

**ATTACHMENT C**

**ENERGY AND CLIMATE ACTION PLAN  
FINAL EIR**

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**FINAL  
ENVIRONMENTAL IMPACT REPORT**

FOR THE

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**ENERGY AND CLIMATE  
ACTION PLAN**

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SCH# 20144021021

*PREPARED FOR:*

**COUNTY OF SANTA BARBARA**  
Long Range Planning Division  
123 East Anapamu Street  
Santa Barbara, CA 93101

*PREPARED BY:*



**MAY 2015**



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ENVIRONMENTAL IMPACT REPORT

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COUNTY OF SANTA BARBARA  
Long Range Planning Division  
123 East Anapamu Street  
Santa Barbara, CA 93101

*Prepared by:*

PMC  
3900 Kilroy Airport Way, Suite 120  
Long Beach, CA 90806

MAY 2015





# County of Santa Barbara Planning and Development

Glenn S. Russell, Ph.D., Director  
Dianne Black, Assistant Director

TO: Board of Supervisors

FROM: Lorianne DeFalco, Planner  
Long Range Planning Division

DATE: May 19, 2015

SUBJECT: **Revisions to the Energy and Climate Action Plan Final Environmental Impact Report:**

## INTRODUCTION

A Draft Environmental Impact Report (SCH# 20144021021) was prepared for the County of Santa Barbara Energy and Climate Action Plan (ECAP) to assess potential environmental impacts resulting from its implementation. The County provided public notice of the availability of the Draft EIR for public review and invited comment from the general public, agencies, organizations, and other interested parties. The public review and comment period was forty-five (45) days, commencing on May 11, 2014, and ending on June 24, 2014. Public comment on the Draft EIR was accepted in written form (via common carrier or in electronic mail form) and orally at a public hearing held during the review period on Wednesday, June 11, 2014, at County Planning Commission Hearing Room 17, 123 East Anapamu Street, Santa Barbara.

As prescribed by State CEQA Guidelines Sections 15088 and 15132, the County of Santa Barbara as the lead agency is required to evaluate significant environmental points raised by individuals, agencies, and organizations in comments on the Draft Environmental Impact Report (Draft EIR) and to prepare written responses to those comments. A Final Environmental Impact Report (Final EIR) was prepared to include Response to Comments together with the Draft EIR. The Responses to Comments contains individual responses to each written and verbal comment received during the public review period for the Draft EIR. In accordance with State CEQA Guidelines Section 15088(b), the written responses describe the disposition of significant environmental issues raised. The County of Santa Barbara and its consultants have provided a good faith effort to respond in detail to all significant environmental points raised by the comments.

There have been subsequent refinements to the ECAP as a result of public review and comments and Board of Supervisor direction. Section 10.0, Refined Project Analysis, of the Final EIR evaluates these refinements. CEQA Guidelines Section 15088.5 describes the circumstances under which a lead agency is required to recirculate an EIR when new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review, but before EIR certification. According to the Guidelines Section 15088.5(a), "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of meaningful opportunity to comment on new substantial adverse project impacts or feasible mitigation measures or alternatives which the project proponent declines to adopt. Section 15088.5(b) states, "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications to an adequate EIR."

The Final EIR, as herein refined by Section 10.0, Refined Project Analysis, may be used to fulfill the environmental review requirements of the ECAP. None of the changes, enacted at the direction of the Board of Supervisors, would result in any new significant environmental impacts nor would they result in a substantial increase in the severity (i.e., change in impact level classification) of any environmental impact originally analyzed in the EIR. Hence, pursuant to CEQA Guidelines Section 15088.5(b), the proposed revisions described in this document have not been recirculated.



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### ABBREVIATIONS

AB	Assembly Bill
APCD	Air Pollution Control District
APLIC	Avian Power Line Interaction Committee
BAU	Business as Usual
BFE	Base Flood Elevation
BMP	Best Management Practices
BOS	Board of Supervisors
CAAQS	California Ambient Air Quality Standards
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CAP	Clean Air Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAS	Climate Action Strategy
CCA	Community Choice Aggregation
CCC	California Coastal Commission
CCR	California Code of Regulations
CCRWQCB	Central Coast Regional Water Quality Control Board
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CH <sub>4</sub>	Methane
CLUP	Coastal Land Use Plan
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO <sub>2</sub>	Carbon Dioxide
CO <sub>2e</sub>	Carbon Dioxide Equivalent
CSI	California Solar Initiative
CTC	California Transportation Commission
CWA	Clean Water Act
CZO	Coastal Zoning Ordinance
dB	Decibel
dBA	A-weighted decibel

DOC	California Department of Conservation
Draft EIR	Draft Environmental Impact Report
DWR	California Department of Water Resources
ECAP	Energy and Climate Action Plan
EFCTC	European Fluorocarbons Technical Committee
EIR	Environmental Impact Report
EPA	US Environmental Protection Agency
ERM	Emission Reduction Measure
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FHWA	Federal Highway Administration
Final EIR	Final Environmental Impact Report
FMMP	Farmland Mapping and Monitoring Program
FPPA	Farmland Protection Policy Act
FTA	Federal Transit Administration
GHG	Greenhouse Gas
GWP	Global Warming Potential
HCP	Habitat Conservation Plan
HFC	Hydrofluorocarbon
LCFS	Low Carbon Fuel Standard
$L_{dn}$	Day-Night Average Noise Level
LESA	Land Evaluation and Site Assessment Model
LIM	Land Inventory and Monitoring
$L_{max}$	Maximum A-weighted Noise Level
LOS	Level of Service
LUDC	Santa Barbara County Land Use and Development Code
MBTA	Migratory Bird Treaty Act
MLUDC	Montecito Land Use and Development Code
MMRP	Mitigation Monitoring and Reporting Program
MMT	Million Metric Tons
MPO	Metropolitan Planning Organization
MTCO <sub>2e</sub>	Metric Tons of Carbon Dioxide Equivalents
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHTSA	National Highway Traffic Safety Administration
NOA	Notice of Availability
NOC	Notice of Completion
NOI	Notice of Intent
NOP	Notice of Preparation
NO <sub>2</sub>	Nitrogen Dioxide

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NO <sub>x</sub>	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
N <sub>2</sub> O	Nitrous Oxide
OHWM	Ordinary High Water Mark
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
O <sub>3</sub>	Ozone
PFC	Perfluorocarbon
PM	Particulate Matter [also PM <sub>10</sub> and PM <sub>2.5</sub> ]
ppm	Parts Per Million
ppv	Peak Particle Velocity
PV	Photovoltaic
ROG	Reactive Organic Gas
RPS	Renewables Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SBCAG	Santa Barbara County Association of Governments
SBCAPCD	Santa Barbara County Air Pollution Control District
SCS	Sustainable Communities Strategy
SF <sub>6</sub>	Sulfur Hexafluoride
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
SWMP	Stormwater Management Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TOD	Transit-Oriented Development
USACE	US Army Corps of Engineers
USDA	US Department of Agriculture
USFWS	US Fish and Wildlife Service
V/C	Volume-to-Capacity
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds

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# **EXECUTIVE SUMMARY**

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## **INTRODUCTION**

This section provides an overview of the proposed County of Santa Barbara Energy and Climate Action Plan (ECAP) project and the environmental analysis.

The County of Santa Barbara is the lead agency for the proposed project. In accordance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, the County prepared and distributed a Notice of Preparation (NOP) of an EIR on February 12, 2014 (SCH# 20144021021). This notice was circulated to the public, local, state, and federal agencies, and other interested parties to solicit comments on the proposed project. The NOP is presented in Appendix B of this Final Environmental Impact Report (Final EIR). The Final EIR will be used by the County of Santa Barbara in its consideration of the environmental impacts associated with the implementation of the proposed ECAP, which includes this environmental review, Comprehensive Plan Amendments, and greenhouse gas (GHG) reduction measures.

### **ES.1 PURPOSE AND SCOPE OF THE FINAL EIR**

This Final EIR provides an analysis of the potential environmental effects associated with the approval of the proposed project, pursuant to CEQA (California Public Resources Code Section 21000, et seq.) and the State CEQA Guidelines (14 California Code of Regulations, Section 15000, et seq.). The Final EIR analysis focuses on potential impacts that could result from implementation of the ECAP.

### **ES.2 PROJECT CHARACTERISTICS**

The proposed ECAP demonstrates the County's continued commitment to reducing GHG emissions. The ECAP is intended to streamline future environmental review of projects within the unincorporated county by following CEQA Guidelines.

The ECAP will act as an implementation tool to identify actions to reduce GHG emissions. The reduction measures described in the ECAP are consistent with the policy provisions contained in the Comprehensive Plan and have been developed in order to successfully achieve a GHG reduction target of 15 percent below the 2007 baseline emissions inventory by the year 2020. See Section 2.5 for a description of the proposed ECAP's GHG reduction measures.

### **ES.3 PROJECT OBJECTIVES**

The County's project objective is to outline a clear path to successfully implement measures that will achieve the County's GHG reduction targets, including the following specific objectives:

- Create a GHG emissions baseline from which to benchmark GHG emissions reductions.
- Reduce the County's GHGs by 15 percent from baseline emissions by 2020 to be consistent with the reduction target of AB 32.
- Increase the community's resilience to the effects of climate change.
- Provide a policy document with specific implementation measures to be considered as part of the planning process for future development projects.

- Provide a list of specific actions that will reduce GHG emissions, with the highest priority given to actions that provide the greatest reduction in GHG emissions and benefit the community at the least cost.
- Identify energy efficiency goals and targets.
- Create an energy efficiency strategy to meet the County's energy reduction goals.
- Implement programs to comply with the State of California's GHG reduction and long-term energy efficiency goals.
- Establish a qualified reduction plan from which future development within the unincorporated county can tier and thereby streamline the environmental analysis necessary under CEQA, as identified in CEQA Guidelines Section 15183.5(b).

### ES.4 PROJECT ALTERNATIVES SUMMARY

The CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to the project that could feasibly attain the basic objectives of the project and reduce the degree of environmental impact. Section 5.0, Alternatives, provides an analysis of alternatives as compared to the proposed project. Alternatives identified for the proposed project include the following:

- **Alternative 1 – No Project Alternative.** Under this alternative, the proposed ECAP and corresponding amendment to the Energy Element of the Comprehensive Plan would not be adopted. This alternative is consistent with CEQA Guidelines Section 15126.6(e)(3)(A).
- **Alternative 2 – 20% or More GHG Reduction Target Alternative (Includes Required Measures, Community Choice Aggregation, and Sustainable Communities Strategy).** Alternative 2 targets a 20 percent or more reduction in GHG emissions from the baseline year by 2020. This option includes all the GHG reduction measures and actions of the proposed ECAP and further strengthens the implementation actions related to the following measures: BE2 – Energy-Efficient Renovations, BE4 – Energy Scoring and Audits, WR1 – Waste Reduction, WR2 – Increased Recycling Opportunities, and WR3 – Construction and Demolition Waste Recycling.
- **Alternative 3 – Modification of Measures BE2 (Energy-Efficient Renovations) and BE4 (Energy Scoring and Audits) Alternative.** Alternative 3 consists of implementing the same ECAP as the proposed project, with revisions to the implementation actions of BE2 – Energy-Efficient Renovations and BE4 – Energy Scoring and Audits.

### ES.5 ISSUES TO BE RESOLVED AND AREAS OF CONTROVERSY

The following points were raised in letter responses to the project's NOP and/or during the project's scoping meeting and may be areas of controversy:

- In response to the NOP, commenters expressed concerns with specific GHG reduction measures proposed in the ECAP.
- In response to the NOP, the Native American Heritage Commission (NAHC) provided recommendations for consideration of Native American resources.

- In response to the NOP, the Santa Barbara County Air Pollution Control District (APCD) provided recommendations for consideration of air quality impacts.
- In response to the NOP, the City of Santa Barbara provided suggestions for the contents of the EIR, including suggestions for alternatives.
- In response to the NOP, the Community Environmental Council, Santa Barbara Bicycle Coalition, and the Coalition for Sustainable Transportation jointly requested clarifications regarding the ECAP and provided suggestions for the ECAP, including suggestions for GHG reduction measures.
- In response to the NOP, the California Department of Fish and Wildlife (CDFW) provided recommendations for consideration of impacts on biological resources.

## ES.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

**Table ES-1** displays a summary of project impacts and proposed mitigation measures that would avoid or minimize potential impacts. In the table, the level of significance is indicated both before and after the implementation of each mitigation measure. For detailed discussions of project impacts and mitigation measures, the reader is referred to the technical environmental analysis in Section 3.0 in this Final EIR.

**TABLE ES-1  
EXECUTIVE SUMMARY**

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
<b>3.1 Land Use</b>			
<b>Impact 3.1.1</b> Implementation of the proposed ECAP would not result in the division of an existing community, nor would it result in substantial land use compatibility issues.	Class III, less than significant	None required	Class III, less than significant
<b>Impact 3.1.2</b> Implementation of the proposed ECAP would not lead to inconsistency with other land use plans and ordinances, including the County’s land use plans and regulations that address physical effects to the environment.	Class III, less than significant	None required	Class III, less than significant
<b>3.2 Transportation and Circulation</b>			
<b>Impact 3.2.1</b> Implementation of the proposed ECAP could result in minor temporary traffic impacts during construction activities resulting from GHG reduction measures and actions. In the long-term, no substantial increase in trip generation would result from the ECAP that is anticipated to result in operational impacts.	Class III, less than significant	None required	Class III, less than significant
<b>Impact 3.2.2</b> The proposed ECAP could influence the roadway improvements of future development projects and would facilitate the implementation of improvements identified in the County’s Bicycle Master Plan. However, future roadway and bicycle improvements would be	Class III, less than significant	None required	Class III, less than significant

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
subject to the County's design standards.			
<b>3.3 Aesthetics and Visual Resources</b>			
<b>Impact 3.3.1</b> Implementation of the proposed ECAP could result in future physical improvements, such as the expansion of the bicycle network, residential unit and industrial facility energy efficiency upgrades, GHG reduction features in new development (e.g., transit and pedestrian amenities, on-site alternative energy improvements), and other indirect improvements. Such improvements would have a limited impact on the county's scenic resources, vistas, scenic highways, and high visual quality and character.	Class III, less than significant	None required	Class III, less than significant
<b>Impact 3.3.2</b> The proposed ECAP includes measures that support the installation of small-scale and utility-scale renewable energy systems. While the proposed ECAP does not propose or facilitate the construction of any specific renewable energy systems, inasmuch as the ECAP would support future solar photovoltaic or wind turbine energy production, the project has the potential to result in glare.	Class III, less than significant	None required	Class III, less than significant
<b>3.4 Agricultural Resources</b>			
<b>Impact 3.4.1</b> Inasmuch as the proposed GHG reduction measures would encourage future physical improvement projects, such as	Class III, less than significant	None required	Class III, less than significant

**ES EXECUTIVE SUMMARY**

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
<p>renewable energy facilities, the proposed ECAP could indirectly result in impacts on agricultural land. While the potential location of future energy generating facilities on agricultural land would result in the conversion of agricultural land and possibly the conversion of lands with Williamson Act contracts, the ECAP is not proposing to entitle or approve any specific energy generating facility projects.</p>			
<b>3.5 Biological Resources</b>			
<p><b>Impact 3.5.1</b> Inasmuch as the proposed GHG reduction measures would encourage physical improvement projects, such as renewable energy facilities, the proposed ECAP could indirectly result in impact on sensitive and special-status species and their associated habitat and migratory corridors.</p>	Class III, less than significant	None required	Class III, less than significant
<p><b>Impact 3.5.2</b> Implementation of the proposed ECAP measures could result in substantial impacts on wetland and riparian habitat in some areas of the county.</p>	Class III, less than significant	None required	Class III, less than significant
<b>3.6 Noise</b>			
<p><b>Impact 3.6.1</b> Construction activity associated with the future implementation of ECAP measures would create temporary noise level increases in discrete locations throughout the county.</p>	Class III, less than significant	None required	Class III, less than significant

Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
<b>Impact 3.6.2</b> Construction activity associated with the future implementation of ECAP measures would create groundborne vibration in discrete locations throughout the county.	Class III, less than significant	None required	Class III, less than significant
<b>Impact 3.6.3</b> Implementation of ECAP measures would not substantially increase noise levels throughout the county due to the adherence to County regulations.	Class III, less than significant	None required	Class III, less than significant
<b>3.7 Air Quality</b>			
<b>Impact 3.7.1</b> Implementation of the proposed ECAP could have a negative effect on air quality as a result of construction-generated air pollutants.	Class III, less than significant	None required	Class III, less than significant
<b>Impact 3.7.2</b> Subsequent activities associated with implementation of the proposed ECAP would not result in projects that would include sources of toxic air contaminants which could affect surrounding land uses.	Class III, less than significant	None required	Class III, less than significant
<b>Impact 3.7.3</b> Subsequent activities associated with implementation of the proposed ECAP would not include sources that could create objectionable odors affecting a substantial number of people or expose new residents to existing sources of odor.	Class III, less than significant	None required	Class III, less than significant
<b>3.8 Greenhouse Gas Emissions</b>			
<b>Impact 3.8.1</b> The proposed ECAP would not conflict with the goals of AB 32 or the AB 32 Scoping Plan.	Class III, less than significant	None required	Class III, less than significant

**ES EXECUTIVE SUMMARY**

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Impact	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
<p><b>Impact 3.8.2</b> The effects of climate change could result in the exposure of unincorporated Santa Barbara County to associated environmental effects. While the exact extent of the environmental effects of climate change on unincorporated Santa Barbara County is not known at this time, state provisions, in addition to existing County Comprehensive Plan policy provisions, address these effects. Thus the proposed project would not result in a new significant impact relating to the effect of climate change on unincorporated Santa Barbara County.</p>	<p>Class III, less than significant</p>	<p>None required</p>	<p>Class III, less than significant</p>



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# **1.0 INTRODUCTION**

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This Environmental Impact Report (EIR) has been prepared for the proposed County of Santa Barbara Energy and Climate Action Plan (ECAP; proposed project) by the County of Santa Barbara, which is the lead agency for the project. The information below provides a brief description of the guiding regulations and documents that relate to this EIR. The proposed project involves adopting the ECAP and amending the Energy Element of the Santa Barbara County Comprehensive Plan (Comprehensive Plan) by adding text to include a policy and research action requiring implementation of the ECAP with provisions for monitoring and updating at least every five years.

### 1.1 DOCUMENT AND PURPOSE

The California Environmental Quality Act (CEQA) requires a public agency to prepare an EIR for any activity that involves the exercise of their discretionary powers when that activity may have a significant physical effect on the environment. The purpose of an EIR is not to recommend approval or denial of a project, but to provide decision-makers, public agencies, and the general public with an objective and informational document that fully discloses the potential environmental effects of a proposed project. The EIR process is specifically designed to objectively evaluate and disclose potentially significant direct, indirect, and cumulative impacts of a proposed project; to identify alternatives that reduce or eliminate a project's significant effects; and to identify feasible measures that mitigate significant effects of a project.

The purpose of this EIR is to satisfy CEQA requirements by analyzing the environmental effects from the adoption and implementation of the proposed Energy and Climate Action Plan. This EIR evaluates the effects of the proposed project on the physical environment, assessing whether the proposed project would result in any significant environmental impacts. This EIR serves as a program EIR under CEQA Guidelines Section 15168. As a program EIR, this document provides a more general analysis of those elements that are proposed as part of the ECAP, as described in the Project Description. As a program EIR, this document focuses on the overall effects of implementing the proposed project.

### 1.2 KNOWN TRUSTEE, RESPONSIBLE, AND INTERESTED AGENCIES

For the purpose of CEQA, the term "trustee agency" means a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California. In CEQA, the term "responsible agency" includes all public agencies other than the lead agency (in this case, the County of Santa Barbara) that may have approval authority in some regard associated with the proposed project. Interested agencies may have a general interest in the proposal with respect to issues germane to their organization. The following agencies have been identified as potential responsible, trustee, or interested agencies with direct or indirect interest in the project:

- California Department of Conservation
- California Department of Fish and Wildlife, Region 5
- California Department of Toxic Substances Control
- California Department of Transportation, District 5
- California Emergency Management Agency
- Native American Heritage Commission

## 1.0 INTRODUCTION

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- Regional Water Quality Control Board (Region 3)
- State Water Resources Control Board
- US Army Corps of Engineers
- US Fish and Wildlife Service
- Santa Barbara County Air Pollution Control District

The project may require approvals, permits, or entitlements from these or other public agencies for which this EIR may be used.

### 1.3 PUBLIC REVIEW OF THE NOTICE OF PREPARATION

The Notice of Preparation (NOP) was submitted to the State Clearinghouse for public review on Wednesday, February 12, 2014. At the close of the public review period (March 14, 2014), eight comment letters had been received by the County of Santa Barbara, the lead agency for the proposed project. The County conducted a scoping session on Monday, March 3, 2014, at 6:00 p.m. at 123 East Anapamu Street, Planning Commission Hearing Room 17, Santa Barbara, CA 93101.

The NOP and corresponding response letters are provided in **Appendix B** of this EIR.

The following points were raised in letter responses to the project's NOP and/or during the project's scoping meeting and may be areas of controversy:

- In response to the NOP, commenters expressed concerns with specific greenhouse gas (GHG) reduction measures proposed in the ECAP.
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- In response to the NOP, the California Department of Fish and Wildlife (CDFW) provided recommendations for consideration of impacts on biological resources.

### 1.4 ORGANIZATION AND SCOPE OF EIR

This EIR was prepared in conformance with the CEQA Guidelines (Sections 15120 through 15132) and includes the following chapters:

- **Executive Summary** describes the purpose of the EIR and includes a summary of project characteristics, a summary of project alternatives, and a summary of impacts and mitigation measures.
- **Chapter 1.0: Introduction** describes the purpose of the EIR and provides an overview of the environmental review process.
- **Chapter 2.0: Project Description** describes the project location, existing conditions, project objectives and characteristics, and intended uses of the EIR, including necessary permits and approvals.
- **Chapter 3.0: Environmental Setting and Analysis** evaluates the potential adverse environmental impacts associated with the proposed project. The analysis provides an overview of the environmental setting for each issue area being evaluated, a discussion of significance thresholds used to determine the level of potential impacts, an assessment of the potential short- and long-term impacts of the proposed project, and a description of the mitigation measures that would reduce or eliminate those impacts, where appropriate and feasible.
- **Chapter 4.0: Cumulative Impact Summary** addresses cumulative impacts.  
**Chapter 5.0: Alternatives** evaluates project alternatives (EIR Alternative No. 1 – No Project Alternative, EIR Alternative No. 2 – 20% or More GHG Reduction Target Alternative, and Alternative 3 – Modification of Measures BE 2 (Energy-Efficient Renovations) and BE 4 (Energy Scoring and Audits) Alternative).
- **Chapter 6.0: Other CEQA Analysis** describes those impacts that are considered significant and unavoidable. The chapter also identifies any significant irreversible environmental changes that could result from the project and includes a discussion of growth-inducing impacts associated with the proposed project.
- **Chapter 7.0: References** lists the documents consulted in the preparation of this document.
- **Chapter 8.0: Report Preparers** lists those persons involved with the preparation of the EIR and those agencies and persons consulted in the preparation of the document.
- **Chapter 9.0: Responses to Comments** provides responses to the comments received on the Draft EIR.

## 1.5 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR will involve the following general procedural steps:

### NOTICE OF PREPARATION

In accordance with Section 15082 of the CEQA Guidelines, the County prepared a Notice of Preparation (NOP) of an EIR for the project on February 12, 2014. The County was identified as the lead agency for the proposed project. The notice was circulated to the public, local, regional, state, and federal agencies, and other interested parties to solicit comments on the proposed project. One public scoping meeting was held on March 3, 2014, to receive additional comments. Comments received in response to the NOP were considered during preparation of

## 1.0 INTRODUCTION

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the Draft EIR and Final EIR. The NOP and comments received from interested parties and agencies are presented in **Appendix B**.

### DRAFT EIR

The Draft EIR contained a description of the project, description of the environmental setting, identification of project impacts, and feasible mitigation measures for impacts found to be significant, as well as an analysis of project alternatives. On completion of the Draft EIR, the County filed the Notice of Availability/Completion (NOA/NOC) with the Governor's Office of Planning and Research to begin the public review period (Public Resources Code Section 21161).

### PUBLIC NOTICE/PUBLIC REVIEW

Concurrent with the Notice of Availability/Notice of Completion (NOA/NOC), the County provided public notice of the availability of the Draft EIR for public review and invited comment from the general public, agencies, organizations, and other interested parties. The public review and comment period was forty-five (45) days, commencing on May 11, 2014, and ending on June 24, 2014. Public comment on the Draft EIR was accepted in written form (via common carrier or in electronic mail form) and orally at a public hearing held during the review period on Wednesday, June 11, 2014, at County Planning Commission Hearing Room 17, 123 East Anapamu Street, Santa Barbara. Notice of the time and location of the public meeting was published prior to the meeting/hearing in accordance with applicable law. All comments or questions regarding the Draft EIR were directed to be addressed to:

Heather Allen, Associate Planner  
**County of Santa Barbara**  
Long Range Planning Division  
123 East Anapamu Street  
Santa Barbara, CA 93101

Electronic communications were directed to be e-mailed to Ms. Allen at hallen@co.santa-barbara.ca.us.

### RESPONSE TO COMMENTS/FINAL EIR

Following the public review period, a Final EIR (Final EIR) was prepared. The Final EIR responds to all comments received during the public review period that raise significant environmental concerns and contains revisions to the Draft EIR, as necessary. The Draft EIR, as revised and combined with responses to comments, constitutes the Final EIR.

### CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The County of Santa Barbara Board of Supervisors reviews and considers the Final EIR. If the County finds that the Final EIR is "adequate and complete," the County may certify the EIR. Upon review and consideration of the Final EIR, the County may take action to approve, revise, or reject the proposed project. Any decision to approve the project would be accompanied by written findings in accordance with CEQA Guidelines Section 15091 and Section 15093. A Mitigation Monitoring and Reporting Program (MMRP) is required to be adopted for projects that involve mitigation measures which have been incorporated into or imposed on the project to reduce or avoid significant effects on the environment. However, based on the analysis in this EIR, no mitigation measures are necessary and thus an MMRP is not required for the proposed project.

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## **2.0 PROJECT DESCRIPTION**

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This section provides a description of the County of Santa Barbara Energy and Climate Action Plan (ECAP; proposed project). The purpose of the project description is to describe the project in a way that is meaningful to the public, reviewing agencies, and decision-makers. As described in Section 15124 of the California Environmental Quality Act (CEQA) Guidelines, a complete project description must contain the following information but is not required to supply extensive detail beyond that needed for evaluation and review of the potential environmental impacts: (1) the location and boundaries of the project on a regional and detail map; (2) a statement of objectives sought by the proposed project; (3) a general description of the project's technical, economic, and environmental characteristics; and (4) a statement briefly describing the intended uses of the environmental impact report (EIR).

### 2.1 PROJECT LOCATION

The project location includes the unincorporated portions of Santa Barbara County, California, where the County retains land use permit authority (see **Figure 2-1**). Thus, the ECAP does not cover the portions of the unincorporated county that are within state and federal lands and waters. These portions of the unincorporated county include the Los Padres National Forest, Vandenberg Air Force Base, the University of California, Santa Barbara, the Chumash Reservation, and the offshore oil and gas production facilities in the Santa Barbara Channel.

Santa Barbara County is located in the central coastal area of California and is bounded by San Luis Obispo County to the north, Ventura County to the east, Kern County to the northeast, and the Pacific Ocean to the south and the west. The geographic center of the county is about 300 miles south of San Francisco and 80 miles north of Los Angeles.

Santa Barbara County is known for its natural scenic resources. The coastal terraces between ocean and mountains, the scenic inland valleys with large expanses of cultivated farmlands and gently rolling hillsides, and the rugged Los Padres National Forest are all key elements that define the county's resources. The county is largely rural in character, with distinct compact urban communities separated by public open space and private grazing lands. The foothill elevations typically reach about 800 feet above sea level. The mountain ranges crest between 4 and 5 miles inland (north and east) from the coast and reach elevations between 3,200 and 3,800 feet above sea level.

Santa Barbara County contains five main geographical subregions: the South Coast Area, Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley. Descriptions of each of these subregions follow.

#### SOUTH COAST AREA

The South Coast Area subregion is the largest designated urbanized area in the county, covering approximately 130 square miles, and includes the cities of Santa Barbara, Goleta, and Carpinteria. This coastal area is characterized by numerous canyons between the foothills of the Santa Ynez Mountains and the Pacific Ocean. The unincorporated communities of the South Coast Area include Summerland, Montecito, and Isla Vista.

#### SANTA MARIA VALLEY

This subregion includes the Santa Maria Valley urbanized area. This urban area is the largest retail trade center in the North County. The valley is situated in the northwest corner of the county and is bounded by the Santa Maria River to the north, the Casmalia Hills to the west, the San Rafael

## **2.0 PROJECT DESCRIPTION**

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Mountains to the east, and the Solomon Hills to the south. The unincorporated communities of Orcutt and Los Alamos are located in this area, as are the cities of Santa Maria and Guadalupe.

### **LOMPOC VALLEY**

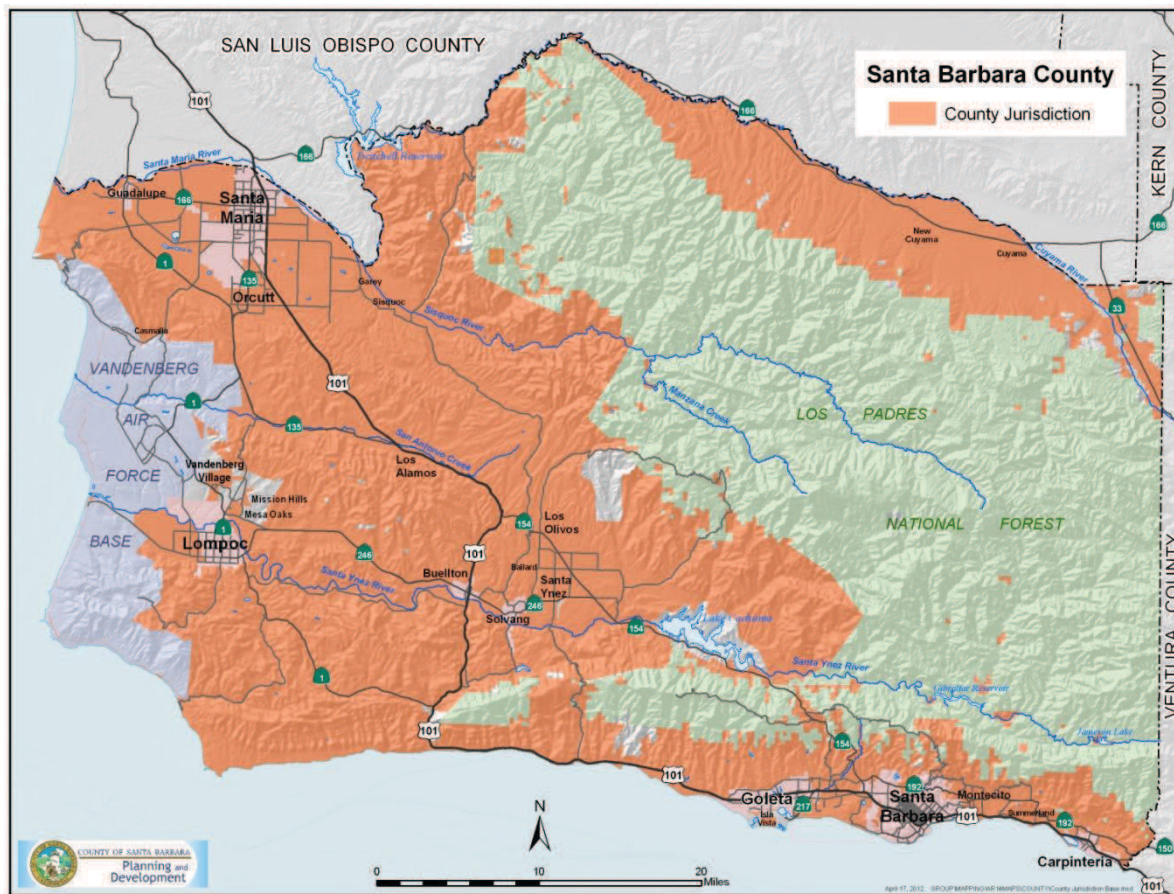
The Lompoc Valley is located in the mid-western portion of the county, adjacent to Vandenberg Air Force Base, and is separated from the rest of the county by the Purisima, Santa Rita, Santa Rosa, and White hills. The Santa Ynez River also traverses the Lompoc Valley in a westerly direction and eventually drains into the Pacific Ocean. This area includes the city of Lompoc and the unincorporated communities of Vandenberg Village and Mission Hills.

### **SANTA YNEZ VALLEY**

The Santa Ynez Valley is located in the central portion of the county, adjacent to the Cachuma Lake Recreation Area. This valley is located at the base of several converging mountain ranges, including the San Rafael and Santa Ynez mountains, and the Purisima and Santa Rita hills. The Santa Ynez River is located to the south of this valley. This area includes the cities of Solvang and Buellton and the unincorporated communities of Los Olivos, Ballard, and Santa Ynez.

### **CUYAMA VALLEY**

The Cuyama Valley is isolated in the far northeastern portion of the county and is a large agricultural area bounded by the Caliente Mountain Range to the north and the Sierra Madre Mountains to the south. The San Andreas Fault is located to the east of the Cuyama Valley and travels in a northwest direction. The valley is bisected by the Cuyama River and includes the communities of Cuyama and New Cuyama.



Source: County of Santa Barbara, Planning and Development

Figure 2.0-1  
County of Santa Barbara Jurisdiction

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## **2.2 PROJECT BACKGROUND**

In March 2009, the Board of Supervisors directed County staff “to take immediate, cost effective, and coordinated steps to reduce the County’s collective greenhouse gas (GHG) emissions” (BOS Resolution 09-059). In response to this direction, the County’s Climate Action Strategy (CAS) was developed, which includes a two-phase strategy to reduce GHG emissions comprising (1) the Climate Action Study, including a countywide GHG inventory, forecast, and evaluation of potential emission reduction measures (ERMs), and (2) a Climate Action Plan (CAP), which, if adopted, would seek to reduce the County’s GHG emissions through implementation of selected ERMs with the goal of achieving a GHG reduction target to be selected by the Board.

