant impact on air quality if operation of the project would:

- Emit (from all project sources, mobile and stationary), less than the daily trigger ~~(~~, which is 55 pounds per day~~)~~ for ~~offsets~~ nitrogen oxides (NO_x) and reactive organic compounds (ROCs), and 80 pounds per day for ~~any pollutant~~PM_{10}; 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 temporary 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 Gas/Global Climate Change Methodology:
The County's methodology to address Global Climate Change in CEQA documents is evolving. For future projects, the significance of GHG emissions may be evaluated based on whether projects are consistent with an adopted Climate Action Plan (or other GHG reduction plan). However, the County has not yet adopted a Climate Action Plan with established GHG emissions reduction strategies. 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. Based on the June 2010 memorandums (see Attachment B) prepared by County Staff, the County's interim approach will look to criteria adopted by the Bay Area Air Quality Management District (BAAQMD), summarized in Table 4.16-1 below, for guidance on determining significance of GHG emissions. This approach by County Staff has been recommended for inclusion in the GHG analysis in CEQA documents for projects that require County discretionary approval.

Table 2
County of Santa Barbara GHG
Significance Determination Criteria

GHG Emission Source Category	Operational Emissions
Non-stationary Sources	1,100 MT of CDE/yr OR 4.6 MT CDE/SP/yr (residents + employees)
Stationary Sources	10,000 MT/yr
Plans	6.6 MT CDE/SP/yr (residents + employees)

Notes: SP = Service Population.
Project emissions can be expressed on a per-capita basis as Metric tons of CDE/Service Population/year, which represents the project's total estimated annual GHG emissions divided by the estimated total number of people that will be living in proposed project.
The BAAQMD does not include any standards for construction-related emissions.

A memorandum supporting Santa Barbara County's use of the BAAQMD GHG thresholds is included in Attachment B.

Impact Discussion:
a, c. Less Than Significant Impacts.
Short-Term Construction Impacts. The proposed project involves the construction of a photovoltaic system on a portion of the hillside behind (to the northeast of) the existing County Jail. Installation of the solar array, inverter building, and associated appurtenant equipment is estimated to require 500 cubic yards of grading to be balanced on site. Minor grading activities for the construction of water diversion brow-ditches above the photovoltaic array and slope stabilization may also be required, subject to recommendations of a soils report. Construction emissions were calculated using URBEMIS Version 9.2.4 2007. As a worst-case scenario, it was assumed that all construction activities would be completed within 8 months (note: estimate construction time is 6 months). The URBEMIS model was modified to reflect the specific construction equipment that would be used, which includes a back-hoe, a small tractor

or bobcat, heavy trucks, and laborer or contractor work trucks. Construction activities would emit annual emissions of 0.22 tons/year of ROC, 2.01 tons/year of NO_x, 0.74 tons/year of PM_{10}. Construction activities would emit an immeasurable amount of SO_x. In addition to construction emissions, vehicle trips associated with construction workers commuting to and from the project site would generate minimal short-term emissions.

The County does not have established thresholds for construction activities. However, since construction activities are temporary in nature and relatively small in scale, impacts would not be significant. In addition, the County of Santa Barbara requires that all discretionary projects implement standard dust control measures to reduce PM_{10} emissions associated with construction activities. The SBCAPCD also requires that fugitive dust control measures are implemented for all projects involving earthmoving activities, regardless of project size or duration. Therefore, the proposed project would be subject to these measures, which include:

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 mph or less.
- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

Furthermore, the proposed project would be subject to the following State requirements:

- All portable diesel-fired construction engines rated at 50 brake-horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Construction engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.
- Fleet owners of mobile construction equipment are subject to the California Air Resources Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, §2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.
- All commercial diesel vehicles are subject to Title 13, §2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

Compliance with the above local and state requirements would ensure that short-term construction impacts would be less than significant. While impacts would be less than significant, Mitigation Measure AQ-1 is also recommended to further reduce impacts to air quality.

Long-Term Operational Emissions. Long-term emissions are typically estimated using the URBEMIS computer model program. However, once the project is operational, it would be unmanned and not generate any daily vehicle trips, or result in any stationary source emissions. The project is intended to provide a renewable source of energy and offset emissions that would otherwise occur from receiving energy from a traditional fossil-fueled power plant. Maintenance vehicles may visit the site a few times per year to clean or maintain the solar panels. However, emissions associated with these trips would be insignificant. Overall, the project would result in reduced emissions, including greenhouse gases, in the long term and would be considered a beneficial project in terms of air quality and GHG emissions impacts.

b. No **Impact.** The proposed project is the construction and operation of a photovoltaic system. No odors would be generated from construction or operational use of the photovoltaic system. As such, the proposed project would not generate objectionable odors that would affect a substantial number of people. In addition, the project would not generate any smoke or ash. Therefore, no impact associated with smoke, ash, or odors would occur.

d. No Impact. The proposed project would generate temporary greenhouse gases during construction. Based on the URBEMIS model results, construction activities would emit approximately 290 tons of greenhouse gases (CO_2) for an estimated six months of construction, which is substantially below the non-stationary source threshold. In addition, greenhouse gas emissions associated with construction are not typically considered in a project's ability to result in sustained greenhouse gas emissions as these emissions occur during a limited period and do not continually occur thereafter. Once the project is operational, it would be unmanned and would not generate any daily vehicle trips, or result in any stationary source emissions and, therefore, would not generate greenhouse gas emissions. In addition, the project would provide a long-term, renewable source of energy and offset emissions that would otherwise occur from producing energy at a traditional fossil-fueled power plant. Therefore, the project would not exceed operational emissions thresholds, and impacts would be less than significant; rather, the project would have a beneficial impact on GHG emissions and GCC.

Cumulative Impacts:
The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the project has been found not to exceed the threshold of significance for air quality and to result in beneficial effects in the long term. Therefore, the project's contribution to regionally significant air pollutant emissions would not be considerable, and its cumulative effect would be less than significant.

Mitigation and Residual Impact:
The following mitigation measures are recommended to minimize impacts associated within construction-related emissions from construction equipment and worker vehicles.

AQ-1 **Recommended Emissions Reduction.** Per the SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents,* the following emissions reduction measures are recommended during construction activities:

- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.

Plan Requirements and Timing: Building and Safety staff shall review plans for all project components prior to project initiation.

Monitoring: Building and Safety inspectors shall perform periodic spot checks during construction to ensure compliance with requirements. APCD inspectors shall respond to nuisance complaints.

4.4 BIOLOGICAL RESOURCES

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

Will the proposal result in:	Poten Signif.	Less than Signif. with Mitigation	Less Than Signif.	No impact	Reviewed Under Previous Document
invertebrates)?					
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. This analysis is based on a technical biological memorandum prepared by Rincon Consultants (see Attachment A), dated December 2010. A biological survey was conducted on December 16, 2010, and CNDDB search was performed on December 14, 2010.

According to maps in the Goleta Community Plan's (GCP's) Environmentally Sensitive Habitat and Riparian Corridor Overlay Map, the project site is located within an Environmentally Sensitive Habitat zone. In addition, the GCP's Area Eastern Goleta Valley Existing Vegetation Map shows the project site is located within a Coastal Sage Scrub zone, which is protected habitat under the GCP.

Plants or animals may be considered to have "special status" due to declining populations, vulnerability to habitat change, or restricted distributions. Special status species are classified in a variety of ways, both formally (e.g. State or Federally Threatened and Endangered Species) and informally ("Special Animals"). Species may be formally listed and protected as Threatened or Endangered by the CDFG or USFWS or as California Fully Protected (CFP) by the CDFG. Informal listings by agencies include California Species of Special Concern (CSC) (a broad database category applied to species, roost sites, or nests), or as USFWS Candidate taxa. CDFG and local governmental agencies may also recognize special listings developed by focal groups (i.e. Audubon Society Blue List; California Native Plant Society (CNPS) Rare and Endangered Plants; U.S. Forest Service regional lists). Section 3503.5 of the Fish and Game Code of California specifically protects birds of prey, and their nests and eggs against take, possession, or destruction. Section 3503 of the Fish and Game Code also incorporates restrictions imposed by the federal Migratory Bird Treaty Act with respect to migratory birds.

Flora
Vegetation on the project site includes coastal sage scrub habitat with several patches of ruderal/non-native grassland habitat. Dominant plants on-site include California sagebrush (*Artemisia californica*), bush sunflower (*Encelia californica*), and giant wildrye (*Leymus condensatus*) with common scrub associates including purple sage (*Salvia leucophylla*), buckbrush (*Ceanothus cuneatus*), and poison oak (*Toxicodendron diversilobum*). The coastal sage scrub in the northern portion of the project site is in pristine condition, where habitat in the southern portion shows signs of disturbance and is inter-mixed with ruderal/non-native grassland. Common non-natives on-site include field mustard (*Hirschfeldia incana*), ripgut (*Bromus diandrus*), and vetch (*Vicia sp.*). Several coast live oaks (*Quercus agrifolia*) and black-flowered figworts (*Scrophularia atrata*) are present in the southern portion of the project site.

Fauna
A woodrat nest was observed on-site. Two species of woodrats could potentially occur: the dusky-footed woodrat (*Neotoma fuscipes*) and the San Diego desert woodrat (*Neotoma lepida*). The San Diego desert woodrat is a state Species of Special Concern.

A side-blotched lizard and a scrub jay were observed on-site. Evidence of other wildlife on-site included gopher holes and other small rodent burrows. Coyote scat was also observed on-site.

County Environmental Thresholds:
Santa Barbara County's Environmental Thresholds and Guidelines Manual (2008) includes guidelines for the assessment of biological resource impacts. The following thresholds are applicable to this project:

Individual Native Trees: Project created impacts may be considered significant due to the loss of 10% or more of the trees of biological value on a project site.

Other Rare Habitat Types: The Manual recognizes that not all habitat-types found in Santa Barbara County are addressed by the habitat-specific guidelines. Impacts to other habitat types or species may be considered significant, based on substantial evidence in the record, if they substantially: (1) reduce or eliminate species diversity or abundance; (2) reduce or eliminate the quality of nesting areas; (3) limit reproductive capacity through losses of individuals or habitat; (4) fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources; (5) limit or fragment range and movement; or (6) interfere with natural processes, such as fire or flooding, upon which the habitat depends.

Impact Discussion:
a, b, c, d, e. Less than Significant with Mitigation. Coastal sage scrub and coast live oaks are protected species under the GCP. It is also likely that the *Scrophularia* species on-site is black-flowered figwort, although no flowers were present for positive identification. Two species of figwort occur in the County. However, the other figwort, the California figwort (*Scrophularia californica*) has a distinctly different leaf pattern. Therefore, the species observed on-site is likely to be the black-flowered figwort. Black-flowered figwort has a state ranking of S2.2 and a California Rare Plant Rank (CRPR) of 1B.2, which is defined as a species that is "Rare or Endangered in California and elsewhere, fairly endangered in California." A Calystegia species was also observed on-site and could potentially be a rare plant species. The project site also has the potential to provide suitable habitat for other special status plants. For a full list of special status species in the Goleta Quad, please refer to Attachment A.

The non-native species on-site consist of ruderal/non-native grassland, which could provide nesting or foraging habitat. However, recurrent vegetation removal has occurred in the southern portion of the site, resulting in a moderately disturbed habitat.

The project involves the installation of a one-megawatt photovoltaic system, which ~~will~~would require ~~at least 1.7~~approximately 2 acres of array coverage. Hence, complete avoidance of the sensitive natural community would not be feasible. The GCP sets forth mitigation recommendations to address potential impacts to biological resources when complete avoidance is not possible and in doing so, provides mitigation in the form of compensatory restoration for impacts to sensitive resources. The proposed project would not cover the entire acreage of the jail facility property; therefore, restoration would be feasible in the undeveloped areas of the site or in other areas of the County property adjacent to the site. To reduce impacts to the sensitive natural community on-site, Mitigation Measures BIO-1 through BIO-3 would be required. With mitigation, impacts to on-site vegetation would be less than significant.

f. Less Than Significant. The proposed project would not involve any human habitation or landscaping. The Sheriff's Department currently mows the majority of the array site for security reasons and fuel

management. Continued mowing for fuel management, security reasons, and to prevent shading would be required in the area adjacent to and between the panel arrays. These activities would be within the 5-acre maximum area of disturbance. Impacts of the photovoltaic array are discussed above in Questions a through e. No significant impacts from introduction of herbicides, pesticides, animal life, human habitation, and non-native plants are anticipated.

g, h, i. Less than Significant with Mitigation. A woodrat nest was observed on-site during the biological survey. In addition, the project site could support nesting birds and potentially other wildlife. Construction of the proposed project would reduce the availability of habitat on the project site, which may result in a reduction in numbers of existing wildlife, including the San Diego desert woodrat.

The loss of habitat would be addressed by Mitigation Measure BIO-1, Coastal Sage Scrub and Black-flowered Figwort Restoration Plan, which was identified under Questions a through e and is discussed below. With Mitigation Measure BIO-1, impacts to loss of habitat would be less than significant. In addition, pre-construction avoidance measures addressed by Mitigation Measure BIO-2 would further reduce impacts to woodrat nests on-site. Therefore, Mitigation Measures BIO-1 and BIO-2 would reduce impacts to special species animals to less than significant.

j, k. Less Than Significant. The proposed fencing would create barriers to movement for wildlife on-site. However, the project site is not located within a known movement corridor and is surrounded by urban land uses, including County facilities and Calle Real and U.S. Highway 101 to the south, multi-family residences and County facilities to the west, a County transfer station to the north, and an equestrian center to the east across County Dump Road. Wildlife utilizing the woodland area to the west of the site would not be restricted by the project as the project site is not within this corridor. The surrounding built environment, including the adjacent buildings directly to the north and south of the site, and surrounding roadway currently limit wildlife movement in the project area.

Cumulative Impacts:
Since the project would not significantly impact biological resources onsite, and since compensatory restoration would be required to mitigate any significant loss of habitat or special status species, the project would not substantially contribute to impacts on the County's biological resources.

Mitigation and Residual Impact:
Implementation of the following mitigation measures would reduce the impacts to biological resources to a less than significant level.

BIO-1 **Coastal Sage Scrub and Black-flowered Figwort Restoration Plan**. All impacted coastal sage scrub habitat acreage and black-flowered figwort individuals shall be restored at a 2:1 ratio (acres/individuals restored to acres/individuals impacted). The total acreage of coastal scrub habitat and the total number of individuals of black-flowered figworts shall be determined based upon final project design. Restoration shall occur first on-site and second on adjacent County lands in ruderal/disturbed habitats. Native species of locally genetic stock shall be used for the restoration. Black-flowered figwort seed shall be collected from the site prior to disturbance to propagate individuals for restoration planting. A restoration plan shall be prepared by a County-approved biologist and shall include the following components at minimum:

- the location of the restoration;
- the number of acres/individuals to be restored;

- planting and irrigation specifications~~,~~;
- weed control methods~~,~~;
- success criteria~~,~~;
- adaptive management program and remedial measures to address negative impacts to restoration efforts;
- contingency measures, ~~and~~ such as initiating procedures, alternative locations for contingency compensatory mitigation, and funding mechanism; and
- report requirements.

The restoration plan shall be implemented concurrent with construction of the project and shall be monitored for a minimum of five (5) years or until the restoration has been determined to be successful.

Plan Requirements and Timing: The Restoration Plan shall be approved by the Planning and Development staff prior to ground disturbing or construction activities. The Restoration Plan shall be implemented concurrently with construction of the project.

Monitoring: A County-approved biologist shall oversee implementation and monitoring of the restoration plan.

BIO-2 Pre-Construction Avoidance Measures.

Special Status Plants. Seasonally-timed special status plant surveys shall be conducted by a County-approved biologist throughout the project site prior to initial ground disturbance. The surveys shall be timed such that the bloom periods for each of the special status plant species with potential to occur on-site are adequately covered. Surveys shall be conducted in accordance with the CDFG and USFWS protocols (California Department of Fish and Game 2009c, United States Fish and Wildlife Service 2000) and all special status plant species observed shall be mapped onto a site-specific aerial photograph and/or topographic map.

Special Status Animals. Pre-construction surveys shall be conducted by a qualified biologist to confirm the presence or absence of San Diego desert woodrat and/or nesting birds on-site.

- San Diego Woodrat. A County-approved biologist shall conduct a biological survey of the entire project site within 2 weeks prior to the start of construction. The survey shall cover the entire area proposed for development plus a 50-foot buffer. If site disturbance will occur during the nesting season (February through September), a 25-foot buffer shall be established around any noted nests, and no disturbance shall occur until the nesting season has completed. If initial vegetation removal is anticipated to occur outside of the nesting season, nests located on-site may be disassembled by hand at a minimum of 5 days prior to disturbance and place the materials at least 100 feet from the limits of disturbance.

- Nesting Birds. To avoid the take of nesting birds protected by the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, proposed project activities, including, but not limited to, vegetation removal and initial ground disturbance, shall take place outside of the bird breeding season (February 1 through August 15). If construction must begin within the breeding season, then no more than two weeks prior to initiation of ground disturbance and vegetation removal, a nesting bird pre-construction survey shall be conducted by a County-approved biologist within the disturbance footprint and a 200-foot buffer. If nests are found, a buffer ranging in size from 75 to 200 feet, depending upon the species and the proposed work activity, shall be determined and demarcated by the biologist with bright orange construction fencing. No ground disturbing activities shall occur within this buffer until the County-approved biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Nesting birds surveys are not required for construction activities occurring between August 16 and January 31.

Plan Requirements and Timing: Special status animal surveys shall be conducted during the timing specified above by a County-approved biologist. Results of the surveys shall be provided to Building and Safety staff within one week of completion and prior to any ground disturbance or construction activities.

Monitoring: A County-approved biologist shall perform the surveys and any woodrat nest dismantling, if necessary.

BIO-3 **Oak Tree Avoidance.** The project site plan shall avoid the removal of the coast live oaks present on-site. A minimum setback of 10 feet from the edge of canopy shall be established and demarcated with bright orange construction fencing. Foot traffic only may be permitted within this buffer.

Plan Requirements and Timing: Final construction and grading plans shall include the location of oak trees and associated buffers and protective fencing. Plans shall be submitted to Building and Safety for review and approval prior to any ground disturbance or construction.

Monitoring: Building and Safety shall review and approve site plans prior to ground disturbance and construction.

With the implementation of the above mitigation measures, residual impacts to biological resources would be less than significant.

4.5 CULTURAL RESOURCES

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

Setting:
For at least the past 10,000 years, the area that is now Santa Barbara County has been inhabited by Chumash Indians and their ancestors. Based on the results of a map and records search at the Central Coast Information Center (CCIC) conducted on December 16, 2010, three prehistoric archaeological sites are located in the vicinity of the proposed project: CA-SBA-1540, -1541 and -1809.

CA-SBA-1541 and -1809 are located on the west side of the Hospital Creek drainage. When originally recorded in 1977, CA-SBA-1541 was described as a shell and lithic scatter with dark midden at least three feet in depth, containing at least one burial. CA-SBA-1809 is described as likely consisting of materials washed down slope from CA-SBA-1541.

CA-SBA-1540 is located on the east side of Hospital Creek. It was discovered and recorded in 1977 after grading for a parking lot and a fire break unearthed human remains. Construction was halted, two burials were re-interred elsewhere, and the site was recorded by Erlandson and Heinzen (1977). It was described as a shell midden with chipped stone debitage, groundstone artifacts and bone fragments scattered on the surface. The site boundary was originally drawn as extending from the southwest to the northeast side of the building, however later excavations confirmed that it is confined to the western side of the building. Based on the original site form and analysis of topographic maps, it appears that previous construction of the Honor Farm Facility covered or removed the eastern portion of the site. The specific extent of prior grading and location of the burials were not discussed in the site form.

In 1995, Phase 1 survey and Phase 2 subsurface testing projects were conducted to identify site boundaries and impacts within an approximately 1-acre area proposed for a parking lot or pad for modular buildings located west of the Honor Farm (Santoro 1995, Santoro and Hazeltine 1995). The project involved capping about 33,750 sq ft and no subsurface excavations were proposed. Santoro documented that part of the project area was covered with imported fill of undetermined origin, however shellfish of

cultural origin and a few artifacts were observed on the surface (note that the original location of the fill dirt is not known). A Phase 2 testing program was recommended to delineate site boundaries, determine the site's significance and to satisfy the requirements of the County Guidelines prior to capping the archaeological site.

The subsequent Phase 2 testing involved excavation of 11 shovel test pits (STPs) on the terrace north, west and southwest of the Honor Farm. Six were excavated in the project's impact area, with negative results. Three were placed northwest of the building and yielded a diverse assemblage of cultural materials including shell beads. Two were excavated on the first narrow terrace slightly northeast of the Honor Farm, also with negative results. It is noteworthy that the report states that even the "negative" STPs contained shell fragments which appeared to be mostly fossil shell from the B soil horizon. This shell may explain why the site was originally mapped as extending to the north and slightly east of the building. Analysis of four beads from the STPs indicated that the site was occupied during the Late Period between about A.D. 1380 and A.D. 1782. However, the presence of a mano and metate may also point to an earlier occupation. Based on the Phase 2 study results, Santoro and Hazeltine refined the site boundary to encompass the intact portion of the site located west-northwest of the Honor Farm.

Additional Phase 2 testing was performed in 1996 for construction of a culvert located within the site boundaries documented in the 1995 Phase 2 study. The purpose of the testing was to check for intact site deposits and human remains. Five STPs were placed at two meter intervals along the centerline of the proposed culvert, for a distance of 18-20 feet. All of the STPs revealed the presence of intact site deposits including food remains, beads, and the by-products of tool and bead manufacture. Consistent with the previous work, the beads were manufactured during the Late Period (Santoro 1996). The six foot wide culvert was then hand excavated and monitored by an archaeologist and Native American representative. No human remains were observed at any stage of the work.

The site area delineated by Santoro and Hazeltine is located entirely northwest of the Main Inmate Housing Facility. It was originally mapped as extending to the north and east of the building, however subsequent testing confirmed that it does not extend east of the "12 o'clock" point of the circular building pad. As mapped by Santoro, the site is relatively intact with the exception of the culvert described above. In other locations, however, it appears to have been partially graded then covered with buildings, or entirely graded away. Specifically, the Honor Farm building pad was created by cutting a 1:1 slope more than 20 feet in height on the east side of the building and placing fill on the south and southeast sides. Based on analysis of the site forms, topographic maps, and direct observation, it is clear that on the east side of the Main Inmate Housing Facility, the site has been entirely removed. Any site remaining on the south side of the building has been covered by fill and/or pavement. Finally, as soil erodes and slumps downward from the hillside toward the building, it is graded and collected and replaced at the top of the hill, potentially further disturbing any deposits that may exist at the base of the hillside.

On January 10, 2011 a Sacred Lands File & Native American Contacts List Request was faxed to the Native American Heritage Commission and letters were mailed to Native Americans known to be listed for Santa Barbara County. To date, no response has been received.

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, b, d, e, g. Less Than Significant with Mitigation. The Honor Farm building, was constructed over 30 years ago on (and covered or removed portions of) prehistoric archaeological site CA-SBA-1540. As described above, the remaining part of the site is located on the west side of the Honor Farm building. This site is an important cultural resource and unique site as defined by CEQA and the Public Resource Code, based on the presence of human remains and the presence of a relatively intact site area containing abundant and diverse cultural materials. Although it is not presently used for religious, sacred, or educational purposes, the presence of burials confirms it as a site of cultural significance to the local Native American community.

The proposed project has three ground-disturbing elements: (1) placement of photovoltaic panels on the hillside to the north of the Honor Farm; (2) excavation of an approximately 4 ft deep, 1 ft wide conduit trench from the photovoltaic array to an inverter box and then on to the electrical vault box tie-in to the southwest of the Honor Farm building, and (3) placement of an approximately 500 sq ft above-ground inverter box at the bottom of the slope. The photovoltaic array would not disturb any cultural resources as it is on an approximately 20 percent slope above the building and above CA-SBA-1540. The proposed project has the conduit emerging from the photovoltaic array at the north side of the building in a location outside of the tested site boundary. It would connect to the inverter shelter, also outside of the tested site boundaries, located above and to the north of the building. From there, the conduit would be placed in a trench that would be dug along the eastern edge of the pavement around the Honor Farm building. As noted in the project description, short segments of the conduit run may require boring, for example, under retaining walls, pipelines, or other infrastructure. The area along which the trench would be dug is between 10 and 20 feet below the original grade; even if site had originally been present in this location, it has since been removed. The trench would end in a paved road near the south side of the building where the conduit would connect into an existing electrical vault box.

As described above, the project would be located outside of the archaeological site and within areas where cultural remains are extremely unlikely to occur. However, this general area was once a village where people were buried, and as such the entire area should be treated with extreme respect and care. Several mitigation measures are required. **Mitigation Measure CR-1** requires a pre-construction meeting to inform construction personnel about the resource and required monitoring. **Mitigation Measure CR-2** calls for fencing about 100 ft from the recorded site boundary on its uphill side, closest to where the photovoltaic panels would be installed (at about the 220 ft elevation contour line) and prohibits any disturbance within this area. **Mitigation Measure CR-3** requires monitoring of all ground disturbing activity for the conduit and inverter box. Finally, **Mitigation Measure CR-4** is the County's standard archaeological discovery clause. Implementation of these mitigation measures would reduce impacts to archaeological and ethnic resources to less than significant.

c, f. Less Than Significant with Mitigation. The proposed project would not increase the long-term potential for trespassing, vandalizing or sabotaging cultural or ethnic resources after installation of the photovoltaic array, as there would be no change in the existing use of the site, nor any increase in population. The proposed project could increase the short-term potential for vandalizing cultural resources during construction activities. With mitigation measures requiring a pre-construction

informational meeting **(Mitigation Measure CR-1)** and monitoring of ground-disturbing activities by an archaeologist and Native American Observer **(Mitigation Measure CR-3),** impacts would be less than significant.

Cumulative Impacts:
Since the project would not impact cultural resources, it would not have a cumulatively considerable effect on the County's cultural resources.