The County Long Range Planning Division prepared the Santa Barbara Climate Action Study in 2011. The purpose of preparing this study was to:

- 1) Demonstrate the County’s commitment to the Climate Change Guiding Principles, as adopted by the Board of Supervisors, by identifying possible existing and future GHG reduction measures and programs.
- 2) Set the framework for the County to comply with the goals and requirements of Assembly Bill 32 and Senate Bill 97, based on an inventory of the County’s current and projected GHG emissions (the countywide GHG inventory and forecast are described below).
- 3) Identify the next steps toward meeting the State’s GHG emissions reductions target.

Once the Climate Action Study was drafted, the second phase of the County’s CAS, preparation of an Energy and Climate Action Plan, was instigated. To develop the Energy and Climate Action Plan, known as the ECAP, County staff engaged the public through community education about climate action planning and related implications for land use policy in Santa Barbara County. Public outreach included a community visioning workshop, participation in the Santa Barbara Earth Day Festival, four facilitated stakeholder meetings, and an online survey. The overall strategy was designed to ensure that balanced, transparent, and effective communication occurred through an inclusive community-wide outreach and engagement campaign.

## **2.3 PROJECT OVERVIEW**

In 2010, the County prepared a 2007 inventory of community-wide GHG emissions for the unincorporated areas of Santa Barbara County. Changes to the regulatory structure since the creation of this initial inventory, including an update to the CEQA Guidelines, prompted the County to re-inventory emissions from community-wide sources. Emissions from unincorporated county sources totaled 1,192,970 metric tons of carbon dioxide equivalents (MTCO<sub>2e</sub>) in the baseline year 2007. As shown in **Table 2-1** and **Figure 2-2**, the transportation sector is the largest contributor at 43 percent, producing approximately 521,160 MTCO<sub>2e</sub>.

## 2.0 PROJECT DESCRIPTION

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**TABLE 2-1**  
**2007 UNINCORPORATED SANTA BARBARA COUNTY EMISSIONS**  
**(WITHOUT STATIONARY SOURCES)<sup>1</sup>**

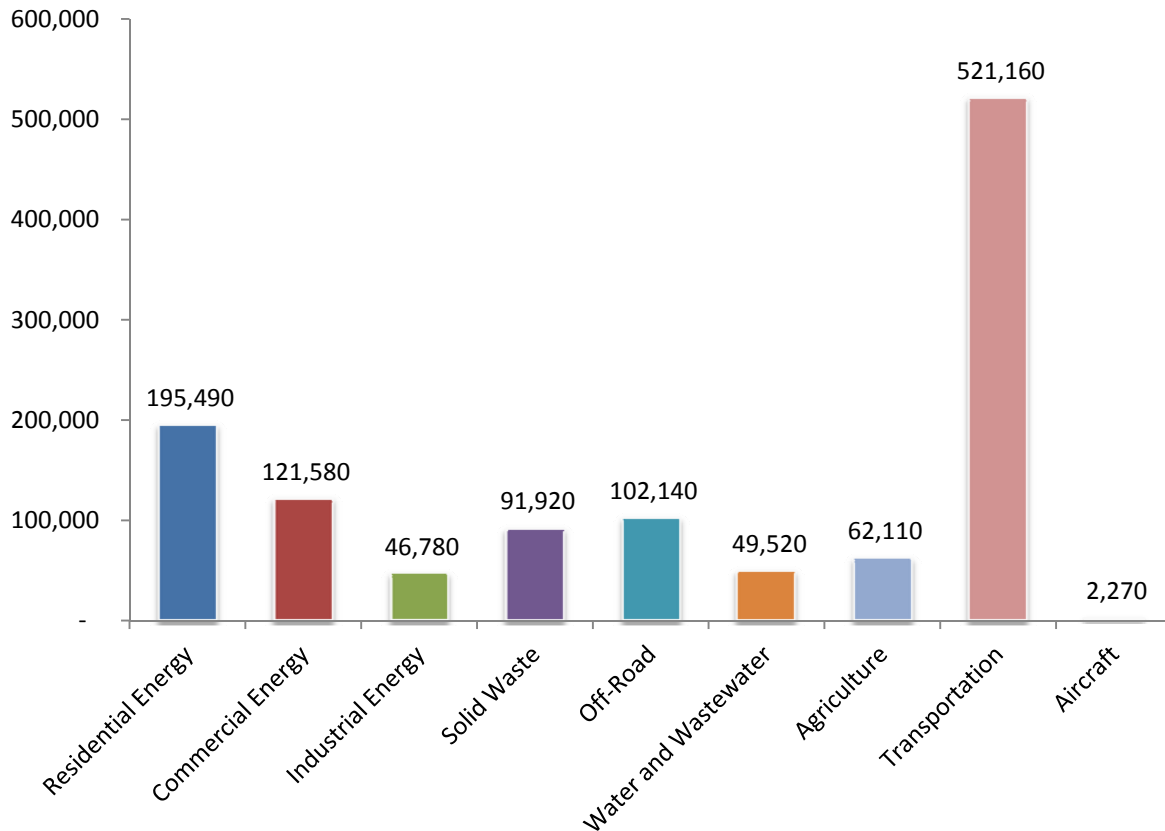
Sector	GHG Emissions (MTCO <sub>2</sub> e)
Residential Energy	195,490
Commercial Energy	121,580
Industrial Energy	46,780
Solid Waste	91,920
Off-Road	102,140
Water and Wastewater	49,520
Agriculture	62,110
Transportation	521,160
Aircraft	2,270
<b>Total</b>	<b>1,192,970</b>

Source: Santa Barbara 2014

<sup>1</sup> The ECAP 2007 Baseline Inventory excludes stationary source emissions since emission reductions from this type of source are unique and will require special attention and collaboration with the Santa Barbara County Air Pollution Control District.

Emissions from residential energy use (195,490 MTCO<sub>2</sub>e) were the next largest contributor, accounting for 16 percent of total emissions. Commercial energy use (121,580 MTCO<sub>2</sub>e), off-road equipment (102,140 MTCO<sub>2</sub>e), solid waste disposal (91,920 MTCO<sub>2</sub>e), agriculture, industrial energy, water and wastewater, and aircraft operations account for the remainder of unincorporated county emissions in 2007.

**FIGURE 2-2**  
**2007 UNINCORPORATED SANTA BARBARA COUNTY EMISSIONS**  
**(WITHOUT STATIONARY SOURCES)**



The ECAP identifies ways the County of Santa Barbara can reduce GHG emissions and implement energy-saving measures in support of a thriving and sustainable community. This will also assist the County with reducing GHG emissions consistent with Assembly Bill (AB) 32. The County GHG reduction target is an annual emission amount of 15 percent below the 2007 baseline emissions inventory by the year 2020.

## 2.4 PROJECT OBJECTIVES

The County's project objective is to outline a clear path to successfully implementing measures that will achieve the County's GHG reduction targets, including the following specific objectives:

- Create a GHG emissions baseline from which to benchmark GHG emissions reductions.
- Reduce the county's GHG emissions by 15 percent from baseline emissions by 2020 to be consistent with the reduction target of AB 32.
- Increase the community's resilience to the effects of climate change.

## 2.0 PROJECT DESCRIPTION

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- Provide a policy document with specific implementation measures to be considered as part of the planning process for future development projects.
- Provide a list of specific actions that will reduce GHG emissions, with the highest priority given to actions that provide the greatest reduction in GHG emissions and benefit the community at the least cost.
- Identify energy efficiency goals and targets.
- Create an energy efficiency strategy to meet the County's energy reduction goals.
- Implement programs to comply with the State of California's GHG reduction and long-term energy efficiency goals.
- Establish a qualified reduction plan from which future development within the unincorporated county can tier and thereby streamline the environmental analysis necessary under CEQA, as identified in CEQA Guidelines Section 15183.5(b).

## 2.5 PROJECT CHARACTERISTICS

The project consists of the adoption of the ECAP and proposed amendments to the Santa Barbara County Comprehensive Plan. Project components are briefly described below.

### ENERGY AND CLIMATE ACTION PLAN

The proposed ECAP (see **Appendix A**) includes a baseline GHG emissions inventory, a forecast of emissions to 2020 and 2035, a GHG reduction target of 15 percent below baseline emissions by 2020, a set of emissions reduction measures to meet the target, and a methodology for tracking and reporting emissions in the future. These emissions reduction measures, combined with the measures identified in the County's Energy Action Plan for municipal facilities, would collectively provide a decrease in both GHG emissions and energy use in the county. Overall, the proposed ECAP seeks to achieve an overall emissions reduction of 15 percent, while also allowing for CEQA tiering of future development and promoting Community Choice Aggregation.<sup>1</sup>

ECAP implementation will assist the State in meeting its GHG reduction goals consistent with AB 32 and energy reduction goals consistent with California's Energy Efficiency Strategic Plan. The ECAP was designed under the premise that the County and the community it represents are uniquely capable of addressing emissions associated with sources under the County's jurisdiction.

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<sup>1</sup> Community Choice Aggregation (CCA) allows communities to offer procurement service to electric customers within their boundaries, which can include developing and owning electric generating resources, such as a county-owned utility-scale solar plant. The environmental benefit from the CCA is driven by the CCA having the ability to procure energy from a portfolio of sources of its choosing, allowing it to increase the amount of renewables beyond what the investor-owned utility offers. Customers within a CCA boundary may "opt out" and continue to receive electricity from the investor-owned utility. Other benefits of a CCA include (1) the ability to locally control electric rates, (2) the ability to know exactly where/how electricity is created (increase use of renewable energy), and (3) the ability for communities to develop electric generation projects that increase local employment.



Per the CEQA Guidelines, local governments may use adopted plans consistent with the CEQA Guidelines to assess the cumulative impacts of projects on climate change, if the adopted plan includes a certified EIR (State CEQA Guidelines Section 15124[b]). The ECAP is intended to streamline future environmental review of projects in the unincorporated county by following the CEQA Guidelines. The ECAP is available for review at 123 East Anapamu Street, Santa Barbara, CA 93101. A draft of the ECAP is also available at the end of **Appendix A** of this Final EIR.

The ECAP will act as an implementation tool to identify measures to reduce GHG emissions. The reduction measures described in the ECAP are consistent with the policy provisions contained in the Comprehensive Plan.

A number of regulatory documents intended to address the environmental effects of climate change through reductions in GHG emissions guided the creation of the ECAP. The ECAP was prepared to be consistent with all of the GHG regulatory provisions, which include the following:

- Executive Order S-3-05 (2005)
- Assembly Bill 32, the California Climate Solutions Act of 2006
- Assembly Bill 1493, automobile CO<sub>2</sub> reduction requirements (adopted 2002)
- Senate Bill 97, modification to the Public Resources Code (2007)
- Senate Bill 375, California's regional transportation and land use planning efforts (2008)
- Senate Bill 1368, emissions performance standards (2008)
- CEQA Guidelines Amendments concerning GHG emissions (2010)

The framework of the ECAP consists of (1) an inventory of GHG emissions that identifies and quantifies existing emissions and projected future emissions; (2) reduction targets to reduce GHG emissions incrementally by 2020 and 2035; and (3) the measures that have been devised to reduce existing emissions to meet the federal, state, and regional GHG emissions reduction targets. The County's ECAP and its reduction targets are consistent with AB 32 and the California Air Resources Board (CARB) recommendations to ensure that California emissions are reduced.

For the purpose of defining "existing" emissions levels, the County chose the emissions in the year 2007 as a benchmark for existing emissions conditions.

The ECAP identifies a State-recommended reduction target of 15 percent below 2007 emissions levels by 2020, consistent with AB 32. This target meets the GHG reduction recommendations identified under the AB 32 Scoping Plan. A reduction of 15 percent below 2007 emissions levels by 2020 would represent a total annual reduction of GHG emissions of approximately 351,210 MTCO<sub>2e</sub>.

### **GHG Emissions Inventory**

As previously discussed, as part of the preparation of the ECAP, the County prepared a GHG inventory that identified the existing, or "baseline," emissions that occur under existing (2007) conditions. Under baseline conditions, the unincorporated county generates approximately 1,192,970 MTCO<sub>2e</sub> per year.

## 2.0 PROJECT DESCRIPTION

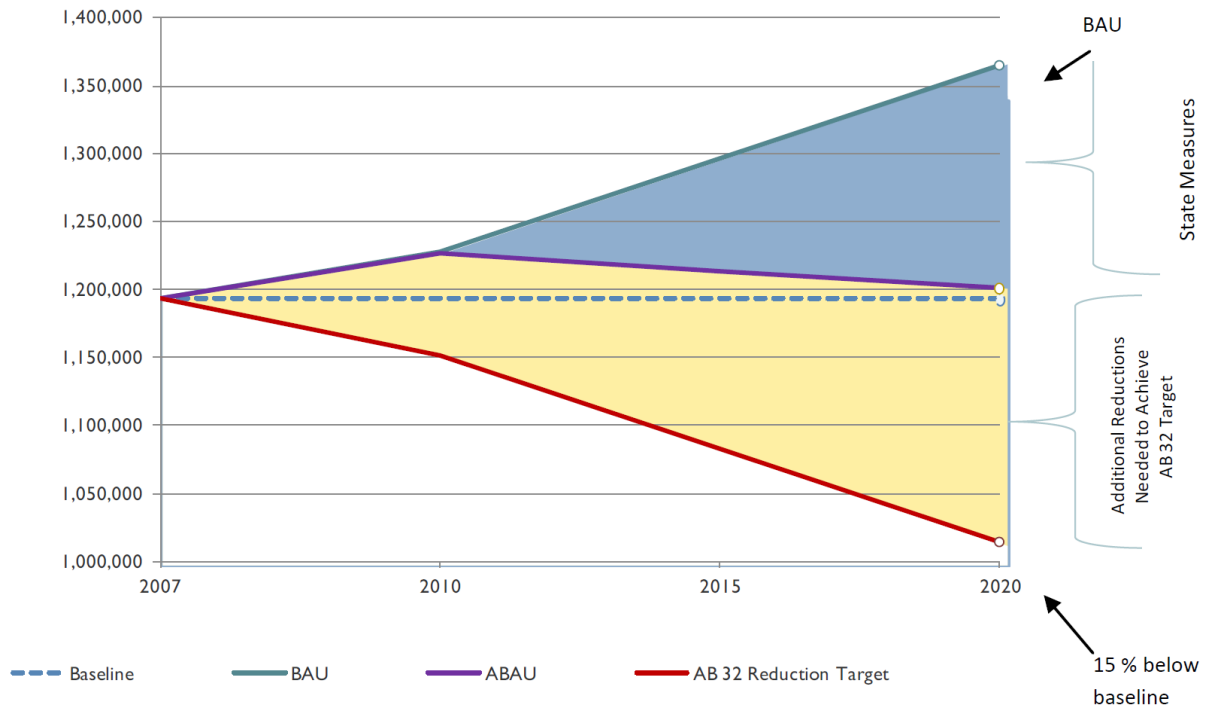
Without implementation of the proposed ECAP, the unincorporated county's predicted emissions would increase by approximately 1 percent, or 7,950 MTCO<sub>2</sub>e, above 2007 baseline emissions by 2020 through reduction efforts mandated by the State. **Table 2-2** summarizes the predicted future emissions without implementation of the proposed ECAP. **Figure 2-3** illustrates the predicted future emissions without implementation of the proposed ECAP and also demonstrates the gap that will need to be closed in order to achieve the GHG reduction target of 15 percent below baseline emissions by 2020.

**TABLE 2-2**  
**SUMMARY OF GHG FORECAST ADJUSTED FOR STATE ACTIONS**

<b>Emissions Inventory</b>	
2007 Baseline Emissions Inventory	1,192,970
2020 Unmitigated Emissions Inventory	1,365,170
<b>Reductions from California State-Led Reduction Efforts</b>	
California Code of Regulations, Title 24	-2,290
AB 1493 (Pavley) Vehicle Standards	-97,550
California Solar Initiative (CSI)	-260
California's Renewables Portfolio Standard (RPS)	-23,850
Low Carbon Fuel Standard (LCFS)	-40,300
<i>Subtotal of State Reduction Efforts</i>	<i>-164,250</i>
Net Emissions	<b>1,200,920</b>
Percent Change from 2007	<b>+ 1.00%</b>

Source: Santa Barbara 2014

**FIGURE 2-3**  
**UNINCORPORATED SANTA BARBARA COUNTY GHG FORECAST AND REDUCTION TARGETS (MTCO<sub>2</sub>e)**



**Anticipated ECAP Emissions Reductions**

The measures proposed in the ECAP comprise a diverse combination of voluntary, phased, and mandatory measures. Phased measures are those that would initially be implemented on a voluntary basis until 2016. At that time, if the participation rate of the measure is below a designated threshold, the measure would be phased into containing mandatory requirements. The reduction measures aim to reduce GHG emissions from each source to avoid reliance on any one strategy or sector to achieve the target. In total, GHG reduction measures in the ECAP would reduce GHG emissions in the unincorporated county by approximately 186,960 MTCO<sub>2</sub>e in 2020. In addition, there is the potential for an additional reduction of 56,610 MTCO<sub>2</sub>e if Community Choice Aggregation (CCA) is successful. **Table 2-3** summarizes the GHG reductions that would be achieved by goal in 2020. (In total, State-recommended programs and GHG reduction measures in the ECAP would reduce GHG emissions in the unincorporated county by approximately 351,210 MTCO<sub>2</sub>e in 2020, plus an additional 56,610 MTCO<sub>2</sub>e if CCA is successful.)

## 2.0 PROJECT DESCRIPTION

**TABLE 2-3  
GHG REDUCTION SUMMARY BY SECTOR**

Emissions Inventory	
2007 Baseline Emissions Inventory	1,192,970
2020 Unmitigated Emissions Inventory	1,365,170
Reductions from ECAP Reduction Efforts by Sector	
Community Choice Aggregation*	-56,610
Sustainable Communities Strategy	-32,410
Land Use Design	-2,480
Transportation	-24,770
Built Environment	-51,950
Renewable Energy	-13,360
Industrial Energy Efficiency	-8,840
Waste Reduction	-47,120
Agriculture	-5,570
Water Efficiency	-460
<b>Total</b>	<b>-186,960</b>

Source: Santa Barbara 2014

\* Community Choice Aggregation is not included in the total reductions since the feasibility of implementing such a program in Santa Barbara County is not yet known.

### Summary of GHG Reduction Measures by Sector

The County received written and verbal comments during the public review period for the Draft EIR. In response to comments received, particularly community concerns related to potentially burdensome requirements contained in the Draft ECAP for homeowners and sellers, County staff has refined several of the GHG emissions reduction measures identified in the Draft EIR. The project incorporating the refinements is referred to hereafter as the Refined Project. A description of the Refined Project and refined GHG reduction measures are shown in **Chapter 10, Table 10-6**.

The following is a summary description of the various emissions reduction measures included in the Draft ECAP. For more detailed discussion of these measures, please refer to Attachment 1 located in **Appendix A** of this Final EIR.

#### Community Choice Aggregation

Community Choice Aggregation (CCA) allows communities to offer procurement service to electric customers within their boundaries. This can include developing and owning electric generating resources, such as a county-owned utility-scale solar plant, but is not required. The environmental benefit from the CCA is driven by the CCA having the ability to procure energy from a portfolio of sources of its choosing, allowing it to increase the amount of renewables beyond what the investor-owned utility offers. Customers within a CCA boundary may “opt out” and continue to receive electricity from the investor-owned utility. Other benefits of a CCA include:

- Ability to locally control electric rates.

- Ability to know exactly where/how electricity is created (increase use of renewable energy).
- Ability for communities to develop electric generation projects that increase local employment.

The first step for Santa Barbara County to implement such a program would be to complete a feasibility study. The CCA could be developed as a new program in the county or could also partner with an existing CCA. Other communities in California have developed or are pursuing CCAs, including Marin County, Sonoma County, Kings County, and the City and County of San Francisco.

**Measure CCA:** Increase the amount of renewable energy used to a minimum of 50% by 2020 through community choice aggregation program or other renewable energy procurement programs.

### Sustainable Communities Strategy

By fully implementing the Sustainable Communities Strategy (SCS) in the unincorporated county, the County can take credit for reductions achieved through SCS implementation in the ECAP. Such a commitment would involve upzonings of some properties in the County. Upzonings of individual parcels would require separate Board approval.

**Measure SCS:** Support the Santa Barbara County Association of Governments' (SBCAG's) implementation of the 2040 Regional Transportation Plan and Sustainable Communities Strategy to reduce per capita GHG emissions from transportation.

### Land Use Design

*Goal: Maximize the efficient use of local land resources through the implementation of policies and programs that promote mixed-use and infill development and reduce dependency on automobiles.*

The distribution of land uses throughout the county influences transportation choices for county residents, employees, and visitors. Where housing, business centers, shopping centers, medical offices, and schools are placed has an impact on transportation choices. Designing communities with well thought out land use patterns can dramatically decrease the amount of vehicle miles traveled and therefore have a direct effect on GHG emissions. The Land Use Design measures presented in the ECAP are designed to affect where jobs and housing are located.

**Measure LUD1:** Promote infill development.

**Measure LUD2:** Coordinate office, commercial, industrial, and high-density residential developments with mass transit service and existing or proposed bikeways.

**Measure LUD3:** Work to increase workforce and affordable housing in Santa Barbara County.

### Transportation

*Goal: Decrease the use of combustion engine vehicles.*

## 2.0 PROJECT DESCRIPTION

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Transportation is the largest contributor of GHG emissions in the county. Transportation emissions can be reduced through three basic approaches: (1) producing more fuel-efficient vehicles; (2) requiring stricter fuel standards, and (3) decreasing the number of vehicle miles traveled. The State is working on programs, measures, and standards that accomplish the first two approaches. The ECAP presents transportation-related measures that seek to accomplish the third approach. The measures are meant to complement the Land Use Design section through the development of a multimodal transportation system that is convenient and user friendly.

**Measure T1:** Create new, additional, or improve existing, car-sharing and ride-sharing programs.

**Measure T2:** Work cooperatively with major local employers to offer incentives and services which decrease single occupancy automobile commuting.

**Measure T3:** Increase the use of alternative-fuel vehicles, and plan for the development of alternative fuel infrastructure.

**Measure T4:** Enhance alternative transportation.

**Measure T5:** Complete an integrated bikeway system, linking residences with commercial centers, work locations, schools, parks, and mass transit facilities to be a high priority for promoting the use of the bicycle as a primary mode of transportation.

**Measure T6:** Improve pedestrian convenience, comfort, and safety.

**Measure T7:** Reduce vehicle idling through enforcement and education targeted toward commercial vehicle operators, school parents, and government employees.

**Measure T8:** Implement traffic signal synchronization technologies or traffic calming measures to reduce idling emissions.

**Measure T9:** Develop commuter rail connections between employment centers.

### Built Environment

*Goal: Foster development and renovations whose location, design, construction, and systems increase energy efficiency.*

Energy consumption, both gas and electric, by businesses and homes represents a significant source of GHG emissions in the county. Residents use natural gas to heat water and power natural gas appliances. Commercial enterprises also use natural gas for water heating. Electricity powers appliances that have become essential for daily life—from residential appliances to local infrastructure such as streetlights. Promoting and achieving more efficient use of energy offers one of the most readily achievable and cost-effective means of GHG reduction. Implementation of energy conservation measures will not only reduce GHG emissions but will also reduce household and business costs associated with energy consumption.

Built Environment ECAP measures target efficiencies in electricity and natural gas use in homes and nonresidential uses to reduce GHG emissions. In Santa Barbara County, which is a low growth area, the majority of future GHG emissions will come from existing buildings. For this reason, it is critical that energy conservation measures focus on improving the efficiency of

existing buildings and ensuring that new construction projects utilize electricity and natural gas as efficiently as possible.

**Measure BE1:** Increase public energy conservation and awareness. Provide information and education to the general public, businesses, and organizations on the importance of energy conservation and available programs, products, and incentives regarding energy efficiency and alternatives. Promote existing low-income energy conservation and weatherization programs, and coordinate with local utility providers and nonprofit corporations to develop additional energy efficiency programs.

**Measure BE2:** Incentivize homeowners and commercial and industrial building owners to improve the energy efficiency of existing buildings upon renovation or alteration. Support and provide resources for tax credits, grants, loans, and other incentives to assist the public, businesses, and local agencies with the purchase of energy-efficient equipment.

**Measure BE3:** Increase participation in the Santa Barbara County Green Business Program.

**Measure BE4:** Improve the energy efficiency of buildings at the time of sale for all residential buildings, and disclose energy use history when nonresidential buildings are being leased or sold.

**Measure BE5:** Maintain and expand the native tree population to enhance the cooling benefits.

**Measure BE6:** Support the local utility providers' implementation of smart grid technology in new and existing residential and nonresidential properties.

**Measure BE7:** Increase the use of electric or alternative-fuel lawn and garden equipment through the development of an exchange or rebate program.

**Measure BE8:** Establish mechanisms and incentives to encourage builders, architects, developers, consultants, and property owners to implement energy efficiency and green building practices in new and existing developments to exceed the California Green and Building Code (Title 24) standards. Consider adoption and implementation of a green building program, with a voluntary component, for all new and existing development with a voluntary reach code.

**Measure BE9:** Assist architects, builders, and others in using state-of-the-art energy technology, design, and spatial orientation for more efficient buildings. Increase the use of passive solar design and daylighting in existing and new structures.

**Measure BE10:** Implement best management practices (BMPs) for construction equipment operation. Examples of BMPs include reduced equipment idling, use of alternative fuels or electrification of equipment, or proper maintenance and labeling of equipment.

## 2.0 PROJECT DESCRIPTION

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**Measure BE11:** Maintain and strengthen the existing training of Planning and Development, Building & Safety Division personnel to remain proficient and consistent in reviewing plans for compliance with the energy code.

### Renewable Energy

*Goal: Promote the use of alternative energy for economic and environmental benefits, and facilitate opportunities for businesses that develop or market alternative energy technologies.*

While energy efficiency in the built environment is the first step to reducing energy consumption and GHG emissions, energy consumption cannot be eliminated. Emissions can be further reduced by generating the energy needed through renewable energy sources. Natural gas can be offset with renewable sources, and electricity can be generated by renewable sources of energy that are cost-effective and help contribute to local energy independence. Through this goal and associated measures, the County can reduce GHG emissions from traditional electricity production and natural gas by promoting the production of renewable energy.

**Measure RE1:** Increase the use of alternative energy technology in appropriate new and existing development.

**Measure RE2:** Encourage the replacement of existing water heaters with solar water heaters.

**Measure RE3:** Adopt a policy or program that offers incentives (such as streamlined permitting, permit waivers, or fee waivers) to encourage a switch in electricity generation from fossil fuels to renewable sources through small-scale renewable electricity generation.

**Measure RE4:** Promote the use of clean alternative energy production by encouraging development of utility-scale renewable electrical generation facilities.

### Industrial Energy Efficiency

*Goal: Improve the efficiency of industrial sector energy uses and processes.*

Similar to the measures in the Built Environment section, industrial energy efficiency–related ECAP measures attempt to reduce emissions from the use of natural gas and electricity specific to the industrial sector. Industrial enterprises use natural gas and electricity for water heating, on-site fuel combustion that supports industrial and manufacturing processes, and to operate appliances and equipment. The energy used at industrial facilities is unique when compared to the residential and commercial sectors.

**Measure IEE1:** Support legislation for tax credits, grants, loans, and other incentives to assist the public, businesses, and local agencies with the purchase of energy-efficient equipment.

**Measure IEE2:** Increase industrial energy users to participation in energy management programs such as the EnergyStar Benchmarking Program to ensure the efficient use of energy resources and proper operation of equipment and facilities.



**Measure IEE3:** Implement energy efficiency upgrades at industrial facilities through streamlining permit review, providing rebates for audits, and highlighting best practices among similar energy users.

**Measure IEE4:** Increase the use of energy efficiency or EnergyStar rated equipment at new or renovated industrial facilities.

### Waste Reduction

*Goal: Exceed the State's required diversion rate of 75 percent by 2020.*

Both the consumption and disposal of resources require energy and emit GHG emissions. As waste is sent to the landfill, it decomposes and emits methane gas. Improved waste management at the local jurisdiction level and individual level are both necessary parts of a successful reduction strategy. The increased conservation of resources through reusing and recycling materials result in less demand for raw materials and fewer GHG emissions generated from future production and transportation of new materials. Additionally, the impact of transporting waste from homes and businesses by waste fleet vehicles can be reduced through increased diversion and cleaner vehicle fleets. This goal seeks to decrease the amount of waste that is being deposited in landfills and to develop energy from the waste which does get landfilled.

**Measure WR1:** Continue to support the programs associated with efficient waste collection and recycling, public school education, and composting.

**Measure WR2:** Seek additional opportunities for county residents to recycle cardboard, glass, paper, and plastic products.

**Measure WR3:** Increase the recycling and reuse of construction waste to reduce energy consumption associated with extracting and manufacturing virgin materials.

**Measure WR4:** Reduce or minimize GHG emissions from waste materials deposited into landfills.

**Measure WR5:** Reduce GHG emissions from waste collection vehicles through the use of alternative fuels for waste collection vehicles.

### Agriculture

*Goal: Facilitate the increased efficiency of agriculture operations.*

Agriculture is another GHG emissions source to be considered and quantified at the local, state, and federal levels. The County recognizes that agriculture is one of its most important resources and critical economic drivers in the county. Integrating agriculture into the County's inventory and GHG reduction strategies allows the County and local agriculturalists to retain a higher degree of local control over how this sector is managed. The inventory of local GHG emissions from agricultural sources follows the best available protocol with the recognition that methodologies and assumptions will change and improve over time. The existing GHG inventory is a valuable foundation, setting the stage for engagement and an ongoing dialogue about the best methods to identify, measure, and reduce local GHG emissions.

**Measure AG1:** Increase local food production and distribution.

## 2.0 PROJECT DESCRIPTION

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- Measure AG2:** Promote the use of science-based agricultural conservation practices, such as those established by various Good Agricultural Practice programs, and seek to expand those programs to include soil, fertilizer, water, crop rotation, and fuel management practices.
- Measure AG3:** Work with the APCD to increase the use of alternatively fueled equipment in agricultural operations through education, incentives, or revisions to existing regulations.
- Measure AG4:** Increase agriculture-related energy conservation through appropriate and practical efficient energy, water, and resource management practices.
- Measure AG5:** Continue to support the programs of the Soil Conservation Service, Resource Conservation Districts, UC Cooperative Extension/Farm Advisor, utility companies, and others that address efficient irrigation because of their associated energy benefits.
- Measure AG6:** Facilitate the increased use of agriculture and open space easements through zoning, dedication of public funds, and mitigation fees to protect carbon-sequestering environments and to support local-resource-based industries.

### Water Efficiency

*Goal: Increase the efficiency of water use to reduce energy consumption associated with various phases of using resources (pumping, distribution, treatment, heating, etc.).*

The use of water requires energy to pump, treat, distribute, collect, and discharge water as it is used by the community. Conservation of water is an important strategy for both reducing energy-related water use and preparing for times of water shortages. Implementing water conservation in existing and new development through water-efficient features and native, drought-tolerant landscaping will ensure that communities will help ensure a consistent water supply.

- Measure WE1:** Encourage water purveyors and water customers to continue their efforts to install more efficient options to decrease energy use associated with reduced pumping, distribution, heating, and treating of water and wastewater.
- Measure WE2:** Maximize end-user water efficiency by encouraging the implementation of prescriptive or performance measures included in the California Green Building Code in all new and existing development.
- Measure WE3:** Increase the use of (per Government Code Section 65590, Article 10.8) native, drought-tolerant landscaping and smart irrigation technologies in new and renovated developments and at public parks and facilities.

### COMPREHENSIVE PLAN AMENDMENT

The Comprehensive Plan Amendment provides policy updates to the existing County Comprehensive Plan Energy Element to include a policy and research action requiring implementation of the ECAP, with provisions for monitoring and updating at least every five

years. Together, these amendments identify a path to integrate ECAP objectives into the County's long-term planning framework. The proposed policy and research action is as follows:

**Policy 8.3: ECAP Implementation:** The County shall implement the Energy and Climate Action Plan (ECAP) to reduce greenhouse gas (GHG) emissions from community-wide sources by a minimum of 15% from the 2007 baseline emissions by 2020.

**Research 8.3.1:** Established in the ECAP, the County shall monitor progress towards achieving GHG reductions every five years. Monitoring of the County's ECAP shall include an update to the GHG emissions from community-wide sources. If it is determined that the ECAP is not achieving specified levels of GHG emission reductions, the ECAP will be updated as needed.

## **2.6 REGULATORY REQUIREMENTS, PERMITS, AND APPROVALS**

Concurrent with the adoption of the ECAP and the recommended amendments to the Comprehensive Plan, the County will amend its Comprehensive Plan to reflect the County's intent to reduce GHG emissions that are reasonably attributable to the County's discretionary land use decisions. Adoption of the recommended amendments to the Comprehensive Plan and the ECAP does not require action by any other agencies.

## **2.7 APPLICATION OF THE ENERGY AND CLIMATE ACTION PLAN TO FUTURE CEQA REVIEWS AND SPECIFIC PROJECTS**

One of the objectives of the proposed project is to adopt an ECAP that satisfies the requirements of Section 15183.5 of the CEQA Guidelines, which sets forth standards for using a GHG reduction plan to address the GHG emissions of specific projects. Under this guideline, compliance with the ECAP can be used in appropriate situations to determine the significance of a project's effects relating to GHG emissions, thus providing streamlined CEQA analysis of future projects that are consistent with the approved ECAP.

CEQA Guidelines Section 15183.5(b) reads as follows:

*(b) Plans for the Reduction of Greenhouse Gas Emissions. Public agencies may choose to analyze and mitigate significant greenhouse gas emissions in a plan for the reduction of greenhouse gas emissions or similar document. A plan to reduce greenhouse gas emissions may be used in a cumulative impacts analysis as set forth below. Pursuant to sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances.*

*(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:*

*(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;*

*(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;*

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- (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;*
  - (D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;*
  - (E) Establish a mechanism to monitor the plan's progress towards achieving the level and to require amendment if the plan is not achieving specified levels;*
  - (F) Be adopted in a public process following environmental review.*
- (2) Use the Later Activities. A plan for the reduction of greenhouse gas emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later projects. An environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. If there is substantial evidence that the effects of a particular project may be cumulatively considerable, notwithstanding the project's compliance with the specified requirements in the plan for the reduction of greenhouse gas emissions, an EIR must be prepared for the project.*

The provisions of the ECAP comply with these requirements by providing a quantified inventory of GHG emissions and by identifying a level based on substantial evidence below which activities subject to the ECAP will not make a cumulatively considerable contribution to GHG impacts. That level is based on the State's AB 32 goals. The ECAP and associated documents also identify and analyze the emissions associated with specific actions, and set forth performance standards to achieve the specified emissions goals. The analysis in the ECAP demonstrates that this level will be achieved by these measures. Finally, the ECAP, including monitoring, will be adopted in a public process following environmental review.