Mitigation and Residual Impact:

The following mitigation measures would reduce the project's cultural resource impacts to a less than significant level:

CR-1. Pre-Construction Workshop. A pre-construction workshop shall be conducted to inform construction personnel about the archaeological issues on site. Prior to any and all ground disturbing activities a pre-construction workshop shall be conducted by a qualified archaeologist and a local Native American (Chumash) observer. Attendees shall include all construction supervisors, other personnel and equipment operators. New operators or supervisors shall receive the briefing by the archaeologist and Native American observer prior to commencing work. The workshop shall:

a. Review the types of archaeological artifacts that may be found during construction and on the ground surface in the vicinity of the proposed project;
b. Provide examples of common artifacts to examine; and
c. Discuss prohibited activities, including unauthorized collection of artifacts and associated penalties.

Plan Requirements and Timing: This condition shall be shown on all grading and building plans. A sign-in sheet shall be provided to document dates and names of persons attending. The sign-in sheet shall be submitted to Building and Safety prior to any ground disturbance or construction and within 48 hours of training of new workers.

CR-2. Fencing. In order to protect the archaeological site from inadvertent disturbance during installation of the photovoltaic panels, the project proponent shall have temporary fencing installed above the archaeological site at approximately the 220 ft contour interval for the duration of grading and construction activities. Ground disturbance of any kind shall be prohibited within the fenced off area.

Plan Requirements and Timing: The location of the fencing shall be approved by the staff archaeologist and shown on all building and grading plans. The area below the fencing shall be labeled "Environmentally Sensitive Exclusion Area." Installation of the fencing shall be supervised by a qualified archaeologist. **Monitoring:** Building and Safety shall review and approve site plans and confirm that fencing is in place prior to any ground disturbance or construction.

CR-3. Cultural Resources Monitor. All earth disturbances including scarification and placement of fill associated with the conduit and inverter box monitored by a Planning &Development qualified archaeologist and a Native American.

Plan Requirements and Timing: This condition shall be shown on all building and grading plans. Prior to commencement of any grading or building, a contract or Letter of Commitment between the General Services Department and the

archaeologist consisting of a project description and scope of work shall be submitted to Building and Safety, and once approved, the contract shall be executed. A monitoring report shall be submitted to Building and Safety and the County Archaeologist prior to final inspection. The monitoring report shall include an appendix containing an independent report provided by the Native American observer. The report shall also be submitted to the Central Coast Information Center at the University of California, Santa Barbara (CCIC). **Monitoring:** Building and Safety shall check plans prior to commencement of any grading or building activity. The General Services Department shall provide Building and Safety staff with the name and contact information for the assigned onsite monitor(s) prior to any ground disturbance and construction. Building and Safety shall confirm receipt of the monitoring report prior to final inspection.

CR-4. Inadvertent discovery of cultural resources. In the event archaeological remains are encountered during grading, the County Archaeologist shall be notified and work shall be stopped immediately or redirected until the significance of the find is evaluated pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program consistent with County Archaeological Guidelines and funded by the General Services Department.

Plan Requirements/Timing: This condition shall be printed on all building and grading plans. **Monitoring:** Building and Safety shall check plans prior to commencement of any grading or building activity and shall spot check in the field.

With the incorporation of these measures, residual impacts would be less than significant.

4.6 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 department or extension of new sources of energy?				X	

Impact Discussion:
The County has not adopted specific significance thresholds for electrical and/or natural gas service impacts (Thresholds and Guidelines Manual).

a, b. No Impact. The proposed project involves the construction and operation of a photovoltaic system that would produce approximately one megawatt (MW) of electricity to help power the County Jail facility and other nearby County facilities (Sheriff Administration, 911 Call Center, Public Health Hospital, Public Health Administration, Mental Health Hospital, Mental Health Administration, Agriculture Commission, Environmental Health, Veteran Hospital, Elections Office, Clerk Recorder Assessor, and others). As the proposed project would generate electricity, it would offset the facility's energy demand and would not require the extension of additional sources of energy. There would be no adverse impact with respect to these issues; rather, the project would have a beneficial impact on energy use.

Cumulative Impacts:
The project's contribution to the regionally significant demand for energy would not be considerable, as it would be beneficial. As such, project implementation would not significantly contribute to cumulative impacts to energy resources.

Mitigation and Residual Impact:
No impacts have been identified; therefore, mitigation is not necessary.

4.7 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		

Impact Discussion:
The project site falls within the service area for Santa Barbara County Fire Station #13, which is located 4750 Hollister Avenue in Santa Barbara. The County has not adopted specific significance thresholds for fire protection impacts (Thresholds and Guidelines Manual, 2008).

a-e. Less than Significant. The site would be accessible to fire fighters during a fire event via Honor Farm Road and County Dump Road, and sufficient facilities exist on-site to provide water. According to the CAL Fire Santa Barbara County Fire Hazard Severity Zone map, the project site is not located within a designated Very High Fire Hazard Area (Cal Fire, 2008). Furthermore, the proposed project would not involve construction of any structures that would be inhabited by people. All construction would comply with County Building & Safety and Fire Code standards.

Cumulative Impacts:
The proposed project would have a less than significant impact with regards to fire hazards. As the project would not create significant fire hazards, the project's contribution to potential impacts would not be cumulatively considerable with regards to fire safety in the County.

Mitigation and Residual Impact:
No impacts have been identified; therefore, mitigation is not necessary.

4.8 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. Permanent changes in topography?			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	

County Environmental Thresholds:
Pursuant to the County's Adopted Thresholds and Guidelines Manual, impacts related to geological resources 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 Planning and Development Department or the Public Works Department. 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 constrains, 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, b. Less Than Significant Impact. Soil on-site consists of Arnold loamy sand with 15 to 30 percent slopes. The site is in an area designated by the Santa Barbara County Comprehensive General Plan as having moderate potential for soil creep and landslides. While slopes on-site vary, the average slope is estimated to be approximately 20-25 percent. The project site is also designated as having a moderate to

low potential for liquefaction, expansive soils, and compressible-collapsible soils. As part of the final project design, a geotechnical evaluation would be conducted in accordance with Building Code requirements. The proposed project would not involve construction of any structures that would be inhabited by people, and ground disturbance is anticipated to be limited to minor re-contouring, construction of brow ditches and other water diversion measures, and minor slope stabilization if recommended by the geotechnical report. Total grading, which would be balanced on site, is estimated to be approximately 500 cy.

c. Less Than Significant Impact. According to General Services Department staff, the proposed project may require grading and/or keying of the hillside to improve slope stabilization, if recommended by the geotechnical report. However, this would not significantly alter the topography of the project area as slope stabilization would follow the existing contours of the project area.

d. No Impact. There are no unique geological features located on the project site. Therefore, there would be no impacts to unique geological features.

e, f. Less Than Significant Impact. The proposed project may include minor grading activities for the construction of water diversion brow-ditches above the photovoltaic array and slope stabilization, if recommended by the geotechnical report. Such water diversion and slope stabilization measures would reduce existing erosion impacts in the project area. In addition, the proposed project would comply with the County's standard erosion control and drainage requirements, which utilize natural drainage systems to the maximum extent feasible. Therefore, impacts would be less than significant.

g, h. No Impact. The proposed project would not require the use or construction of a septic system, nor would any mineral or ore extraction occur as a result of the proposed project. There would be no impacts.

i, j, k. Less Than Significant Impact. Soil on-site consists of Arnold loamy sand with 15 to 30 percent slopes. The site is in an area designated by the Santa Barbara County Comprehensive General Plan as having moderate potential for soil creep. However, the proposed project would not involve construction of any structures that would be inhabited by people. The proposed project may require grading for water diversion brow ditches and slope stabilization, but this grading would be minor and would be intended to improve existing slope conditions. Grading activities would be remedial, which may result in the displacement of topsoil, but re-compaction would prevent the loss of topsoil, and grading volumes would be balanced on site. Furthermore, the nearest sensitive receptors would be at least 300 feet from ground disturbing activities during project construction. Therefore, vibration from minor grading activities would not be expected to reach sensitive receptors. Impacts to grading on slopes, loss of topsoil, and vibration would be less than significant.

l. No Impact. The proposed project does not include mining activities. Therefore, spoils, tails, or overburden would not result from the proposed project.

Cumulative Impacts:
As identified, the proposed project's impacts to geologic processes would be less than significant. As geologic processes are site-specific and not cumulative by nature, the project would not result in incremental effects on geologic hazards that could impact new development in the County. As such, the project's impacts are not cumulatively considerable.

Mitigation and Residual Impact:
No significant impacts have been identified; therefore, mitigation is not necessary.

4.9 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	

County Environmental Thresholds:
The County's safety threshold addresses involuntary public exposure from facilities or activities involving significant quantities of hazardous materials (e.g., oil wells, pipelines, rocket propellants, chlorine, etc.) . The County of Santa Barbara Thresholds and Guidelines Manual (2008), identifies that these thresholds do not apply when populations are sporadic, which includes land-uses such as hiking trails.

Impact Discussion:
a, b, c. No Impact. The project site is currently undeveloped, and historical aerials dating back 16 years also show no development on the project site. No hazardous materials are currently used or stored on the project site. The project site is not listed on the EnviroStor database or on any Cortese List data resources (http://www.calepa.ca.gov/SiteCleanup/CorteseList/) for use or storage of toxic or hazardous materials. Therefore, it is unlikely that past uses of this property that would have used or stored hazardous materials. The proposed project would not use or require materials that could result in an explosion or release of hazardous materials.

There are four sites within a ½ mile radius with historic leaking underground storage tanks (LUSTs) and two sites with active remediation of LUSTs, according to the State Water Resources Board Geotracker database (https://geotracker.waterboards.ca.gov/). The four historic LUSTs have closure status and do not pose a risk to the project site. The two active sites would not be expected to impact soil or groundwater in the project area due to their distance from the project site and remedial and monitoring activity. The proposed project would not involve the use or storage of large quantities of hazardous materials. Therefore, there would be no impacts with respect to the use or storage of hazardous materials.

d. **No Impact**. The proposed project would be located on an unused hillside adjacent to the County Jail Facility and would not interfere with emergency response or evacuation plans. Therefore, there would be no impact.

e. No Impact. The construction and operation of the photovoltaic system would not use, emit, or transport any materials that would be considered a public health or safety hazard. There would be no impact to public health.

f. Less Than Significant Impact. The proposed project would include a high-voltage electrical conduit, which would be installed in trenches between the photovoltaic array and the inverter shelter, as well as between the inverter shelter and the tie-in to the existing power grid at the electrical vault box in Honor Farm Road. The proposed project would meet all interconnectivity standards as set forth by Southern California Edison, and the distribution of electricity from the existing vault box to surrounding County facilities would remain the same. Once installed, the conduit would be protected by a layer of concrete and backfilling of the trench in which it would be installed. In addition the solar array would be enclosed within a secured fence that would include a locked access gate and barbed wire. The fenced enclosure and concrete layer would reduce potential impacts to public safety to a less than significant level.

g. No Impact. The proposed project is not located in the vicinity of oil and gas pipelines or facilities. Therefore, there would be no impact with respect to exposure of oil or gas pipelines or facilities.

h. **No Impact.** The proposed project would not require water use or use of any chemicals that have the potential for contamination of the public water supply. Therefore, no impact associated with contamination of public water supply is anticipated.

Cumulative Impacts:
Because the project would not create significant impacts with respect to hazardous materials and/or risk of upset, it would not make a cumulatively considerable contribution to cumulative safety impacts.

Mitigation and Residual Impact:
No significant impacts have been identified; therefore, mitigation is not necessary.

4.10 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 project site is an undeveloped, but partially disturbed portion of the County property. The nearest historic landmark is the Hope House at 399 Nogal Drive, which is approximately ¾ of a mile southeast of the project site.

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 project would not have an impact on a significant historical resource, as none have been documented on the project site or within ½ mile of the site (GCP, 2010). Furthermore, no structures in the project area would be modified or demolished. Therefore, no impact would occur.

Cumulative Impacts:
The proposed project would have no impacts to historical resources. As such, the project's contribution to cumulative impacts would not be considerable.

Mitigation and Residual Impacts:
The proposed project would not have an impact on historical resources; therefore, mitigation is not necessary.

4.11 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	
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:

The project site is approximately 5 acres, located on an undeveloped portion of a 61.81-acre parcel that is the site of the County's main jail facilities. The project site is surrounded by County facility and residential uses. The Santa Barbara County Transfer Station lies to the north and east of the project site, and the Santa Barbara County Jail and Sheriff's Department are located south of the project site. The County facility has a land use designation of Institutional/Government Facility and zoning designation of Recreation (REC). Parcels to the west are designated Residential Multiple and are zoned Design Residential – 8 units/acre (DR-8).

County Environmental Thresholds:
The Environmental Thresholds and Guidelines Manual (2008) contains no specific thresholds for land use. Generally, a potentially significant impact can occur if a project would result in a physical effect related to the checklist questions identified above.

Impact Discussion:
a, b. No Impact. The proposed project would involve installation of an approximately 1-MW photovoltaic system to provide a portion of the electricity required to power the various County facilities located adjacent to the project site. The proposed project would be allowed under the existing land use designation of Institutional/Government Facility. In addition, non-utility grade solar projects are exempt from the planning permit process per the Land Use and Development Code, Section 35.30.160 (B). Furthermore, the proposed project would be in compliance with the goals and policies set forth in the County Comprehensive Plan. There would be no impacts associated with land use conflicts.

c, d, e, f, g. No Impact. The proposed project would install a photovoltaic system on an undeveloped site and would not construct any buildings or structures that would be inhabited by people. Therefore, no impacts would occur with respect to population growth or residential development.

h. Less Than Significant Impact. The proposed project would install a photovoltaic system on an undeveloped site. While the site is undeveloped and would be considered passive open space, it is located in an urban area surrounded by government facilities and multi-family residential dwellings. Access is not currently permitted on the site, as the site is located adjacent to the County Jail facility. No recreational activities would be permitted in this area due to the proximity to the County Jail Facility. Therefore, impacts to open space would be less than significant.

i, j. No Impact. The proposed project would not cause an economic or social effect that would result in a physical change, as the project is located on a currently undeveloped portion of County property in an area that is not publicly accessible. The project site is also not located in an airport safety zone. There would be no impacts.

Cumulative Impacts:
Implementation of this project is not anticipated to result in any substantial change to the site's conformance with land use policies and standards. Thus, the project would not cause a cumulatively considerable effect on land use.

Mitigation and Residual Impact:
No impacts were identified; therefore, no mitigation is necessary.

4.12 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:
Noise is generally defined as unwanted or objectionable sound. It is measured on a logarithmic scale and is expressed in a-weighted decibels (dBA). 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 (Ldn) are noise indices which account for differences in intrusiveness between day-and night-time uses. County noise thresholds are 1) 65 dBA CNEL maximum for exterior exposure and 2) 45 dBA 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.

Some land uses are considered more sensitive to noise levels than others, due to the amount of noise exposure (in terms of both exposure time and insulation from noise) and the types of activities typically involved. Residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, parks, and outdoor recreation areas are generally considered more sensitive to noise than are commercial and industrial land uses. The sensitive receptors closest to the project area are multi-family dwellings approximately 300 feet west of the project site. Other sensitive receptors include County facilities, such as the Psychiatric Health facility and the Employees University, which are located southwest of the project site at approximately 600 feet and 1,000 feet, respectively.

County Environmental Thresholds:
The County of Santa Barbara Environmental Thresholds and Guidelines (2008) prohibits unnecessary, excessive and annoying noises from all sources, be it noise associated with temporary construction activities or long-term uses of land. The exposure level of 65 dBA is considered to be the maximum outdoor noise level compatible with residential and other noise-sensitive land uses. Development that would generate noise levels in excess of 65 dBA CNEL and could affect sensitive receptors is generally presumed to have a significant impact. In addition, according to the Santa Barbara County Environmental Thresholds Manual (2008), noise-generating construction activities within 1,600 feet of sensitive receptors, including schools and residences, is limited to the hours of 8 a.m. to 5 p.m. Monday through Friday only. The manual also stipulates that construction equipment generating noise levels in excess of 95 dBA may be subject to additional mitigation.

Impact Discussion:
a, c. Less than Significant. Long-term noise resulting from implementation of the proposed project would include noise from the inverters required to convert the electricity from direct current (DC) to alternating current (AC). Typical noise associated with a large inverter system (comprised of four inverters) would be approximately 70 dB at distance of 10 feet (estimate provided by PV Powered, an inverter manufacturer). Sound levels typically attenuate from a point source at approximately 6 dB for each doubling of distance. Based on this attenuation rate, the inverters would produce noise levels of

approximately 36 dB at the nearest multi-family dwellings, which are located approximately 550 feet from the proposed inverter shelter location. This noise level would not exceed County thresholds for exterior noise levels. Therefore, impacts to long-term noise levels resulting from the proposed project would be less than significant.

b. Less Than Significant Impact. Construction of the proposed project would temporarily generate noise that could impact adjacent sensitive receptors within 1,600 feet of the proposed project. In accordance with the Santa Barbara County Environmental Thresholds Manual (2008), construction activities would be restricted to the hours of 8:00 a.m. to 5:00 p.m. on weekdays only. Noise-generating equipment that may be required includes a back-hoe, a small tractor or bobcat, heavy trucks, and laborer or contractor work trucks. The back-hoe would generate the loudest noise during project construction, based on Figure 2 in the Noise Thresholds in the Santa Barbara County Environmental Thresholds Manual. However, noise generated from the back-hoe would not exceed the construction noise threshold of 95 dBA set forth in the manual. Therefore, compliance with the Santa Barbara County Environmental Thresholds Manual would reduce construction noise impacts to less than significant.

Cumulative Impacts:
Operation of the proposed project would not have a significant impact on ambient noise levels in the project vicinity. In addition, the project would not be located on a noise sensitive land use. Therefore, the project would not result in any noise-related impacts that could be cumulatively considerable.

Mitigation and Residual Impact:
No impacts have been identified; therefore, mitigation is not necessary.

4.13 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	

Impact Discussion:
a, b, c, d, e. No Impact. The proposed project would involve construction of accessory structures that would not be inhabited by people. Therefore, the project would not result in an increased demand for police services, school facilities, solid waste facilities, sewer system facilities, or storm water drainage or water treatment facilities. There would be no impact.

Cumulative Impacts:
There would be no significant impacts with respect to public services; therefore, no impacts would occur that could be cumulatively considerable.

Mitigation and Residual Impact:
No impacts have been identified; therefore, mitigation is not necessary.

4.14 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	

Impact Discussion:
a-c. No Impact. The project site is zoned REC, although the site is not currently used for recreational purposes, and there is no public access to the site. The proposed site is part of a County facility that houses a County Jail, Sheriff Administration, 911 Call Center, Public Health Hospital, Public Health Administration, Mental Health Hospital, Mental Health Administration, Agriculture Commission, Environmental Health, Veteran Hospital, Elections Office, Clerk Recorder Assessor, and others, which is consistent with the land use designation of Institutional/Government Facility. The proposed installation of a photovoltaic system would not conflict with recreational facilities as no recreational uses are present onsite. Furthermore, no change in population would result from the proposed project. Therefore, the proposed project would not result in an increase in demand for recreational uses or otherwise affect existing recreational facilities.

Cumulative Impacts:
There would be no significant impacts with respect to recreation; therefore, no impacts would occur that could be cumulatively considerable.

Mitigation and Residual Impact:
No impacts have been identified; therefore, mitigation is not necessary.

4.15 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	

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

Impact Discussion:

a. Less Than Significant Impact. The proposed project would result in a minimal number of vehicle trips as operation of the photovoltaic system would not require regular on-site employees or caretakers. County staff would visit the site for periodic maintenance, such as panel cleaning, and occasional trips may be required by contractors in the event of system malfunctions. Maintenance needs are anticipated to be approximately 1-2 times monthly. Construction of the proposed project would temporarily increase vehicle trips to the project site, but the workforce of approximately 20 laborers would not result in significant impacts to the existing traffic loads in the project area. Therefore, impacts to circulation in the project vicinity would be less than significant.

b, c, d, e. No Impact. Operational use of the proposed project would not require regular on-site employees or the use of vehicles, except during periodic maintenance activities. Therefore, there would be no impacts to road maintenance, parking facilities, local transit systems, or waterborne, rail, or air traffic.

f. Less Than Significant Impact. Operational use of the proposed project would not require the presence of on-site personnel or the use of vehicles, except during periodic maintenance activities. Construction of the proposed project would temporarily increase vehicle trips to the project site, but the workforce of approximately 20 laborers would not impact existing traffic loads in the project area. Both operational and construction trips resulting from the proposed project would be very minimal. Furthermore, the proposed project would use existing roads, driveways, and parking areas, which do not currently have hazardous design features or limited access. Therefore, the proposed project would not have a significant impact to traffic hazards.

g, h. No Impact. The proposed project consists of the construction and operation of accessory structures located in an undeveloped portion of the County Jail property. Operation of the photovoltaic system would not require the presence of regular on-site personnel or vehicles and would generate less than 1 Average Daily Traffic (ADT) trip/day and hence would not adversely affect any area roadways. The project does not require any modifications to the egress or ingress to the site, and would not affect existing sight distances. Therefore, there would be no impacts to road capacity or safety or to the Congestion Management Plan system.

Cumulative Impacts:
Operational use of the proposed photovoltaic system would generate traffic volumes less than 1 ADT, which would not result in significant number of new trips on area roadways. Therefore, the project's contribution to transportation/ circulation impacts would not be cumulatively considerable.

Mitigation and Residual Impact:
No impacts have been identified; therefore, mitigation is not necessary.

4.16 WATER RESOURCES/FLOODING

Will the proposal result in:	Poten Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters?				X	
b. Changes in percolation rates, drainage patterns or the rate and amount of surface water runoff?			X		
c. Change in the amount of surface water in any water body?				X	
d. Discharge, directly or through a storm drain system, into surface waters (including but not limited to wetlands, riparian areas, ponds, springs, creeks, streams, rivers, lakes, estuaries, tidal areas, bays, ocean, etc) or alteration of surface water quality, including but not limited to temperature, dissolved oxygen, turbidity, or thermal water pollution?			X		
e. Alterations to the course or flow of flood water or need for private or public flood control projects?				X	
f. Exposure of people or property to water related hazards such as flooding (placement of project in 100 year flood plain), accelerated runoff or tsunamis?				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 overcommitment of any groundwater basin? Or, a significant increase in the existing overdraft or overcommitment 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		

Impact Discussion:
a, c. No Impact. The proposed project would not alter the course or flow of water within any water body. The proposed project may require minor grading activities, including construction of brow ditches to control sheet flow across the site, prevent excessive erosion, and reduce soil creep. However, these activities would not require ground disturbance or other activities that would affect the currents or direction of local water

courses or water bodies. The proposed project would not change or cause a change in the volume of any surface waters. There would be no impacts to water courses or surface waters.

b, d. Less than Significant. The proposed project would not add impervious surfaces that would result in increased rates of storm water runoff. The solar arrays would be angled such that water hitting the panels would still infiltrate the ground. The project may require minor grading activities and/or the construction of water diversion brow-ditches to reduce on-site erosion and improve slope stability. These activities would result in minor, localized alteration of on-site drainage, but would not significantly affect off site areas or the watershed. Grading and the construction of brow-ditches would be limited to the amount necessary to comply with the recommendations of the soils report, and total grading volumes are anticipated to be approximately 500 cy and balanced on-site. As part of the grading permit, a Stormwater Pollution Protection Plan (SWPPP) would be prepared and implemented. The SWPPP would include Best Management Practices (BMPs) for construction activities such as installation of silt fencing, stray waddles, and other measures to prevent runoff of silt-laden water off site. Implementation of the SWPPP would ensure that no significant impacts to water quality would occur during construction of the project. Impacts would be less than significant.

e, f. No Impact. No portion of the proposed project is within the 100-year flood zone or tsunami zone (FEMA, 2005). Furthermore, the proposed project would not construct any structures that would be inhabited by people. Therefore, implementation of the project would have no impact related to flooding or flood control.

g, h, i, j, k. No Impact. The proposed project would require surface excavation of up to four feet deep for the conduit runs and the pole-mounts could be installed to a depth of 10 feet. A Groundwater Extraction Well Replacement Workplan (2010) for a site less than ½ a mile to the northwest indicated that soil saturation did not occur until a depth of at least 35 feet and ranging as deep as 110 feet below grade. The report also indicated that elevation of static water surface decreased to the southwest, which is the direction of the proposed project. The disturbance required by the proposed project would be significantly above groundwater levels in the project area. In addition, the proposed pole-mount design of the photovoltaic system would have minimal ground disturbance and would not result in impervious surfaces. No materials would be used that would cause the degradation of groundwater quality or affect groundwater recharge. Furthermore, the proposed project's water requirements are limited to that needed to periodically clean the photovoltaic panels to keep the panels operating at full capacity. Water requirements are estimated to be approximately 0.~~09~~08 acre-feet/yr (approximately ~~30~~27,000 gal/yr) for the ~~5,000~~4,500 panels, assuming 1 gallon of water is required per panel and panels are cleaned up to six times a year. The additional 0.~~09~~08 acre-feet/yr would not result in a significant water demand and which would be provided by the existing service from the Goleta Water District. For comparison purposes, a typical single-family residence has a water demand of approximately 0.38 acre-feet/yr of water (Goleta Water District, 2005 Urban Water Master Plan). The proposed project would not result overdraft or other impacts to groundwater quality.

l. Less Than Significant Impacts. Surface water quality would not be significantly impacted, as no development is proposed that would increase storm water pollutants, nor are impervious surfaces proposed that would collect pollutants. The panels are designed to allow water infiltration in between panel array units, such that the project will not result in significant changes to permeability. Hence, substantial changes in runoff or stormwater pollutants would not occur, and impacts would be less than significant.

Cumulative Impacts:
The project's water demand would not exceed County thresholds for contribution to a regionally significant impact. The project's contribution to the regionally significant issues of water supplies and water quality would not be considerable, and is less than significant.

Mitigation and Residual Impact: No impacts have been identified; therefore, mitigation is not necessary.

5.0 INFORMATION SOURCES

5.1 COUNTY DEPARTMENTS CONSULTED

Sheriff, Fire, Public Works, Planning and Development

5.2 COMPREHENSIVE PLAN

X	Seismic Safety/Safety Element	X	Conservation Element
X	Open Space Element	X	Noise Element
	Coastal Plan and Maps		Circulation Element
X	ERME	X	Energy Element

5.3 OTHER SOURCES

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

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

With the incorporation of the required mitigation measures, the proposed project would not cause impacts that are cumulatively considerable. The project has the potential to contribute to cumulative air quality, biological resources, and cultural resources impacts. However, provided that the mitigation measures contained in this document are implemented, none of these cumulative impacts are substantial, and the project would not cause any cumulative impacts to become substantial. Therefore, with the incorporation of mitigation measures the proposed project does not have a Mandatory Finding of Significance due to cumulative impacts.