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## **3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS**

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### 3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

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The following is the environmental analysis for the proposed County of Santa Barbara Energy and Climate Action Plan (ECAP; proposed project). As noted in Sections 1.0 and 2.0, the focus of the Final Environmental Impact Report (Final EIR) is on the changes associated with the proposed greenhouse gas (GHG) reduction measures and whether those changes will result in significant environmental effects. As discussed below, the impact analysis in this Final EIR considers the indirect effects of implementation of ECAP measures.

#### 3.1 ANALYSIS APPROACH USED TO EVALUATE IMPACTS OF THE PROPOSED PROJECT

As discussed in Section 2.0, Project Description, the County of Santa Barbara (County) is proposing to adopt an ECAP and amend its Comprehensive Plan (Comprehensive Plan) to add corresponding text to include a policy and research action requiring implementation of the ECAP, with provisions for monitoring and updating at least every five years. The objective of the project is to develop measures that will reduce GHG emissions from unincorporated areas in the county in compliance with state goals and mandates (e.g., Assembly Bill 32, Executive Order S-3-05, CEQA Guidelines). To these ends, proposed measures address issues that affect GHG emissions, including water and energy consumption, transportation and land use patterns, agriculture, and waste. Measures included in the ECAP establish voluntary, phased, and mandatory emissions reduction programs for county agencies, residents, and businesses, and include a monitoring and tracking program.

The ECAP is not a land use plan and does not alter any land use designations in the County's Comprehensive Plan. The ECAP also does not include entitlements or approvals for the construction of any structures or facilities. Thus, the ECAP does not provide for development of areas not previously considered for development by the County and would not directly result in physical environmental effects due to the construction and operation of facilities. However, in implementing the proposed measures, the ECAP encourages actions that could lead to the construction of facilities which could result in physical environmental effects. This Final EIR focuses on the overall effects of the proposed ECAP within the county; it does not examine the effects of the potential site-specific projects that may occur in the future under the ECAP. The nature of the ECAP is such that many proposed measures are intended to be general, with details to be determined during implementation. Therefore, this Final EIR assumes that specific development projects or infrastructure improvement proposals submitted to the County will require an independent environmental assessment consistent with the requirements of CEQA.

In terms of the potential to generate environmental effects, the ECAP includes three types of measures. The first type involves avoided emissions, referring to emissions that are prevented from being released by changed behaviors. This category includes measures that would have positive effects with regard to reductions in resource and energy use without resulting in negative physical environmental effects. These include actions such as promoting energy conservation, recycling, and waste reduction, and performing outreach to reduce energy consumption. These measures require no additional infrastructure to be constructed and are generally accomplished by changes in behavior by individuals in the county. Also included in this category are measures aimed at encouraging the use of energy-efficient and resource-sensitive designs in new development. While these actions would be related to new development, which would likely result in physical environmental effects, the new development would occur with or without the ECAP. Therefore, application of ECAP measures would result in no additional physical environmental impacts in new development and would, in fact, reduce the projects' physical effects relative to development without ECAP measures.

The second category of GHG-reducing measures includes efforts to achieve greater efficiency that could result in minor construction on existing structures. The ECAP identifies strategies for

### 3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

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greater efficiencies when a behavior or activity cannot be avoided, but can be accomplished in a more efficient or less energy-dependent manner. These measures include incentives for energy efficiency upgrades in existing homes and businesses, such as weatherization, installation of smart grid technologies, and development of alternative energy technology in appropriate new and existing development. Regarding energy efficiency upgrades in existing homes and businesses, property owners would complete improvements on existing structures. In some instances, retrofits would be for fixtures, such as water heaters, that are at or near the end of their useful life and would be recycled or discarded in the landfill even without incentives for replacement with high-performing, energy-efficient alternatives. Other minor improvements, such as installation of alternative energy technology in appropriate new and existing development, would be encouraged primarily in areas that have already been developed. These types of improvements are not assumed to result in substantial ground disturbance or use of major construction equipment.

The third type of measure encourages or provides incentives for development of improvements or facilities that are more intensive than minor retrofits described above. The analysis in this Final EIR focuses on these types of facilities because construction and/or operation of these stand-alone facilities have the potential to result in physical environmental impacts. For example, the proposed ECAP includes measures and actions to expand the bicycle network in accordance with the County's Bicycle Master Plan and to install video signal detection for cyclists on minor connector roadways. The ECAP could also indirectly result in construction of energy-generating facilities, such as wind turbines and photovoltaic/solar arrays, most of which would primarily be installed on rooftops of existing or new buildings.

This analysis evaluates the possible physical environmental effects of implementation of the ECAP. Certain GHG reduction measures included in the project have been developed by regional agencies, such as the GHG reduction goals contained in the Santa Barbara County 2040 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) developed by the Santa Barbara County Association of Governments (SBCAG) and the waste reduction and increased recycling goals of the County's Single-Use Plastic Bag Ban Ordinance. SBCAG (2013) previously considered the environmental evaluation of the RTP/SCS in the RTP/SCS EIR. The environmental evaluation of the County's Single-Use Plastic Bag Ban Ordinance was previously considered in the Single Use Plastic Bag Ban Ordinance EIR (Santa Barbara 2013).

The following sections in this chapter present a description of environmental setting conditions (including applicable regulatory setting), an evaluation of the direct and indirect environmental effects resulting from the implementation of the proposed project, and identification of existing regulations and programs that mitigate environmental effects. Where applicable, this Final EIR contains additional feasible mitigation measures and identifies whether significant environmental effects of the project would remain after application of regulations, programs, and feasible mitigation measures.

#### 3.1.1 CLASSIFICATION OF IMPACTS

The County of Santa Barbara categorizes impacts into the following classes:

- Class I Impacts. Significant unavoidable adverse impacts.
- Class II Impacts. Significant environmental impacts that can be feasibly mitigated or avoided.
- Class III Impacts. Adverse impacts found not to be significant.
- Class IV Impacts. Impacts beneficial to the environment.



### 3.1.2 EFFECTS FOUND TO BE NOT SIGNIFICANT

As discussed in Section 2.0, Project Description, the intent of the ECAP is to reduce GHG emissions from unincorporated areas in the county. The proposed ECAP was prepared with environmental factors in mind and is intended to be self-mitigating to the maximum extent possible. To achieve this, the ECAP includes reduction measures that are designed to reduce environmental impacts. Thus, the reduction measures in the ECAP not only reduce GHG emissions associated with existing and future uses in the county but would also provide mitigating effects in other issue areas, such as reductions in single-occupant vehicle use and associated air pollution emissions, a reduction in solid waste, water conservation, and a corresponding reduction in wastewater treatment. In addition, continued application of the County's zoning regulations (Montecito Land Use and Development Code, Land Use and Development Code and Article II Coastal Zoning Ordinance) on future development would further reduce the potential for environmental effects.

Based on the review of the proposed ECAP and consistent with the project's Notice of Preparation, the County of Santa Barbara determined that the proposed project would not cause or otherwise result in significant environmental effects in the resource areas discussed below.

#### **Forestland Resources**

Most of the forestlands in the county are in the Los Padres National Forest. This area is under federal ownership and is thus outside the County's jurisdiction. However, as identified in the Comprehensive Plan, forestlands exist throughout all areas of the county. Implementation of certain reduction measures in the ECAP, such as Measures LUD2, T5, and T6, which support the construction of new bike and pedestrian facilities, represent the reduction measures that could potentially encroach into the forestland areas under County jurisdiction. However, these ECAP measures would involve the placement of improvements in predominantly existing urban and developed areas of the county and not in forestland areas.

ECAP Measure RE4 promotes renewable energy generating facilities and supporting equipment such as transmission lines that could convert or cross forestlands. As shown on the CEC's (2008) California Wind Resource Potential Map, large portions of the county have potential for renewable wind energy generating facilities (see Figure 3.4-1), and much of these portions of the county are outside the Los Padres National Forest. The Santa Barbara County Environmental Thresholds and Guidelines Manual (2008) contains guidance for addressing forestland impacts from land use development. For instance, future projects implementing ECAP measures would be evaluated pursuant to CEQA and the Environmental Thresholds and Guidelines Manual on a case-by-case basis and be considered significant if they would lead to changes in habitat value and species composition. Projects determined to be potentially significant would then be required to implement mitigation provided in the guidelines manual. As stated in the manual, the criteria for determining changes in habitat value and species composition include consideration of whether the project would result in (1) habitat fragmentation, (2) removal of the understory, (3) alteration to drainage patterns, (4) disruption of the canopy, and/or (5) removal of a significant number of trees that would cause a break in the canopy or disruption in animal movement in and through the affected woodland. The Environmental Thresholds and Guidelines Manual also contains a mandatory protocol for the assessment of potential impacts to individual trees. Future projects implementing ECAP measures would be required to consider impacts and implement any needed mitigation consistent with the manual.

The County zoning ordinances addresses potential impacts to forestlands. For instance, Section 35-907 regulates the loss of oak trees in the county. Existing oak trees that are removed to accommodate development are required to be replaced according to recommendations of

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an oak tree management plan. The oak tree management plan is required to demonstrate how impacted oak forests would be protected from fragmentation as well as identify on-site replacement planting locations. The intent of County Development Code Chapter 35 Section 35-907 is to promote oak forests in the county through appropriate management techniques, conserve the native plant life heritage, and regulate oak tree removal activity.

Adherence to the County Environmental Thresholds and Guidelines Manual and zoning ordinances would address impacts to forestland associated with ECAP measures. As previously stated, the proposed ECAP is a policy-level document that does not include site-specific designs or proposals for development projects, nor does it grant any entitlements for development that would have the potential to adversely affect forestland resources. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Land Use Element and Coastal Land Use Plan. Thus, forestland impacts associated with the proposed project would not be significant, as the ECAP only promotes renewable energy generation and does not propose to entitle or approve any specific energy generating facility projects.

#### Cultural and Historic Resources

##### Archaeological Resources and Human Remains

Development of some of the proposed project's measures could result in damage, destruction, or removal of known and/or unrecorded archaeological or prehistoric resources, resulting in impacts. Many of the ECAP measures are not expected to generate significant impacts because they are minor improvements to existing structures and/or infrastructure or because they are limited to County programs. However, other ECAP measures would involve ground-disturbing activities that could potentially disturb or damage undiscovered archaeological resources and/or human remains. For instance, ECAP Measures LUD2, T5, and T6 would support the construction of new bike and pedestrian facilities.

Archaeological/prehistoric resources have been identified by previous investigations in the county (see pages 228 through 234 of the Comprehensive Plan Conservation Element), and it is anticipated that archaeological resources may be discovered in other areas in the county during construction of facilities envisioned under the ECAP. These activities have the potential to destroy and/or degrade known and unknown prehistoric archaeological resources, historical archaeological resources, or human remains. Health and Safety Code Section 7050.5 requires that whenever human remains are uncovered, excavation activities must be stopped and the county coroner be called in to assess the remains. If the county coroner determines that the remains are of Native American origin, the Native American Heritage Commission must be contacted within 24 hours. At that time, the lead agency must consult with the appropriate Native Americans, if any, as timely identified by the Native American Heritage Commission. In addition, the Comprehensive Plan requires the evaluation of potential archaeological resources and their settings on a case-by-case basis. A list of approved archaeologists in Santa Barbara County is available from the Planning and Development Department, County of Santa Barbara, from the Department of Anthropology, University of California, Santa Barbara, and from the Santa Barbara Museum of Natural History. In the case when a site is identified as possibly containing archaeological resources, an approved archaeologist is required to be obtained in order to systematically survey the site. Consequently, if any previously undiscovered resources are uncovered during construction activities, work would be suspended to prevent damage to the resources. Consequently, compliance with existing policies would ensure that **no significant impacts** on human remain or known or undiscovered archeological or prehistoric resources would occur.

### Historic Resources

The County's ECAP is a policy-level document that does not include any site-specific designs or proposals for development projects, nor does it grant any entitlements for development that would have the potential to adversely affect cultural resources. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Land Use Element. As a policy document, the ECAP would have no direct impact on cultural resources, but future implementation activities could potentially affect these resources.

ECAP Measures BE8 and RE1 would support, but not entitle or approve, installation of small-scale renewable energy systems, including solar photovoltaic, pre-wired renewable energy-ready homes, and wind energy, in the county. Similarly, Measure RE4 would promote, but not entitle or approve, utility-scale renewable energy generation. Additionally, ECAP Measures BE2, BE4, and RE2 would allow energy efficiency upgrades on existing development, which could include historic resources. Construction of these facilities would have the potential to impact historic resources. However, the County's historic preservation program's primary purpose is to protect and enhance historic sites. As required under Chapter 18A of the County Code of Ordinances, the Historic Landmarks Advisory Commission designates landmarks of historic or architectural significance and imposes restrictions on the owners of these landmarks in order to ensure their preservation. The committee may limit the use of a county landmark to protect it. Because the environment of an historic site often is as important as the site itself, the committee may regulate land uses in the vicinity of a county landmark and prohibit construction, destruction, or alteration of adjacent buildings or structures as may be necessary to ensure the landmark's preservation and enhancement.

In addition, all future development projects that would implement ECAP measures would be subject to applicable County regulations and requirements, and could be subject to further CEQA analysis of project-specific impacts. CEQA states that "[a] project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (Public Resources Code [PRC] Section 21084.1; 14 California Code of Regulations Section 15064.5). A "significant historical resource" (including both a prehistoric and historic resource) is one that is found to be eligible for listing in the California Register of Historical Resources. Additionally, historical resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance can also be listed in the California Register, if the criteria for listing under the ordinance have been determined by the Office of Historic Preservation to be consistent with California Register criteria adopted by the commission (pursuant to PRC Section 5024.1[e]).

Continued implementation of the Santa Barbara County Code of Ordinances and CEQA would ensure that **no significant impacts** to historic resources would occur.

### **Geology and Soils**

#### Seismic Hazard

The ECAP does not directly involve the construction of structures. Any structures that could be constructed consistent with the ECAP would be subject to existing California Building Code standards, which include seismic standards that would ensure buildings are adequately designed and constructed based on site-specific conditions. Furthermore, the County Comprehensive Plan Seismic Safety and Safety Element recommends that an adequate site-specific investigation be performed where the possibility of soil or geologic problems exists.

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Therefore, implementation of the proposed ECAP would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving earthquake, ground shaking, or seismic-related ground failure. **No impact** in these issue areas is expected.

#### Soil Erosion

ECAP measures that would involve ground-disturbing activities could result in activities which would result in the loss of topsoil. For instance, ECAP Measures LUD2, T5, and T6 would support the construction of new bike and pedestrian facilities. However, Chapter 14 of the County Code requires the implementation of relevant best management practices (BMPs) during all new grading, excavations, fills, nonagricultural land disturbance, erosion and sediment control measures, drainage devices, cuts, borrow pits, stockpiling, compaction of fill, and land reclamation projects. Additionally, the State Water Resources Control Board (SWRCB) permits all regulated construction activities under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity. Coverage under a General Construction Permit requires the preparation of a stormwater pollution prevention plan (SWPPP) and Notice of Intent (NOI) to request coverage under the General Permit. The NOI includes site-specific information and the certification of compliance with the terms of the General Construction Permit. The SWPPP includes pollution prevention measures (erosion and sediment control measures and measures to control non-stormwater discharges and hazardous spills), demonstration of compliance with all applicable local and regional erosion and sediment control standards, identification of responsible parties, a detailed construction timeline, and BMPs monitoring and maintenance schedule to determine quantities of pollutants leaving the site. SWPPP best management practices are recognized as effective methods to prevent or minimize the potential releases of pollutants into drainages, surface waters, or groundwater. Strict SWPPP compliance coupled with the use of appropriate BMPs would reduce potential erosion and water quality impacts during construction activities. Therefore, **no significant impact** in this issue area is expected.

#### Unstable or Expansive Soils

Implementation of the proposed ECAP would not locate people or structures on unstable geologic units or soil, or cause instability of geologic units or soils. Any structures that could be constructed consistent with the ECAP would be subject to existing California Building Code standards, which include standards for unstable soils that would ensure buildings are adequately designed and constructed based on site-specific conditions. In addition, Chapter 10 of the County Code mandates that where the general condition of the soil or underlying rock of a building site is such that it may present a potential for failure or a hazard to the public, a County building official may require additional information to ascertain the safety and stability of the site and may also require that the plans for a proposed building be approved by a licensed engineering geologist. Therefore, **no impact** in this issue area is expected.

#### Septic Tanks

Implementation of the proposed ECAP does not involve septic tanks or alternate wastewater disposal systems. Therefore, **no impact** in this issue area is expected.

### Hazards and Hazardous Materials

#### Transport, Use, or Disposal of Hazardous Materials

The majority of proposed ECAP measures would not involve the routine transport, use, or disposal of hazardous materials. However, Measure RE4 would promote, but not entitle or approve, utility-scale renewable energy generation; the associated facilities could potentially store some hazardous materials. Any land uses that store hazardous materials are subject to the Hazardous Material Business Plan program, which is regulated by the Santa Barbara County Fire Department as part of the Certified Unified Program. The program requires the preparation of a document that provides an inventory of hazardous materials on-site, emergency plans and procedures in the event of an accidental release, and training for employees on safety procedures for handling hazardous materials and what to do in the event of a release or threatened release. These plans are routine documents that are intended to disclose the presence of hazardous materials and provide information on actions to be taken if materials are inadvertently released. Therefore, while Measure RE4 could prompt a land use that stores some hazardous materials, the reporting requirements for hazardous materials, preparation of a hazardous material business plan, and compliance with all required regulations and laws would ensure that hazardous materials are stored and handled properly. As such, **no significant impact** in this issue area is expected.

#### Accident Conditions Involving the Release of Hazardous Materials into the Environment

Proposed ECAP measures may be implemented by future construction projects that would require use of construction materials, some of which could be hazardous, such as paints and solvents. However, the construction activities associated with new alternative transportation facility projects or residential and commercial retrofit and renovation projects recommended by the ECAP would not use these materials in large enough quantities to cause significant adverse effects.

ECAP Measures BE2, BE4, and RE2 would allow energy efficiency upgrades on existing structures, some of which could be a source of asbestos, lead paint, and other hazardous materials. Upgrade activities could result in exposure to hazardous materials by disturbing and thus releasing asbestos and/or lead during demolition and remodeling activities. However, demolition and remodeling activities would be subject to federal state and local regulations specifically aimed at preventing lead and asbestos hazards. For example, the US Environmental Protection Agency (EPA) requires contractors or firms performing renovation, repair, and painting projects that disturb lead-based paint in buildings built before 1978 to be certified and to follow specific work practices to prevent lead contamination (the EPA's Renovation, Repair, and Remodeling rule). The EPA has also developed asbestos demolition and renovation requirements in the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation (40 CFR, Part 61, Subpart M), which includes notification, inspection, and emission control requirements.

**No significant impact** in this issue area is expected.

#### Hazardous Materials, Substances, or Waste Within One-Quarter Mile of an Existing or Proposed School

Implementation of the measures of the proposed ECAP would not result in hazardous emissions. **No impact** in this issue area is expected.

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### Hazardous Material Sites

Though the unincorporated county areas contain sites that are listed in the California Department of Toxic Substances Control's EnviroStor database, future development projects will require compliance with Comprehensive Plan policies related to safety and hazardous materials that are designed to safeguard the public from potential adverse impacts associated with certain land uses, including those that are associated with hazardous materials. For example, Comprehensive Plan Seismic Safety and Safety Element Objective 3 both restricts land uses and activities that generate excessive amounts of hazardous materials or wastes and requires the review of proposed development in proximity to any existing or proposed hazardous waste facility to ensure that future development and land use decisions consider and incorporate site design, setbacks, and buffering techniques appropriate for the site and provide adequate safeguards of any potential adverse impacts to development from hazardous waste facilities. **No significant impact** in this issue area is expected.

### Hazard Within 2 Miles of an Airport

Airport-related hazards are generally associated with aircraft accidents, particularly during takeoffs and landings. Airport operation hazards include incompatible land uses, power transmission lines, wildlife hazards (e.g., bird strikes), and tall structures that penetrate the airport security zone. The ECAP is not a land use plan and does not alter any land use designations in the County's Comprehensive Plan. Any future development of structures instigated by the ECAP would be required to comply with applicable Federal Aviation Administration (FAA) regulations that affect development in the Accident Potential Zones. Implementation of the measures of the proposed ECAP would not result in an airport safety hazard for people residing or working in the county. **No impact** in this issue area is expected.

### Emergency Response Plan or Emergency Evacuation Plan

Implementation of the measures of the proposed ECAP would not impair or interfere with an adopted emergency response plan or emergency evacuation plan. **No impact** in this issue area is expected.

### Wildland Fire

Implementation of the measures of the proposed ECAP would not involve projects that would expose additional persons to risk from wildland fire. **No impact** in this issue area is expected.

## **Hydrology and Water Quality**

### Water Quality Standards

Implementation of the measures of the proposed ECAP would not violate water quality standards or waste discharge requirements. As noted above, using the appropriate BMPs would reduce potential water quality impacts during construction activities. The County's Stormwater Management Plan (SWMP) is composed of six elements that are expected to reduce pollutants discharged into receiving water bodies when implemented together. These elements include (1) Public Education and Outreach; (2) Public Participation/Involvement; (3) Illicit Discharge Detection and Elimination; (4) Construction Site Runoff; (5) Post-Construction Runoff Control; and (6) Pollution Prevention/Good Housekeeping. The County has developed BMPs for both construction and post-construction runoff control that are applicable to new development projects. Additional BMPs may be applied to new development in order to meet the Regional

### 3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

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Water Quality Control Board's requirements for compliance with standards to reduce pollutant loadings from stormwater to the "maximum extent practicable" (MEP standards) on any case-by-case project. Furthermore, as previously stated Chapter 14 of the County Code requires the implementation of relevant BMPs during all new grading, excavations, fills, nonagricultural land disturbance, erosion and sediment control measures, drainage devices, cuts, borrow pits, stockpiling, compaction of fill, and land reclamation projects. Therefore, **no significant impact** in this issue area is expected.

#### Groundwater Supplies

Implementation of the measures of the proposed ECAP would not reduce groundwater supplies or reduce groundwater recharge. In fact, ECAP measures encourage water conservation, which would result in positive effects on groundwater. **No adverse impact** in this issue area is expected.

#### Drainage

Implementation of the measures of the proposed ECAP would not alter existing drainage patterns or result in substantial erosion, siltation, or flooding. Any subsequent projects would be verified by a County building official prior to approval (see County Code of Ordinances Section 14.29, Drainage, Erosion, and Sediment Control), which would ensure that project-related drainage facilities would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. In addition, as previously stated, future construction activities would be required to implement BMPs, which are recognized as effective methods to prevent or minimize the potential releases of pollutants into drainages, surface waters, or groundwater (EPA 2012). **No significant impact** in this issue area is expected.

#### Runoff

Implementation of the measures of the proposed ECAP would not substantially contribute to polluted runoff or runoff water that would exceed the capacity of stormwater drainage systems or degrade water quality. Any subsequent projects would be verified by a County building official prior to approval (see County Code of Ordinances Section 14.29, Drainage, Erosion, and Sediment Control), which would ensure that project-related drainage facilities would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. Therefore, **no significant impact** in this issue area is expected.

#### Flooding

Implementation of the measures of the proposed ECAP would not place housing or structures within a 100-year flood hazard area that would impede or redirect flows or expose people or structures to hazards involving flooding. Chapter 15A of the County Code of Ordinances prohibits encroachment into the floodway unless it is shown by a registered civil engineer that the encroachment will not result in a rise in the Base Flood Elevation (BFE) and would not expose property to flood hazards. If the development would encroach, the project must mitigate for that encroachment and demonstrate no rise in the BFE and no loss of conveyance. County Code of Ordinances Chapter 15A requires that new construction have a lowest finished floor at least 2 feet above the BFE, unless lowered by the Floodplain Administrator (but not below the BFE). Therefore, **no significant impact** in this issue area is expected.

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### Mineral Resources

#### Availability of a Known Mineral Resource

Implementation of the measures of the proposed ECAP would not affect known mineral resources, as the ECAP is consistent with the land uses envisioned in the Comprehensive Plan and the County Land Use and Development Code, the Montecito Land Use and Development Code, and the Article II Coastal Zoning Ordinance (collectively known as the County zoning ordinances) and would not remove programs that currently protect mineral resources. **No impact** would result.

#### Loss of Availability of a Locally Important Mineral Resource Recovery Site

Implementation of the measures of the proposed ECAP would not affect a locally important mineral resource recovery site. **No impact** would result.

### Population and Housing

#### Induce Substantial Population Growth

As previously stated, certain GHG reduction measures included in the project have been developed by regional agencies, such as the GHG reduction goals contained in the County 2040 RTP/SCS developed by SBCAG. As part of this long-range comprehensive planning effort, SBCAG prepared a Regional Growth Forecast in order to provide a consistent county economic and population growth forecast to the year 2040. SBCAG growth forecasts are projections used to plan for public infrastructure, housing, and employment throughout the region. The 2040 projections indicate that population in the SBCAG region is expected to grow by 96,165, an increase of approximately 23 percent, between 2010 and 2040. Employment in the region is expected to grow by 60,200 jobs, an increase of approximately 30 percent. The ECAP would not directly or indirectly result in increases in population and does not accommodate growth beyond that anticipated. While the policy provisions of the ECAP envision land use scenarios that would facilitate the development of infill and transit-oriented development (TOD) projects in existing urbanized areas, and thus could potentially redistribute growth patterns. Future infill and TOD projects promoted by the ECAP would not necessarily result in significant new population but rather would concentrate it within existing urban cores instead of on the periphery of urban areas or in rural or semirural areas. Therefore, **no impact** related to population growth is expected.

#### Displace Existing Housing

While the effects of climate change itself, through sea level rise, could result in the need for people to relocate from coastal areas, this change would occur with or without the ECAP. Implementation of the measures of the proposed ECAP does not promote and would not otherwise displace existing housing. **No impact** related to existing housing is expected.

#### Displace People

Implementation of the measures of the proposed ECAP would not displace people. **No impact** related to displacing people is expected.



### Public Services

#### Public Services Causing the Need for New Governmental Facilities

Implementation of the proposed ECAP would not accommodate additional growth beyond that anticipated by the Comprehensive Plan and therefore would not increase demand for public services or facilities. Implementation of the measures in the proposed ECAP would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. Therefore, **no impact** on public services causing the need for new governmental facilities is expected.

### Recreation

#### Park Facilities

Implementation of the proposed ECAP would not increase population or the demand for park facilities. Therefore, the ECAP would not result in physical deterioration of recreational facilities or require new facilities, the construction of which could cause physical environmental impacts. In addition, ECAP Measures T5 and T6 propose pedestrian and bike paths that, in addition to encouraging people to walk and/or bike instead of drive, provide recreational opportunities. Therefore, **no impact** related to recreation is expected.

### Utilities and Service Systems

#### Wastewater Treatment Facilities

Implementation of the proposed ECAP would not accommodate additional growth beyond that anticipated by the Comprehensive Plan or increase demand for wastewater treatment. Therefore, the ECAP would not exceed service capacity, exceed the wastewater treatment requirements of the Regional Water Quality Control Board, or require the construction of new water or wastewater treatment facilities. Therefore, **no impact** on wastewater treatment is expected.

#### Storm Drainage Facilities

Implementation of the proposed ECAP would not accommodate additional growth beyond that anticipated by the Comprehensive Plan or result in the need for new or expanded storm drainage facilities. Therefore, **no impact** on storm drainage infrastructure is expected.

#### Solid Waste

The ECAP includes measures to increase the amount of recyclable diversion, increase the use of recycled materials, and reduce the amount of materials sent to landfill. Therefore, implementation of the proposed ECAP would reduce impacts on landfills and would comply with regulations related to solid waste. In addition, GHG reduction measures included in the ECAP have been developed in coordination with other County initiatives such as the waste reduction and increased recycling goals of the County's Single-Use Plastic Bag Ban Ordinance. Therefore, **no adverse impact** related to solid waste is expected.

### 3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

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#### Energy Resources

The proposed ECAP contains measures that support energy-conserving programs and renewable energy generators and encourage development in close proximity to transit (e.g., Measures BE1, RE4, and LUD1). These measures would help to reduce the use of energy resources through the reduction of fossil fuel consumption and private motor vehicle use. In addition, proposed ECAP measures related to transportation would reduce vehicle miles traveled (VMT), and thus automotive fuel use, throughout the county. Therefore, the proposed ECAP would result in **no adverse impact** associated with the use of energy resources.

### 3.2 ENVIRONMENTAL IMPACT ANALYSIS

The Final EIR addresses the environmental effects of implementing the proposed project. The Impacts and Mitigation Measures subsection in each technical section of this chapter identifies the direct and indirect environmental effects associated with implementation of the proposed project. Standards of significance are identified and used to determine whether the environmental effects are considered significant and require the application of mitigation measures. Each environmental impact analysis is identified numerically and is supported by substantial evidence.

Mitigation measures for the proposed project consist of performance standards that identify clear requirements which would avoid or minimize significant environmental effects (the use of performance standard mitigation is allowed under CEQA Guidelines Section 15126.4(a) and is supported by case law *Rio Vista Farm Bureau Center v. County of Solano* ([1st Dist. 1992] 5 Cal. App. 4th at pp. 371, 375–376 [7 Cal. Rptr. 2d 307])).

This document focuses on the overall effects of the proposed ECAP within the county; the Final EIR does not examine the effects of the potential site-specific projects that may occur in the future under the ECAP. The nature of the ECAP is such that proposed measures are intended to be general, with details to be determined during implementation. Therefore, this Final EIR assumes that specific development projects and infrastructure improvement proposals submitted to the County will necessitate an environmental assessment consistent with the requirements of CEQA. Thus, many of the impacts and mitigation measures can only be described in this Final EIR in general terms. Depending on the issue area, the significance criteria are identifiable quantitative, qualitative, or performance thresholds beyond which the proposed project would be considered to result in a significant effect.

The ECAP is not a land use plan or a specific development project and it does not alter the Comprehensive Plan Land Use Diagram. This Final EIR is based on the assumption that all development will be consistent with the Comprehensive Plan and will be required to comply with existing regulations and implement the measures of the proposed ECAP. Development-specific construction and operational impacts are not known. Therefore, this Final EIR provides a program-level impact analysis.

### 3.3 ENVIRONMENTAL SETTING AND ANALYSIS

Each technical section contains a subsection that describes the physical setting associated with the technical area of discussion, consistent with CEQA Guidelines Section 15125.

#### 3.4 CONSIDERATION OF STATE REDUCTION MEASURES

State-led or State-induced reduction strategies included in the AB 32 Scoping Plan are factored into the ECAP emissions forecast. Strategies include all state actions that are approved, programmed, and/or adopted and require no additional local action, such as the Renewable Portfolio Standard, the Pavley Standards, and the cap-and-trade program (see Section 3.8, Greenhouse Gases and Climate Change Adaptation, for a full description of these state actions). The environmental evaluation of the State-led GHG reducing strategies included in the AB 32 Scoping Plan have been previously considered in functional equivalent documents, which are comparable to EIRs. Evaluation is accomplished via review of environmental documents prepared by the California Air Resources Board (CARB) for implementation of GHG emissions reduction programs (functional equivalent documents). Environmental documents include:

- Functional Equivalent Document for California Cap on GHG Emissions and Market-Based Compliance Mechanisms (CARB 2010a)
- Functional Equivalent Document for Proposed Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375 (CARB 2010b)
- Functional Equivalent Document for Renewable Electricity Standard (CARB 2010c)
- Functional Equivalent Document for Climate Change Scoping Plan (CARB 2008)

The County, in preparing this Final EIR, has been able to make maximum feasible and appropriate use of the technical information in these documents. These documents are not incorporated into this EIR, but were used as information sources for the preparation of the EIR.

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## **3.1 LAND USE**



This section describes land uses in the county and the potential related impacts of the proposed Energy and Climate Action Plan (ECAP). The land use setting is primarily based on applicable information provided in the Santa Barbara County Comprehensive Plan, field visits conducted by PMC staff, and other land use and environmental documents adopted/certified by the County of Santa Barbara.

### 3.1.1 EXISTING SETTING

#### LAND USE PATTERNS

Santa Barbara County can be separated into five geographically separate areas: the South Coast Area, Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and Cuyama Valley.

The South Coast area is the most urbanized area in the county. Included in this region are the cities of Santa Barbara, Carpinteria, and Goleta, and the unincorporated communities of Summerland, Montecito, and Isla Vista. Although this area is primarily developed with residential, commercial, and industrial uses, agriculture remains an important secondary use between the boundaries of the individual cities and communities, and in some urbanized areas, such as the unincorporated eastern Goleta Valley.

The Santa Maria Valley includes the cities of Santa Maria and Guadalupe and the communities of Orcutt and Los Alamos. Santa Maria is the largest urban center in the northern portion of the county with a population just over 100,000. However, much of the valley remains agricultural and rural in character.

The Lompoc Valley, adjacent to Vandenberg Air Force Base, includes the city of Lompoc and the communities of Vandenberg Village and Mission Hills. Other than the urbanized communities and uses that serve the needs of the air force base, this valley primarily comprises agricultural land uses. The Cuyama Valley also primarily comprises agricultural land uses and includes the communities of Cuyama and New Cuyama.

The Santa Ynez Valley includes the cities of Solvang and Buellton and the communities of Los Olivos, Ballard, and Santa Ynez. Primary land uses in the valley include agriculture, ranch-style residential, and visitor-serving commercial. Vineyards are prominent throughout much of the Santa Ynez Valley.

### 3.1.2 REGULATORY FRAMEWORK

#### STATE

##### **California Coastal Act**

The California Coastal Act was enacted by the State Legislature in 1976 to provide long-term protection of California's 1,100 mile coastline for the benefit of current and future generations. The California Coastal Commission oversees application and implementation of the Coastal Act and has authority over certain types of land use and development in the coastal zone through administration of the Coastal Act.

Coastal Act Policy 30250(a) states, "New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not

### 3.1 LAND USE

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able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.”

#### LOCAL

Santa Barbara County regulates the physical development of land through its Comprehensive Plan and the County Land Use and Development Code, the Montecito Land Use and Development Code, and the Article II Coastal Zoning Ordinance (collectively known as the County zoning ordinances). New development must be consistent with the Comprehensive Plan and the requirements and standards of the County zoning ordinances.