7.0 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 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 to the disadvantage of long-term environmental goals?				X	
3. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects and the effects of probable future projects.)			X		
4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X		
5. Is there disagreement supported by facts, reasonable assumptions predicated upon facts and/or expert opinion supported by facts over the significance of an effect which would warrant investigation in an EIR ?				X	

1. Less than Significant. Based on the information obtained in the preparation of this Initial Study, the proposed project would not substantially reduce the habitat of fish or wildlife species, cause fish or wildlife populations to drop below self-sustaining levels threaten to eliminate plant or animal communities. In addition, the proposed project is not expected to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors any more than current conditions allow (see Section 4.4, *Biological Resources,* for further detail). The project would also avoid known cultural resources on-site, as discussed in Section 4.5, Cultural Resources. Thus, impacts associated with biological and cultural resources would be less than significant.

2. No Impact. The project would not achieve short-term environmental goals at the expense of long-term environmental goals. The proposed project would provide the following short-term and long-term environmental goals: increase the use of alternative energy and reduce greenhouse gas emissions. The

short-term environmental goals are not achieved at the expense of long-term environmental goals; therefore, no impacts would occur.

3. Less than Significant. The project would not create any significant impacts that cannot be mitigated to a less than significant level for the following issue areas: Air Quality, Biological Resources, and Cultural Resources. Therefore, the project's contribution to cumulative impacts would be less than significant.

4. Less than Significant. Implementation of the proposed photovoltaic system would not result in potentially significant impacts to human beings, either directly or indirectly. Therefore, the project's impacts would be less than significant.

5. No Impact. There is no disagreement with the information, facts, or expert opinion provided in this report to indicate that an EIR investigation is warranted. The findings in this report are consistent with technical reports prepared to determine the validity of information, facts and expert opinions presented in the above report.

8.0 PROJECT ALTERNATIVES

There are **no impacts** which can not be mitigated to a less than significant level. Therefore, it is not necessary to identify alternatives to the project.

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

Zoning for the proposed photovoltaic system is Recreation (REC) and the land use designation is Institutional/Government Facility. The proposed project is consistent with the existing zoning and land use, as the property is owned and operated by the County for a governmental purpose. Furthermore, the site is not currently used for recreational purposes, and no public access is or would be allowed due to the proximity to the County Jail facility.

The project is consistent with the Comprehensive Plan ~~Polices including:~~ Policies. Specifically, the proposed project would help the County meet the Energy Element Goal 5 to encourage the use of alternative energy for environmental and economic benefits, and encourage opportunities for businesses that develop or market energy technologies. Furthermore, avoidance, mitigation, and restoration are applied to environmentally sensitive habitat in the project area, as described under Biological Resources, Mitigation Measures BIO-1 through BIO-3, to avoid significant impacts to these sensitive habitats and resources and to ensure no net loss of habitat function. The specific Comprehensive Plan Policies that apply to this project include:

Energy Element

Policy 5.2. The County shall encourage the use of alternative energy technology in appropriate new and existing development.

Regulatory Incentive 5.2.1. Where appropriate and feasible, the County shall remove impediments (e.g. prolonged review due to a proposal including a new and different technology) to the utilization of alternative energy technologies that are cost-effective and contribute to improved environmental conditions.

Policy 5.4 The County shall use solar photovoltaic equipment in county applications when it is cost-effective on a life-cycle cost basis.

Land Use Element

Hillside and Watershed Protection Policies

2. All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

3. For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.

Goleta Community Plan

Policy SF-EGV-3.2: County Departments should work cooperatively to utilize public lands as efficiently and appropriately as possible by identifying opportunities to achieve their objectives with joint solutions, particularly related to safety, resources, recreation, and transportation.

Policy AQ-EGV-1.1: The County shall impose appropriate restrictions on construction activities associated with development to avoid deterioration of air quality.

Policy ECO-EGV-2.3: Where sensitive plant species and sensitive animal species are found pursuant to the review of a discretionary project, the habitat in which the sensitive species is located shall be preserved to the maximum extent feasible. For the purposes of this policy, sensitive plant species are those species which appear on the County's list of locally rare, rare or endangered plants, and the California Native Plant Society's Inventory of Endangered Vascular Plants of California. Sensitive animal species are defined as those animal species identified by the California Department of Fish and Game, the U.S. Fish and Wildlife Service and/or are listed in Tate's The Audubon Blue List (birds).

DevStd ECO-EGV-2A: Where sites proposed for development contain sensitive or important habitats and areas to be preserved over the long term, the impacts to these habitats shall be avoided or mitigated as a component of a project, including, but not limited to, the following conditions:

- Require project applicants to dedicate onsite open space easements covering such areas,
- Require onsite habitat restoration programs utilizing appropriate locally occurring native species propagated from plants in close proximity to the site,
- Require monetary contributions toward habitat acquisition and management, and/or
- Require an offsite easement and/or restoration of comparable habitat/area when onsite preservation is infeasible.

One or a combination of the above shall be required, as determined by a qualified biologist.

Policy ECO-EGV-2.4: Restoration: In those cases where adverse impacts to biological resources cannot be avoided after impacts have been minimized, restoration shall be considered as mitigation. Restoration may also be required for parcels on which development is proposed and on which disturbance has

previously occurred if the currently proposed development would exacerbate the existing impact. Where onsite restoration is infeasible or not beneficial with regard to long-term preservation of habitat, an offsite easement and/or restoration which covers comparable quality and quantity of habitat and will ensure long-term preservation shall be considered. The following policies shall be used as guidelines for the restoration effort but shall not preclude reasonable use of a parcel:

- Restoration shall include the appropriate diversity and density of plants native to the locality,
- Restoration shall incorporate maintenance and monitoring measures to ensure that the remedial action is mitigating permanent remedy of the impact of development,
- When restoration is required, on-site rather than off-site restoration shall be preferred.

DevStd ECO-EGV-2B: A minimum replacement ratio of 2:1 shall be required to mitigate the destruction of native habitat areas or biological resources. The area or units to be restored, acquired, or dedicated for a permanent protective easement shall be twice the biological value of that which is destroyed.

Policy ECO-EGV-5.1: Protecting Existing Trees: Existing trees in Eastern Goleta Valley shall be preserved to the maximum extent feasible, prioritizing "protected trees". Protected trees are defined for the purposes of this policy as mature native, naturalized, or roosting/nesting trees that are healthy, structurally sound, and have grown into the natural stature particular to the species. Protected trees include, but are not limited to:

- Oaks (Quercus agrifolia),
- Sycamores (Platanus racemosa),
- Willow (Salix sp.),
- Pines,
- Redwoods,
- Maples (Acer macrophyllum),
- California Bay Laurels (Umbellularia californica),
- Cottonwood (Populus fremontii & Populus balsimifera), and
- Any trees serving as known raptor nesting or key raptor roosting sites.

DevStd ECO-EGV-5A: All existing "protected trees" shall be protected from damage or removal, except in cases where preservation of trees would preclude reasonable use of a parcel, or threaten life and/or property.

Policy ECO-EGV-6.1: Environmentally Sensitive Habitat (ESH) areas and Riparian Corridors (RC) within Eastern Goleta Valley shall be protected and, where feasible and appropriate, enhanced.

Policy ECO-EGV-6.2: The following general criteria are utilized to determine which resources and habitats in Eastern Goleta Valley are identified as ESH. Significant habitat resources within urban, EDRN and Mountainous Areas that meet one or in most cases several of these criteria shall have coverage of the ESH overlay.

1. Unique, rare, or fragile communities which should be preserved to ensure their survival into perpetuity.
2. Habitats of rare and endangered species that are also protected by State and Federal laws.
3. Plant communities that are of significant interest because of extensions of ranges, or unusual hybrid, disjunct, or relict species.
4. Specialized wildlife habitats which are vital to species survival, e.g., White-tailed Kite habitat, butterfly trees.
5. Outstanding representative natural communities that have values ranging from a particularly rich flora and fauna to an unusual diversity of species.

6. Areas which are important because of their high biological productivity and ecological function such as wetlands and vernal pools.
7. Areas which are structurally important in protecting watershed ecology and species, e.g., riparian corridors that protect stream banks from erosion and provide shade.

Policy ECO-EGV-6.4: ESH and RC Habitat Types: The following specific biological resources and habitats in the urban, inner-rural, EDRN and Mountainous areas shall be considered environmentally sensitive and designated on the Goleta Valley Community Plan ESH/Riparian Corridor map based on the criteria of Policy ECO-EGV-1.1 and shall be protected and preserved through provisions of the Environmentally Sensitive Habitat (ESH) and Riparian Corridor (RC) overlay.

- Riparian woodland corridors,
- Monarch butterfly roosts,
- Sensitive native flora,
- Coastal sage scrub,
- Oak woodlands,
- Vernal pools,
- Native Grasslands,
- Wetlands,
- Raptor/Turkey Vulture Roosts,
- Critical wildlife habitat, and
- Wildlife Corridors

DevStd ECO-EGV-6C: Development within ESH areas in the urban area, EDRNs and Mountainous-GOL Zone Districts shall provide onsite restoration of any project-disturbed buffer or riparian vegetation, unless restoration would preclude reasonable use of the parcel. A restoration plan, approved by the County, shall be developed by a County approved biologist (or other experienced individual acceptable to the County) and implemented at the applicant's expense, per the requirements for Restoration Plans.

DevStd ECO-EGV-6F: Restoration Plans for ESH and RC Disturbances: When a habitat and/or vegetation restoration plan is required per the requirements of this section, the applicant shall prepare and implement a habitat restoration plan to restore degraded or disturbed portions of an ESH or RC area outside of any formal landscaping plan to offset increased development and increased human and domestic animal presence. The restoration plan shall use native species that would normally occur on-site absent any disturbance. The restoration plan shall contain the source of the plant material, planting methods and locations, site preparation, weed control, and monitoring criteria and schedules.

Policy ECO-EGV-7.1: Native woodlands, native grasslands, and coastal sage scrub shall be preserved and protected as viable and contiguous habitat areas.

DevStd ECO-EGV-7A: Development shall avoid impacts to native woodlands, native grasslands, and coastal sage scrub that would isolate, interrupt, or cause a break in a contiguous habitat which would disrupt animal movement patterns, disable foraging viability, seed dispersal routes, or increase vulnerability of species to weed invasion or local extirpations such as fire, flooding, disease, etc.

DevStd ECO-EGV-7C: Native Grassland and Coastal Sage Scrub Buffer Areas: Native grasslands and coastal sage scrub shall be preserved by providing a minimum 10 foot buffer vegetated with native species and by placing the project outside of the buffer rather than in or through the middle of the habitat area, except where such an action would preclude reasonable use of a parcel.

Policy GEO-EGV-2.2: Ground disturbances and development on slopes of 20 percent or greater should be avoided, unless such avoidance would preclude reasonable use of the parcel, wherein the portion of the site which exhibits the least amount of slope shall be utilized. Development on these sites should be designed to minimize combined grading from driveway and building pad creation.

Policy VIS-EGV-1.2: Public Vistas and Scenic Local Routes afford prominent views from public places of the following local visual resources:

- Santa Ynez Mountains and foothills,
- Undeveloped skyline,
- Coastal resources, including beaches, wetlands, bluffs, mesas, the Santa Barbara Channel and islands,
- Open space, or other natural areas,
- Natural watershed resources, such as creek/riparian corridors, wetlands, vernal pools, habitat areas, etc., and
- Agricultural areas.

Policy VIS EGV-1.10: In hillside areas, structures shall avoid the use of highly reflective materials, or be sited to minimize visible glare, with the exception of solar panel installations.

10.0 RECOMMENDATION BY GENERAL SERVICES STAFF

On the basis of the Initial Study, the staff of General Services:

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

__X__ 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:

PROJECT EVALUATOR: _____ Rincon Consultants, Inc. **DATE:** 01/27/2011

11.0 DETERMINATION BY ENVIRONMENTAL HEARING OFFICER

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

SIGNATURE: _____ **INITIAL STUDY DATE:** 1/27/11

SIGNATURE: _____ **NEGATIVE DECLARATION DATE:** 1/27/11

SIGNATURE: _____ **REVISION DATE:** _____

SIGNATURE: _____ **FINAL NEGATIVE DECLARATION DATE:** 7/5/11

ATTACHMENTS

A. Biological Survey Memo, CNDDB List, and CNPS Inventory
B. Santa Barbara County Planning and Development Memorandums on GHG Emissions Analysis
C. Comments Received on the Draft Initial Study - Mitigated Negative Declaration

Attachment A

Biological Survey Memo, CNDDB List, and CNPS Inventory

Rincon Consultants, Inc.

Environmental Scientists Planners Engineers

MEMORANDUM

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Date: December 17, 2010
To: Rob Mullane, Project Manager
Organization:
From: Carie Wingert, Associate Biologist
Email:
cc:
Re: Calle Real Solar Photo-Voltaic Project

Rob –

On December 16, 2010, I visited the Calle Real Photo-Voltaic Project Site at the Santa Barbara County Jail in Goleta. I met Roy Hapeman of the County's General Services Department on-site and he gave me a brief overview of the project and history of the site. Following our brief meeting, I conducted a reconnaissance survey of the site, documenting all plants and animals I encountered and noting the habitats present on-site, and the condition of those habitats.

The project site is situated on a southwest-facing slope and is vegetated with coastal sage scrub habitat with several patches of ruderal/non-native grassland habitat. A cleared path bisects the project site. To the north of the cleared path, most of the coastal scrub habitat was intact and had a high diversity of native plant species. To the south of this cleared path, the coastal scrub habitat showed evidence of disturbance with lower plant species diversity and patches of ruderal/non-native grassland interspersed. Ruderal/non-native grassland habitat was more abundant towards to the top of the hill, as well as at the bottom of the hill where the inverter box will be located. Mr. Hapeman stated that portions of the hill are subject to vegetation removal by the County, and a fire has burned a portion of the hill in recent years. These events contributed to the disturbed nature of the coastal scrub and to the presence of ruderal/non-native grassland in the southern portion of the site. However, despite previous

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disturbance, the native seed bank is likely intact as several native California sagebrush individuals were observed sprouting in the cleared path that bisects the project site.

During my site visit I also observed several coast live oak trees along the southern boundary. Most of the oak trees were on a south-facing slope. Under these oak trees and in the coastal scrub habitat in the southern portion of the project site, I also observed many *Scrophularia* sp. individuals. Though no flowers were present for positive identification, the black-flowered figwort (*S. atrata*) is the only species documented in this region according to Consortium of California Herbarium. This species was also reported for the Goleta Quad in the California Natural Diversity Database (CNDDB) and is a CNPS List 1B.2 plant. A special status *Calystegia* species was also reported for the Goleta Quad in the CNDDB. A *Calystegia* species was also identified on site but could not be identified to a sufficient level to determine rarity due to the timing of site visit. Additional special status plants may also be present on-site, but may not have been evident due to the timing of the site visit.

I also observed a woodrat nest on-site. Two species of woodrats could potentially occur: the dusky-footed woodrat and the San Diego desert woodrat. The San Diego desert woodrat is a state Species of Species Concern.

Biological Issues Identified On-site:

- **Coastal Sage Scrub habitat** – qualifies as ESH, avoidance/mitigation required
- **Special Status Plants** –one likely on-site, potential for others (seasonally-timed surveys required)
- **Special Status Animals** – potential San Diego desert woodrat, nesting birds, potentially others
- **Oak Trees**

According to the Goleta Community Plan, coastal sage scrub is a protected habitat within urban, inner-rural, EDRN and Mountainous areas, and for this reason the County has mapped the site as Environmental Sensitive Habitat (ESH) in the Goleta Community Plan. There are many policies and development standards within the Goleta Community Plan that deal with special status plant and animals, oak trees, native habitat, and restoration, which would apply to this project. These policies and development standards provide for the reasonable use of the parcel, while requiring avoidance (to the extent feasible), minimization, and mitigation for impacts to special status resources. Furthermore, there appears to be adequate mitigation opportunities within and adjacent to the subject property.

The specific discussion of impacts to biological resources and required avoidance, minimization, and restoration mitigation measures will be developed in the Initial Study/Mitigated Negative Declaration.

Inventory of Rare and Endangered Plants

v7-10dec 12-02-10

Status: search results for "+"Goleta (143A) 3411947"" - Wed, Dec. 29, 2010 13:48 c

+"Goleta (143A) 3411947" Search

Tip: Want to search by county? Try the **county index**.[all tips and help.][search history]

Hits 1 to 12 of 12

Requests that specify topo quads will return only Lists 1-3.

To save selected records for later study, click the ADD button.

ADD checked items to Plant Press | check all | check none

Selections will appear in a new window.

open	save	hits	scientific	common	family	CNPS
		1	**Arctostaphylos refugioensis**	Refugio manzanita	Ericaceae	List 1B.2
		1	**Atriplex coulteri**	Coulter's saltbush	Chenopodiaceae	List 1B.2
		1	**Atriplex serenana var. davidsonii**	Davidson's saltscale	Chenopodiaceae	List 1B.2
		1	**Calochortus weedii var. vestus**	late-flowered mariposa lily	Liliaceae	List 1B.2
		1	**Centromadia parryi ssp. australis**	southern tarplant	Asteraceae	List 1B.1
		1	**Horkelia cuneata ssp. puberula**	mesa horkelia	Rosaceae	List 1B.1
		1	**Juncus luciensis**	Santa Lucia dwarf rush	Juncaceae	List 1B.2
		1	**Lasthenia glabrata ssp. coulteri**	Coulter's goldfields	Asteraceae	List 1B.1
		1	**Layia heterotricha**	pale-yellow layia	Asteraceae	List 1B.1
		1	**Lonicera subspicata var. subspicata**	Santa Barbara honeysuckle	Caprifoliaceae	List 1B.2
		1	**Scrophularia atrata**	black-flowered figwort	Scrophulariaceae	List 1B.2
		1	**Thelypteris puberula var. sonorensis**	Sonoran maiden fern	Thelypteridaceae	List 2.2

To save selected records for later study, click the ADD button.

ADD checked items to Plant Press | check all | check none

Selections will appear in a new window.

No more hits.

California Department of Fish and Game
Natural Diversity Database
Selected Elements by Scientific Name - Portrait
Goleta Quad

	Scientific Name/Common Name	Element Code	Federal Status	State Status	GRank	SRank	CDFG or CNPS
1	Arctostaphylos refugioensis Refugio manzanita	PDERI041B0			G2	S2?	1B.2
2	Atriplex coulteri Coulter's saltbush	PDCHE040E0			G2	S2.2	1B.2
3	Atriplex serenana var. davidsonii Davidson's saltscale	PDCHE041T1			G5T2?	S2?	1B.2
4	Calochortus weedii var. vestus late-flowered mariposa-lily	PMLIL0D1J2			G3G4T2	S2.2	1B.2
5	Calystegia sepium ssp. binghamiae Santa Barbara morning-glory	PDCON040E6			G5TH	SH	1A
6	Centromadia parryi ssp. australis southern tarplant	PDAST4R0P4			G4T2	S2.1	1B.1
7	Charadrius alexandrinus nivosus western snowy plover	ABNNB03031	Threatened		G4T3	S2	SC
8	Cicindela hirticollis gravida sandy beach tiger beetle	IICOL02101			G5T2	S1	
9	Coelus globosus globose dune beetle	IICOL4A010			G1	S1	
10	Danaus plexippus monarch butterfly	IILEPP2010			G5	S3	
11	Emys marmorata western pond turtle	ARAAD02030			G3G4	S3	SC
12	Eucyclogobius newberryi tidewater goby	AFCQN04010	Endangered		G3	S2S3	SC
13	Horkelia cuneata ssp. puberula mesa horkelia	PDROS0W045			G4T2	S2.1	1B.1
14	Juncus luciensis Santa Lucia dwarf rush	PMJUN013J0			G3	S3	1B.2
15	Lasthenia conjugens Contra Costa goldfields	PDAST5L040	Endangered		G1	S1.1	1B.1
16	Lasthenia glabrata ssp. coulteri Coulter's goldfields	PDAST5L0A1			G4T3	S2.1	1B.1
17	Layia heterotricha pale-yellow layia	PDAST5N070			G2	S2	1B.1
18	Lonicera subspicata var. subspicata Santa Barbara honeysuckle	PDCPR030R3			G5T2	S2.2	1B.2
19	Passerculus sandwichensis beldingi Belding's savannah sparrow	ABPBX99015		Endangered	G5T3	S3	
20	Rallus longirostris levipes light-footed clapper rail	ABNME05014	Endangered	Endangered	G5T1T2	S1	
21	Scrophularia atrata black-flowered figwort	PDSCR1S010			G2	S2.2	1B.2
22	Southern Coastal Salt Marsh	CTT52120CA			G2	S2.1	
23	Suaeda esteroa estuary seablite	PDCHE0P0D0			G4	S3.2	1B.2

	Scientific Name/Common Name	Element Code	Federal Status	State Status	GRank	SRank	CDFG or CNPS
24	Thelypteris puberula var. sonorensis Sonoran maiden fern	PPTHE05192			G5T3	S2.2?	2.2
25	Tryonia imitator mimic tryonia (=California brackishwater snail)	IMGASJ7040			G2G3	S2S3	

Attachment B

Santa Barbara County Planning and Development
Memorandum on GHG Emissions Analysis

Interim Procedures for Evaluating Greenhouse Gas Emissions

State Office of Planning and Research (OPR) promulgated new regulations on March 18, 2010 amending the CEQA Guidelines to address evaluation of green house gas (GHG) emissions in CEQA documents. Although the new regulations do not require lead agencies to adopt significance thresholds with respect to GHG emissions, they do require lead agencies to determine the significance of such emissions based data. CEQA Guidelines Section 15064.4. The purpose of this memorandum is to provide interim guidance on evaluating GHG emissions in CEQA documents for projects in the County. 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 such time as County-specific data becomes available and significance thresholds applicable to GHG emissions are developed and formally adopted, some guidance is needed on how to approach GHG emissions on currently pending projects.

This guidance document applies only to projects that are subject to CEQA: (1) discretionary development projects and (2) plans (General Plan elements, community plans, etc.). For projects that fall within categorical or statutory exemptions to CEQA, GHG emissions are presumed to be less than significant.[1] This guidance document will apply to most projects subject to CEQA for which the CEQA document (ND or EIR) is circulated after March 18, 2010.

GHG Emission Analysis

For projects subject to CEQA, planners will typically prepare an Initial Study to evaluate the project's potential for significant environmental impacts, including significant impacts to air quality and climate as a result of GHG emissions. Environmental review of projects should evaluate GHG emissions applying the following steps:

Step 1: Quantify Emissions

State law defines GHGs to include seven gases or categories of gases:

Carbon dioxide (CO_2)
Methane (CH_4)
Nitrous oxide (N_2O)
Hydrofluorocarbons (HFCs)
Perfluorocarbons (PFCs)

[1] However, a limited exception to categorically exempt projects exists for cumulative impacts when the cumulative impact of successive projects of the same type in the same place over time is significant. CEQA Guidelines Section 15300.2(b).

Sulphur hexafluoride (SF_6)
Nitrogen trifluoride (NF_3)

Total GHG emissions of a project for all GHGs should be expressed as carbon dioxide equivalent (CO_2e) measured in metric tons. While the first three gases are the most common emissions, and emissions of other GHGs may be de minimis for most projects, a CO_2e conversion table for GHGs is attached for reference.

Analysis should focus solely on operational emissions, which typically represent the vast majority of GHG emissions over the life of a project. Operational emissions typically consist of direct and indirect project emissions. Direct emissions include point-source & fugitive emissions, a large reduction in reflectivity,[2] and a large reduction in sequestration,[3] and vehicle emissions. Indirect emissions occur as a result of energy use (electricity and gas).

Direct Emissions

- Use the Urban Land Use Emissions Model (URBEMIS) to quantify direct project emissions, including vehicle emissions. The URBEMIS model output is given in English tons. Figures should be converted to metric tons by multiplying by a factor of 0.91.

Indirect Emissions: Natural Gas Usage

- URBEMIS will also calculate indirect emissions for natural gas use for heating and cooking.

Indirect Emissions: Electricity Usage

- Residential land uses: If project-specific electricity usage estimates are not available, electricity usage per household can be estimated using data from the American Communities Survey and Santa Barbara County electricity usage reported by the California Energy Commission (CEC). The most current available electricity usage data is for calendar year 2007. The American Communities Survey reports that the average number of households in Santa Barbara County for 2005-2007 was 140,137 (U.S. Census Fact Finder, 2010). The CEC reports that residential electricity usage in Santa Barbara County for year 2007 was 818.20 million kilowatt-hrs (kWh) (California Energy Commission ECDMS, 2010). Average electricity usage in Santa Barbara County for calendar year 2007 was therefore 5,838.56 kWh/yr/household. This value may be used

[2] Use only for larger-scale projects (e.g., shopping centers) with large roofs and parking lots.
[3] Use only for large-scale projects that result in appreciable loss of trees.

to estimate per-household electricity usage for CEQA purposes. Between 2007 and 2009, the average household size for new single-family residences in Santa Barbara County was 3,258 square feet, based on Accela data. The average annual electrical energy usage per square foot is 1.79 kWh/sq. ft./year, which translates into GHG emissions of 0.714 kg/SF/year.

- Commercial land uses: If project-specific electricity usage estimates are not available, a generic electricity usage rate can be used. The California Commercial End-Use Survey, a study commissioned by the California Energy Commission and published in 2006, provides an annual electricity usage rate estimate of 13.63 kilowatt-hours per square foot (kWh/ft^2) of commercial space (Itron, Inc., 2006). This figure can be used in lieu of project-specific electricity usage amounts.

- Industrial land uses: If the project is an industrial facility that has industry-specific electricity requirements, electricity usage estimates should be developed for the specific project in consultation with APCD.