#### **County of Santa Barbara Comprehensive Plan**

The guiding element that defines the blueprint for physical development is the Land Use Element and Coastal Land Use Plan. Other state-mandated elements include the Circulation, Conservation, Noise, Open Space, Housing, and Seismic Safety & Safety elements. In addition, the County of Santa Barbara includes elective elements in its Comprehensive Plan. These include the Agricultural, Environmental Resource Management (ERME), Scenic Highway, Hazardous Waste, and Energy elements. The Comprehensive Plan also includes community and specific plans that serve as blueprints for physical development of unincorporated communities and watershed-based areas. The Comprehensive Plan provides general goals, policies, and implementation programs, which are applicable to the proposed ECAP. The County is required to maintain internal consistency among all adopted elements of the Comprehensive Plan.

The Comprehensive Plan acknowledges that the County is committed to going beyond federal and state-mandated requirements to promote alternative energy sources (Santa Barbara 2011b). The Comprehensive Plan recognizes that alternative energy sources are viable and provide largely untapped potential for reducing dependence on conventional energy. The County Comprehensive Plan Energy Element (Santa Barbara 2009) contains goals, recommendations, and policies that promote the implementation of alternative energy. These include:

- Goal 5: Alternative Energy. Encourage the use of alternative energy for environmental and economic benefits, and encourage opportunities for businesses that develop or market alternative energy technologies.
- Policy 5.2: Alternative Energy Technologies. The County shall encourage the use of alternative energy technology in appropriate new and existing development.
- Policy 5.3: Cogeneration. The County shall encourage installation and use of cogenerating systems where they are cost-effective and appropriate.
- Policy 5.4: Solar Photovoltaic Equipment. The County shall use solar photovoltaic equipment in county applications when it is cost-effective on a life-cycle cost basis.
- Policy 5.8: Electric Shuttle Programs. Support the efforts of transit providers to develop electric shuttle programs.
- Public Service 5.8.1: The County shall support and request transit providers to expand their utilization of electric shuttle buses.



- Policy 5.9: Electric Vehicle Charging Facilities. Encourage electric vehicle recharging infrastructure.
- Public Service 5.9.1: The County, in conjunction with the public utilities, shall explore incentives for new developments that include installation of solar and off-peak hour charging facilities on-site.
- Policy 5.10: Alternatively Fueled Vehicles. The County shall encourage the use of alternatively fueled vehicles by individuals.
- Policy 5.13: Alternative Energy Technology Businesses. Among broader countywide efforts to attract businesses, the County shall initiate planning efforts to pursue desired businesses that develop or market alternative energy technologies.
- Regulatory Incentive 5.13.1: The County should identify potential incentives to reduce environmental and permitting lead times and costs for alternative energy technology businesses that locate in the county.
- Public Service 5.13.2: The County shall pursue companies that develop or market alternative energy technology to establish operations locally.
- Public Service 6.1.4: The County shall create incentives for projects which utilize alternative energy sources.

#### **County of Santa Barbara Community Plans**

Community plans focus on general planning issues pertaining to an identified geographical area or community. Community plans are commonly used in counties or large cities that contain a variety of distinct regions. Community plans are adopted in the same manner as a comprehensive plan amendment and are similarly implemented by local ordinances (e.g., zoning). A community plan must include or reference all of the seven elements required for a comprehensive or general plan and must be internally consistent with the overall Comprehensive Plan. The County has prepared nine separate community plans to address specific subregions in Santa Barbara County. These subregions include Goleta Valley, Isla Vista, Los Alamos, Mission Canyon, Montecito, Orcutt, Santa Ynez, Summerland, and Toro Canyon.

Applicable policies in each community plan amend and refine elements of the County's Comprehensive Plan, but each community plan is maintained as a separate stand-alone document, providing a more defined blueprint for future land use decisions. Each community plan sets out specific goals and policies relating to community development, public facilities and services, and resources and constraints. Community plans also designate the type of land use (e.g., residential, commercial, industrial) allowed for each parcel in the applicable planning area, and the maximum density allowed for residential parcels. These designations determine the amount of growth that can be expected to occur through potential subdivision of land or infill development. Zoning for every parcel has been mapped consistent with the land use designations and density specified in each plan.

While the policy direction and development standards of each community plan govern site-specific development proposals, environmental review and planning permit approvals are still required for specific developments.

## 3.1 LAND USE

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### County of Santa Barbara Zoning Ordinances

The Santa Barbara County Land Use and Development Code, the Montecito Land Use and Development Code, and the Article II Coastal Zoning Ordinance (collectively known as the County zoning ordinances) constitute a portion of Chapter 35 of the Santa Barbara County Code. The County zoning ordinances carry out the policies of the Santa Barbara County Comprehensive Plan by classifying and regulating the uses of land and structures in the county, consistent with the Comprehensive Plan. The County zoning ordinances are adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the county (Section 35.10.010, Purpose of Development Code).

The County zoning ordinances are the primary tools used by the County to implement the goals, objectives, and policies of the County of Santa Barbara Comprehensive Plan, including any applicable community and specific plans. Provisions of the County zoning ordinances and any land use, subdivision, or development approved in compliance with these regulations must be consistent with the Comprehensive Plan, including any applicable community and specific plans.

### 2040 Santa Barbara County Regional Transportation Plan and Sustainable Communities Strategy

The 2040 Santa Barbara County Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) is the latest iteration of the RTP originally adopted by the Santa Barbara County Association of Governments (SBCAG) in 1975 (SBCAG 2013). This plan reflects changes in legislative requirements, local land use policies, and resource constraints. The 2040 RTP/SCS covers the entire area of Santa Barbara County and includes the cities of Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Barbara, Santa Maria, and Solvang as well as the unincorporated communities in the county. Capital improvement projects identified in the 2040 RTP/SCS are located on state highways, county roads, and locally owned streets, as well as on transit district property and public utility lands. The SCS sets forth a forecast development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, is intended to reduce greenhouse gas (GHG) emissions from passenger vehicles and light trucks to achieve the regional GHG reduction targets set by the California Air Resources Board (CARB).

### 3.1.3 IMPACTS AND MITIGATION MEASURES

#### STANDARDS OF SIGNIFICANCE

A land use impact is considered significant if implementation of the project would result in any of the following (based on State CEQA Guidelines Appendix G):

- a) Physically divide an established community.
- 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, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- c) Conflict with an adopted conservation plan or natural community conservation plan.

Implementation of the proposed project would result in no impacts associated with habitat conservation plans as described below.

### Habitat Conservation Plans

The proposed ECAP would not conflict with an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan, as there are no adopted countywide habitat or natural community conservation plans in the region. Therefore, there would be no adverse impact related to conflicts with an applicable habitat conservation plan or natural community conservation plan, and this issue (Standard of Significance c) will not be addressed further in the Final EIR.

### METHODOLOGY

Evaluation of potential impacts of the proposed ECAP was based on review of the County Comprehensive Plan. The following analysis is based on information gathered from the Coastal Land Use Plan and Land Use, Conservation, Energy, and Agriculture elements of the Comprehensive Plan. The focus of this impact analysis is whether implementation of the proposed ECAP would result in significant physical environmental impacts associated with land use.

### IMPACTS AND MITIGATION MEASURES

#### Physically Divide an Established Community

**Impact 3.1.1** Implementation of the proposed ECAP would not result in the division of an existing community, nor would it result in substantial land use compatibility issues. This impact is considered adverse, but **less than significant (Class III)**.

Division of an established community commonly occurs as a result of development and construction of physical features that constitute a barrier to easy and frequent travel between two or more constituent parts of a community. For example, a large freeway structure with few crossings could effectively split a community. Likewise, geographic features could similarly affect the community, such as the construction of a large development project on the opposite side of a river from the existing community.

The proposed ECAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to physically divide the community or conflict with adopted plans. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Land Use Element and Coastal Land Use Plan.

The proposed ECAP includes measures to reduce GHG emissions by, among other things, promoting increased density and mixed-use development near transit nodes. However, the ECAP does not propose changing existing land use designations or development standards, and there are currently land uses and zoning designations under the County's jurisdiction (e.g., the Mixed-Residential/Commercial zone and Mixed-Commercial/Industrial zone) that are able to accommodate higher-density mixed-use development. Similarly, while ECAP Measure RE4 (Utility-scale Renewable Energy Projects) supports utility-scale renewable energy generating facilities, existing land uses and zoning designations are able to accommodate this kind of land use (e.g., Inland Area Agriculture and Industrial zones for utility-scale wind energy generation facilities and Agriculture zones in the Cuyuma Valley rural region for utility-scale solar energy generation facilities).

### 3.1 LAND USE

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In addition, the proposed ECAP contains measures to benefit neighborhood connectivity. For instance, ECAP Measure LUD1 (Infill Development) proposes to integrate complete streets policies and projects into updates of the Comprehensive Plan. Complete streets are streets designed and operated to enable safe access for all users, including pedestrians, bicyclists, motorists, and transit riders of all ages and abilities. Complete streets make it easy to cross the street, walk to shops, and bicycle to work. Measure LUD1 also encourages new residential development to be within walking distance of public activity centers such as schools and parks, and seeks to retrofit existing, older neighborhoods to improve connectivity, redesign circulation, and create walkable streets.

As previously stated, the County zoning ordinances carry out the policies of the County of Santa Barbara Comprehensive Plan by classifying and regulating the uses of land and structures in the county, consistent with the Comprehensive Plan, thus ensuring integration and compatibility of new development with existing land use conditions (for instance, utility-scale energy generation facilities are not allowed in residential zones). The proposed ECAP does not propose changing existing land use designations or development standards that would divide any established communities. Therefore, the proposed ECAP would result in an adverse, but **less than significant (Class III)**, impact.

#### **Conflict with Adopted Land Use Plan/Policies/Regulations**

**Impact 3.1.2** Implementation of the proposed ECAP would not lead to inconsistency with other land use plans and ordinances, including the County's land use plans and regulations that address physical effects to the environment. This impact is considered adverse, but **less than significant (Class III)**.

This impact discussion includes a discussion of potential conflicts between the ECAP and existing planning documents in the county, including the County Comprehensive Plan and 2040 Santa Barbara County Regional Transportation Plan and Sustainable Communities Strategy, described above.

As previously stated, the proposed ECAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would conflict with adopted plans. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Coastal Land Use Plan and Land Use Element. Implementation of the proposed measures under the ECAP would be subject to all County development and land use standards, as well as further CEQA analysis of project-specific impacts. Future implementation projects of ECAP measures will require compliance with Comprehensive Plan policies related to land use and Zoning Ordinance requirements associated with zoning districts, allowable uses, and development standards.

The proposed Comprehensive Plan Amendment provides policy updates to the existing County Comprehensive Plan Energy Element to include a policy and research action requiring implementation of the ECAP, with provisions for monitoring and updating at least every five years. Together, these amendments identify a path to integrate ECAP objectives into the County's long-term planning framework. As previously presented in Section 2.0, Project Description, the proposed policy and research action is as follows:

**Policy 8.3: ECAP Implementation:** The County shall implement the Energy and Climate Action Plan (ECAP) to reduce greenhouse gas (GHG) emissions from community-wide sources by a minimum of 15% from the 2007 baseline emissions by 2020.

**Research 8.3.1:** Established in the ECAP, the County shall monitor progress towards achieving GHG reductions every five years. Monitoring of the County's ECAP shall include an update to the GHG emissions from community-wide sources. If it is determined that the ECAP is not achieving specified levels of greenhouse gas emission reductions, the ECAP will be updated as needed.

As previously stated, the project does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Coastal Land use Plan and Land Use Element. Approval of the proposed ECAP would establish conformance between the ECAP and the Comprehensive Plan.

The 2040 Santa Barbara RTP/SCS is a transportation plan that focuses on capital improvement projects on state highways, county roads, and locally owned streets, as well as on transit district property and public utility lands. It also sets forth a forecast development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, is intended to reduce GHG emissions from passenger vehicles and light trucks to achieve the regional GHG reduction targets set by CARB. The ECAP specifically proposes Measure SCS, which supports SBCAG's implementation of the 2040 RTP/SCS in order to reduce per capita GHG emissions from transportation sources. Therefore, the ECAP would not conflict with the RTP/SCS.

As the proposed ECAP would not conflict with any applicable adopted land use plans, policies, or regulations, this impact is considered adverse, but **less than significant (Class III)**.

### CUMULATIVE IMPACTS

Land use impacts are typically isolated to a jurisdiction, except where land uses may interact or conflict with adjacent jurisdictions. The cumulative context for land use impacts would be development in Santa Barbara County. As previously stated, the proposed ECAP includes measures to reduce GHG emissions by, among other things, promoting increased density and mixed-use development near transit nodes. The development of more dense mixed-use districts in close proximity to transit nodes represents an environmentally preferred method for accommodating a growing population and reducing sprawl. The ECAP would not result in the division of any communities in the county, and as demonstrated above, the ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Land Use Element and Coastal Land Use Plan. Furthermore, ECAP Measure SCS would ensure that the County participates in the coordinated land use and transportation planning in the region as identified in the 2040 RTP/SCS. Thus, the project's contribution to cumulative land use impacts would be adverse, but **less than cumulatively considerable (Class III)**.

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## **3.2 TRANSPORTATION AND CIRCULATION**





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## 3.2 TRANSPORTATION AND CIRCULATION

This section describes the existing transportation systems in Santa Barbara County, characterizes different modes of transportation, and analyzes potential transportation-related impacts associated with the proposed Energy and Climate Action Plan (ECAP). The existing setting and analysis in this section utilize the County of Santa Barbara Comprehensive Plan (primarily the Circulation Element), the Santa Barbara County Association of Governments (SBCAG) Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and corresponding EIR (SBCAG 2013a, 2013b), and the Santa Barbara County Bicycle Master Plan (2012).

### 3.2.1 EXISTING SETTING

Santa Barbara County lies along California's Central Coast between San Luis Obispo County to the north and Ventura County to the east. The developed portions of the county are primarily in the southern coastal areas, which include the cities of Goleta, Santa Barbara and Carpinteria and in the northern valley areas, which include the cities of Santa Maria, Lompoc, and Guadalupe, and the communities of Santa Ynez, Buellton, Los Olivos, and Orcutt. The mountainous Los Padres National Forest occupies nearly the entire northeastern half of Santa Barbara County and provides a substantial physical barrier between the developed portions of the county.

#### ROADWAY NETWORK

The primary vehicular roadway in Santa Barbara County is US Highway 101, which provides north-south access through the county. State Route (SR) 1 also trends in a generally north-south direction to the west of US Highway 101 and provides access to Guadalupe, the Orcutt community, Vandenberg Air Force Base, and Lompoc. SR 154 travels in a northwesterly direction from Santa Barbara to the Los Olivos area through the Cachuma Lake Recreation Area and the Santa Ynez community.

East-west-trending routes through the county include SR 166, SR 135, and SR 246 from north to south, respectively. SR 166 connects Santa Maria and Guadalupe and also provides access to the northeastern portion of the county between the Los Padres National Forest in Santa Barbara County and the Carrizo Plain National Monument area in San Luis Obispo County. SR 33 also provides access to this portion of the county, connecting SR 166 to points south in Ventura County. SR 135 travels in a northwesterly direction from US 101 in the Los Alamos community to SR 1 near Vandenberg Air Force Base. SR 246 also travels in a northwesterly direction from SR 154 in the Santa Ynez community to SR 1 in Lompoc, intersecting with US Highway 101 in Buellton.

The Comprehensive Plan Circulation Element identifies seven basic functional classes of roads—freeway, expressway, two-lane expressway, arterial road, major road, two-lane major road, and collector road—as defined below.

- **Freeway:** A four- or six-lane divided arterial highway with full control of access and with grade separations at intersections. As the highest type of road facility, freeways provide maximum service and safety for through traffic. Freeways serve as the principal arterials of the interstate and intrastate system of highways, carrying traffic between cities, traffic generators, and points of interest.
- **Expressway:** A four-lane arterial highway with at least partial control of access, which may or may not be divided or have grade separations at intersections. As a secondary type of intercity or community highway, expressways carry much of the traffic between important centers of activity and employment.

## 3.2 TRANSPORTATION AND CIRCULATION

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- **Two-Lane Expressway:** A two-lane arterial highway with at least partial control of access, which may have grade separations at intersections. As a secondary type of intercity or community highway, expressways carry much of the traffic between important centers of activity and employment.
- **Arterial Road:** A divided four-lane road with intersections at grade and partial control of access. Arterial roads serve as the highest type of facility carrying local traffic within communities. With emphasis on through traffic-carrying capability, these roads serve as principal access routes to shopping areas, places of employment, community centers, recreational areas, and other places of assembly.
- **Major Road:** An undivided four-lane road with intersections at grade and partial control of access. Major roads serve as a secondary type of arterial facility carrying local through traffic within communities. Major roads frequently serve as access to shopping areas, employment centers, recreational areas, residential areas, and places of assembly.
- **Two-Lane Major Road:** An undivided, two-lane road with intersections at grade and partial control of access. Two-lane major roads serve as a secondary type of arterial facility carrying local through traffic within communities. Two-lane major roads frequently serve as access to shopping areas, employment centers, recreational areas, residential areas, and places of assembly. Where such roads serve industrially zoned property, the County Standard Industrial Street Section using 10-foot parking shoulders is used.
- **Collector Road:** A two-lane undivided road with intersections at grade and designed to take a minimum interference of traffic from driveways. Collector roads are designed to provide principal access to residential areas or to connect streets of higher classifications to permit adequate traffic circulation.

### PUBLIC TRANSPORTATION

Santa Barbara County is served by a series of bus routes and passenger rail services. SBCAG's (2009a) Transit Resource Guide provides a complete description of transit opportunities in Santa Barbara County. Major transit opportunities in the county include:

- **Amtrak:** Amtrak offers two passenger rail services and a bus service with stops in Santa Barbara County—Coast Starlight, Pacific Surfliner, and Thruway Motorcoach. Stops in the county include:
  - Coast Starlight: Santa Barbara
  - Pacific Surfliner: Carpinteria, Santa Barbara, Goleta, Lompoc-Surf, Guadalupe
  - Thruway Motorcoach: Solvang, Buellton, Lompoc, Santa Maria
- **Greyhound:** Greyhound provides bus services to destinations statewide and across the nation. There are Greyhound bus stations in Santa Barbara and Santa Maria.
- **Intra-County Bus Services:** Multiple bus services and lines exist in Santa Barbara County, including but not limited to the following providers/lines: Santa Barbara Metropolitan Transit District (MTD), Santa Maria Area Transit (SMAT), City of Lompoc Transit (COLT), Santa Ynez Valley Transit (SYVT), Santa Maria Organization of Transportation Helpers

(SMOOTH), Clean Air Express, Coastal Express, The Breeze Bus, Guadalupe Shuttle, Los Alamos Shuttle, Valley Express, and Wine Country Express.

### 3.2.2 REGULATORY FRAMEWORK

#### FEDERAL

The Moving Ahead for Progress in the 21st Century Act (MAP-21) was passed by Congress on June 29, 2012, and signed into law by President Obama on July 6, 2012. MAP-21 provides \$105 billion in funding for surface transportation programs for fiscal years 2013 and 2014. This law replaced the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), which was passed in 2005 and extended ten times.

#### STATE

State guidelines generally set the framework for regional and local planning efforts. State law requires the regional and local planning agencies to develop and submit a Regional Transportation Plan (RTP) every three years to the California Transportation Commission (CTC) and the California Department of Transportation (Caltrans).

#### REGIONAL

##### **Santa Barbara County Association of Governments**

SBCAG is responsible for regional transportation planning in Santa Barbara County and is designated by state and federal agencies as the county's metropolitan planning organization, the local transportation authority, and the regional transportation planning agency for Santa Barbara County. SBCAG's primary transportation planning document is its Regional Transportation Plan (RTP), which is a long-range (20-year) plan of regional transportation needs, goals, and projects and provides guidance for public policy decisions regarding transportation expenditures and financing.

SBCAG's latest RTP is the 2040 Regional Transportation Plan and Sustainable Communities Strategy (SCS) (SBCAG 2013a). The SCS component of the RTP, as required by Senate Bill 375, integrates land use patterns and the transportation network in a manner that reduces vehicle miles traveled (VMT) and related greenhouse gas (GHG) emissions.

SBCAG is also the congestion management agency for Santa Barbara County. In this role, SBCAG prepares congestion management programs (CMPs) for the county. The most recent Santa Barbara County CMP was approved in 2009 (SBCAG 2009b). The CMP addresses the problem of increasing congestion on regional highways and principal arterials through a coordinated approach involving the state, county, cities, transit providers, and the air pollution control district (SBCAG 2009b). The CMP identifies a minimum acceptable level of service (LOS) of D for CMP intersections identified on the CMP Highway and Street Network. A deficiency plan is required for any facilities operating below LOS D.

##### **County of Santa Barbara**

The County of Santa Barbara's primary transportation planning document is the Circulation Element of the Comprehensive Plan, which was adopted in 1980 and republished in 2010 (Santa Barbara 2010). The Circulation Element identifies policies and standards for circulation facilities in

## 3.2 TRANSPORTATION AND CIRCULATION

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the county. For example, the element identifies level of service standards for county roadway intersections (specified below in **Table 3.2-1**).

The County of Santa Barbara has also adopted a Bicycle Master Plan (Santa Barbara 2012). The 2012 Bicycle Master Plan is an update of the County's 1999 plan and consolidates various future bicycle network plans identified in the County's community and specific plans, city general plans, and other previously adopted planning documents. In addition to identifying existing and planned bicycle facilities, the Bicycle Master Plan identifies strategies for promoting bicycle use, provides guidance for bicycle connections, and provides consistency with related policies and plans of the County and incorporated cities in the county.

### 3.2.3 IMPACTS AND MITIGATION MEASURES

#### STANDARDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project would normally have a significant impact on the environment if it would result in any of the following:

- a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.
- b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.
- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- d) Substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- e) Result in inadequate emergency access.
- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Implementation of the proposed project would result in no impacts associated with air traffic patterns or emergency access as described below.

#### **Air Traffic Patterns**

Implementation of the proposed ECAP would include implementing a variety of measures and actions to reduce GHG emissions. None of the proposed measures or actions involves air travel, airports, or related facilities. The ECAP would have no effect on population or employment opportunities in Santa Barbara County; thus, it would not increase the need for air travel. The proposed ECAP itself would not result in the construction of any new structures that could restrict or impede air travel. Any future development of structures instigated by the ECAP would be required to comply with applicable Federal Aviation Administration (FAA) regulations that affect

development in the Accident Potential Zones. Therefore, adoption of the proposed ECAP would not result in a change in air traffic patterns and would have no impact. Therefore, air traffic patterns (Standard of Significance c) will not be addressed further in the Final EIR.

**Emergency Access**

The ECAP would not result in any new development potential or construction of facilities that would adversely affect emergency access. GHG reduction measures such as signal synchronization promote traffic efficiency and thus can improve response times of emergency responders. Any future construction implementing ECAP measures and actions that involve roadway improvements would remain subject to County roadway design standards, such as sight distance requirements and curb-to-curb separation distances. Adoption of the proposed ECAP would not result in inadequate emergency impacts and would have no impact. Therefore, emergency access (Standard of Significance e) will not be addressed further in the Final EIR.

**County of Santa Barbara Environmental Thresholds and Guidelines Manual**

The County's threshold criteria are intended to provide a basis for improved analysis of the potential traffic impacts of proposed projects. It should be noted that the following criteria are guidelines for the majority of potential traffic impacts. The list of criteria is not intended to be all inclusive, as the potential for impact may vary depending on the environmental setting and the nature of the project. The project's impacts are assessed against the following County thresholds. A significant traffic impact occurs when:

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

**TABLE 3.2-1  
LEVEL OF SERVICE STANDARDS**

<b>Level of Service (Including Project)</b>	<b>Increase in V/C Greater Than</b>
A	0.20
B	0.15
C	0.10
	or the addition of:
D	15 trips
E	10 trips
F	5 trips

- Project access to a major road or arterial road would require a driveway that would create an unsafe situation or a new traffic signal or major revisions to an existing traffic signal.
- Project adds traffic to a roadway that has design features (e.g., narrow width, road side ditches, sharp curves, poor sight distance, inadequate pavement structure) or receives use which would be incompatible with substantial increases in traffic (e.g., rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use, etc.) that will become potential safety problems with the

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addition of project or cumulative traffic. Exceedance of the roadways designated Circulation Element Capacity may indicate the potential for the occurrence of the above impacts.

- Project traffic would utilize a substantial portion of an intersection's capacity where the intersection is currently operating at acceptable levels of service (A–C) but with cumulative traffic would degrade to or approach LOS D (V/C 0.81) or lower. Substantial is defined as a minimum change of 0.03 for intersections which would operate from 0.80 to 0.85 and a change of 0.02 for intersections which would operate from 0.86 to 0.90, and 0.01 for intersections operating at anything lower.

### METHODOLOGY

The impact analysis presented below evaluates the transportation and circulation impacts of the proposed ECAP in consideration of both the CEQA standards of significance and the County's significance thresholds identified above. The analysis considers the Circulation Element of the County Comprehensive Plan, SBCAG's RTP/SCS, SBCAG's Congestion Management Program, and the Santa Barbara County Bicycle Master Plan.

Specific subsequent activities or projects, their associated locations, and physical effects on the environment from the implementation of the ECAP measures and actions are not known at this time. Thus, this analysis uses a qualitative/programmatic approach to evaluating possible transportation and circulation impacts from implementation of the ECAP measures/actions.

### IMPACTS AND MITIGATION MEASURES

#### Performance of the Circulation System

**Impact 3.2.1** Implementation of the proposed ECAP could result in minor temporary traffic impacts during construction activities resulting from GHG reduction measures and actions. In the long term, no substantial increase in trip generation would result from the ECAP that is anticipated to result in operational impacts. Traffic impacts are considered adverse, but **less than significant (Class III)**.

Implementing the proposed ECAP would include implementing a variety of measures and actions to reduce GHG emissions. Many such measures and actions apply to and would influence future development projects and land use decisions (e.g., requiring pre-wiring for electric vehicle charging stations in new development, requiring new projects to include mass transit improvements such as bus pullouts, requiring the implementation of green building practices in new development). Many of the measures are programs (e.g., requiring reduced-fare or free transit passes for certain groups of people, establishing a bike-sharing program, providing education and outreach, developing a lawn and garden equipment exchange or rebate program). A limited selection of measures would result in physical changes in the environment or, through incentives, could indirectly result in physical changes in the environment. For example, the proposed ECAP includes measures and actions to expand the bicycle network in accordance with the County's Bicycle Master Plan and to install video signal detection for cyclists on minor connectors. As additional examples, the ECAP requires energy efficiency upgrades in residential units at the time of building sale or shortly thereafter, and calls for the expansion of emPowerSBC to allow for funding of multi-family housing and alternative energy packages.

Inasmuch as the proposed ECAP would result in construction activities, temporary minor traffic increases could occur as a result of construction equipment vehicles and employee vehicle trips to and from construction sites. These impacts, however, would be temporary in nature and would end on completion of construction.

In the long term, none of the proposed ECAP measures or actions would cause an increase in vehicle trip generation. Rather, many of the proposed measures and actions are intended to reduce vehicle miles traveled, such as Measures LUD1 (promote infill development), LUD2 (promote transit-oriented development), T1 (expand car-sharing and ride-sharing opportunities), T2 (provide commuter incentives), T4 (enhance alternative transportation), and T6 (improve pedestrian access). Therefore, no long-term traffic impacts in excess of the significance thresholds would occur as a result of adoption of the proposed ECAP.

Likewise, the ECAP would not conflict with an applicable plan, program, ordinance, or policy establishing measures of effectiveness for the performance of mass/public transit, bicycle, pedestrian, or non-motorized travel. As noted, the ECAP includes measures and actions that are intended to improve the public transit system and non-motorized travel, such as measures T5 (complete an integrated bikeway system), T6 (improve pedestrian access), and T9 (promote the development of commuter rail connections). Therefore, adoption of the proposed ECAP would have adverse, but **less than significant (Class III)**, impacts related to transit, bicycle, pedestrian, or non-motorized travel.

### Roadway or Traffic Hazards

**Impact 3.2.2** The proposed ECAP could influence the roadway improvements of future development projects and would facilitate the implementation of improvements identified in the County's Bicycle Master Plan. However, future roadway and bicycle improvements would be subject to the County's design standards. Therefore, impacts related to roadway and traffic hazards are adverse, but **less than significant (Class III)**.

The proposed GHG reduction measures and actions would not result in any new development potential or construction of facilities that would propose land use changes which are expected to alter roadway designs that would increase hazards. Conversely, measures such as T8 (signal synchronization) promote traffic efficiency. Any future construction implementing ECAP measures and actions that involve roadway improvements would remain subject to County roadway design standards, such as sight distance requirements and curb-to-curb separation distances. Likewise, implementation of the ECAP's measures and actions regarding bicycle facility improvements would be in accordance with the County's Bicycle Master Plan, which specifies design standards for bicycle facilities based on standards established by Caltrans, the Institute of Traffic Engineers (ITE), the American Association of State Highway Transportation Officials (AASHTO), and the Manual on Uniform Traffic Control Devices (MUTCD). Therefore, the proposed ECAP would not substantially increase hazards because of a design feature or incompatible use and would have adverse, but **less than significant (Class III)** impacts.

### CUMULATIVE IMPACTS

Implementing the proposed ECAP would include implementing a variety of measures and actions to reduce GHG emissions. None of the proposed ECAP measures or actions would cause an increase in vehicle trip generation. Rather, many of the proposed measures and actions are intended to reduce vehicle miles traveled, such as Measures LUD1 (promote infill development), LUD2 (promote transit-oriented development), T1 (expand car-sharing and ride-sharing

### 3.2 TRANSPORTATION AND CIRCULATION

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opportunities), T2 (provide commuter incentives), T4 (enhance alternative transportation), and T6 (improve pedestrian access). Therefore, the proposed ECAP's contribution to cumulative traffic and circulation impacts would be adverse, but **less than cumulatively considerable (Class III)**.



### **3.3 AESTHETICS AND VISUAL RESOURCES**



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## 3.3 AESTHETICS AND VISUAL RESOURCES

This section describes the visual conditions and resources of Santa Barbara County, summarizes its landscape characteristics, and discusses the impacts associated with implementation of the proposed Energy and Climate Action Plan (ECAP). The existing setting and analysis in this section references the County of Santa Barbara Comprehensive Plan (primarily the Scenic Highway, Conservation, Open Space, and Environmental Resource Management elements) and the County's Visual Aesthetics Impact Guidelines, which are a component of the County's Environmental Thresholds and Guidelines Manual (2008).

### 3.3.1 EXISTING SETTING

The Open Space Element of the County's Comprehensive Plan (2009a, p. 21) provides the following description of the scenic quality of Santa Barbara County:

*Santa Barbara County is renowned world-wide for the scenic beauty of its seascapes and mountains. The coastal shelves, nestled between ocean and mountains, and the scenic inland valleys provide natural settings that are difficult to rival. The large expanses of cultivated farmlands and grazing lands on the valley floors and gently rolling hillsides provide a green or golden pastoral setting, depending on the season, that delights the eye of resident and traveler.*

*Unfortunately, as the cities have grown, their expansion has consumed one scenic open area after another, particularly on lands close to the urban centers. Irreplaceable natural areas and sites with unique recreational potential are beginning to disappear, most notably along the coastal bluffs. While not all of the coast can or ought to be designated open space, there should be a reasonable balance between lands planned for private development and those remaining available for visual or actual public access and enjoyment. Surely, lands with unique natural assets should be placed in the latter category; other sites may be more debatable.*

*Open space lands with outstanding scenic qualities often can be preserved by prohibiting construction because other constraints on development, such as flooding or steep slopes, are present. Where no such combination of constraints exists, acquisition of the land generally will be necessary, particularly if it is intended to be used for public recreation. However, in many situations, using either the design review or the subdivision approval procedure, portions of a site may be permitted to be developed, on condition that the most scenic areas remain as undeveloped open space.*

*The County is large (2,774 square miles) and, of course, is mainly undeveloped. Forty-five percent of this area is in public ownerships and is likely to remain primarily in open space. To survey all of these lands in order to differentiate among the scenic qualities of various areas would take years to accomplish and would add little to the Comprehensive Plan. Furthermore, scenic value should not be gauged only in terms of an area's intrinsic beauty (a subjective and ill-defined criterion at best), but also in terms of the number of people who see the area. Identification and rating of scenic sites in the Sierra Madre Mountains, for instance, would be of relatively little worth, because so few people will see these areas and they are not in danger of being developed. Sites visible from highways and close to urban centers are seen by tens of thousands daily, and consequently are worthy of detailed study for scenic values.*

### 3.3 AESTHETICS AND VISUAL RESOURCES

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The Open Space Element includes scenic value maps that were the result of countywide and study area computer modeling. This modeling rated scenic value on a scale from 1 to 6, with areas of low scenic value rated 1–2, areas of moderate scenic value rated 3–4, and areas of high scenic value rated 5–6. The Open Space Element’s scenic value maps depict these designations geographically. The element provides the following summary of the results of the scenic value area modeling (2009a, p. 21):

*Only 10.5 percent of all land included in the computer analysis of the four study areas was classified as having high scenic value, while nearly 58 percent was in the low category. The Santa Ynez Valley has the highest percentage of all the land classified in the high level, 20.4 percent, whereas the Santa Maria-Orcutt area has the lowest, 4.2 percent. Much of the high scenic value land in the Santa Ynez Valley corresponds with the numerous creeks, the river, and the hills in the northern portion of the study area. County-wide, 10.6 percent of the land included in the computer analysis was classified as having high scenic value, and 56 percent was in the low value category.*

The scenic value maps also depict major travel corridors and urban areas perimeters, as these are among the most important scenic areas from the standpoint of the number of people who see them. To that end, the element also includes a travel corridors and urban perimeters evaluation map that identifies such resources of scenic value. The Open Space Element identifies the following routes as having the highest scenic values (as reiterated in the Environmental Resources Management Element) (2009b, p. 9-10):

- US 101: Los Alamos–Buellton
- US 101: Gaviota Beach–South Coast Urban Complex
- US 101: Montecito–Rincon Point
- SR 1: Lompoc–US 101
- SR 154: Los Olivos–US 101
- SR 154: Lake Cachuma–Santa Barbara
- SR 166: Santa Maria–Cuyama
- SR 176: Santa Maria–Los Olivos
- Jalama Road: SR 1–Jalama County Park
- Jalama County Park–Gaviota Beach State Park
- Drum Canyon Road: Los Alamos–Lompoc–Buellton link
- Toro Canyon Park–Serena Park

In addition, the Scenic Highways Element of the Comprehensive Plan (2009c, p. 5-6) provides the following discussion regarding scenic highways in the county:

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

*Portions of other State highways traversing the County are in the State's master plan of highways eligible for "Scenic Highway" designation. The master plan was adopted by the Legislature with the specific legislation. These eligible highways may become official State Scenic Highways when a plan of preservation is implemented by the County for these routes. ...The eligible highways are:*

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

#### **3.3.2 REGULATORY FRAMEWORK**

##### STATE

##### **California Coastal Act**

In brief summary, the California Coastal Act of 1976 was enacted to protect, maintain, enhance, and restore the coastal zone environment; assure orderly, balanced utilization and conservation of coastal zone resources; maximize public access to the coastal zone; maximize recreational opportunities in the coastal zone; assure priority for coastal-dependent and coastal-related development over other development on the coast; and provide procedures to implement coordinated planning and development for mutually beneficial uses in the coastal zone (Section 30001.5).

The following sections of the California Coastal Act emphasize protection of important scenic resources and views from public areas such as highways, roads, beaches, and trails.

- Section 30251: "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of the surrounding area and, where feasible, to restore and enhance visual quality in visually degraded areas..."
- Section 30253: New development shall "where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses." Such communities are defined as "areas that add to the visual attractiveness of the coast."

### **3.3 AESTHETICS AND VISUAL RESOURCES**

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#### **State Scenic Highway Program**

In 1963, the California legislature created the Scenic Highway Program to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to state highways. The state regulations and guidance governing the Scenic Highway Program are found in the Streets and Highways Code, Section 260, et seq. A highway may be designated scenic depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the traveler's enjoyment of the view. A scenic corridor is the land generally adjacent to and visible from the highway and is identified using a motorist's line of vision. A reasonable boundary is selected when the view extends to the distant horizon.

#### **Nighttime Sky – Title 24 Outdoor Lighting Standards**

The California legislature passed a bill in 2001 requiring the California Energy Commission (CEC) to adopt energy efficiency standards for outdoor lighting for both the public and private sectors. In response to the legislature, in November 2003, the CEC adopted changes to Title 24, Parts 1 and 6, Building Energy Efficiency Standards. These standards became effective on October 1, 2005, and included changes to the requirements for outdoor lighting for residential and nonresidential development. The standards aim to improve the quality of outdoor lighting and help to reduce the impacts of light pollution, light trespass, and glare. The standards regulate lighting characteristics such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off. Different lighting standards are set by classifying areas by lighting zone. The classification is based on population figures of the 2000 Census. These areas are designated as LZ1 (dark), LZ2 (rural), or LZ3 (urban).

#### **REGIONAL**

#### **County of Santa Barbara Comprehensive Plan**

The County of Santa Barbara Comprehensive Plan provides a long-term plan for physical development in the unincorporated portions of the county. Individual development projects proposed must demonstrate general consistency with the goals and policies outlined in the Comprehensive Plan, which articulates and implements the County's long-term vision.

#### **County of Santa Barbara Zoning Ordinances**

The Santa Barbara County Land Use and Development Code (LUDC), the Montecito Land Use and Development Code (MLUDC), and the Article II Coastal Zoning Ordinance (CZO) (collectively known as the County zoning ordinances), include development standards protecting visual resources. Section 35.30.120 of the LUDC, Section 35.430.120 of the MLUDC, and Section 35-139 of the CZO provides restrictions on outdoor lighting to protect spillover onto adjacent properties and to minimize interference with vehicular traffic on private/public streets from lighting. The County zoning ordinances contain height and size limits, including guidelines for development that regulate the design of future development, in some cases, through review of project plans by the Regional Boards of Architectural Review, which have review authority over the exterior appearance of buildings, structures or signs erected or altered in any neighborhood or on any site subject to architectural review in unincorporated portions of Santa Barbara County.

### 3.3.3 IMPACTS AND MITIGATION MEASURES

#### STANDARDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project would normally have a significant impact on the environment if it would result in any of the following:

- a) Have a substantial adverse effect on a scenic vista.
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- c) Substantially degrade the existing visual character or quality of the site and its surroundings.
- d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

#### **County of Santa Barbara Environmental Thresholds and Guidelines Manual**

The County Visual Aesthetic Impact Guidelines in the County of Santa Barbara Thresholds Manual (2008) provide guidance in determining the importance of visual resources. The guidelines identify the questions below, which are intended to provide information to address the criteria specified in Appendix G of the State CEQA Guidelines. Affirmative answers to these questions indicate potentially significant impacts to visual resources.

- 1a. Does the project site have significant visual resources by virtue of surface waters, vegetation, elevation, slope, or other natural or man-made features which are publicly visible?
- 1b. If so, does the proposed project have the potential to degrade or significantly interfere with the public's enjoyment of the site's existing visual resources?
- 2a. Does the project have the potential to impact visual resources of the Coastal Zone or other visually important areas (i.e., mountainous area, public park, urban fringe, or scenic travel corridor)?
- 2b. If so, does the project have the potential to conflict with the policies set forth in the County's CLUP, the Comprehensive Plan, or any applicable community plan to protect the identified views?
3. Does the project have the potential to create significant adverse aesthetic impact through obstruction of public views, incompatibility with surrounding uses, structures, or intensity of development, removal of significant amounts of vegetation, loss of important open space, substantial alteration of natural character, lack of adequate landscaping, or extensive grading visible from public areas?

#### METHODOLOGY

The analysis presented below evaluates the impacts of the proposed ECAP on aesthetics and visual resources in consideration of both the evaluation questions and significance thresholds identified above. The analysis considers the County's Comprehensive General Plan (primarily the

### 3.3 AESTHETICS AND VISUAL RESOURCES

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Scenic Highway, Conservation, Open Space, and Environmental Resource Management elements) and the Visual Aesthetics Impact Guidelines, which are a component of the County's Environmental Thresholds and Guidelines Manual (Santa Barbara 2008).

Specific subsequent activities or projects, their associated locations, and physical effects on the environment from the implementation of the ECAP measures and actions are not known at this time. Thus, this analysis uses a programmatic approach to evaluating possible aesthetic and visual impacts from implementation of the ECAP measures and actions.

#### IMPACTS AND MITIGATION MEASURES

#### Scenic Vista, Scenic Resources, Scenic Highways, and Existing Visual Character and Quality

**Impact 3.3.1** Implementation of the proposed ECAP could result in future physical improvements, such as the expansion of the bicycle network, residential unit and industrial facility energy efficiency upgrades, GHG reduction features in new development (e.g., transit and pedestrian amenities, on-site alternative energy improvements), and other indirect improvements. Such improvements would have a limited impact on the county's scenic resources, vistas, scenic highways, and high visual quality and character. Aesthetic impacts are considered adverse, but **less than significant (Class III)**.

The proposed ECAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the aesthetic quality of the environment or to adversely affect visual resources. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Coastal Land Use Plan and Land Use Element. As a policy document, the ECAP would have no direct impact on visual resources, but future implementation activities have the potential to affect aesthetics.

Implementing the proposed ECAP would include implementing a variety of measures and actions to reduce GHG emissions. Many such measures and actions apply to and would influence future development projects and land use decisions (e.g., requiring pre-wiring for electric vehicle charging stations in new development, requiring new projects to include mass transit improvements such as bus pullouts, requiring the implementation of green building practices in new development). Many of the measures are programs (e.g., requiring reduced-fare or free transit passes for certain groups of people, establishing a bike-sharing program, providing education and outreach, developing a lawn and garden equipment exchange or rebate program). A limited selection of measures would result in physical changes in the environment or, though incentives, could indirectly result in physical changes in the environment. For example, the proposed ECAP includes measures and actions to expand the bicycle network in accordance with the County's Bicycle Master Plan and to install video signal detection for cyclists on minor connectors. As additional examples, the proposed ECAP requires energy efficiency upgrades in residential units at the time of building sale or shortly thereafter, and the proposed ECAP calls for the expansion of emPowerSBC to allow for funding of multi-family housing and alternative energy packages.

The proposed ECAP does not change any land use designations and does not relieve any development standards for land development or infrastructure improvements. The aesthetic and visual impacts of the proposed ECAP would be largely limited to changes resulting from future improvements to the bicycle network, residential unit and industrial facility energy efficiency



upgrades, GHG reduction features in new development (e.g., transit and pedestrian amenities, on-site alternative energy improvements), and other indirect improvements promoted by the ECAP.

None of the improvements that would result from approval of the proposed ECAP would themselves be expected to substantially obstruct views or degrade visual character or quality. Future improvements to the bicycle network, as identified in the County's Bicycle Master Plan, would be primarily ground-level riding facilities and associated improvements (e.g., signage, safety improvements). Energy efficiency upgrades to existing structures would primarily involve improvements to the interior and shell of structures, and only minor external improvements are anticipated, such as replacing heating, ventilation, and air conditioning units, water heaters, and similar equipment. Similarly, the ECAP's influence on future development would be ancillary to the development itself, having little if any effect on the scale or visual character of such development. Therefore, while Santa Barbara County contains notable scenic resources, vistas, and scenic highways and has a high visual quality overall, adoption of the proposed ECAP would not significantly interfere with the public's enjoyment of visual resources, would not conflict with policies or plans to protect views (e.g., County Code Chapter 21, Land Division, Santa Barbara County Scenic Values Mapping and associated standards), and would not result in changes to the environment that would significantly obstruct views, change land use intensity, change vegetative cover, or reduce the county's open space or alter its natural character. Aesthetic impacts are considered adverse, but **less than significant (Class III)**.

#### Light and Glare

**Impact 3.3.2** The proposed ECAP includes measures that support the installation of small-scale and utility-scale renewable energy systems. While the proposed ECAP does not propose or facilitate the construction of any specific renewable energy systems, inasmuch as the ECAP would support future solar photovoltaic or wind turbine energy production, the project has the potential to result in glare. Light and glare impacts are considered adverse, but **less than significant (Class III)**.

As discussed under Impact 3.3.1 above, the proposed ECAP is a policy-level document that does not include any site-specific designs or proposals, nor does the ECAP grant any entitlements for development that would increase daytime glare or nighttime illumination in the county. As a policy document, the ECAP would have no direct impacts resulting from light and/or glare, but future implementation activities could have an effect.

Measure RE3 (Alternative Energy Incentives) of the proposed ECAP would support the installation of small-scale renewable energy systems through the adoption of a policy or program that offers incentives (such as streamlined permitting, permit waivers, or fee waivers). Similarly, Measure RE4 expresses the County's support for the use of clean alternative energy production by encouraging development of utility-scale renewable electrical generation facilities. Renewable energy systems supported by Measures RE3 and RE4 (Utility-scale Renewable Energy Projects) could include solar photovoltaic, solar collector, and wind energy production facilities. The potential for utility-scale solar facilities could result in glare impacts by introducing anthropogenic features that have reflective potential and by possible removal of vegetation that provides shading and shielding. Solar facilities could result in daytime glare impacts as a result of reflective surfaces on the solar collectors and the materials used to construct the module such as the trackers, panel backing, and mounting systems. A variety of viewers could potentially see these facilities, such as motorists, residents, recreationists, or businesses.

### 3.3 AESTHETICS AND VISUAL RESOURCES

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However, by design, solar power generation facilities limit glare because lost reflected light results in reduced electricity production. For example, photovoltaic (PV) solar panels are designed to absorb solar radiation and thus by design are non-reflective. Nonetheless, PV panels do create a sheen that can be perceived as a minor glare. Other types of solar collectors, such as parabolic troughs and heliostat facilities, do use reflective surfaces to direct solar rays onto a target. By design, the target in these facilities largely blocks reflected light from surrounding views. Even still, glare from reflective solar collectors, particularly from the outer edges of the solar arrays, could adversely impact viewers.

The intensity of potential glare impacts would differ under atmospheric conditions, time of day, and time of year, and based on proximity to the source of glare. Sensitive viewers could experience direct reflection from the arrays; however, they may experience little or no glare for the majority of the day. This direct reflection may only occur for a short period of the day (as the sun rises and sets) and during certain times of the year.

However, the proposed project is a policy-level document that does not include site-specific designs or proposals for development projects, nor does it grant any entitlements for development that would have the potential to result in light and glare impacts. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Land Use Element and Coastal Land Use Plan. Nevertheless, some physical changes could be facilitated by the proposed ECAP that promote installation of utility-scale renewable energy generators. However, individual projects would be reviewed on a case-by-case basis, subject to project-specific environmental review consistent with the County Environmental Thresholds and Guidelines Manual and zoning ordinances, and would have to be found consistent with state law and County policies and standard conditions of approval. Future project characteristics and locations are unknown and any impact analysis and conclusion on level of significance would be speculative at this time for such project-specific impacts. Therefore, impacts at the program level attributable to adoption and implementation of the proposed ECAP are considered adverse, but **less than significant (Class III)**.

#### CUMULATIVE IMPACTS

Implementing the proposed ECAP would include implementing a variety of measures and actions to reduce GHG emissions. As noted above in Impact 3.3.1, indirectly, the proposed ECAP has the potential to result in a limited impact on the county's scenic resources, vistas, scenic highways, and high visual quality and character. Such resources could also be impacted by future development as the county continues to build out in accordance with the Comprehensive Plan. However, the proposed ECAP would not result in a change in land use patterns, land use designations, or development standards. The aesthetic and visual impacts of the ECAP would be largely limited to changes resulting from future improvements to the bicycle network, residential unit and industrial facility energy efficiency upgrades, GHG reduction features in new development (e.g., transit and pedestrian amenities, on-site alternative energy improvements), and other indirect improvements promoted by the ECAP. Similarly, the ECAP's influence on future development would be ancillary to the development itself, having little if any effect on the scale or visual character of such development. Thus, the project's contribution to cumulative aesthetics or visual resource impacts would be adverse, but **less than cumulatively considerable (Class III)**.

## **3.4 AGRICULTURAL RESOURCES**



This section addresses agricultural resources and the potential impacts of the proposed Energy and Climate Action Plan (ECAP). The existing setting and analysis in this section utilizes the County of Santa Barbara Comprehensive Plan and the County Code of Ordinances.

### 3.4.1 EXISTING SETTING

Agriculture has historically been an important part of the county's economy. The county currently ranks in the top 13 agricultural-producing counties in California for gross value of agricultural production (CDFA 2013). The value of agricultural production in the year 2012 for the county totaled \$1,291,009,000, an increase of approximately \$96 million from the previous year (CDFA 2013). Top producing crops include strawberries, broccoli, wine grapes, head lettuce, and avocados. The majority of these crops are cultivated on the approximately 680,000 acres of producing agricultural lands in private ownership in Santa Barbara County. Of this acreage, approximately 78 percent (531,400 acres) are currently enrolled in Land Conservation Act (Williamson Act) contracts (Santa Barbara 2009).

#### FARMLAND CLASSIFICATION AND RATING SYSTEM

The Farmland Mapping and Monitoring Program (FMMP), administered by the California Department of Conservation (DOC), maps agricultural areas based on soil quality and land use, with categories such as Prime Farmland, Farmland of Statewide Importance, and Grazing Lands. More information about these classifications is provided below.

#### Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program was established in 1982 to continue the important farmland mapping efforts begun in 1975 by the US Department of Agriculture (USDA) Natural Resources Conservation Service. The intent of the USDA was to produce agricultural resource maps based on soil quality and land use across the nation. As part of the nationwide agricultural land use mapping effort, the USDA developed a series of definitions known as Land Inventory and Monitoring (LIM) criteria. The LIM criteria classified land's suitability for agricultural production. Suitability included both the physical and chemical characteristics of soils and the actual land use. Important Farmland Maps are derived from the USDA soil survey maps using the LIM criteria.

Important Farmland Maps for California are compiled using the modified LIM criteria. The minimum mapping unit is 10 acres unless otherwise specified. Units of land smaller than 10 acres are incorporated into the surrounding classification. The Important Farmland Maps identify five agriculture-related categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. Each is summarized below, based on the California Department of Conservation's (1994) Guide to the Farmland Mapping and Monitoring Program. The most current information available from the FMMP is from 2010.

#### Prime Farmland

Prime Farmland is land with the best combination of physical and chemical features able to sustain the long-term production of agricultural crops. These lands have the soil quality, growing season, and moisture supply needed to produce sustained high yields. Lands defined as Prime Farmland must have been used for production of irrigated crops at some time during the four years prior to the Important Farmland Map date.

### 3.4 AGRICULTURAL RESOURCES

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#### Farmland of Statewide Importance

Farmland of Statewide Importance is land similar to Prime Farmland but with minor shortcomings, such as greater slopes or having less ability to hold and store moisture. The land must have been used for the production of irrigated crops at some time during the four years prior to the Important Farmland Map date.

#### Unique Farmland

Unique Farmland is land of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include nonirrigated orchards or vineyards, as found in some climatic zones in California. The land must have been cultivated at some time during the four years prior to the Important Farmland Map date.

#### Farmland of Local Importance

Farmland of Local Importance is land of importance to the local economy, as defined by each county's local advisory committee and adopted by its board of supervisors. Farmland of Local Importance is either currently producing, or has the capability of production, but does not meet the criteria of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland.

#### Grazing Land

Grazing Land is land on which the existing vegetation, whether grown naturally or through management, is suited to the grazing of livestock. The minimum mapping unit for this category is 40 acres.

#### IMPORTANT FARMLAND IN SANTA BARBARA COUNTY

**Table 3.4-1** provides a breakdown of farmland acreage in Santa Barbara County based on the FMMP categories. The entire county includes approximately 66,568 acres of Prime Farmland, along with approximately 12,475 acres of Farmland of Statewide Importance, 35,606 acres of Unique Farmland, and 10,643 acres of Farmland of Local Importance. These categories account for approximately 18 percent of the total number of agricultural acres in the county. **Table 3.4-1** does not take into account any development in the county after 2010, when the most recent Important Farmland Map was published.

**TABLE 3.4-1**  
**FARMLAND IN SANTA BARBARA COUNTY**

Farmland Type	Total Acres
Prime Farmland	66,568
Farmland of Statewide Importance	12,475
Unique Farmland	35,606
Farmland of Local Importance	10,643
<b>Important Farmland Subtotal</b>	<b>125,292</b>
Grazing Land	581,642
<b>Agricultural Land Subtotal</b>	<b>706,934</b>
Other Land*	265,911
Urban and Built-Up Land	62,762
Water	3,723
<b>Total</b>	<b>1,039,330</b>

Source: DOC 2011a

\*Other Land indicates those lands not otherwise placed in a FMMP category. For Santa Barbara County, this includes natural vegetation, rural residential, wetlands, and vacant lands.

#### FARMLAND CONVERSION

The conversion of lands suitable for agricultural to urban development and other uses is an issue of concern in California. As shown in **Table 3.4-2**, Santa Barbara County experienced the loss of 61 acres of Important Farmland between the years 2008 and 2010, with an additional 496 acres of Important Farmland committed to nonagricultural uses (DOC 2011b).

**TABLE 3.4-2**  
**FARMLAND CONVERSION IN SANTA BARBARA COUNTY 2008–2010**

Land Use Category	Acreage in 2008	Acreage in 2010	Net Acreage Change
Prime Farmland	67,170	66,568	-602
Farmland of Statewide Importance	12,298	12,475	+177
Unique Farmland	34,779	35,606	+827
Farmland of Local Importance	11,106	10,643	-463
<b>Important Farmland Subtotal</b>	<b>125,353</b>	<b>125,292</b>	<b>-61</b>
Grazing Land	581,985	581,642	-343
<b>Agricultural Land Total</b>	<b>707,338</b>	<b>706,934</b>	<b>-404</b>

Source: DOC 2011b

## 3.4 AGRICULTURAL RESOURCES

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### 3.4.2 REGULATORY FRAMEWORK

#### FEDERAL

##### **Farmland Protection Policy Act**

The Natural Resources Conservation Service (NRCS), a federal agency within the US Department of Agriculture, is the agency primarily responsible for implementation of the Farmland Protection Policy Act (FPPA). The purpose of the FPPA is to minimize federal programs' contribution to the conversion of farmland to nonagricultural uses by ensuring that federal programs are administered in a manner that is compatible with state, local, and private programs designed to protect farmland. The NRCS provides technical assistance to federal agencies, state and local governments, tribes, or nonprofit organizations that desire to develop farmland protection programs and policies.

The NRCS summarizes FPPA implementation in an annual report to Congress. The FPPA also established the Farmland Protection Program and Land Evaluation and Site Assessment (LESA).

##### **Farmland Protection Program**

The NRCS administers the Farmland Protection Program, a voluntary program aimed at keeping productive farmland in agricultural uses. Under the Farmland Protection Program, the NRCS provides matching funds to state, local, or tribal government entities and nonprofit organizations with existing farmland protection programs to purchase conservation easements. The goal of the program is to protect between 170,000 and 340,000 acres of farmland per year (USDA-NRCS 2010). Participating landowners agree not to convert the land to nonagricultural use and retain all rights to use the property for agriculture. A minimum of 30 years is required for conservation easements, and priority is given to applications with perpetual easements. The NRCS provides up to 50 percent of the fair market value of the easement being conserved (USDA-NRCS 2010).

To qualify for a conservation easement, farmland must meet several criteria. The land must be:

- Prime Farmland, Unique Farmland, or other productive soil, as defined by the NRCS based on factors such as water moisture regimes, available water capacity, developed irrigation water supply, soil temperature range, acid-alkali balance, water table, soil sodium content, potential for flooding, erodibility, permeability rate, rock fragment content, and soil rooting depth;
- Included in a pending offer to be managed by a nonprofit organization, state, tribal, or local farmland protection program;
- Privately owned;
- Placed under a conservation plan;
- Large enough to sustain agricultural production;
- Accessible to markets for the crop that the land produces; and
- Surrounded by parcels of land that can support long-term agricultural production



### STATE

#### **California Department of Conservation**

The DOC administers and supports a number of programs, including the Williamson Act, the California Farmland Conservancy Program, the Williamson Act Easement Exchange Program, and the Farmland Mapping and Monitoring Program. These programs are designed to preserve agricultural land and provide data on conversion of agricultural land to urban use. The DOC is responsible for approving Williamson Act Easement Exchange Program agreements.

#### **Important Farmland Inventory System and Farmland Mapping and Monitoring Program**

The Important Farmland Inventory System, initiated in 1975 by the US Soil Conservation Service (now the NRCS), classifies land based on ten soil and climatic characteristics. The Department of Conservation started a similar system of mapping and monitoring for California in 1980, known as the FMMP.

Under the California Environmental Quality Act (CEQA), the lead agency is required to evaluate agricultural resources in environmental assessments at least in part based on the FMMP. The state's system was designed to document how much agricultural land in California was being converted to nonagricultural land or transferred into Williamson Act contracts. The definitions of Important Farmland types are provided in the Farmland Mapping and Monitoring Program discussion in the Existing Setting section above.

#### **Williamson Act**

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is promulgated in California Government Code Sections 51200–51297.4. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments. Specifically, this legislation enables landowners who voluntarily agree to participate in the Williamson Act program to receive assessed property taxes according to the income-producing value of their property in agricultural use, rather than on the property's assessed market value.

Private land within locally designated agricultural preserve areas is eligible for enrollment under Williamson Act contracts. To meet this requirement, two or more parcels may be combined if they are contiguous or if they are under common ownership. A county or city may establish agricultural preserves of less than 100 acres if it finds that smaller preserves are necessary due to the unique characteristics of the agricultural enterprises in the area and that the establishment of preserves of less than 100 acres is consistent with the general plan of the county or city (California Government Code Section 51230 et seq.).

The Williamson Act program is administered by the California Department of Conservation in conjunction with local governments, which administer the individual contract arrangements with landowners. The landowner commits the parcel to a 10-year "rolling" period wherein no conversion out of agricultural use is permitted. Each year, the contract automatically renews unless a notice of nonrenewal or cancellation is filed. In return, the land is taxed at a rate based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value. An application for immediate cancellation can also be requested by the landowner, provided that the proposed immediate cancellation application is consistent with the cancellation criteria stated in the California Land Conservation Act and those adopted by the

### 3.4 AGRICULTURAL RESOURCES

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affected county or city. Nonrenewal or immediate cancellation does not change the zoning of the property. Participation in the Williamson Act program is dependent on county adoption and implementation of the program and is voluntary for landowners.

The Williamson Act states that a board or council shall, by resolution, adopt rules governing the administration of agricultural preserves. The rules of each agricultural preserve specify the uses allowed. Generally, any commercial agricultural use will be permitted in any agricultural preserve; however, local governments may identify compatible uses permitted with a use permit.

California Government Code Section 51238 states that the erection, construction, alteration, or maintenance of electric and communication facilities, as well as other facilities, is determined to be a compatible use within any agricultural preserve, unless otherwise decided by a local board or council. Also, Section 51238 states that a board of supervisors may impose conditions on lands or land uses to be placed within preserves to permit and encourage compatible uses in conformity with Section 51238.1.

California Government Code Section 51238.1 allows a board or council to deem compatible any use, without conditions or mitigation, which would otherwise be considered incompatible. However, this may occur only if the use meets the following conditions:

- The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels on other contracted lands in agricultural preserves.
- The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels on other contracted lands in agricultural preserves. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.
- The use will not result in the significant removal of adjacent contracted land from agricultural or open space use.

#### **California Coastal Act**

The California Coastal Commission (CCC) has authority over certain types of land use and development within the coastal zone through administration of the California Coastal Act. The Coastal Act contains specific policies which address the preservation of agricultural land and the protection of such land from non-agricultural conversion.

- Coastal Act Policy 30241: The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:
  - By developing available lands not suited for agriculture prior to the conversion of agricultural lands.
  - By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b) of this section, and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.

- Coastal Act Policy 30242: All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless: (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.
- Coastal Act Policy 30250(a): New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulative, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

### LOCAL

#### County of Santa Barbara Comprehensive Plan

The Santa Barbara County Comprehensive Plan provides a general framework or blueprint for development and physical growth in the county. The Comprehensive Plan's Coastal Land Use Plan and Agricultural and Land Use elements contain various goals and policies that address agricultural resources, including the preservation and expansion of agricultural land use in rural areas of the county. Such lands are designated AC, A-I, or A-II by the Land Use Element and A-I or A-II by the Coastal Land Use Plan of the Comprehensive Plan and provide opportunities for a range of commercial agricultural operations. Comprehensive Plan policies outline the County's priority to preserve and, where feasible, expand and intensify agricultural land uses. Agricultural operations are encouraged in areas containing both prime and non-prime soils. Relevant goals and policies are summarized below.

#### Agricultural Element

**Goal I:** Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow (taking into account environmental impacts) expansion and intensification shall be supported.

**Policy I.A:** The integrity of agricultural operation shall not be violated by recreational or other non-compatible uses.

**Policy II.D:** Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.

**Goal III:** Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.

### 3.4 AGRICULTURAL RESOURCES

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#### Land Use Element

**Regional Goal, Agriculture:** In the rural areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported. Lands with both prime and non-prime soils shall be reserved for agricultural uses.

The Land Use Element establishes limited exceptions to this goal, where certain limited uses are appropriately located in the Rural Area of the county. The definition of Rural Area identifies mineral (including oil) extraction and related uses, recreation (public or private), and uses of a public or quasi-public nature as exceptions. The Land Use Element also establishes Overlays for Rural Areas Only to designate uses that are nonagricultural; these overlays include Mineral Resource Industry, Agricultural Industry, Waste Disposal Facility, and Petroleum Resource Industry. Limited application of these overlays historically has allowed nonagricultural uses, subject to case-by-case discretionary approval of the overlay via amendment to the Land Use Maps.

#### Coastal Land Use Plan

The County Coastal Land Use Plan (CLUP) implements the policies of the Coastal Act in the coastal zone and includes several policies related to agricultural protection. Relevant policies are presented below:

- CLUP Policy 8-2: If a parcel is designated for agricultural use and is located in a rural area not contiguous with the urban/rural boundary, conversion to nonagricultural use shall not be permitted unless such conversion of the entire parcel would allow for another priority use under the Coastal Act (e.g., coastal dependent industry, recreation and access, or protection of an environmentally sensitive habitat). Such conversion shall not be in conflict with contiguous agricultural operations in the area, and shall be consistent with Sections 30241 and 30242 of the California Coastal Act.
- CLUP Policy 8-4: As a requirement for approval of any proposed land division of agricultural land designated as Agriculture I or II in the land use plan, the County shall make a finding that the long-term agricultural productivity of the property will not be diminished by the proposed division.

#### **Uniform Rules of Agricultural Preserves and Farmland Security Zones**

The Santa Barbara County Uniform Rules of Agricultural Preserves and Farmland Security Zones (Uniform Rules) is the set of rules the County uses to administer its Agricultural Preserve Program under the Williamson Act. The Uniform Rules implement the Williamson Act by defining eligibility requirements and compatible uses that each participating landowner must adhere to in order to receive a reduced tax assessment. The Uniform Rules' eligibility criteria require that an agricultural preserve consist of no less than 100 acres for non-prime agricultural lands, 40 acres for prime agricultural lands, or a combination of 40 acres that may consist of a combination of 20-acre prime agricultural lands or five-acre minimum super prime agricultural lands. The County also enforces agricultural preserve contract requirements to ensure tax assessments for contracted lands are appropriate.

The Uniform Rules also establish standards for the termination of Williamson Act contracts and the withdrawal of land from the Agricultural Preserve program, without impairing the integrity of the program. Uniform Rule 6 provides standards for the termination of contracts via several methods, which include nonrenewal, cancellation, annexation, public acquisition, and rescission. Uniform Rule 6-1.1, Nonrenewal, states, "Withdrawal by a notice of nonrenewal is the

preferred method considered in all instances, whether for all or part of the contracted land where whole parcels are involved. This method is open to either party to the contract, does not require a finding of fact, and provides for an adjustment in land assessed values, pursuant to Section 426 of the Revenue and Taxation Code." Upon serving a notice of nonrenewal, the existing contract remains in effect for the balance of the period remaining from the date of the original execution or the last renewal of the contract, typically a period of ten years. Uniform Rule 6-1.2, Cancellation, outlines the process for a landowner to petition the Board of Supervisors for the cancellation of his or her Williamson Act or Farmland Security Zone contract. The Board of Supervisors may grant tentative approval for cancellation of a Williamson Act contract only if it can make all of the findings for either Government Code Section 51282(a)(1)(b) or Section 51282(a)(2)(c).

### **County of Santa Barbara Zoning Ordinances**

The Santa Barbara County Land Use and Development Code, the Montecito Land Use and Development Code, and the Article II Coastal Zoning Ordinance (collectively known as the County zoning ordinances) constitute a portion of Chapter 35 of the Santa Barbara County Code. The County zoning ordinances carry out the policies of the County Comprehensive Plan and Local Coastal Program by classifying and regulating the uses of land and structures in the county, consistent with these legislative acts. The County zoning ordinances are adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the county (Section 35.10.010, Purpose of Development Code).

### County Code, Chapter 3, Article V, Right-to-Farm Ordinance

The purpose of this division of the code is to protect agricultural land uses on land designated on the Comprehensive Plan/Coastal Plan Land Use Maps as AC, A-I, or A-II or on land zoned exclusively for agricultural use from conflicts with nonagricultural land uses that may result in financial hardship to agricultural operators or the termination of their operation.

The purpose of the ordinance is to preserve and protect for exclusive agricultural use on those lands zoned for agricultural use, to support and encourage continued agricultural operations in the county, and to forewarn prospective purchasers or residents of property adjacent to or near agricultural operations of the inherent potential problems associated with such purchase or residence including, but not limited to, the sounds, odors, dust, and chemicals that may accompany agricultural operations.

Projects that are proposed and/or approved in the county proximate to agriculturally zoned lands are often required to provide notice to future residents, tenants, and users of the right to farm.

### **3.4.3 IMPACTS AND MITIGATION MEASURES**

#### STANDARDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project would normally have a significant impact on the environment if it would result in any of the following:

- 1) The impact analysis provided below is based on the following State CEQA Guidelines Appendix G thresholds of significance. The project would result in a significant impact to agricultural and forestland resources if it would:

### 3.4 AGRICULTURAL RESOURCES

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- 2) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.
- 3) Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- 4) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
- 5) Result in the loss of forestland or conversion of forestland to non-forest use.
- 6) Involved other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to non-forest use.

Please refer to Section 3.0, Introduction to Environmental Analysis, for a discussion of forestland and timberland resources.

#### County of Santa Barbara Environmental Thresholds and Guidelines Manual

The County of Santa Barbara Agricultural Resource Guidelines, included within the Santa Barbara County Environmental Thresholds and Guidelines Manual (Santa Barbara 2008) uses a point system to assign relative values to particular characteristics of a site's agricultural productivity (e.g., soils, parcel size, water availability, land use designation, and a range of other issues) to determine whether a proposed project's impact on loss or impairment of agricultural resources will be considered to have a potentially significant impact.

#### METHODOLOGY

Evaluation of potential impacts of the proposed ECAP was based on review of the County Comprehensive Plan. The following analysis is based on information gathered from the Coastal Land Use Plan and Land Use, Conservation, and Agriculture elements of the Comprehensive Plan, the California Department of Conservation (2011b) Farmland Conversion Reports for 2008 to 2010, and the California Department of Conservation (2011a) Important Farmlands Map.

#### IMPACTS AND MITIGATION MEASURES

##### Agricultural Impacts

**Impact 3.4.1** Inasmuch as the proposed GHG reduction measures would encourage future physical improvement projects, such as renewable energy facilities, the proposed ECAP could indirectly result in impacts on agricultural land. While the potential location of future energy generating facilities on agricultural land would result in the conversion of agricultural land and possibly the conversion of lands with Williamson Act contracts, the ECAP is not proposing to entitle or approve any specific energy generating facility projects. Since energy generating facilities promoted by the ECAP are already allowed on agricultural lands under existing conditions, this impact would be adverse, but **less than significant (Class III)**.

According to the DOC Land Use Conversion data (2011b), as indicated in **Table 3.4-1**, Santa Barbara County contains approximately 66,568 acres of Prime Farmland, 12,475 acres of

Farmland of Statewide Importance, 35,606 acres of Unique Farmland, and 10,643 acres of Farmland of Local Importance (described hereafter as important farmlands). The county also contains approximately 581,642 acres of Grazing Land. The proposed ECAP is a policy-level document that does not include site-specific designs or proposals for development projects, nor does it grant any entitlements for development that would have the potential to adversely affect agricultural resources. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Land Use Element and Coastal Land Use Plan. As a policy document, the ECAP would have no direct impact on agricultural resources, but future implementation activities could adversely affect agricultural resources.