- *Determine the appropriate emission factor to estimate GHG emissions for the location of the subject project.* Santa Barbara County projects are generally served by either Pacific Gas & Electric (PG&E) in North County or Southern California Edison (SCE) in South County. Emission factors for carbon dioxide (CO_2) have been developed for these specific utilities and are available at the California Climate Action Registry's CARROT program website at www.climateregistry.org/CARROT/Public/Reports.aspx. For example, the user may enter the specific utility (e.g., Southern California Edison) and reporting year (most current available is 2007), generate a report for that year, and scroll to the bottom of the annual emissions report to where "Reference Documents" are provided. The user may then click on the link to the "SCE PUP for 2007," and at the bottom of this report under "Emissions Efficiency Metrics," an emission factor of 630.89 lbs CO_2 per megawatt-hour (MWh) is provided. As of this printing, the most current CO2 emission factors for electricity usage are:

    - Southern California Edison users: 286.16 kg CO_2/MWh (0.28616 kg/kWh) for reporting year 2007.

    - Pacific Gas & Electric users: 290.91 kg CO_2/MWh (0.29091 kg/kWh)

    - Consult with APCD for equipment-specific emission factors for industrial/stationary sources.

- *Calculate GHG Emissions from electricity usage* by multiplying the project characteristics by the electricity usage rate and the emission factor. For example:

    a. 100 households x 5,838.56 kWh/household x 0.28616 kg/kWh = 167,076 kg CO_2/yr, which converts to 167 metric tons/yr.

    b. 100,000 square feet (commercial) x 13.63 kWh/sf x 0.28616 kg/kWh = 390,036 kg CO_2/yr, which converts to 390 metric tons/yr.

- Based on the residential and commercial electricity usage noted above, and using the above methodology, the estimated indirect emissions from electricity usage for the average residence is 2.33 metric tons of CO_2e per year. Similarly, the indirect emissions from electricity consumption for commercial buildings is 0.521 kg of CO_2e per square foot per year.

Use the following table or the emissions calculator spreadsheet in the Digital Library to tabulate project emissions from various sources:

Estimated Annual Operational GHG Emissions

Source	***CO_2e (metric tons)***
Direct Emissions	
Point-source & fugitive emissions	
Large reduction in reflectivity	
Large reduction in sequestration	
Vehicle Miles Traveled	
Indirect Emissions	
Energy Use	
• *Natural Gas*	
• *Electricity*	
Total GHG Operational Emissions	

Although OPR recommends evaluation of water usage and construction activities, BAAQMD did not propose or adopt thresholds for emissions from these sources and this guidance document does not include these emission sources.

Step 2: Determine Significance

Given the global nature of climate change resulting from GHG emissions, GHG emission impacts are inherently cumulative in nature. The determination whether a project's GHG emissions impacts are significant depends on whether emissions would be a cumulatively considerable contribution to the significant cumulative impact.

In the absence of specific Santa Barbara County inventory data, planners should refer to the Bay Area Air Quality Management District (BAAQMD) adopted thresholds of significance for GHG emissions as a guideline in evaluating Santa Barbara County projects.[4] The following table summarizes these standards:

Interim Significance Determination Criteria	
GHG Emission Source Category	**Operational Emissions**
Other than Stationary Sources	1,100 MT CO_2e/yr OR 4.6 MT CO_2e/SP/yr (residents + employees)
Stationary Sources	10,000 MT CO_2e /yr
Plans	6.6 MT CO_2e/SP/yr (residents + employees)

As noted above, the BAAQMD does not suggest any guidelines for construction-related emissions.

If emissions fall below the stated thresholds, the project does not create the potential for significant impacts as a result of GHG emissions. If emissions exceed the stated thresholds, proceed to Step 3.

According to the BAAQMD, the 1,100 metric ton significance criteria is equivalent to approximately 60 single-family residences or average annual household GHG emissions of approximately 18.3 metric tons/household/year.[5] This is consistent with the EPA's estimate of average annual per capita GHG emissions of 16,008 lbs (7.26 metric tons) per person. Based on this equivalency, for purposes of evaluation of GHG emissions from residential projects in Santa Barbara County during this interim period, emissions from residential developments of 10 or

[4] CEQA allows lead agencies, when adopting significance thresholds, to consider thresholds of significance previously adopted or recommended by other public agencies, where supported by substantial evidence. CEQA Guidelines Section 15064.7(c).

[5] BAAQMD Thresholds of Significance (May 2010), at 60.

fewer residences are considered to be less than significant without further, more detailed justification or analysis. More detailed, factually specific analysis is only required for residential developments of above size.

Step 3: Apply Mitigation

If a project would generate emissions in excess of the BAAQMD levels, it should be considered to have a cumulatively considerable and therefore significant impact. Where a cumulative impact as a result of GHG emissions is significant, the CEQA Guidelines require consideration of feasible mitigation. Feasible mitigation measures should be applied that would, where possible, reduce GHG emissions below the level of significance.

Such mitigation may include:

- Measures in an existing County plan or program
- Implementation of project features and design
- Offsets
- Sequestering of greenhouse gases

CEQA Guidelines Section 15126.4(c).

The following standard mitigation measure may be appropriate for certain development projects. Plans and planning documents may also apply this mitigation measure by requiring it of projects constructed under the plan.

Mitigation Measure: GHG Reduction

The project will reduce operational green house gas emissions to less than significant levels through implementation of one of the following measures. The project will either:

A. Comply with the adopted Climate Action Plan, if it is approved and in place prior to permit approval, or

B. Purchase carbon offsets, or

C. Prior to permit issuance, develop a GHG reduction plan that reduces annual green house gas emissions from the project by a minimum of 1.7 MT CO_2e per person per year for the operational life of the project. The plan will be implemented on site by the project owner and may include, but is not be limited to, the following components:

    1. Alternative fuel vehicles
    2. Energy conservation policies

3. Energy efficient equipment, appliances, heating and cooling
4. Energy efficient lighting
5. Green building and roofs
6. Water conservation and recycling
7. Renewable energy production
8. Trip reduction
9. Carbon sequestration

A further potential mitigation measure available to non-residential energy users is direct purchase of electrical energy from renewable energy service providers (ESP). SB 695, approved in October 2009, phases in such direct purchase. Under this law, non-residential customers may purchase electricity from an ESP up to an overall historical maximum load amount in each utility territory.

Although CEQA allows use of offsets, the County has no current program or policy with respect to their use. As with any mitigation, use of purchased offsets would be subject to monitoring and enforcement. An offset program will be included as part of the County's Climate Action Plan.

Step 4: Quantify Mitigation

To determine whether mitigation is adequate to reduce emissions to a less than significant level, the effectiveness of mitigation must be quantified and the reduction in emissions assessed against the applicable significance standard.

Depending on the mix of measures selected, emission reductions for specific reduction measures can be quantified using the Climate and Air Pollution Planning Assistant (CAPPA) tool developed by Local Governments for Sustainability (ICLEI). This tool can be found in the P&D Digital Library in the following location:

G:\GROUP\P&D\Digital Library\Protos & Templates\Planning Permit Processing\CEQA Documents\CEQA Guides

The tool allows the user to select an array of specific GHG reduction measures and then tabulates total reductions automatically based on the measures selected. The table of total reductions is shown on the last tab in the spreadsheet and follows the format below.

Mitigation Measure	*CO_2e*
Measure 1	
Measure 2	
Measure 3	
. . .	
Total GHG Emissions Reductions	

Step 5: Calculate Residual Impact

Subtract the total emissions reductions from the total GHG emissions. If the result is less than the applicable threshold, no significant residual impact exists.

If feasible mitigation measures are not adequate to reduce emissions to a less than significant level, the County can still approve a project, but must adopt a Statement of Overriding Considerations with preparation of an EIR that explains why additional mitigation is not feasible.

Attachments:

1. Support for Use of BAAQMD GHG Standards
2. Initial Study Proto
3. GHG CO_2e Conversion Table
4. CAPPA Tool

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. While Santa Barbara County land use patterns differ from those in the Bay Area as a whole, Santa Barbara County 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 eight 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 CO_2e/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 CO_2e/California Service Population/yr (residents + employees) for non-stationary sources.

Stationary Sources

BAAQMD determined a threshold of 10,000 MT CO_2/year for greenhouse gas emissions from stationary sources. This threshold was developed based on estimating CO_2 emissions from projects in the Air District from 2005 – 2007. Only CO_2 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 CO_2/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. <u>Plan-Level Thresholds</u>

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 plan level GHG impacts, 6.6 MT CO_2e/California Service Population/yr (residents + employees). This efficiency threshold was calculated using all emissions sectors, rather than just the land use based sectors as was done for project level thresholds. This difference is due to the fact that plans are comprised of more than just land use related emissions (e.g. industrial).

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. A lead agency may consider thresholds of significance adopted or recommended by other public agencies, provided they are supported by substantial evidence. CEQA Guidelines Section 15064.7(c). 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.[1] 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[2][3][4][5]

County	Population (2010)	% Change in Population (2009-2010)	Average Annual Growth Rate (2000 – 2009)	Average Household Size[6]	Average Commute Time (minutes)	Daily VMT (millions)

[1] Santa Barbara County Operating Plan for 2010-1011

[2] 2006 -2008 American Communities Survey

[3] Source Inventory of Bay Area Greenhouse Gas Emissions, BAAQMD, 2010

[4] Vision 2030: SBCAG 2008 Regional Transportation Plan

[5] California Department of Finance

[6] 2006 -2008 American Communities Survey

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
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.[7] Data is not yet available for GHG emissions from stationary sources in Santa Barbara County, but the oil and gas industry is the most prominent industrial use in the County.

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

[7] Source Inventory of Bay Area Greenhouse Gas Emissions, BAAQMD, 2010

Table 2. Potential Stationary Source Projects Affected a Given Threshold[8]

	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.[9] 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 asSanta 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.

[8] CEQA & Climate Change, CAPCOA, 2008

[9] 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.

Attachment C

Comments Received on the
Draft Initial Study – Mitigated Negative Declaration

STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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January 19, 2011

JAN 20 2011

Rob Hapeman
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Santa Maria, CA 93455-3623

Sent by Fax: 805-934-6258
Number of Pages: 4

Re: Calle Real Photovoltaic Project, Santa Barbara County

Dear Mr. Hapeman:

A record search of the sacred land file has failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the sacred lands file does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Enclosed is a list of Native Americans individuals/organizations who may have knowledge of cultural resources in the project area. The Commission makes no recommendation or preference of a single individual, or group over another. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at (916) 653-4040.

Sincerely,

Katy Sanchez
Program Analyst

Native American Contact List
Santa Barbara County
January 18, 2011

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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Calle Real Photovoltaic Project; Santa Barbara County.

Native American Contact List
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January 18, 2011

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Melissa M. Parra-Hernandez
119 North Balsam Street Chumash
Oxnard , CA 93030
envyy36@yahoo.com
805-983-7964

Frank Arredondo
PO Box 161 Chumash
Santa Barbara Ca 93102
ksen_sku_mu@yahoo.com
805-617-6884
ksen_sku_mu@yahoo.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Calle Real Photovoltaic Project; Santa Barbara County.

Santa Barbara County
Air Pollution Control District

February 24, 2011

Roy Hapeman
Santa Barbara County
General Services Department
1105 Santa Barbara Street
Santa Barbara, CA 93101

Re: APCD Comments on MND for Calle Real Photovoltaic Project

Dear Mr. Hapeman:

The Air Pollution Control District (APCD) has reviewed the Mitigated Negative Declaration (MND) for the subject project, which consists of construction of pole-mounted solar panels covering approximately 172 acres on the hillside northeast of the County Jail buildings. Also proposed are a 500 square foot inverter shelter building, and 1,200 linear feet of trenching for conduit to connect the panel array to the inverter shelter and from the shelter to the jail facility. Grading for the project consists of 500 cubic yards of cut and 500 cubic yards of fill to be balanced on-site. The subject property, a 61.8-acre parcel zoned REC and identified in the Assessor Parcel Map Book as APN 059-140-029, is located at 4434 Calle Real in the unincorporated Goleta area.

Air Pollution Control District staff offers the following comments on the MND:

1. **Initial Study, Air Quality Section, County Environmental Thresholds, Page 15:** The first bulleted significance threshold should state the daily trigger for offsets of 55 pounds per day for NO_x and ROCs, and 80 pounds per day for PM_{10}.

2. **Initial Study, Air Quality Section, Mitigation and Residual Impact, Page 17:** The mitigation section should be updated with the latest standard dust conditions (Attachment A) and conditions for diesel construction equipment (Attachment B).

Air Pollution Control District staff offers the following general comments:

1. APCD Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities*, became effective on July 21, 2010 and establishes new limits on the generation of visible fugitive dust emissions at demolition and construction sites. The rule includes measures for minimizing fugitive dust from on-site activities and from trucks moving on- and off-site. The text of the rule can be viewed on the APCD website at www.sbcapcd.org/rules/download/rule345.pdf.

2. All portable diesel-fired construction engines rated at 50 brake-horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Construction engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.

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

Sincerely,

Eric Gage,
Air Quality Specialist
Technology and Environmental Assessment Division

Attachments: Fugitive Dust Control Measures
Diesel Particulate and NO_x Emission Measures

cc: Project File
TEA Chron File

Santa Barbara County
Air Pollution Control District

ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

These measures are required for all projects involving earthmoving activities regardless of the project size or duration. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions.

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.

- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.

- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.

- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.

- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.

- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

  Plan Requirements: All requirements shall be shown on grading and building plans and as a note on a separate information sheet to be recorded with map. **Timing**: Requirements shall be shown on plans or maps prior to land use clearance or map recordation. Condition shall be adhered to throughout all grading and construction periods.

  MONITORING: Lead Agency shall ensure measures are on project plans and maps to be recorded. Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

Santa Barbara County
Air Pollution Control District

ATTACHMENT B
DIESEL PARTICULATE AND NO_x EMISSION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is an updated list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.
- Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.
- All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

The following measures are recommended:

- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

Plan Requirements: Measures shall be shown on grading and building plans. **Timing:** Measures shall be adhered to throughout grading, hauling and construction activities.

MONITORING: Lead Agency staff shall perform periodic site inspections to ensure compliance with approved plans. APCD inspectors shall respond to nuisance complaints.

Fire Department

"Serving the community since 1926"

HEADQUARTERS
4410 Cathedral Oaks Road
Santa Barbara, CA 93110-1042
(805) 681-5500 FAX: (805) 681-5563

Michael W. Dyer
Fire Chief
County Fire Warden

Christian J. Hahn
Deputy Fire Chief

February 8, 2011

To: Roy Hapeman
County of Santa Barbara
105 East Anapamu Street
Santa Barbara, CA 93101

Re: Calle Real Photovoltaic Project; SCH#2011011087

The Santa Barbara County Fire Department Vegetation Management Section has had the opportunity to review the draft initial study/mitigated negative declaration for the proposed Calle Real Photovoltaic Project and offers the following:

Santa Barbara County Fire as an agent of CAL Fire has no concerns or comments.

Thank you for the opportunity to review your proposed project.

Respectfully,

Bob Tanner
Fire Captain
Vegetation Management
Santa Barbara County Fire Department
(805)686-5068

cc: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044
dd: Ken Nehoda, CAL Fire, PO Box 944246, Sacramento, CA 94244-2460

From: Brian Trautwein [mailto:btraut@edcnet.org]
Sent: Tuesday, March 01, 2011 10:33 AM
To: 'rhapema@co.santa-barbara.ca.us'
Subject: County Campus Solar Project - Comments and Questions

Hi Roy,

EDC reviewed the MND for the proposed County Campus Solar Project.

We support solar power in general as an alternative to fossil fuels.

We also support proper siting of all development to avoid impacts which can be feasibly avoided.
The proposed project sites a facility within 1.7 acres of coastal sage scrub sensitive habitat (ESH).

Development must comply with general plans. The Goleta Community Plan has specific policies which seek to avoid impacts to ESH and coastal sage scrub:

> Policy Bio-GV-2: "ESH and riparian corridors within the Goleta Planning Area shall be preserved and, where feasible and appropriate, enhanced."
> DevStd Bio-GV-2.2: "New development within 100 feet of ESH shall be required to include setbacks or undeveloped buffer zones…"
> Policy BGio-GV-3: "Development within areas designated ESH shall comply with the applicable habitat protection policies."
> Policy Bio-GV-13: "Areas of one or more acres of coastal sage scrub shall be preserved to the maximum extent feasible, consistent with reasonable use of a parcel."
> See also DevStds Bio-GV-13.1 – 13.3.

When impacts cannot be avoided, CEQA requires that enforceable, effective mitigation measures be included to ensure impacts are mitigated. Such measures, such as habitat restoration plans, cannot be deferred.

We have three questions:

1. What process did the county go through to determine that a location outside of ESH was infeasible?
2. Why are the solar panels not proposed on the rooftop of the jail and other buildings, like the Parks Department's and Flood Control District's maintenance buildings and offices, as an alternative to avoid impacts to ESH?
3. Why does the mitigation measure involving a habitat restoration plan defer development of a restoration plan to a later date without providing performance standards to ensure success? Does this not entail deferral of a mitigation measure in violation of CEQA?

Since the comment deadline is soon approaching, can you please respond to these comments and questions today, or let me know your schedule for replying?

We support utilizing solar power, and urge the County to do so in a way that avoids or minimizes projects' environmental impacts.

Thank you.

Sincerely,

Brian Trautwein
Environmental Analyst
Environmental Defense Center
906 Garden Street
Santa Barbara, CA 93101
btraut@edcnet.org
(805) 963-1622 X 108
(805) 962-3152 fax

From: Brian Trautwein [mailto:btraut@edcnet.org]
Sent: Wednesday, March 02, 2011 4:47 PM
To: Hapeman, Roy
Subject: RE: County Campus Solar Project - Comments and Questions

Hi Roy,

I am writing as a follow-up to our conversation yesterday. Thank you for taking the time to explain the process County staff went through in considering alternative locations for the County Campus Solar Project.
EDC strongly supports solar power and we support locating projects such as the County Campus Solar Project outside of sensitive habitats and in developed or disturbed areas to the maximum extent feasible.

Thank you for agreeing during our conversation to respond to the following points:

1. Can the habitat restoration plan be prepared, or substantially more detail provided, prior to project approval so that the mitigation can be demonstrated to be effective per CEQA rather than deferred?
2. In response to your statement that vegetation will be retained and earth work minimized within the project footprint through utilization of "earth screws," can you agree to and propose a new mitigation measure / condition of approval that would in essence state: "native vegetation at the project site shall be preserved to the maximum extent feasible"?
3. Please provide an analysis of project consistency with the following Goleta Community Plan policies and development standards:

   Policy Bio-GV-2: "ESH and riparian corridors within the Goleta Planning Area shall be preserved and, where feasible and appropriate, enhanced."
   DevStd Bio-GV-2.2: "New development within 100 feet of ESH shall be required to include setbacks or undeveloped buffer zones…"
   Policy BGio-GV-3: "Development within areas designated ESH shall comply with the applicable habitat protection policies."
   Policy Bio-GV-13: "Areas of one or more acres of coastal sage scrub shall be preserved to the maximum extent feasible, consistent with reasonable use of a parcel."
   See also DevStds Bio-GV-13.1 – 13.3.

It seems that it is feasible to build this project, or a similar project, in areas which would avoid all or some of the coastal sage habitat and comply with County policies.

Lastly, you indicated that in 2010 the Board directed staff to pursue the proposed location in ESH. EDC prefers building the project in the parking lot you described instead in the 1.7 acres of environmentally sensitive coastal sage scrub habitat.

Thank you again for the time you took explaining the project planning for me. We look forward to your responses to the above points.

Very Sincerely,

Brian Trautwein
Environmental Analyst
Environmental Defense Center
906 Garden Street
Santa Barbara, CA 93101
btraut@edcnet.org
(805) 963-1622 X 108
(805) 962-3152 fax

From: Darlene Chirman [mailto:darlene.chirman@gmail.com]
Sent: Wednesday, March 02, 2011 3:13 PM
To: Hapeman, Roy
Cc: Brown, Cecilia; Steve Ferry
Subject: FW: County Campus Solar Project - Comments and Questions

Roy Hapeman

Dear Mr. Hapeman,

Santa Barbara Audubon has reviewed the Mitigated Ngative Declaration for the e proposed County Campus Solar Project.

We support solar power as an alternative to fossil fuels. Appropriate siting is critical in avoiding impacts where feasible.

The proposed solar facility would be located on 1.7 acres of a 5-acre site which includes environmentally sensitive habitat—coast live oak woodland and coastal safe scrub. Unfortunately, we didn't hear of this project until 2 days ago. I was able to have a quick look at the site today int he rain!

Audubon would like to suggest that the site be mapped and see if what areas could be utilized that have invasive Tamarisk, ruderal weeds, or Eucalyptus trees, to see what areas of native habitat could be retained. An alternative site might be the old count dump across the road—there are portions which have not been restored. Or a combination of roof-top panels and disturbed area adjacent to the honor farm or on the old landfill.

Audubon would also like to see wild-life friendly fencing, that allows passage of wildlife, given the natural habitat.

To the extent that sensitive habitats are disturbed, a revegetation mitigation plan should be prepared and approved with the approval of the project.

Sincerely, Darlene Chirman

--

Darlene Chirman, President
Santa Barbara Audubon
President@SantaBarbaraAudubon.org
(805) 692-2008

http://www.SantaBarbaraAudubon.org/

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

JERRY BROWN
GOVERNOR

March 2, 2011

Roy Hapeman
Santa Barbara County
General Services Department
105 E. Anapamu Street
Santa Barbara, CA 93101

Subject: Calle Real Photovoltaic Project
SCH#: 2011011087

Dear Roy Hapeman:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 1, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2011011087
Project Title Calle Real Photovoltaic Project
Lead Agency Santa Barbara County

Type MND Mitigated Negative Declaration

Description The proposed project involves the construction and operation of a photovoltaic system on an approximately 5-acre hillside site adjacent to the County Jail at 4434 Calle Real in Santa Barbara (refer to Figure 1, Project Vicinity). The project is a photovoltaic system that will produce approximately one megawatt (MW) of electricity to help power the County jail facility and other nearby County facilities. Approximately 5,000 individual solar panels would be installed on a portion of the hillside behind the existing County Jail buildings. Each photovoltaic panel would be approximately six feet by three feet in size and mounted in clusters or rows of panels, with a mosaic of several panels per mounting unit. The project would require the installation of power inverter equipment, which would be enclosed in an inverter shelter building of approximately 500 square feet.

Lead Agency Contact

Name Roy Hapeman
Agency Santa Barbara County
Phone (805) 568-2628 **Fax**
email
Address General Services Department
105 E. Anapamu Street
City Santa Barbara **State** CA **Zip** 93101

Project Location

County Santa Barbara
City Santa Barbara
Region
Lat / Long 34° 26.8' N / 119° 16.5' W
Cross Streets Calle Real & Honor Farm Road
Parcel No. 059-140-029
Township **Range** **Section** **Base**

Proximity to:

Highways U.S. 101, Hwy 154
Airports
Railways Southern Pacific RR
Waterways
Schools San Marcos, La Colina
Land Use Land Use: Institutional/Government facility, Zoning: Recreation

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 5; Regional Water Quality Control Board, Region 3; California Energy Commission; Native American Heritage Commission; Public Utilities Commission

Date Received 01/31/2011 **Start of Review** 01/31/2011 **End of Review** 03/01/2011

Note: Blanks in data fields result from insufficient information provided by lead agency.

DEPARTMENT OF FORESTRY AND FIRE PROTECTION
P.O. Box 944246
SACRAMENTO, CA 94244-2460
Website: www.fire.ca.gov
(916) 657-0300

clear
3/1/11
e

February 2, 2011

Santa Barbara County Fire Department
Attn: Robert Tanner, Environmental Coordinator
P.O. Box 843
Buellton, CA 93427

The following environmental document was submitted to CAL FIRE Headquarters, Environmental Protection for review under the California Environmental Quality Act (CEQA) or the National Environmental Policy Act (NEPA). The proposed project, located within your Unit/Program Area, may have an impact upon CAL FIRE's fire protection and/or natural resource protection and management responsibilities or require a CAL FIRE permit or approval. Your determination of the appropriate level of CAL FIRE involvement with this project is needed. Please review the attached document and address your comments, if any, **to the lead agency** prior to the due date. Your input at this time can be of great value in shaping the project. If your Department's Environmental Coordinator is not available, please pass on to another staff member in order to meet the mandated deadline.

Please submit comments directly to the lead agency before the mandated due date with a copy to the State Clearing House (P.O. Box 3044, Sacramento, CA 95812-3044).

Project name: Calle Real Photovoltaic Project
SCH #: 2011011087
Document Type: Notice of Preparation (NOP)
Potential Area(s) of Concern: Fire Protection?

MANDATED DUE DATE:3/1/2011

X No Comment – Explain briefly on the lines below:
No impact on Fire Protection, natural resources are being protected appropriately through plan.

Name and Title of Reviewer: Bob Tanner, Fire Captain

Phone (805) 686-5068 Email: robert.tanner@sbcfire.com

Note: Please complete this form and return it, with a copy of any comments, for CAL FIRE's records to Ken Nehoda or Allen Robertson, Environmental Protection, P.O. Box 944246, Sacramento, CA 94244-2460. If you have already reviewed and/or commented on this project, please send a copy to the address above.

Fire Department

"Serving the community since 1926"

HEADQUARTERS
4410 Cathedral Oaks Road
Santa Barbara, CA 93110-1042
(805) 681-5500 FAX: (805) 681-5563

Michael W. Dyer
Fire Chief
County Fire Warden

Christian J. Hahn
Deputy Fire Chief

February 8, 2011

To: Roy Hapeman
County of Santa Barbara
105 East Anapamu Street
Santa Barbara, CA 93101

Re: Calle Real Photovoltaic Project; SCH#2011011087

The Santa Barbara County Fire Department Vegetation Management Section has had the opportunity to review the draft initial study/mitigated negative declaration for the proposed Calle Real Photovoltaic Project and offers the following:

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Thank you for the opportunity to review your proposed project.

Respectfully,

Bob Tanner
Fire Captain
Vegetation Management
Santa Barbara County Fire Department
(805)686-5068

cc: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044
dd: Ken Nehoda, CAL Fire, PO Box 944246, Sacramento, CA 94244-2460

State of California
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE
P.O. BOX 3044
SACRAMENTO, CALIFORNIA 95812-3044