Implementation of certain measures in the ECAP, such as the promotion of bicycle and pedestrian infrastructure (LUD2, T5, and T6), the construction of public transit improvements (T4), and support for new alternative technology in new and existing development (RE1), could potentially encroach into areas supporting agricultural production. However, these reduction measures would primarily involve the placement of improvements in existing urban and developed areas of the county. Similarly, ECAP measures, such as the Energy Efficiency and Green Building standards (BE8), Alternative Energy Development (RE1), and replacement of solar water heating systems (RE2), are not anticipated to impact agricultural lands because these GHG reduction strategies represent further intensification of an existing human setting rather than the complete loss of a more natural setting like agricultural lands.

In contrast, a measure promoting the use of clean alternative energy production by encouraging development of utility-scale renewable electrical generation facilities (RE4), could result in renewable energy generating facilities and supporting facilities such as transmission lines that would convert or cross agricultural lands. Based on review of the California Energy Commission's (2008) California Wind Resource Potential Map, large portions of the county have potential for renewable wind energy generating facilities (see **Figure 3.4-1**). The draft staff paper entitled California Solar Resources (CEC 2005) was also reviewed and shows the northeast portion of the county to be the most suitable for solar. However the highest "concentrating solar power" rating in the county is only 5.00–5.50, which is substantially lower than the southeast portion of California, which has been identified as the best location for utility-scale solar energy generation plants and contains a concentrating solar power rating of as high as 8.37 (CEC 2005). Utility-scale and private-scale wind generating facilities and private-scale solar generating facilities are currently allowed in the Agriculture zoning districts as provided in the County Land Use and Development Code under Section 35.21.030. These facilities and supporting equipment (e.g., transmission lines) could result in the loss of agricultural lands, including important farmlands and farmlands under Williamson Act contracts, as well as result in conflicts with existing agricultural operations. The size of these facilities can vary from just a few acres to several thousand acres; therefore, the extent of the operational life of these facilities may be substantial.

As stated, wind and solar generating facilities are currently allowed in the County Agriculture zoning districts as provided in the County Land Use and Development Code under Section 35.21.030. (Utility-scale wind and solar generating facilities are prohibited on lands covered by the Montecito Land Use and Development Code, and utility-scale and private-scale wind generating facilities and utility-scale solar generating facilities are prohibited on lands covered by the Coastal Zoning Ordinance.) The County Comprehensive Plan includes policies that address potential impacts to agricultural lands. For instance, Policy II.D of the Comprehensive Plan Agriculture Element states that the conversion of highly productive agricultural lands, whether urban or rural, shall be discouraged and that the County will support programs which encourage the retention of highly productive agricultural lands. Furthermore, as mandated by Policy 8.2 of the Coastal Land Use Plan Element as well as Article II Coastal Zoning Ordinance, if

### 3.4 AGRICULTURAL RESOURCES

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a parcel in the County's coastal zone is designated for agricultural use and is located in a rural area not contiguous with the urban/rural boundary, conversion to nonagricultural use is not permitted unless such conversion of the entire parcel would allow for another priority use under the Coastal Act, e.g., coastal-dependent industry, recreation and access, or protection of an environmentally sensitive habitat. Any proposed conversion of farmland in the coastal areas of the county could not be in conflict with contiguous agricultural operations in the area and must be consistent with Sections 30241 and 30242 of the Coastal Act. Policy 8-4 of the Coastal Land Use Plan states that as a requirement for approval of any proposed land division of agricultural land designated as Agriculture I or II in the land use plan, the County must first make a finding that the long-term agricultural productivity of the property will not be diminished by the proposed division.

The County zoning ordinances also address potential impacts to agricultural lands. The County zoning ordinances mandate the land uses that are allowed within the Agricultural zoning district established by the Comprehensive Plan, determine the type of planning permit/approval required for each use, and provide basic standards for site layout and building size. Development standards for utility-scale and private-scale wind energy and private-scale solar energy projects, such as height restrictions, setbacks, and unit spacing requirements, are contained in the County Land Use and Development Code. Development standards for private-scale wind energy and solar energy projects, such as height restrictions, setbacks, and unit spacing requirements, are also contained in the Montecito Land Use and Development Code. Additionally, the County zoning ordinances carry out the policies of the County Comprehensive Plan and Local Coastal Program by classifying and regulating the uses of land and structures in the county, consistent with these legislative acts. One of the primary purposes of the County Coastal Zoning Ordinance is to designate and protect lands appropriate for long-term agricultural use within or adjacent to urbanized areas and to preserve prime agricultural soils. In addition to the Comprehensive Plan and the County zoning ordinances, the ECAP also contains measures to benefit agriculture. For instance, an ECAP measure would require the facilitation of the increased use of agricultural easements through zoning, dedication of public funds, and mitigation fees (AG6).

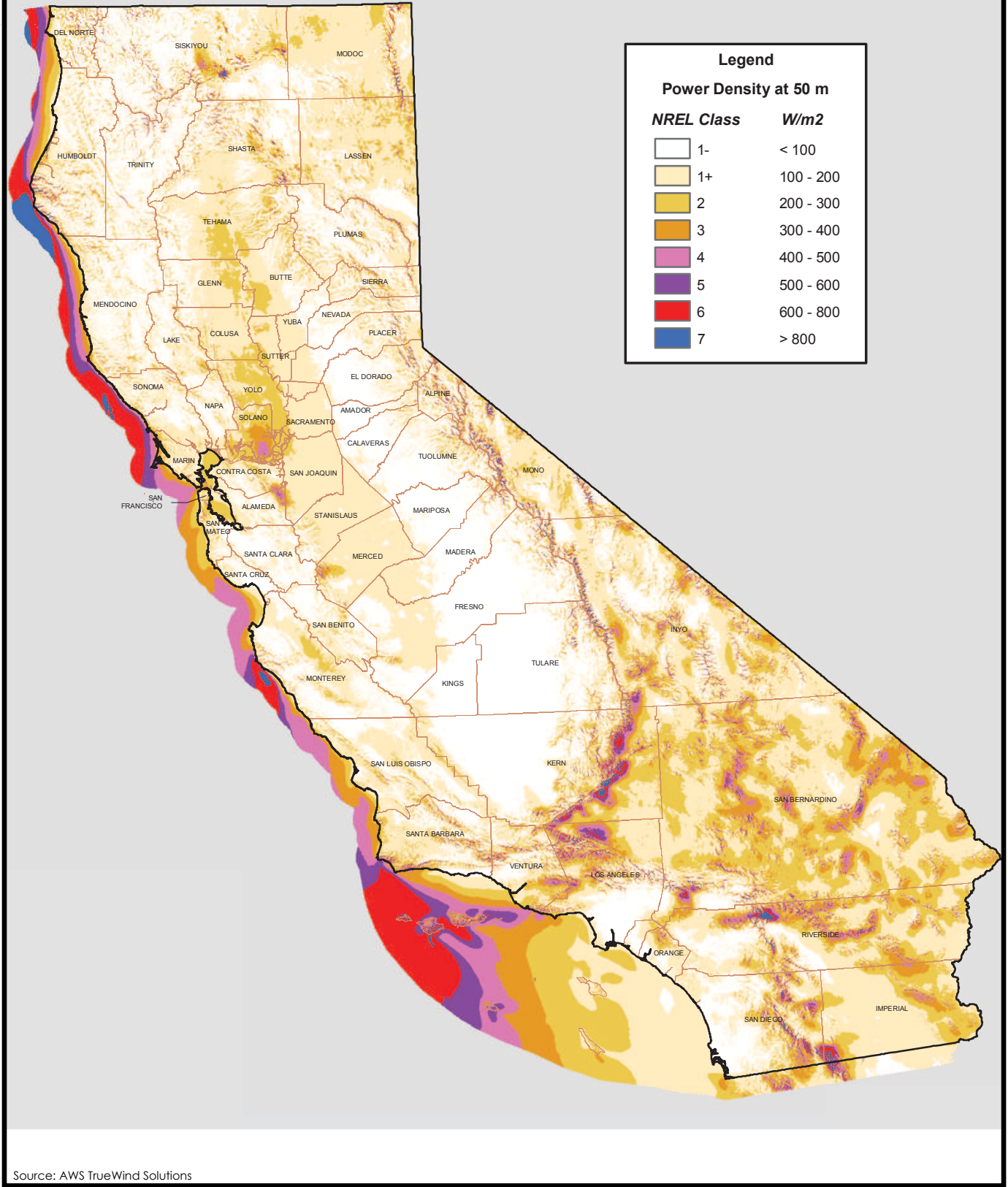
As previously described, the CCC has authority over certain types of land use and development within the coastal zone through administration of the California Coastal Act. The act contains specific policies that address the preservation of agricultural land and the protection of such land from nonagricultural conversion. For instance, Coastal Act Policy 30242 states that all lands within the coastal zone suitable for agricultural use shall not be converted to nonagricultural uses unless: (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Additionally, Coastal Act Policy 30241 requires that the maximum amount of prime agricultural land be maintained in agricultural production to assure the protection of the areas' agricultural economy.

As noted above, implementation of Comprehensive Plan policies and the County zoning ordinances, as well as continued adherence to the California Coastal Act, would address agricultural impacts. Furthermore, the ECAP contains measures to benefit agriculture. In addition, while the loss of agricultural lands from the construction of renewable energy generating facilities could be substantial, such facilities are already allowed on agricultural lands under the existing regulatory environment. Thus, agricultural impacts associated with the proposed ECAP would be adverse, but **less than significant (Class III)**, as the ECAP only promotes utility-scale renewable energy generation and does not propose to fund, entitle, or approve any specific energy generating facility projects.



T:\\_CS\Work\Santa Barbara County of\ECAP\ER\Figures

# Annual Wind Power at 50 Meter Elevation



Source: AWS TrueWind Solutions

Not to Scale



**Figure 3.4-1**  
California Wind Resources

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#### CUMULATIVE IMPACTS

The cumulative context for the impacts on agriculture resources would be from urban development within Santa Barbara County. The loss of productive agricultural land has occurred over the last several decades as urban development expands into agricultural areas. It is reasonable to assume that present and future development activities would continue to result in additional impacts. The County has strong policies to deter and minimize urban encroachment on agricultural lands; however, requests for annexations from incorporated cities for may continue into the future. As previously demonstrated, the proposed ECAP would not result in significant impacts on farmland. As described above, the ECAP only promotes utility-scale renewable energy generation and does not propose to entitle, fund, or approve any specific energy generating facility projects. The contribution to cumulative impacts on agricultural resources is considered to be adverse, but **less than cumulatively considerable (Class III)** and thus not significant.

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## **3.5 BIOLOGICAL RESOURCES**



This section describes the biological resources present in Santa Barbara County, analyzes impacts that could occur to biological resources due to implementation of the proposed Energy and Climate Action Plan (ECAP), and includes appropriate mitigation measures to reduce or avoid these impacts.

### 3.5.1 EXISTING SETTING

#### HABITAT

Santa Barbara County contains a wide diversity of tree (hardwood and coniferous forests, oak woodlands), shrub (chaparral, coastal scrub), and herbaceous (grasslands, arid beach dunes) habitat types. A description of habitat types that exist in the county is provided below. It should be noted that these habitat descriptions are generalized and that site-specific variation is likely to be present.

**Blue Oak Woodland.** Generally these woodlands have an overstory of scattered trees, although the canopy can be nearly closed. The canopy is dominated by broad-leaved trees, 5 to 15 meters (16 to 50 feet) tall, commonly forming open savanna-like stands on dry ridges and gentle slopes. Blue oak (*Quercus douglasii*) is typically the dominant tree species. Shrubs such as poison oak (*Toxicodendron diversilobum*), California coffeeberry (*Rhamnus californicus*), buckbrush (*Ceanothus cuneatus*), and redberry (*Rhamnus crocea*) are often present but rarely extensive and often occur on rock outcrops. Typical understory is composed of an extension of annual grassland vegetation described below.

**Montane Hardwood-Coniferous Forest.** These forests include both conifers and hardwoods, often as a closed forest. To be considered montane hardwood-coniferous forest, at least one-third of the trees must be conifer and at least one-third must be broad-leaved. Species composition varies by geographic region, but in the Central Coast region of California common tree species include coast live oak (*Quercus agrifolia*), big leaf maple (*Acer macrophyllum*), Pacific madrone (*Arbutus menziesii*), tanoak (*Lithocarpus densiflorus*), canyon live oak (*Quercus chrysolepis*), Coulter pine (*Pinus coulteri*), and coastal redwood (*Sequoia sempervirens*). The habitat often occurs in a mosaic-like pattern with small pure stands of conifers interspersed with small stands of broad-leaved trees. Most of the broad-leaved trees are sclerophyllous evergreen, but winter-deciduous species also occur. Relatively little understory occurs under the dense, bi-layered canopy. However, considerable ground and shrub cover can occur in ecotones or following disturbance.

**Montane Riparian Forest.** The vegetation of montane riparian forest habitats is variable and often structurally diverse. Usually, these riparian areas occur as a narrow, often dense grove of broad-leaved, winter-deciduous trees with a sparse understory. At high mountain elevations, more shrubs tend to occur in the understory. In the Coast Range, big leaf maple and California bay laurel (*Umbellularia californica*) are typical dominants of montane riparian habitat.

**Valley Oak Woodland.** This habitat can range in structure from savanna-like to forest-like stands. The canopies tend to be partially closed and comprise mostly winter-deciduous, broad-leaved species such as valley oak (*Quercus lobata*). Dense stands typically grow in valley soils along natural drainages and decrease with the transition from lowlands to uplands. Shrubs are also associated with this habitat in lowland areas, especially along drainages. Valley oak stands with little or no grazing tend to develop a partial shrub layer of bird disseminated species, such as poison oak, toyon (*Heteromeles arbutifolia*), and California coffeeberry. Ground cover consists of a well-developed carpet of annual grasses and forbs such as species of wild oat (*Avena* sp.), bromes (*Bromus* sp.), and ryegrass.

### 3.5 BIOLOGICAL RESOURCES

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**Coastal Oak Woodland.** Coastal oak woodlands are common to mesic coastal foothills of California. The woodlands do not form a continuous belt, but occur in a mosaic closely associated with mixed chaparral, coastal scrub, and annual grasslands. South of Sonoma County, these woodlands are commonly dominated by coast live oak. At drier sites, other species such as blue oak and foothill pine (*Pinus sabiniana*) may also be interspersed. The understory of dense stands tends to be composed of shade-tolerant shrubs and herbaceous plant species such as California blackberry (*Rubus ursinus*), miner's lettuce (*Claytonia perfoliata*) and toyon. In areas with more open canopies, the understory may be more dominated by grassland and shrub species such as California blackberry and poison oak.

**Eucalyptus Forest.** This habitat type ranges from single-species thickets with little or no shrubby understory to scattered trees over a well-developed herbaceous and shrubby understory. In most cases, eucalyptus forms a dense stand with a closed canopy. Blue gum eucalyptus (*Eucalyptus globulus*) and red gum eucalyptus (*E. camaldulensis*) are the most common eucalyptus species found in these stands. The understory of these areas tends to have extensive patches of leaf litter but may include species such as poison oak.

**Valley Foothill Riparian.** This habitat type is associated with drainages, particularly those with low-velocity flows, floodplains, and gentle topography. This habitat generally comprises a sub-canopy tree layer dominated by cottonwoods (*Populus* sp.), sycamore (*Platanus racemosa*), and/or valley oak and an understory shrub layer typically consisting of willows (*Salix* spp.) and/or mulefat (*Baccharis salicifolia*).

**Chamise-Redshank Chaparral.** This habitat type can range from nearly pure stands of chamise (*Adenostoma fasciculatum*) or redshank (*A. sparsifolium*) to a mixture of both. Mature chamise-redshank chaparral is single layered, generally lacking well-developed herbaceous ground cover and overstory trees. Shrub canopies frequently overlap, producing a nearly impenetrable canopy of interwoven branches. Redshank stands tend to be slightly taller and more open than chamise-dominated stands. Fire occurs regularly in chamise-redshank chaparral and influences habitat structure.

**Coastal Scrub.** This habitat type is typically dominated by shrub species with mesophytic leaves and shallow root systems. This habitat type can differ in composition depending on proximity to the coastline. California sagebrush (*Artemisia californica*) tends to be common in all coastal scrub habitats. From Mount Diablo to Santa Barbara County, black sage (*Salvia mellifera*) and California buckwheat (*Eriogonum fasciculatum*) become more abundant in mesic areas. In drier areas from Santa Barbara County to Orange County, purple sage (*S. leucophylla*) is more prevalent in the species composition of this habitat type.

**Mixed Chaparral.** This habitat type occurs on the hills and lower mountain slopes in Santa Barbara County. Mixed chaparral is a structurally homogeneous brushland type dominated by shrubs with thick, stiff, heavily cutinized evergreen leaves. Shrub height and crown cover vary with age since last burn, precipitation, aspect, and soil type. At maturity, cismontane mixed chaparral typically is a dense, nearly impenetrable thicket.

**Annual Grasslands.** This habitat type is composed primarily of non-native annual herbs and forbs and typically lacks shrub or tree cover. The physiognomy and species composition of annual grasslands is highly variable and also varies considerably on a temporal scale. Grazing is a common land use within this habitat type. Common grass species include wild oats, soft chess brome (*Bromus hordeaceus*), ripgut brome (*B. diandrus*), and red brome (*B. madritensis*). Common forb species can include species of filaree (*Erodium* sp.) and bur clover (*Medicago* sp.). California poppy (*Eschscholzia californica*) can also be quite common in this habitat type.



**Drainages.** Four primary watersheds occur in the county: Santa Maria, which includes the Cuyama and Sisquoc watersheds; San Antonio Creek; Santa Ynez; and South Coast, which is composed of approximately 50 short, steep watersheds. The headwaters of the principal watersheds are generally undeveloped, and the middle and lower sections are often developed with urban or agricultural uses. The four major rivers draining these watersheds are the Santa Maria, Sisquoc, Cuyama, and Santa Ynez. Several creeks are associated with each one of these watersheds. The drainages within these watersheds are of biological importance, as they provide valuable foraging habitat, breeding habitat, and movement habitat for a wide variety of animal species, including sensitive species such as steelhead – Southern California distinct population segment (DPS) (*Oncorhynchus mykiss*), California red-legged frog (*Rana draytonii*), and southwestern willow flycatcher (*Empidonax traillii extimus*).

### SPECIAL-STATUS SPECIES

Santa Barbara County is home to several species protected by federal and state agencies. Important animal species can be found in a variety of habitats in the county. The California Department of Fish and Wildlife (CDFW), US Fish and Wildlife Service (USFWS), and California Native Plant Society (CNPS) collectively list 266 special-status plant and animal species that occur in Santa Barbara County (SBCAG 2013).

### WILDLIFE MOVEMENT CORRIDORS

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

The habitats within the link do not necessarily need to be the same as the habitats that are being linked. Rather, the link merely needs to contain sufficient cover and forage to allow temporary inhabitation by ground-dwelling species. Typically, habitat linkages are contiguous strips of natural areas, though dense plantings of landscape vegetation can be used by certain disturbance-tolerant species. Depending on the species using a corridor, specific physical resources (such as rock outcroppings, vernal pools, or oak trees) may need to be located within the habitat link at certain intervals to allow slower-moving species to traverse the link. For highly mobile or aerial species, habitat linkages may be discontinuous patches of suitable resources spaced sufficiently close together to permit travel along a route in a short period of time.

Wildlife movement corridors can be either large or small in scale. The mountainous regions of Santa Barbara County may support wildlife movement on a regional scale, while riparian corridors may provide more local-scale opportunities for wildlife movement throughout the county.

## 3.5 BIOLOGICAL RESOURCES

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### 3.5.2 REGULATORY FRAMEWORK

#### FEDERAL

##### **Endangered Species Act**

Provisions of the federal Endangered Species Act (ESA), as amended (16 USC 1531), protect federally listed threatened and endangered species and their habitats from unlawful take. "Take" under the ESA includes activities such as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." USFWS regulations define harm to include some types of "significant habitat modification or degradation." In the case of *Babbitt, Secretary of Interior, et al., Petitioners v. Sweet Home Chapter of Communities for a Great Oregon, et al.* (No. 94-859), the United States Supreme Court ruled on June 29, 1995, that harm may include habitat modification "where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering."

For projects with a federal nexus, Section 7 of the ESA requires that, in consultation with the USFWS, a federal agency use its authority to further the purpose of the ESA and to ensure that its actions are not likely to jeopardize the continued existence of listed species or result in destruction or adverse modification of critical habitat. Section 10(a)(1)(B) allows nonfederal entities to obtain permits for incidental taking of threatened or endangered species through consultation with the USFWS. Key provisions of the ESA are summarized below.

##### Section 10

Section 10 of the ESA provides a means for nonfederal entities (states, local agencies, and private parties) that are not permitted or funded by a federal agency to receive authorization to disturb, displace, or kill (i.e., take) threatened and endangered species. It allows the USFWS to issue an incidental take permit authorizing take resulting from otherwise legal activities, as long as the take would not jeopardize the continued existence of the species. Section 10 requires the applicant to prepare a habitat conservation plan (HCP) addressing project impacts and proposing mitigation measures to compensate for those impacts. The HCP is subject to USFWS review and must be approved by the reviewing agency or agencies before a proposed project can be initiated. Because the issuance of the incidental take permit is a federal action, the USFWS must also comply with the requirements of ESA Section 7 and the National Environmental Policy Act (NEPA).

##### Section 7

Section 7 of the ESA applies to the management of federal lands, as well as other federal actions, such as federal approval of private activities through the issuance of federal permits, licenses, funding, or other actions that may affect listed species. Section 7 directs all federal agencies to use their existing authorities to conserve threatened and endangered species and, in consultation with the USFWS, to ensure that their actions do not jeopardize listed species or destroy or adversely modify critical habitat. Critical habitat is defined as specific areas that are essential to the conservation of federally listed species.

##### **Clean Water Act, Section 404**

The objective of the Clean Water Act (1977, as amended) is to restore and maintain the chemical, physical, and biological integrity of the nation's waters. Discharge of fill material into waters of the United States, including adjacent wetlands, is regulated by the US Army Corps of

Engineers (USACE) under Section 404 of the federal Clean Water Act (33 USC 1251–1376). USACE regulations implementing Section 404 define waters of the United States to include intrastate waters, including lakes, rivers, streams, wetlands, and natural ponds, the use, degradation, or destruction of which could affect interstate or foreign commerce. Wetlands are defined for regulatory purposes as “areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 CFR 328.3; 40 CFR 230.3). The jurisdictional boundaries for other waters of the United States are identified based on the presence of an ordinary high water mark (OHWM) as defined in 33 CFR 328.3(e). The placement of structures in “navigable waters of the U.S.” is also regulated by the USACE under Section 10 of the federal Rivers and Harbors Act (33 USC 401 et seq.). Projects are permitted under either individual or general (e.g., nationwide) permits. Specific applicability of permit type is determined by the USACE on a case-by-case basis.

In 1987, the USACE published a manual that standardized the manner in which wetlands were to be delineated nationwide. To determine whether areas that appear to be wetlands are subject to USACE jurisdiction (jurisdictional wetlands), a wetland delineation must be performed. Under normal circumstances, positive indicators from three parameters—(1) wetland hydrology, (2) hydrophytic vegetation, and (3) hydric soils—must be present to classify a feature as a jurisdictional wetland. More recently, the USACE (2008) developed the Arid West Regional Supplement for identifying wetlands and distinguishing them from aquatic habitats and other non-wetlands. The supplement presents wetland indicators, delineation guidance, and other information that is specific to the Arid West Region. In addition to verifying wetlands for potential jurisdiction, the USACE is responsible for the issuance of permits for projects that propose filling of wetlands. Any permanent loss of a jurisdictional wetland as a result of project construction activities is considered a significant impact.

A “no net loss” wetlands policy is an overall policy goal for wetland protection first adopted by the George H. W. Bush Administration (1989–1993) and endorsed and updated by the Clinton Administration (1993–2001).

### **Clean Water Act, Section 401**

Section 401 of the Clean Water Act (CWA) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the United States to obtain a certification that the discharge will comply with the applicable effluent limitations and water quality standards. The appropriate Regional Water Quality Control Board regulates Section 401 requirements.

### **Migratory Bird Treaty Act**

Migratory birds are protected under the Migratory Bird Treaty Act (MBTA) of 1918 (16 USC 703–711). The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in Code of Federal Regulations (CFR) Title 50, Part 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21).

### **Bald and Golden Eagle Protection Act**

The bald eagle and golden eagle are federally protected under the Bald and Golden Eagle Protection Act (16 USC 668–668c). It is illegal to take, possess, sell, purchase, barter, offer to sell or purchase or barter, transport, export, or import at any time or in any manner a bald or golden eagle, alive or dead, or any part, nest, or egg of these eagles unless authorized by the Secretary

### 3.5 BIOLOGICAL RESOURCES

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of the Interior. Violations are subject to fines and/or imprisonment for up to one year. Active nest sites are also protected from disturbance during the breeding season.

#### **Fish and Wildlife Coordination Act**

Section 7 of Fish and Wildlife Coordination Act, 16 USC 742 et seq., 16 USC 1531 et seq., and 50 CFR 17 requires consultation if any project facilities could jeopardize the continued existence of an endangered species. Applicability depends on Federal jurisdiction over some aspect of the project (e.g., dredge or fill activities in "waters of the U.S."). The administering agency is expected to be the Army Corps of Engineers (USACE) in coordination with the USFWS.

STATE

#### **California Endangered Species Act**

Under the California Endangered Species Act (CESA), the CDFW has the responsibility for maintaining a list of endangered and threatened species (California Fish and Game Code Section 2070). The CDFW maintains a list of "candidate species," which are species that the CDFW formally notices as being under review for addition to the list of endangered or threatened species. The CDFW also maintains lists of "species of special concern," which serve as species "watch lists." Pursuant to the requirements of the CESA, an agency reviewing a proposed project within its jurisdiction must determine whether any state-listed endangered or threatened species may be present on the project site and determine whether the proposed project will have a potentially significant impact on such species. In addition, the CDFW encourages informal consultation on any proposed project that may impact a candidate species.

Project-related impacts to species on the CESA endangered or threatened list would be considered significant. State-listed species are protected under the mandates of the CESA. Take of protected species incidental to otherwise lawful management activities may be authorized under California Fish and Game Code Section 206.591. Authorization from the CDFW would be in the form of an Incidental Take Permit.

#### **California Wetlands Conservation Policy**

In August 1993, then-Governor Wilson announced the California Wetlands Conservation Policy. The goals of the policy are to establish a framework and strategy that will:

- Ensure no overall net loss and achieve a long-term net gain in the quantity, quality, and permanence of wetlands acreage and values in California in a manner that fosters creativity, stewardship, and respect for private property.
- Reduce procedural complexity in the administration of state and federal wetlands conservation programs.
- Encourage partnerships to make landowner incentive programs and cooperative planning efforts the primary focus of wetlands conservation and restoration.

The governor also signed Executive Order W-59-93, which incorporated the goals and objectives contained in the new policy and directed the Resources Agency to establish an Interagency Task Force to direct and coordinate administration and implementation of the policy.

### California Regional Water Quality Control Board

#### Clean Water Act, Section 401 Water Quality Certification

Section 401 of the CWA (33 USC 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the United States to obtain a certification that the discharge will comply with the applicable effluent limitations and water quality standards. The appropriate Regional Water Quality Control Board (in California) regulates Section 401 requirements. The Central Coast Regional Water Quality Control Board (CCRWQCB) covers Santa Barbara County and is responsible for controlling discharges to surface waters of the State by issuing waste discharge requirements or commonly by issuing conditional waivers to waste discharge requirements.

#### Delegated Permit Authority

California has been delegated permit authority for the National Pollutant Discharge Elimination System (NPDES) permit program including stormwater permits for all areas except Indian lands. Issuing CWA Section 404 dredge and fill permits remains the responsibility of the USACE, but the State actively uses its CWA Section 401 certification authority to ensure 404 permits protect state water quality standards.

#### State Definition of Covered Waters

Under California state law, "waters of the state" means "any surface water or groundwater, including saline waters, within the boundaries of the state." Therefore, water quality laws apply to both surface water and groundwater. After the US Supreme Court decision in *Solid Waste Agency of Northern Cook County v. Army COE of Engineers (SWANCC v. USCOE)*, the Office of Chief Counsel of the State Water Resources Control Board (SWRCB) released a legal memorandum confirming the State's jurisdiction over isolated wetlands. The memorandum stated that under the California Porter-Cologne Water Quality Control Act, discharges to wetlands and other waters of the State are subject to state regulation, and this includes isolated wetlands. In general, Regional Water Quality Control Boards regulate discharges to isolated waters in much the same way as they do for federal-jurisdictional waters, using Porter-Cologne rather than CWA authority.

### California Fish and Game Code

#### Fully Protected Species

Certain species are considered fully protected, meaning that the code explicitly prohibits all take of individuals of these species except for take permitted for scientific research. Section 5050 lists fully protected amphibians and reptiles, Section 5515 lists fully protected fish, Section 3511 lists fully protected birds, and Section 4700 lists fully protected mammals.

It is possible for a species to be protected under the California Fish and Wildlife Code, but not fully protected. For instance, the mountain lion (*Puma concolor*) is protected under Section 4800 et seq., but is not a fully protected species.

#### Protection of Birds and Their Nests

Eggs and nests of all birds are protected under Section 3503 of the California Fish and Wildlife Code, nesting birds (including raptors and passerines) under Sections 3503.5 and 3513, and birds

### **3.5 BIOLOGICAL RESOURCES**

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of prey under Section 3503.5. Migratory non-game birds are protected under Section 3800 and other specified birds under Section 3505.

#### **Native Plant Protection Act of 1977**

The Native Plant Protection Act of 1977 and implementing regulations in Section 1900 et seq. of the California Fish and Game Code designates rare and endangered plants and provides specific protection measures for identified populations. It is administered by the CDFW.

#### **Stream and Lake Protection**

The CDFW has jurisdictional authority over streams and lakes and the wetland resources associated with these aquatic systems under California Fish and Game Code Sections 1600 et seq. through administration of lake or streambed alteration agreements. Such agreements are not a permit, but rather a mutual accord between the CDFW and the project proponent. Under California Fish and Game Code Section 1600–1616, the CDFW has the authority to regulate work that will “substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river lake or stream.” The CDFW enters into a streambed alteration agreement with the project proponent and can impose conditions in the agreement to minimize and mitigate impacts to fish and wildlife resources. Because the CDFW includes under its jurisdiction streamside habitats that may not qualify as wetlands under the federal Clean Water Act definition, CDFW jurisdiction may be broader than USACE jurisdiction.

A project proponent must submit a notification of streambed alteration to the CDFW before construction. The notification requires an application fee for streambed alteration agreements, with a specific fee schedule to be determined by the CDFW. The CDFW can enter into programmatic agreements that cover recurring operation and maintenance activities and regional plans. These agreements are sometimes referred to as Master Streambed Alteration Agreements.

#### **LOCAL**

#### **Santa Barbara County Comprehensive Plan**

The Santa Barbara County Comprehensive Plan contains the Conservation Element, which includes policies to protect biological resources. The Conservation Element contains policies regarding the protection of habitats, including coastal strand and marine habitats, chaparral and scrub habitats, grassland, woodland and savanna, forest habitats, riparian forests and woodlands, introduced trees and scrubs, swampy habitats, and aquatic habitats. The County’s Comprehensive Plan, including the Land Use Element and Coastal Land Use Plan, also includes various policies designed to protect biological values. Additionally, community plans in Santa Barbara County and the general plans of the cities in the county further protect biological resources.

With regard to riparian habitats, development or intrusion within the habitat itself or within County-defined setbacks (generally within 50 feet in urban areas, within 100 feet in rural areas, and within 200 feet of major rivers) may require avoidance or mitigation. The County specifically protects native specimen trees. In particular, rare native trees that are low in number or isolated in distribution may be particularly significant. Significance evaluation is done on a case-by-case basis and considers tree size, numbers, location, and relationship to habitat.

The County of Santa Barbara also protects certain non-native trees that provide habitat value for important animal species. Monarch butterfly habitat includes the protection of eucalyptus trees. Protection includes setbacks (50 feet from butterfly roosting trees in the Coastal Plan Policy) and timing of disturbance. Non-native trees may also provide turkey vulture and raptor roosts. These trees provide resting and/or breeding locations for turkey vultures and birds of prey. County protective measures for vulture roosts include setbacks similar to trees for butterflies.

### 3.5.3 IMPACTS AND MITIGATION MEASURES

#### STANDARDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines states that a project is considered to have a significant impact on biological resources if it is found to:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.
- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

Implementation of the proposed project would result in no impacts associated with habitat conservation plans as described below.

#### **Habitat Conservation Plans**

The proposed ECAP would not conflict with an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan, as there are no adopted countywide habitat or natural community conservation plans in the region. Therefore, there would be no adverse impact related to conflicts with an applicable habitat conservation plan or natural community conservation plan and this issue (Standard of Significance f) will not be addressed further in the Final EIR.

## 3.5 BIOLOGICAL RESOURCES

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### County of Santa Barbara Environmental Thresholds and Guidelines Manual

The County of Santa Barbara Environmental Thresholds and Guidelines Manual (2008) indicates that the determination of biological impacts is done on a case-by-case basis since with the complexity of biological resource issues, substantial variation can occur between cases. As required by the manual, an assessment of impacts must account for both short- and long-term impacts. Thus, the assessment must account for items such as immediate tree removal and longer-term, more subtle impacts, such as interruption of the natural fire regime or interference with plant or animal propagation. Disturbances to habitats or species may be significant, as determined by substantial evidence in the record (not public controversy or speculation).

#### METHODOLOGY

The impact analysis below uses County Comprehensive Plan policies and development standard provisions of the Environmental Thresholds and Guidelines Manual to determine whether implementation of the proposed ECAP would result in a new impact to biological resources. Specific subsequent projects, their associated locations, and physical effects on the environment from the implementation of the ECAP measures under the County's jurisdiction are not known at this time. Thus, this analysis uses a qualitative/programmatic approach to evaluating possible impacts to biological resources from implementation of the ECAP measures. The analysis also considers recently prepared environmental review documents for renewable energy and transportation efficiency projects in the county (e.g., Cuyama Solar Facility and Comprehensive Plan/Land Use Development Code Amendments Project EIR (Santa Barbara 2014) and 2040 Santa Barbara County Regional Transportation Plan and Sustainable Communities Strategy EIR (SBCAG 2013)) to identify potential impacts unique to implementation of the ECAP reduction measures.

#### IMPACTS AND MITIGATION MEASURES

##### Natural Habitat Areas/Sensitive Species/Wildlife Corridors

**Impact 3.5.1** Inasmuch as the proposed GHG reduction measures would encourage physical improvement projects, such as renewable energy facilities, the proposed ECAP would not directly or indirectly result in impacts on sensitive and special-status species or their associated habitat and migratory corridors. This impact is adverse, but **less than significant (Class III)**.

The County of Santa Barbara ECAP is a policy-level document that does not include site-specific designs or proposals for development projects, nor does it grant any entitlements for development that would have the potential to adversely affect biological resources. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the County Comprehensive Plan Land Use Element and Coastal Land Use Plan. As a policy document, the ECAP would have no direct impact on biological resources, but future implementation activities could adversely affect biological resources. However, it is noted that implementation of future ECAP measures would be required to comply with the environmental reporting requirements of CEQA following submittal of a specific development proposal, including the need to evaluate potential biological impacts for both short- and long-term impacts in the form of site-specific biological studies on a case-by-case basis.

Many of the proposed ECAP measures would not result in infrastructure being constructed and are generally accomplished by minor changes in behavior by individuals in the community or



through actions such as promoting energy conservation, recycling, and waste reduction, or may involve minor construction on existing structures. Other measures, however, encourage or provide incentives for development of improvements or facilities that are more intensive than minor retrofits. ECAP Measures BE1 (Energy Efficiency and Outreach), BE8 (Energy Efficiency and Green Building Standards), RE1 (Alternative Energy Development), RE2 (Solar Water Heaters), RE3 (Alternative Energy Incentives), and RE4 (Utility-Scale Renewable Energy Projects) would support installation of small-scale renewable energy systems, the installation of solar hot water systems, pre-wired solar homes, and utility-scale renewable energy generators, including solar photovoltaic and wind turbines, in the county. Construction and operation of these facilities would have the potential to impact biological resources. Specifically, implementation of ECAP measures could involve installation of wind generators and other renewable energy facilities that have the potential to impact sensitive and special-status species in unique ways compared with other development. Wildlife may be potentially affected by certain greenhouse gas (GHG) reduction measures through:

- Loss of habitat and blockage of movement corridors;
- Electrocutation from transmission lines;
- Noise;
- Presence of or collision with turbines or transmission lines;
- Maintenance activities; or
- Special-status avian and bat strikes with wind energy facilities.

In some instances, turbines, transmission lines, and other facility structures may interfere with behavioral activities, including migratory movements, and may provide additional perch sites for raptors, thereby increasing predatory levels on other wildlife. Additionally, in certain cases wind power generating facilities have the potential for direct mortality to special-status birds, raptors, and bats due to collisions with wind turbines, and indirect death to bats through barotraumas (Baerwald et al. 2008).<sup>1</sup>

As required by the County Environmental Thresholds and Guidelines Manual, implementation of future ECAP measures would be required to evaluate potential biological impacts for both short- and long-term impacts in the form of site-specific biological studies on a case-by-case basis. Site-specific biological studies are required for many proposed development projects in the county in order to account for short-term items, such as immediate tree removal, and longer-term, more subtle impacts, such as interruption of the natural fire regime or interference with plant or animal propagation. [There are areas in the county where little or no importance is given to a habitat, and it is presumed that disruption would not create a significant impact. Examples of areas where impacts on habitat are presumed to be insignificant include small areas of non-native grassland, areas of historical disturbance, such as intensive agriculture, and others. Projects proposed in these defined areas are sometimes not required to perform a site-specific study (Santa Barbara 2008).] According to the Environmental Thresholds and Guidelines Manual, disturbances to habitats or species may be significant, as determined by substantial evidence, if they affect significant resources in the following ways:

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<sup>1</sup> Barotrauma refers to trauma caused by rapid or extreme changes in air pressure, affecting enclosed cavities within the body, such as the middle ear, sinuses, and lungs.

### 3.5 BIOLOGICAL RESOURCES

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- Substantially reduce or eliminate species diversity or abundance.
- Substantially reduce or eliminate the quantity or quality of nesting areas.
- Substantially limit reproductive capacity through losses of individuals or habitat.
- Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources.
- Substantially limit or fragment range and movement (geographic distribution or animals and/or seed dispersal routes).
- Substantially interfere with natural processes, such as fires or floods, upon which the habitat depends.

Future site-specific biological studies associated with the future implementation of ECAP measures, as required by the County Environmental Thresholds and Guidelines Manual, would identify specific impacts and mitigation measures in accordance with the County Comprehensive Plan policies and Guidelines for Assessment of Biological Resources Impacts in the Environmental Thresholds and Guidelines Manual. Potential mitigation measures could include avoiding sites with known sensitive and special-status plant species or communities and/or replacing and compensating for the loss of sensitive communities.

The proposed project is a policy-level document that does not include site-specific designs or proposals for development projects, nor does it grant any entitlements for development that would have the potential to result in impacts on biological resources. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Land Use Element and Coastal Land Use Plan. Nevertheless, some physical changes could be facilitated by the proposed ECAP. However, implementation of future ECAP measures would be required to comply with the environmental reporting requirements of CEQA following submittal of a specific development proposal, including the need to evaluate potential biological impacts for both short- and long-term impacts in the form of site-specific biological studies on a case-by-case basis consistent with the County Environmental Thresholds and Guidelines Manual and zoning ordinances. Individual projects would also have to be found consistent with state law and County policies and standard conditions of approval. Future project characteristics and locations are unknown, and any impact analysis and conclusion on level of significance would be speculative at this time for such project-specific impacts. Since the proposed ECAP would not approve or entitle any actual renewable energy development projects, impacts at the program level attributable to adoption and implementation of the proposed ECAP are adverse, but **less than significant (Class III)**.

#### **Wetland/Riparian Habitats**

**Impact 3.5.2** Implementation of the proposed ECAP measures could result in impacts on wetland and riparian habitat in some areas of the county. The proposed ECAP would result in an adverse, but **less than significant, Class III** impact.

In general, the ECAP measures involve expansion of existing facilities in urbanized or already developed areas and/or within existing rights-of-way, rather than extension of infrastructure into undeveloped portions of the county. Therefore, most contemplated improvements would not be expected to adversely affect important biological habitats, such as wetlands and riparian areas.

However, there is the potential that certain future ECAP measures would involve the development of bicycle paths or traffic efficiency improvements along riparian corridors and/or in wetland areas, such as those associated with the Santa Maria, Sisquoc, Cuyama, and Santa Ynez rivers. Construction of these facilities could have both direct impacts due to disturbance of riparian and/or wetland flora and fauna and indirect impacts due to increased erosion and sedimentation, which would adversely affect downstream water quality. Such disturbance would also have the potential to adversely affect species that inhabit these types of areas, including various amphibians, songbirds, fish, and raptors. ECAP measure-supported projects in the vicinity of riparian and/or wetland areas would nearly always require a site-specific review to definitively determine the extent of impacts and types of mitigation necessary. [There are areas in the county that possess little or no habitat value, and it is presumed that disruption in such areas would not create a significant impact. Examples of areas where impacts on habitat are presumed to be insignificant include small areas of non-native grassland, areas of historical disturbance, such as intensive agriculture, and others (Santa Barbara 2008).] To that end, implementation of future ECAP measures would be required to comply with the environmental reporting requirements of CEQA following submittal of a specific development proposal, including the need to evaluate potential biological impacts for both short- and long-term impacts in the form of site-specific biological studies on a case-by-case basis. Section D of the County Environmental Thresholds and Guidelines Manual includes habitat-specific impact assessment guidelines, which provide additional impact assessment guidelines specific to several biological communities to determine whether impacts would be significant. The following summarizes the thresholds applied to wetland and riparian habitat types throughout the county:

1. **Wetlands, Coastal Salt Marsh, and Vernal Pools.** The following types of project-created impacts may be considered significant:
  - Projects which result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, or result in degradation of water quality, or would threaten the continuity of wetland-dependent animal or plant species.
  - Substantial interruption of wildlife access, use, and dispersal in wetland areas.
  - Impacts to the hydrologic functions of wetlands systems, such as the quantity and quality of runoff, etc.
  - Substantial alteration of tidal circulation or decrease of tidal prism in coastal salt marsh habitats.
  - Adverse hydrologic changes (e.g., altered freshwater input), substantial increase of sedimentation, introduction of toxic elements, or alteration of ambient water temperature in coastal salt marshes.
  - Indirect impacts from construction activities near coastal marshes, such as noise and turbidity, on sensitive animal species, especially during critical periods, such as breeding and nesting.
  - Disruption of wildlife dispersal corridors in coastal salt marshes.
  - Disturbance or removal of substantial amounts of marsh habitats.
  - Direct removal of a vernal pool or vernal pool complex.

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- Direct or indirect adverse hydrologic changes in vernal pool habitats such as altered freshwater input, changes in the watershed area or runoff quantity and/ or quality, substantial increase in sedimentation, introduction of toxic elements, or alteration of ambient water temperature.
- Disruption of larger plant community (e.g., grassland) within which vernal pool occurs, isolation or interruption of contiguous habitat which would disrupt animal movement patterns, seed dispersal routes, or increase vulnerability of species to weed invasion or local extirpation.

2. **Riparian Habitats.** The following types of project-created impacts may be considered significant:

- Direct removal of riparian vegetation.
- Disruption of riparian wildlife habitat, particularly animal dispersal corridors and/or understory vegetation.
- Intrusion within the upland edge of the riparian canopy (generally within 50 feet in urban areas, within 100 feet in rural areas, and within 200 feet of major rivers), leading to potential disruption of animal migration, breeding, etc., through increased noise, light and glare, and human or domestic animal intrusion.
- Disruption of a substantial amount of adjacent upland vegetation where such vegetation plays a critical role in supporting riparian-dependent wildlife species (e.g., amphibians), or where such vegetation aids in stabilizing steep slopes adjacent to the riparian corridor, which reduces erosion and sedimentation potential.
- Construction activity which disrupts critical time periods (nesting, breeding) for fish and other wildlife species.

3. **Oak Woodlands and Forests.** The following types of project-created impacts may be considered significant:

- Habitat fragmentation.
- Removal of understory.
- Alteration to drainage patterns.
- Disruption of the canopy.

Removal of a significant number of trees that would cause a break in the canopy or disruption in animal movement in and through the woodland. The County of Santa Barbara Environmental Thresholds and Guidelines Manual also contains a mitigation hierarchy. The following general approaches to reducing biological impacts are presented in the order of their effectiveness (Santa Barbara County 2008):

- a) **Avoidance.** Avoid direct or indirect impacts to significant biological resources through project design. Focus on maintaining large, contiguous habitat areas and animal movement corridors. A project design which clusters development on a relatively limited portion of the project site may reduce the habitat area disturbed by the project.

- b) **On-Site Mitigation.** Minimize or reduce impacts through on-site design and resource protection measures. Measures may include vegetative spatial buffer between project and habitat areas; revegetation; habitat enhancement; erosion and water quality protection; on-site replacement/compensation; maintenance and management measures such as fencing, weed control, use of building envelopes, and dedication of areas through open space or conservation easements or grant deed of development rights; short-term measures to protect against construction impacts (e.g., fencing, timing of construction to avoid nesting season).
- c) **Off-Site Mitigation.** Compensate for on-site impacts through off-site measures. When avoidance or on-site mitigation is infeasible or inadequate to reduce impacts, measures such as those listed under on-site mitigation can be considered in off-site locations or may be accomplished through in-lieu fees. Off-site approaches may be appropriate at times if a greater ecological value may be clearly gained than with on-site mitigation (i.e., where on-site habitat is of low quality or highly fragmented).
- d) **Habitat Replacement/Compensation Guidelines.** The mitigation approach of replacing habitat either on-site or off-site, to compensate for habitat loss, is generally not a preferred approach because it always results in some habitat loss (either short-term or long-term) and because prospects for successful habitat replacement are problematic. Replacement mitigation should involve the same habitat type, location(s) within the same watershed and as close as possible to the site of impact, and should result in comparable and compensating size and habitat value. Beneficial ecological restoration projects, where the purpose of the project is to enhance or restore biological or habitat resources, compensate replacement at a minimum ratio of 1:1.

In addition to the biological analysis guidelines and mitigation hierarchy contained in the County Environmental Thresholds and Guidelines Manual, a number of regulatory mechanisms, as discussed in the Regulatory Framework section above, address various types of construction-related impacts to wetlands. Disturbance within any waters of the United States and/or adjacent wetlands would require a Section 404 permit from the USACE, which would place certain requirements for avoidance or replacement of lost wetlands habitat. When a project would alter the natural flow or bed, channel, or bank of any river, stream, or lake, a Section 1601 streambed alteration agreement would need to be obtained from the California Department of Fish and Wildlife. Like the 404 permit, this agreement would be expected to include measures that alleviate impacts to riparian habitats. Preparation and implementation of the stormwater pollution prevention plans (SWPPPs) required under Section 401 of the Clean Water Act would alleviate potential indirect impacts relating to increased erosion, sedimentation, and runoff.

Direct and growth-inducing impacts determined to cause a significant adverse effect on riparian and/or wetland habitats would be ameliorated by avoidance of sites with known sensitive and special-status plant species or communities and/or replacing and compensating for the loss of sensitive communities at a minimum ratio of 1:1 in accordance with the County's Environmental Thresholds and Guidelines Manual. Furthermore, compliance with existing regulations, such as Sections 401 and 404 of the Clean Water Act (which requires no net loss of wetlands) and Section 1601 of the Fish and Game Code would protect wetland resources from direct and indirect impacts and ensure no net loss of wetlands. The proposed project is a policy-level document that does not include site-specific designs or proposals for development projects, nor does it grant any entitlements for development that would have the potential to result in impacts on biological resources. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Land Use Element and Coastal Land Use Plan.

### 3.5 BIOLOGICAL RESOURCES

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Nevertheless, some physical changes could be facilitated by the proposed ECAP. However, implementation of future ECAP measures would be required to comply with the environmental reporting requirements of CEQA following submittal of a specific development proposal, including the need to evaluate potential biological impacts for both short- and long-term impacts in the form of site-specific biological studies on a case-by-case basis consistent with the County Environmental Thresholds and Guidelines Manual and zoning ordinances. Individual projects would also have to be found consistent with state law and County policies and standard conditions of approval. Future project characteristics and locations are unknown, and any impact analysis and conclusion on level of significance would be speculative at this time for such project-specific impacts. Impacts on wetlands and riparian habitat would be adverse, but **less than significant (Class III)**.

#### CUMULATIVE IMPACTS

The cumulative context for the biological resources analysis for the proposed ECAP is Santa Barbara County. As development in the county continues, habitat for plant and wildlife species native to the region is lost through conversion to urban development. Although more mobile species may be able to survive these changes in their environment by moving to new areas, less mobile species would be extirpated. With continued conversion of natural habitat to human use, the availability and accessibility of remaining foraging and natural habitats in this ecosystem would dwindle and those remaining natural areas would not be able to support additional plant or animal populations above their current carrying capacities through increased competition for resources, displacement, and development-induced introduction of non-native species. The conversion of plant and wildlife habitat and loss of protected species on a regional level could therefore result in a cumulatively significant impact on biological resources.

As discussed above, improvements associated with implementation of the ECAP would generally not be extensive and would not contribute substantially to the loss of species or habitat. Implementation of future ECAP measures would be required to comply with the environmental reporting requirements of CEQA following submittal of a specific development proposal, including the need to evaluate potential biological impacts for both short- and long-term impacts in the form of site-specific biological studies on a case-by-case basis consistent with the County Environmental Thresholds and Guidelines Manual and zoning ordinances. Individual projects would also have to be found consistent with state law and County policies and standard conditions of approval. The impacts of proposed ECAP measures on biological resources would be adverse, but **less than cumulatively considerable (Class III)**, and thus not significant.

## **3.6 NOISE**





This section describes the ambient noise environment and the related impacts of the proposed County of Santa Barbara Energy and Climate Action Plan (ECAP). The California Environmental Quality Act (CEQA) requires that lead agencies consider the reasonably foreseeable adverse environmental effects of projects they are considering for approval. Construction noise, traffic noise, operational noise, and other noise impacts associated with implementation of the proposed ECAP are analyzed in this section.

### 3.6.1 EXISTING SETTING

Focusing on unincorporated areas of Santa Barbara County, noise-sensitive receptors include convalescent homes, hospitals, day-care centers, residential areas, schools, hotels, libraries, and campgrounds. Potential major noise generators include roadways, airports, commercial and industrial land uses, and railroads. Noise-sensitive land uses are generally considered to include those uses that would result in noise exposure that could cause health-related risks to individuals. Places where quiet is essential are also considered noise-sensitive uses. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Other land uses such as parks, historic sites, cemeteries, and recreation areas are also considered sensitive to increases in exterior noise levels. School classrooms, places of assembly, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

#### NOISE SOURCES

Noise issues associated with stationary and transportation sources in the county are discussed below.

#### Stationary Sources

Stationary noise sources include industrial and commercial land uses. Many industrial processes produce noise, even when the best available noise control technology is applied. Noise exposures in industrial facilities are controlled by federal and state employee health and safety regulations (i.e., regulations of the Occupational Safety and Health Administration of the US Department of Labor [OSHA] and the California Division of Occupational Safety and Health [Cal/OSHA]). Exterior noise levels that affect neighboring parcels are typically subject to local noise standards. Commercial, recreational, and public facility activities can also produce noise that may affect adjacent noise-sensitive land uses. These noise sources can be continuous or intermittent and may contain tonal components that are annoying to individuals who live nearby. For instance, emergency-use sirens and backup alarms are often considered nuisance noise sources, but may not occur frequently enough to be considered incompatible with noise-sensitive land uses. In addition, noise generation from fixed noise sources may vary based on climate conditions, time of day, and existing ambient noise levels.

From a land use planning perspective, fixed-source noise control issues focus on two goals: (1) preventing the introduction of new noise-producing uses in noise-sensitive areas; and (2) preventing encroachment of noise-sensitive uses on existing noise-producing facilities. The first goal can be achieved by applying noise performance standards to proposed new noise-producing uses. The second goal can be met by requiring that new noise-sensitive uses near noise-producing facilities include mitigation measures to ensure compliance with noise performance standards. Each of these goals stresses the importance of avoiding the location of new uses that may be incompatible with adjoining uses.

## 3.6 NOISE

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### Transportation Sources

In Santa Barbara County, as in most areas, transportation facilities are by far the most significant sources of noise (Santa Barbara 2009). This is true in terms of the magnitude of noise produced and the number of people affected.

Noise contours illustrate the dispersion of noise from its source, depicting points of equal average noise level. Day-night average sound level ( $L_{dn}$ ) values represent weighted-average levels that account for the magnitude, frequency of occurrence, and time of occurrence of noise events. Noise occurring at night is given added emphasis to account for its greater intrusiveness compared with daytime noise. The contours provide a good first estimate of noise exposure around major transportation facilities, and when more precise noise information is needed for a specific location, on-site monitoring should be used to supplement the noise contours.

#### Aircraft Noise

Both the Santa Barbara and Santa Maria airports have commercial and general aviation activities. Because of the level of activity, noise generated at these airports is audible in the surrounding communities. Therefore, land uses in the surrounding areas have been planned to ensure that noise levels remain at acceptable levels for the various uses.

The remaining airports in the county, Lompoc and Santa Ynez, are general aviation airports, with little commercial traffic and no jet operations. While these general aviation airports do not generate as much noise as the Santa Barbara or Santa Maria airports, flight operations at these locations have also had impacts on the nearby residential areas because of their location.

In addition to the four active county airports, flight operations at Vandenberg Air Force Base, located near Lompoc, generate noise. While these operations are limited, the resulting 65 decibels (dBA) contour extends into a portion of Lompoc. As a federal facility, the air force base is exempt from County noise controls. Nevertheless, the air force has developed measures to reduce noise impacts from flight operations in the areas surrounding the base.

In addition to airplanes, helicopter flights occur throughout the county. These flights typically follow major and primary arterials, with the exception of police patrol activities. Cottage Hospital in Santa Barbara is verified as a Level II Trauma Center and provides helicopter emergency medical services. Helicopters traveling to Cottage Hospital follow the US Highway 101 corridor until turning inland at Junipero Street toward the hospital. Although single-event noise exposure resulting from helicopter operations may be considered a nuisance, the relatively low frequency and short duration of these operations do not significantly affect average daily noise levels anywhere in the county.

#### Railroad Noise

Train operations on the Union Pacific Railroad and the Santa Maria Railroad also generate noise in proximity to the railroad lines. The Union Pacific Railroad right-of-way traverses the county through much of its coastal area, passing through the cities of Carpinteria, Santa Barbara, and Guadalupe. This rail corridor is used by Union Pacific freight trains for an average of 10 to 16 trips per day (SBCAG 2013). The Santa Maria Railroad originates in Santa Maria and travels westward through Santa Maria to connect with the Union Pacific railroad line in Guadalupe. An average of two local freight trains operate on this line each day.

Amtrak provides the only commercial inter-city passenger rail transportation available in Santa Barbara County. Its trains share the Union Pacific Railroad main line tracks. The Amtrak Pacific Surfliner has five daily round trips that serve Santa Barbara County.

Noise is generated during rail operations by locomotives starting and stopping, trains braking, the connection and disconnection of cars, train whistles, and track noise (the trains' wheels running on the track). Noise-sensitive land uses within approximately 800 feet of the tracks could be exposed to noise levels above 65 dBA (Santa Barbara 2009). In the northern part of the county, much of the rail corridor is through open areas. In the southern part of the county, train tracks tend to be located much closer to residences.

### Motor Vehicle Traffic Noise

Motor vehicles are the most significant source of noise in most of Santa Barbara County. This can be attributed to the extensive network of major, primary, and secondary arterials located throughout the county, as well as the large number of vehicle trips that occur each day.

The noisiest single road corridor in the county is US Highway 101, due to both the high traffic volumes experienced and the high speed of traffic. In 2010, daily traffic on US Highway 101 ranged from 127,750 vehicles on the segment between Milpas Street and the Hollister Interchange to 33,874 vehicles on the segment between the Hollister Interchange and Clark Avenue in the Santa Maria area. As a result, noise levels along the entire US Highway 101 corridor exceed 65 dBA CNEL (Community Noise Equivalent Level) within certain distances from the freeway centerline. (CNEL is the average A-weighted noise level during a 24-hour day obtained after the addition of 5 dB to sound levels in the evening from 7 p.m. to 10 p.m. and after the addition of 10 dB to sound levels in the night between 10 p.m. and 7 a.m.) In the South County, existing land uses within approximately 400 feet of the freeway centerline may be exposed to noise levels over 65 dBA CNEL; in the North County, land uses within approximately 200 feet of the freeway centerline may be exposed to noise levels over 65 dBA CNEL.

Traffic on other major transportation corridors also generates noise in excess of 65 dBA CNEL within certain distances from the centerline of the freeway/roadway.

## **3.6.2 REGULATORY FRAMEWORK**

Federal, state, and local governments have established noise standards and guidelines to protect citizens from potential hearing damage and various other adverse physiological and social effects associated with noise. Those regulations most applicable to the community are summarized below.

### FEDERAL

#### **Noise Control Act of 1972**

The Noise Control Act of 1972 directed the US Environmental Protection Agency (EPA) to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The act directed that all federal agencies comply with applicable federal, state, interstate, and local noise control regulations. It also required that the EPA establish criteria for noise level adequate to protect health and welfare with an adequate margin of safety but without regard to cost or feasibility. In addition, the EPA was given the responsibility for coordinating federal research and activities related to noise control and for establishing federal noise emission standards for selected products distributed in interstate commerce. The Noise

## 3.6 NOISE

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Control Act was subsequently amended by the Quiet Communities Act of 1978, which encouraged the development of noise control programs at the state and community levels (Caltrans 2002a).

### **US Environmental Protection Agency**

A report published in 1974 by the EPA, Office of Noise Abatement and Control, continues to be a source of useful background information. Entitled Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety, this report is better known as the levels document. The document is intended to provide state and local governments, as well as the federal government and the private sector, with an informational point of departure for the purposes of decision-making. The document states that undue interference with activity and annoyance will not occur if outdoor noise levels in residential areas are below a day-night average ( $L_{dn}$ ) noise level of 55 dBA (decibels) and indoor levels are below 45 dBA  $L_{dn}$ . Allowing for an average 15 dBA reduction in sound level between outdoors and indoors (with windows partially open), the interior noise level of 45 dBA  $L_{dn}$  would equate to an exterior noise level of 60 dBA  $L_{dn}$ . An exterior noise level of 60 dBA  $L_{dn}$  would allow normal conversation at distances up to 2 meters (6.5 feet) with 95 percent sentence intelligibility. In addition, various correction factors can be applied to account for the intrusiveness of the noise source, as well as site-specific and meteorological conditions (EPA 1974).

### STATE

#### **California Building Code**

Title 24 of the California Code of Regulations contains standards for allowable interior noise levels associated with exterior noise sources (California Building Code, 2013 edition, Volume 1, Chapter 12). The standards apply to new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family residences. The standards state that the interior noise level attributable to exterior sources may not exceed 45 dBA CNEL in any habitable room. Proposed residential structures to be located where the CNEL exceeds 60 dBA require an acoustical analysis showing that the proposed building design would achieve the prescribed allowable interior noise standard. Worst-case noise levels, either existing or future, are to be used as the basis for determining compliance with these standards.

### LOCAL

#### **County of Santa Barbara Comprehensive Plan**

The County of Santa Barbara Environmental Thresholds and Guidelines Manual, Chapter 12, Noise Thresholds (2008) and the County of Santa Barbara Comprehensive Plan include the following guidelines related to noise:

- a. In the planning of land use, a 65 dBA day-night average sound level is regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs.
- b. Noise-sensitive land uses are considered to include:
  - i. Residential, including single- and multi-family dwellings, mobile home parks, dormitories, and similar uses.

- ii. Transient lodging, including hotels, motels, and similar uses.
- iii. Hospitals, nursing homes, convalescent hospitals, and other facilities for long-term medical care.
- iv. Public or private educational facilities, libraries, churches, and places of public assembly.
- c. Noise-sensitive uses proposed in areas where the day-night average sound level is 65 dBA or more should be designed so that interior noise levels attributable to exterior sources do not exceed 45 dBA  $L_{dn}$  when doors and windows are closed. An analysis of the noise insulation effectiveness of proposed construction should be required, showing that the building design and construction specifications are adequate to meet the prescribed interior noise standard.
- d. Residential uses proposed in areas where the day-night average sound level is 65 dBA or more should be designed so that noise levels in exterior living spaces will be less than 65 dBA  $L_{dn}$ . An analysis of proposed projects should be required, indicating the feasibility of noise barriers, site design, building orientation, etc., to meet the prescribed exterior noise standard.
- e. The County Planning and Development Department, including the Building and Safety Division, and the County Public Health Department's Environmental Health Services Division have administrative procedures for determining project compliance with the California Noise Insulation Standards related to interior noise levels.

### **County of Santa Barbara Code of Ordinances**

Chapter 40 of the County Code of Ordinances states that it is unlawful within the unincorporated area of Santa Barbara County to make, assist in making, permit, continue, create, or cause to be made, any loud and unreasonable noise, music, percussion or other sound which is broadcast outside of any residence or building by means of any amplified musical instrument, drum, or similar device, or by means of any radio, loudspeaker, sound amplifier or phonograph, or by means of or employing any similar device which amplifies and produces, reproduces or broadcasts sound, during any of the following periods of time:

- a. The night and following morning of any Sunday, Monday, Tuesday, Wednesday, or Thursday between the hours of 10:00 a.m. of such day and 7:00 a.m. the following morning; or
- b. The morning hours after midnight of any Friday or Saturday, between 12 midnight, following such day, and 7:00 a.m. the following morning.

Within such time periods, a loud and unreasonable sound includes any sound created by means prohibited above which is clearly discernible at a distance of 100 feet from the property line of the property upon which it is broadcast or which is at any level of sound in excess of 60 dBA at the edge of the property line of the property upon which the sound is broadcast.

### **County of Santa Barbara Zoning Ordinances**

The Santa Barbara County Land Use and Development Code, the Montecito Land Use and Development Code, and the Article II Coastal Zoning Ordinance (collectively known as the

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County zoning ordinances) constitute a portion of Chapter 35 of the Santa Barbara County Code. The County zoning ordinances carry out the policies of the County of Santa Barbara Comprehensive Plan by classifying and regulating the uses of land and structures in the county, consistent with the Comprehensive Plan. The County zoning ordinances are adopted to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the county (Section 35.10.010, Purpose of Development Code).

The County zoning ordinances are the primary tools used by the County to implement the goals, objectives, and policies of the County of Santa Barbara Comprehensive Plan. Provisions of the County zoning ordinances and any land use, subdivision, or development approved in compliance with these regulations must be consistent with the Comprehensive Plan, including any applicable community or specific plan.

### 3.6.3 IMPACTS AND MITIGATION MEASURES

#### STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the following State CEQA Guidelines Appendix G thresholds of significance. The project would result in a significant noise impact if it would:

- a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies.
- b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.
- c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
- d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
- e) Expose people residing or working in the project area to excessive noise levels for a project located within an airport land use plan area or, where such a plan has not been adopted, or within 2 miles of a public airport or a public use airport.
- f) Expose people residing or working in the project area to excessive noise levels for a project within the vicinity of a private airstrip.

#### County of Santa Barbara Environmental Thresholds and Guidelines Manual

The CEQA Guidelines (Appendix G) criteria are expanded and made more specific in the County's noise thresholds contained in the County of Santa Barbara Environmental Thresholds and Guidance Manual (2008). The County's thresholds are intended to be used with flexibility because each project must be viewed in its specific circumstances. The following noise thresholds will be applied in the impact analysis for determining significance of noise impacts:

- a. A proposed development that would generate noise levels in excess of 65 dBA CNEL and could affect sensitive receptors would generally be presumed to have a significant impact.

- b. Outdoor living areas of noise-sensitive uses that are subject to noise levels in excess of 65 dBA CNEL would generally be presumed to be significantly affected by ambient noise. A significant impact would also generally occur where interior noise levels cannot be reduced to 45 dBA CNEL or less.
- c. A project will generally have a significant effect on the environment if it will increase substantially the ambient noise levels for noise-sensitive receptors adjoining areas. Per item a., this may generally be presumed when ambient noise levels affecting sensitive receptors are increased to 65 dBA CNEL or more. However, a significant effect may also occur when ambient noise levels affecting sensitive receptors increase substantially but remain less than 65 dBA CNEL, as determined on a case-by-case level.
- d. Noise from grading and construction activity proposed within 1,600 feet of sensitive receptors, including schools, residential development, commercial lodging facilities, hospitals, or care facilities, would generally result in a potentially significant impact. According to EPA guidelines, average construction noise is 95 dBA at a 50-foot distance from the source. A 6 dB drop occurs with a doubling of the distance from the source. Therefore, locations within 1,600 feet of the construction site would be affected by noise levels over 65 dBA. To mitigate this impact, construction within 1,600 feet of sensitive receptors is required to be limited to weekdays between the hours of 8 a.m. and 5 p.m. only. Noise attenuation barriers and muffling of grading equipment may also be required. Construction equipment generating noise levels above 95 dBA may require additional mitigation.

## METHODOLOGY

The analysis of noise impacts considers the effects of temporary construction-related noise, long-term operational noise, and groundborne vibration impacts associated with greenhouse gas (GHG) reduction measures in the proposed ECAP. Specific subsequent activities or projects, their associated locations, and physical effects on the environment from the implementation of the ECAP are not known at this time. Therefore, the analysis recognizes the programmatic nature of the proposed ECAP and focuses on the potential implications of the proposed ECAP measures and not on the individual project-level effects of specific projects.

## IMPACTS AND MITIGATION MEASURES

### Short-Term Construction Noise

**Impact 3.6.1** Construction activity associated with the future implementation of ECAP measures would create temporary noise level increases in discrete locations throughout the county. This impact is considered adverse, but **less than significant (Class III)**.

Many of the ECAP measures, such as BE2 (Energy-Efficient Renovations), BE4 (Energy Scoring and Audits), and RE2 (Solar Water Heaters), would provide for minor energy efficiency upgrades on existing development and infrastructure and, therefore, are not expected to generate significant short-term noise-related impacts. There are, however, other ECAP measures that could involve grading and paving or the construction of permanent facilities. For instance, ECAP Measures LUD2 (Transit-Oriented Development), T5 (Integrated Bikeway System), and T6 (Pedestrian Improvements) would support the construction of new bike and pedestrian facilities, and Measure RE4 (Utility-Scale Renewable Energy Projects) would promote utility-scale renewable energy generation. The operation of heavy equipment during the construction of

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infrastructure associated with these ECAP measures would result in temporary increases in noise in the immediate vicinity of individual construction sites. During construction, noise from construction activities may intermittently dominate the noise environment in the immediate area of construction.

Construction is performed in discrete steps, each of which has its own mix of equipment and consequently its own noise characteristics. Typical construction noise levels vary up to a maximum of 95 dBA at 50 feet from the construction site during the noisiest construction phases. Site preparation activities, which include excavation and grading, tend to generate the highest noise levels because the noisiest construction equipment is earth-moving equipment. Earth-moving equipment includes excavating machinery such as backhoes, bulldozers, draglines, front loaders, and earth-moving and compacting equipment, which includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. **Table 3.6-1** summarizes noise levels produced by construction equipment that is commonly used during construction projects.

**TABLE 3.6-1**  
**TYPICAL CONSTRUCTION NOISE LEVELS**

Equipment	Noise Levels at 50 Feet
Front-End Loader	85 dBA
Bulldozer	85 dBA
Backhoe	80 dBA
Water Truck (or other heavy truck)	88 dBA
Generator	81 dBA
Concrete Mixer	85 dBA
Tamper/Roller	75 dBA
Crane, Mobile	83 dBA
Paver	87 dBA
Jack Hammer	85 dBA
Grader/Excavator/ Scraper	85 dBA
Paver	85 dBA
Pile Driver (Impact/Vibratory)	95 dBA

Sources: FTA 2006; FHWA 2006; EPA 1971

As shown in **Table 3.6-1**, maximum intermittent noise levels associated with construction equipment typically range from approximately 75 to 87 dBA  $L_{max}$  at 50 feet ( $L_{max}$  is the maximum A-weighted noise level recorded for a single noise). Pile driving, which is not often employed, exceeds the typical construction noise range, producing noise levels of approximately 95 dBA  $L_{max}$  at 50 feet.

Noise levels from point sources, such as construction sites, typically attenuate at a rate of about 6 dBA per doubling of distance (EPA 1971). Based on this attenuation rate and assuming a maximum noise level of approximately 95 dBA  $L_{eq}$  at 50 feet, average construction noise levels



would be reduced to approximately 65 dBA  $L_{eq}$  at approximately 1,600 feet from a construction site. Predicted noise levels would vary depending on multiple factors, such as the number and type of equipment used, equipment usage rates, area of activity, and shielding provided by intervening terrain and structures. Delivery vehicles, construction employee vehicle trips, and haul truck trips may also contribute to overall construction noise levels. Although construction-generated noise levels would be short term, significant increases in ambient noise levels at nearby noise-sensitive land uses could potentially occur. For noise-sensitive land uses, such as residential dwellings, activities occurring during the more noise-sensitive evening and nighttime hours are of particular concern. Construction activities occurring during these more noise-sensitive hours may result in increased levels of annoyance and potential sleep disruption to occupants of nearby residential dwellings.

The County has promulgated and implemented noise policies and requirements for construction projects contained in the County of Santa Barbara Environmental Thresholds and Guidance Manual (2008). For instance, the manual states that noise from grading and construction activity proposed within 1,600 feet of sensitive receptors would generally result in noise levels over 65 dBA. To mitigate this impact, the County requires construction within 1,600 feet of sensitive receptors to be limited to weekdays between the hours of 8 a.m. and 5 p.m. only. Furthermore, noise attenuation barriers and muffling of grading equipment could also be required. Specific techniques may include, but are not limited to, the use of sound blankets on construction equipment, the use of temporary walls and noise barriers to block and deflect noise, and the use of steam blow piping silencers. In addition, according to the Environmental Thresholds and Guidance Manual, construction equipment generating noise levels above 95 dBA may require additional mitigation such as specific noise analyses and implementation of any determined measures to reduce noise to an acceptable level.

Due to the short-term nature of construction noise, the intermittent frequency of construction noise, and required compliance with the construction noise standards established as part of the Environmental Thresholds and Guidance Manual noted above, construction noise level increases would not result in a substantial temporary or periodic increase in ambient noise levels in excess of standards established. Therefore, through adherence to the Environmental Thresholds and Guidance Manual, implementation of the proposed ECAP would result in adverse, but **less than significant (Class III)** construction noise impacts.

### **Groundborne Vibration**

**Impact 3.6.2** Construction activity associated with the future implementation of ECAP measures would create groundborne vibration in discrete locations throughout the county. This impact is adverse, but **less than significant (Class III)**.

The effects of ground vibration can vary from no perceptible effects at the lowest levels, to low rumbling sounds and detectable vibrations at moderate levels, to slight damage to nearby structures at the highest levels. At the highest levels of vibration, damage to structures is primarily architectural (e.g., loosening and cracking of plaster or stucco coatings) and rarely results in structural damage. The effects of ground vibration are influenced by the duration of the vibration and the distance from the vibration source.

There are no federal, state, or local regulatory standards for vibration. However, various criteria have been established to assist in the evaluation of vibration impacts. For instance, the California Department of Transportation (Caltrans) has developed vibration criteria based on human perception and structural damage risks. For most structures, Caltrans considers a peak-

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particle velocity (ppv) threshold of 0.2 inches per second to be the level at which architectural damage (i.e., minor cracking of plaster walls and ceilings) to normal structures may occur. Below 0.10 inches per second, there is virtually no risk of architectural damage to normal buildings. In terms of human annoyance, continuous vibrations in excess of 0.1 inches per second ppv are identified by Caltrans as the minimum level perceptible level for ground vibration. Short periods of ground vibration in excess of 0.2 inches per second ppv can be expected to result in increased levels of annoyance to people in buildings (Caltrans 2002b).

#### Long-Term Operation

Many of the ECAP measures, such as BE2 (Energy-Efficient Renovations), BE4 (Energy Scoring and Audits), and RE2 (Solar Water Heaters), would provide for minor energy efficiency upgrades on existing development and infrastructure. Such measures are not expected to generate significant noise impacts because they are minor upgrades to existing facilities. ECAP measures, such as the implementation of alternative transportation enhancement strategies (T4), the development of commuter rail connections (T9), and roadway improvements including signal synchronization and traffic flow management provisions (T8), could result in increased groundborne vibration and noise levels associated with transportation sources, such as roadway traffic and/or passenger train traffic.

Research conducted by Caltrans (2002b) indicates that in terms of potential annoyance to people, road traffic levels associated with on-road vehicles are typically highest associated with truck pass-bys, as automobile traffic normally generates vibration peaks of one-fifth to one-tenth that of trucks. Based on measurements conducted by Caltrans, even the highest truck-generated vibrations, which were measured at approximately 16 feet from the centerline of the near travel lane, were not found to exceed 0.08 inches per second (Caltrans 2002b). This rate of generated vibrations coincides with levels defined as “readily perceptible” to humans yet not to the level considered to be annoying (Caltrans 2002b).

Train vibration levels may be quite high, depending on the speeds, load, condition of track, the amount of ballast used to support the track, and the type/use of train (i.e., passenger or freight). Based on measurements conducted by Caltrans (2002b), at approximately 16 feet from the rail line, vibration levels are 0.27 inches per second. This rate of generated vibrations coincides with levels defined as “annoying to people in buildings” (Caltrans 2002b). Other research conducted by Caltrans (2002b) indicates that in any situation the probability of exceeding architectural damage risk levels for continuous groundborne vibrations from trains is very low and from freeway traffic is practically nonexistent.

Noise level limitations on train noise adopted by the EPA promise little reduction of noise from this source because limits are actually no less than the levels currently experienced in the county. Local governments have no authority to restrict railroad operations. Thus, the only remaining opportunity to reduce railroad noise impact is to control the use of land in the immediate vicinity of the railroad. As previously stated, the County zoning ordinances carry out the policies of the County of Santa Barbara Comprehensive Plan by classifying and regulating the uses of land and structures in the county, consistent with the Comprehensive Plan, thus ensuring integration and compatibility of new development with existing land use conditions.

For these reasons, long-term exposure to groundborne vibration resulting from implementation of the proposed ECAP related to roadway and transit facility improvements would not be anticipated to exceed applicable groundborne vibration criteria. For instance, while ECAP Measure T9 promotes the future development of commuter rail connections between employment centers, adherence to the County zoning ordinances would ensure integration and

compatibility of new rail connections with existing land use conditions. In addition, while any increase in train trips would incrementally increase groundborne vibration levels in the vicinity of the rail line, these vibration increases would be intermittent and localized. Therefore, though individual trains may cause periodic annoyance, the overall change in the groundborne noise and vibration environment would not be significant.

### Construction Activities

With the exception of pavement breaking, blasting, and pile driving, construction activities and related equipment typically generate groundborne vibration levels of less than 0.20 inches per second, which is the architectural damage risk threshold recommended by Caltrans. Based on Caltrans (2002b) measurement data, use of off-road tractors, dozers, earthmovers, and haul trucks generates groundborne vibration levels of less than 0.10 inches per second or one-half of the architectural damage risk level, at 10 feet. The highest vibration level associated with a pavement breaker was 2.88 inches per second at 10 feet (Caltrans 2002b). During pile driving, vibration levels near the source depend mainly on the soil's penetration resistance as well as the type of pile driver used. Impact pile drivers tend to generate higher vibration levels than vibratory or drilled piles. Groundborne vibration levels of pile drivers can range from approximately 1 to 1.5 inches per second (Caltrans 2002b). As with construction-generated noise levels, pile driving can result in a high potential for human annoyance from vibrations, and pile-driving activities are typically considered as potentially significant if these activities are performed within 200 feet of occupied structures (Caltrans 2002b). Vibration levels associated with blasting are highly variable, site-specific, and dependent on various factors, such as the amount of explosive used, soil conditions between the blast site and the receptor, and the depth where blasting would take place. Blasting that occurs below the surface would typically produce lower vibration levels due to additional attenuation provided by distance to the receptor and transmission through soil and rock.

The County of Santa Barbara Environmental Thresholds and Guidance Manual states that construction activities within 1,600 feet of a sensitive receptor would generally result in significant noise-related impacts. To mitigate this impact, the County requires construction within 1,600 feet of sensitive receptors to be limited to weekdays between the hours of 8 a.m. and 5 p.m. only. Furthermore, the County has noise requirements for construction projects that could include specific noise analyses and implementation of any determined measures that reduce noise to an acceptable level.

Due to the short-term nature and intermittent frequency of construction vibrations, the required compliance with the County Code's hourly restrictions for construction-related activities and vibration standards to avoid vibrations during times when it could potentially be more of a nuisance, and adherence to the Environmental Thresholds and Guidance Manual, construction vibration level increases would not result in exposure of persons to or generation of excessive groundborne vibration. The impact of future construction vibration would result in an adverse, but **less than significant (Class III)** impact.

### **Long-Term Operational Noise**

**Impact 3.6.3** Implementation of ECAP measures would not substantially increase noise levels throughout the county because of the required adherence to County regulations. This is considered an adverse, but **less than significant (Class III)** impact.

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Various ECAP measures proposed under the project would promote roadway modification projects, some of which involve improving existing facilities for the purpose of increasing their efficiency. For example, ECAP Measure T3 (Alternative-Fuel Vehicles and Incentives) would seek to increase the use of alternative-fuel vehicles and plan for the development of alternative-fuel infrastructure. ECAP Measure T8 (Traffic Signal Synchronization) could lead to roadway improvements including signal synchronization and traffic flow management provisions. Such measures would not in and of themselves introduce new traffic, but rather are intended to relieve current or projected future traffic congestion. However, in some cases, traffic efficiency measures would accommodate increased traffic speed and volumes. The development of commuter rail connections (as promoted by Measure T9) could result in increased noise levels associated with train sources.

ECAP Measure RE4 (Utility-Scale Renewable Energy Projects) would encourage the development of new renewable energy generating facilities. For generation facilities that use steam turbines, such as certain wind solar energy projects, typically the loudest noise encountered is created by the steam blows just prior to the commencement of operations. After erection and assembly of the feed water and steam systems, the piping and tubing that comprises the steam path has accumulated dirt, rust, scale, and construction debris such as weld spatter, dropped welding rods, and the like. If the plant were started up without thoroughly cleaning these systems, this debris would find its way into the steam turbine, quickly destroying the machine. In order to prevent this, before the steam system is connected to the turbine, the steam line is temporarily routed to the atmosphere. High pressure steam is then raised in a heat recovery steam generator (HRSG) or a boiler and allowed to escape to the atmosphere through the steam piping. This flushing action, referred to as a steam blow, is effective at cleaning out the steam system. A series of short steam blows, lasting 2 or 3 minutes each, is performed several times daily over a period of two or three weeks. At the end of this procedure, the steam line is connected to the steam turbine, which is then ready for operation. These steam blows can produce noise as loud as 130 dBA at a distance of 100 feet, which is an exceedingly disturbing level. In order to minimize disturbance from steam blows, the steam blow piping can be equipped with a silencer that will reduce noise levels by 20 to 30 dBA (CEC, CalEPA, and DWR 2009, p. 4.6-7).

As mandated by the Comprehensive Plan Noise Element, a 65 dBA day-night average sound level is regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs. The County zoning ordinances carry out the policies of the County of Santa Barbara Comprehensive Plan by classifying and regulating the uses of land and structures in the county, consistent with the Comprehensive Plan, thus ensuring integration and compatibility of new development with existing land use conditions. In addition, as mandated by the County Environmental Thresholds and Guidance Manual on a project-by-project level, any future proposed project that would generate noise levels in excess of 65 dBA CNEL and could affect sensitive receptors would generally be presumed to have a significant impact subject to mitigation.

Implementation of the Comprehensive Plan and continued enforcement of County zoning ordinances standards would ensure that future development meets applicable noise criteria for land use compatibility and/or includes noise attenuation features to meet applicable noise standards. This impact is adverse, but **less than significant (Class III)**.

### CUMULATIVE IMPACTS

The cumulative setting for noise consists of Santa Barbara County and proposed, approved, and conceptual development anticipated in the county. At the time of specific project-level

environmental review, implementation of certain ECAP measures, in combination with other future development in the region, has the potential to temporarily increase noise levels due to construction activities and permanently increase noise levels due to more developed circulation systems. It is anticipated that potential impacts would be addressed on a case-by-case project-level basis through compliance with County Comprehensive Plan and zoning ordinance policy provisions. With the incorporation of these policy provisions, no cumulatively considerable noise or vibration impacts would occur from temporary construction or operational activities associated with implementation of the proposed ECAP. Impacts are adverse, but **less than cumulatively considerable (Class III)**.

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## **3.7 AIR QUALITY**





This section examines the air quality in Santa Barbara County, includes a summary of applicable air quality regulations, and analyzes potential air quality impacts associated with the County of Santa Barbara's proposed Energy and Climate Action Plan (ECAP).

### 3.7.1 EXISTING SETTING

#### SOUTH CENTRAL COAST AIR BASIN

The California Air Resources Board (CARB) has divided California into regional air basins according to topographic drainage features. Santa Barbara County is located in the South Central Coast Air Basin and is within the jurisdiction of the Santa Barbara County Air Pollution Control District (SBCAPCD).

#### Topography and Meteorology

The county's air quality is influenced by both local topography and meteorological conditions. The semipermanent high pressure that lies off the Pacific Coast leads to limited rainfall (approximately 8 inches per year), with warm, dry summers and relatively cold, dry winters. Maximum summer temperatures average in the high 80s to 90s (degrees Fahrenheit). During winter, average minimum temperatures are in the 30s.

Santa Ana winds are northeasterly winds that occur primarily during fall and winter, but occasionally in spring. These are warm, dry winds blown from the high inland desert that descend down the slopes of a mountain range. Wind speeds associated with the Santa Ana winds are generally 15 to 20 miles per hour, though wind speeds can sometimes exceed 60 miles per hour. During Santa Ana conditions, pollutants emitted in Santa Barbara County, Ventura County, and the South Coast Air Basin (Los Angeles region) are moved out to sea. These pollutants can then be moved back onshore into Santa Barbara County in what is called a "post-Santa Ana condition."

Surface temperature inversions (0 to 500 feet) are most frequent during the winter, and subsidence inversions (1,000 to 2,000 feet) are most frequent during the summer. Inversions are an increase in temperature with height and are directly related to the stability of the atmosphere. Inversions act as a cap to the pollutants that are emitted below or within them, and ozone concentrations are often higher directly below the base of elevated inversions than they are at the earth's surface. For this reason, elevated monitoring sites will occasionally record higher ozone concentrations than sites at lower elevations. Generally, the lower the inversion base height and the greater the rate of temperature increase from the base to the top, the more pronounced effect the inversion will have on inhibiting vertical dispersion.

Poor air quality is usually associated with air stagnation (high stability and restricted air movement). Therefore, it is reasonable to expect a higher frequency of pollution events in the southern portion of the county where light winds are frequently observed, as opposed to the northern part where the prevailing winds are usually strong and persistent.

#### AIR POLLUTANTS OF CONCERN

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law. These regulated air pollutants are known as "criteria air pollutants" and are categorized into primary and secondary pollutants. Primary air pollutants are those that are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), coarse particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>),

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lead (Pb), and fugitive dust are primary air pollutants. Of these, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are criteria pollutants. ROG and NO<sub>x</sub> are criteria pollutant precursors and go on to form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O<sub>3</sub>) and nitrogen dioxide (NO<sub>2</sub>) are the principal secondary pollutants.

Other pollutants, such as carbon dioxide, a natural byproduct of animal respiration that is also produced in the combustion process, have been linked to such phenomena as climate change. While there are no adopted thresholds for their release, Assembly Bill (AB) 32 requires the state to reduce emissions to 1990 levels by 2020, which is discussed further in Section 3.8, Greenhouse Gases and Climate Change Adaptation. These pollutants do not jeopardize the attainment status of the Basin. Sources and health effects commonly associated with criteria pollutants are summarized in **Table 3.7-1**.

**TABLE 3.7-1  
CRITERIA AIR POLLUTANTS SUMMARY OF COMMON SOURCES AND EFFECTS**

Pollutant	Major Man-Made Sources	Human Health & Welfare Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO <sub>2</sub> )	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O <sub>3</sub> )	Formed by a chemical reaction between volatile organic compounds (VOC) and nitrous oxides (NO <sub>x</sub> ) in the presence of sunlight. VOCs are also commonly referred to as reactive organic gases (ROGs). Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles and dyes.
Particulate Matter (PM <sub>10</sub> & PM <sub>2.5</sub> )	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Sulfur Dioxide (SO <sub>2</sub> )	A colorless, nonflammable gas formed when fuel containing sulfur is burned; when gasoline is extracted from oil; or when metal is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.

Pollutant	Major Man-Made Sources	Human Health & Welfare Effects
Lead (Pb)	Metallic element emitted from metal refineries, smelters, battery manufacturers, iron and steel producers, use of leaded fuels by racing and aircraft industries.	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems.

Source: CAPCOA 2011

## AMBIENT AIR QUALITY

Ambient air quality in the county can be inferred from ambient air quality measurements conducted at air quality monitoring stations. Existing levels of ambient air quality and historical trends and projections in the county are documented by measurements made by the SBCAPCD, the air pollution regulatory agency in the South Central Coast Air Basin that maintains air quality monitoring stations. Air quality monitoring sites in Santa Barbara County are located at Carpinteria, El Capitan Beach, Gaviota, Goleta, Las Flores, Lompoc, the Los Padres National Forest, Santa Barbara, Santa Maria, Santa Ynez, and Vandenberg Air Force Base. **Table 3.7-2** shows historical occurrences of O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> pollutant levels exceeding state and federal ambient air quality standards for the three-year period of 2010, 2011, and 2012. Ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> are the most important pollutants affecting the county.

**TABLE 3.7-2  
AMBIENT AIR QUALITY MONITORING DATA FOR SANTA BARBARA COUNTY**

Pollutant Standards	2010	2011	2012
<b>Carpinteria-Gobernador Road Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.093	0.110	0.094
Max 8-hour concentration (ppm) (state/federal)	0.079 / 0.079	0.085 / 0.084	0.074 / 0.074
Number of days above state 1-hour standard	0	1	0
Number of days above state/federal 8-hour standard	3 / 2	1 / 1	1 / 0
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration (µg/m <sup>3</sup> ) (state/federal)	* / *	* / *	* / *
Number of days above state/federal standard	* / *	* / *	* / *
<b>Fine Particulate Matter</b>			
Max 24-hour concentration (µg/m <sup>3</sup> ) (state/federal)	* / *	* / *	* / *
Number of days above federal standard	*	*	*
<b>El Capitan Beach Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.084	0.105	0.074
Max 8-hour concentration (ppm) (state/federal)	0.073 / 0.073	0.077 / 0.077	0.063 / 0.062
Number of days above state 1-hour standard	0	1	0
Number of days above state/federal 8-hour standard	1 / 0	1 / 1	0 / 0

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Pollutant Standards	2010	2011	2012
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	41.0 / 40.0	36.0 / 35.0	41.0 / 41.0
Number of days above state/federal standard	0 / 0	0 / 0	0 / 0
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above federal standard	*	*	*
<b>Gojota-GTC Site B Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.071	0.084	0.083
Max 8-hour concentration (ppm) (state/federal)	0.062 / 0.062	0.072 / 0.071	0.069 / 0.069
Number of days above state 1-hour standard	0	0	0
Number of days above state/federal 8-hour standard	0 / 0	2 / 0	0 / 0
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above state/federal standard	* / *	* / *	* / *
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above federal standard	*	*	*
<b>Goleta-Fairview Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.072	0.091	0.065
Max 8-hour concentration (ppm) (state/federal)	0.065 / 0.065	0.076 / 0.075	0.056 / 0.056
Number of days above state 1-hour standard	0	0	0
Number of days above state/federal 8-hour standard	0 / 0	1 / 0	0 / 0
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	44.0 / 45.2	67.9 / 70.0	46.5 / 48.0
Number of days above state/federal standard	* / *	* / 0	0 / 0
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	23.6 / *	18.4 / *	29.0 / *
Number of days above federal standard	*	*	*
<b>Las Flores Canyon #1 Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.091	0.099	0.091
Max 8-hour concentration (ppm) (state/federal)	0.083 / 0.082	0.091 / 0.090	0.082 / 0.081
Number of days above state 1-hour standard	0	1	0

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Pollutant Standards	2010	2011	2012
Number of days above state/federal 8-hour standard	4 / 3	2 / 1	4 / 2
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	29.0 / 29.0	33.0 / 32.0	35.0 / 34.0
Number of days above state/federal standard	0 / 0	0 / 0	0 / 0
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above federal standard	*	*	*
<b>Lompoc-HS&amp;P Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.078	0.082	0.067
Max 8-hour concentration (ppm) (state/federal)	0.069 / 0.069	0.078 / 0.078	0.064 / 0.063
Number of days above state 1-hour standard	0	0	0
Number of days above state/federal 8-hour standard	0 / 0	2 / 1	0 / 0
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above state/federal standard	* / *	* / *	* / *
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above federal standard	*	*	*
<b>Lompoc-H Street Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.075	0.073	0.059
Max 8-hour concentration (ppm) (state/federal)	0.060 / 0.059	0.060 / 0.060	0.055 / 0.054
Number of days above state 1-hour standard	0	0	0
Number of days above state/federal 8-hour standard	0 / 0	0 / 0	0 / 0
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	55.1 / 54.3	71.1 / 67.5	54.5 / 52.7
Number of days above state/federal standard	* / 0	2.1 / 0	3.0 / 0
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	19.1 / *	18.8 / *	18.1 / *
Number of days above federal standard	*	*	*
<b>Paradise Road-Los Padres National Forest Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.089	0.089	0.081
Max 8-hour concentration (ppm) (state/federal)	0.083 / 0.083	0.083 / 0.082	0.073 / 0.072

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<b>Pollutant Standards</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
Number of days above state 1-hour standard	0	0	0
Number of days above state/federal 8-hour standard	6 / 1	3 / 1	2 / 0
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above state/federal standard	* / *	* / *	* / *
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above federal standard	*	*	*
<b>Santa Barbara-700 E. Canon Perdido Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.075	0.089	0.071
Max 8-hour concentration (ppm) (state/federal)	0.062 / 0.061	0.077 / 0.076	0.058 / 0.057
Number of days above state 1-hour standard	0	0	0
Number of days above state/federal 8-hour standard	0 / 0	1 / 1	0 / 0
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	57.6 / *	69.4 / *	72.0 / *
Number of days above state/federal standard	* / *	3.1 / *	* / *
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	17.4 / 27.3	* / 25.9	* / 31.0
Number of days above federal standard	0	0	0
<b>Santa Maria-906 S. Broadway Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.070	0.065	0.057
Max 8-hour concentration (ppm) (state/federal)	0.059 / 0.058	0.061 / 0.061	0.052 / 0.051
Number of days above state 1-hour standard	0	0	0
Number of days above state/federal 8-hour standard	0 / 0	0 / 0	0 / 0
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	71.9 / *	64.2 / *	72.0 / *
Number of days above state/federal standard	10.6 / *	* / *	10.7 / *
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	14.7 / 15.7	* / 18.0	* / 32.0
Number of days above federal standard	0	0	0
<b>Santa Ynez-Airport Road Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.089	0.090	0.074

Pollutant Standards	2010	2011	2012
Max 8-hour concentration (ppm) (state/federal)	0.081 / 0.080	0.081 / 0.080	0.061 / 0.060
Number of days above state 1-hour standard	0	0	0
Number of days above state/federal 8-hour standard	1 / 0	1 / 0	0 / 0
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above state/federal standard	* / *	* / *	* / *
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above federal standard	*	*	*
<b>Vandenberg Air Force Base-STS Power Monitoring Station</b>			
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.077	0.079	0.069
Max 8-hour concentration (ppm) (state/federal)	0.073 / 0.073	0.067 / 0.067	0.062 / 0.062
Number of days above state 1-hour standard	0	0	0
Number of days above state/federal 8-hour standard	1 / 0	0 / 0	0 / 0
<b>Coarse Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	65.0 / 63.0	54.0 / 53.0	47.0 / 47.0
Number of days above state/federal standard	5.7 / 0	6.4 / 0	0 / 0
<b>Fine Particulate Matter</b>			
Max 24-hour concentration ( $\mu\text{g}/\text{m}^3$ ) (state/federal)	* / *	* / *	* / *
Number of days above federal standard	*	*	*

Source: CARB 2013a

Notes:

$\mu\text{g}/\text{m}^3$  = micrograms per cubic meter; ppm = parts per million

\* = No data is currently available from CARB to determine the value

## TOXIC AIR CONTAMINANTS

In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For regulatory purposes, carcinogenic TACs are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals. Noncarcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

There are many different types of TACs, with varying degrees of toxicity. Sources of TACs include: industrial processes, such as petroleum refining and chrome-plating operations; commercial operations, such as gasoline stations and dry cleaners; and motor vehicle exhaust. Public exposure to TACs can result from emissions from normal operations, as well as from accidental

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releases of hazardous materials during upset conditions. The health effects of TACs include cancer, birth defects, neurological damage, and death.

To date, CARB has designated nearly 200 compounds as toxic air contaminants and has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, one of the most important in California being particulate matter from diesel-fueled engines. In 1998, CARB identified particulate emissions from diesel-fueled engines (diesel PM) as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

### SENSITIVE RECEPTORS

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are considered to be sensitive receptors to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Schools are also considered sensitive receptors, as children are present for extended durations and engage in regular outdoor activities. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation.

### 3.7.2 REGULATORY FRAMEWORK

Implementation of greenhouse gas (GHG) reduction measures contained in the proposed ECAP has the ability to release gaseous emissions of criteria pollutants and dust into the ambient air; therefore, future development activities under the proposed project entitlements fall under the ambient air quality standards promulgated at the local, state, and federal levels. The federal Clean Air Act of 1971 and the Clean Air Act Amendments (1977) established the national ambient air quality standards (NAAQS), which are promulgated by the US Environmental Protection Agency (EPA). The State of California has also adopted its own California ambient air quality standards (CAAQS), which are promulgated by CARB. Implementation of ECAP measures would occur in the Santa Barbara County portion of the South Central Coast Air Basin, which is under the air quality regulatory jurisdiction of the SBCAPCD and is subject to the rules and regulations adopted by the SBCAPCD to achieve the national and state ambient air quality standards. Federal, state, regional, and local laws, regulations, plans, and guidelines are summarized below.

### AMBIENT AIR QUALITY STANDARDS

The Clean Air Act of 1971 established NAAQS, with states retaining the option to adopt more stringent standards or to include other pollution species. These standards are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect those "sensitive receptors" most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise.



Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both the State of California and the federal government have established health-based ambient air quality standards for six air pollutants. As shown in **Table 3.7-3**, these pollutants include ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), PM<sub>10</sub>, PM<sub>2.5</sub>, and lead (Pb). In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

**TABLE 3.7-3  
AIR QUALITY STANDARDS**

Pollutant	Averaging Time	California Standards	National Standards
Ozone (O <sub>3</sub> )	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )	0.075 ppm
	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	—
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )	9 ppm (10 mg/m <sup>3</sup> )
	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	35 ppm (40 mg/m <sup>3</sup> )
Nitrogen Dioxide (NO <sub>2</sub> )	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	100 ppb
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )	53 ppb (100 µg/m <sup>3</sup> )
Sulfur Dioxide (SO <sub>2</sub> )	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )	N/A
	3 Hour	—	N/A
	1 Hour	0.25 ppm (665 µg/m <sup>3</sup> )	75 ppb
Particulate Matter (PM <sub>10</sub> )	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	N/A
	24 Hour	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>
Particulate Matter – Fine (PM <sub>2.5</sub> )	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>
	24 Hour	N/A	35 µg/m <sup>3</sup>
Sulfates	24 Hour	25 µg/m <sup>3</sup>	N/A
Lead (Pb)	Calendar Quarter	N/A	1.5 µg/m <sup>3</sup>
	30 Day Average	1.5 µg/m <sup>3</sup> )	N/A
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	N/A
Vinyl Chloride (chloroethene)	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	N/A
Visibility-Reducing Particles	8 Hour (10:00 to 18:00 PST)	—	N/A

Source: CARB 2013b

Notes: mg/m<sup>3</sup> = milligrams per cubic meter; ppm = parts per million; ppb = parts per billion; µg/m<sup>3</sup> = micrograms per cubic meter

## AIR QUALITY ATTAINMENT PLANS

The federal Clean Air Act Amendments of 1990 and the California Clean Air Act of 1988 mandate the preparation of clean air plans that provide an overview of air quality and sources of air pollution and identify pollution-control measures needed to meet federal and state air quality standards. The SBCAPCD and the Santa Barbara County Association of Governments (SBCAG) are responsible for formulating and implementing the clean air plan for Santa Barbara

### 3.7 AIR QUALITY

County. The plan provides an overview of the regional air quality and sources of air pollution and identifies the pollution-control measures needed to meet clean air standards. The schedule for plan development is outlined by state and federal requirements, and is influenced by regional air quality. Clean air plans affect the development of SBCAPCD rules and regulations and other programs. They also influence a range of activities outside the district, including transportation planning, allocation of money designated for air quality projects, and more.

The SBCAPCD 2010 Clean Air Plan (CAP) is the latest update required by the state to show how the SBCAPCD plans to meet the state 8-hour ozone standard. The SBCAPCD Board adopted the 2010 CAP and certified the associated EIR at its meeting held January 20, 2011. The 2010 CAP satisfies both state and federal planning requirements (the 2013 CAP has been drafted though has yet to be adopted).

**Table 3.7-4** shows the federal and state attainment status for the South Central Coast Air Basin and, thus, the county. The region is nonattainment for federal ozone standards and is nonattainment for state ozone and PM<sub>10</sub> standards (CARB 2011, 2013c).

Areas with air quality that exceed adopted air quality standards are designated as nonattainment areas for the relevant air pollutants. Areas that comply with air quality standards are designated as attainment areas for the relevant air pollutants. State Implementation Plans (SIPs) must be prepared by states for areas designated as federal nonattainment areas to demonstrate how the area will come into attainment of the exceeded federal ambient air quality standard.

**TABLE 3.7-4  
FEDERAL AND STATE AMBIENT AIR QUALITY ATTAINMENT STATUS  
FOR THE SOUTH CENTRAL COAST AIR BASIN**

Pollutant	Federal	State
1-hour Ozone (O <sub>3</sub> )	—	Nonattainment
8-hour Ozone (O <sub>3</sub> )	Nonattainment	Nonattainment
Coarse Particulate Matter (PM <sub>10</sub> )	Unclassified	Nonattainment
Fine Particulate Matter (PM <sub>2.5</sub> )	Unclassified/Attainment	Unclassified
Carbon Monoxide (CO)	Unclassified/Attainment	Attainment
Nitrogen Dioxide (NO <sub>2</sub> )	Unclassified/Attainment	Attainment
Sulfur Dioxide (SO <sub>2</sub> )	Unclassified	Attainment

Source: CARB 2011, 2013c

#### Santa Barbara County Air Pollution Control District

The SBCAPCD monitors air quality and regulates stationary emission sources in Santa Barbara County. As a responsible agency under the California Environmental Quality Act (CEQA), the SBCAPCD reviews environmental documents prepared by other lead agencies or jurisdictions to reduce or avoid impacts on air quality and to ensure that the lead agency's environmental document is adequate to fulfill CEQA requirements. As a concerned agency, the SBCAPCD comments on environmental documents and suggests mitigation measures to reduce air quality impacts.

### SBCAPCD Rules and Regulations

The SBCAPCD is the regional agency responsible for rulemaking, permitting, and enforcement activities affecting stationary sources in the county. Specific rules and regulations adopted by the SBCAPCD limit the emissions that can be generated by various activities and identify specific pollution reduction measures that must be implemented in association with various activities. These rules regulate not only emissions of the six criteria air pollutants, but also toxic emissions and acutely hazardous non-radioactive materials emissions.

Emissions sources subject to these rules are regulated through the SBCAPCD's permitting process and standards of operation. Through this permitting process, the SBCAPCD monitors generation of stationary emissions and uses this information in developing its air quality plans. Any sources of stationary emissions constructed as part of a proposed ECAP would be subject to the SBCAPCD rules and regulations. Both federal and state ozone plans rely on stationary source control measures set forth in the SBCAPCD's rules and regulations.

With respect to the construction activities associated with development instigated by measures included in the proposed ECAP, applicable SBCAPCD regulations would relate to architectural coatings (Rule 323) and paving materials (Rule 329, Cutback and Emulsified Asphalt Paving Materials). With respect to the operational phase of a project, SBCAPCD Rule 808 would apply to any new or modified stationary sources in the county.

### **3.7.3 IMPACTS AND MITIGATION MEASURES**

#### STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the following State CEQA Guidelines Appendix G thresholds of significance. The project would result in a significant impact to air quality if it would:

- a) Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- b) Conflict with or obstruct implementation of any applicable air quality plan.
- c) Expose sensitive receptors to substantial pollutant concentrations.
- d) Create objectionable odors affecting a substantial number of people.
- e) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

In addition, air quality impacts are considered to be significant if the following could result from the implementation of the proposed ECAP:

- a) Result in significant construction-related air quality impacts.

Implementation of the proposed project would result in no impacts associated with long-term, operational air pollutant emissions, conflicts with the SBCAPCD 2010 Clean Air Plan, or County of Santa Barbara Comprehensive Plan Air Quality Supplement of the Land Use Element as

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described below. Therefore, there would be no adverse impact related to these issues and they will not be addressed further in the Final EIR.

#### **Violate Air Quality Standard or Contribute Substantially to an Air Quality Violation: Long-Term, Operational Emissions**

The proposed ECAP contains measures (e.g., BE1, RE4, and LUD1) that support energy-conserving programs and renewable energy generators and encourage development in close proximity to transit. These measures would help to reduce adverse air quality effects through the reduction of fossil fuel consumption and private motor vehicle use. Furthermore, there are no measures proposed under the ECAP that would intensify the use of fossil-fuel-propelled automobiles, and ECAP Measure T3 proposes to increase alternative-fuel infrastructure in the county. In addition, proposed ECAP measures related to transportation would reduce vehicle miles traveled (VMT), and thus automobile-generating air pollutants, throughout the county. Therefore, the proposed ECAP would not result in any impacts associated with contributing substantially to an existing or projected air quality violation, or increasing criteria pollutants during operational activities.

#### **Conflict with the SBCAPCD 2010 Clean Air Plan**

As part of its enforcement responsibilities, the EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the California Clean Air Act requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

As previously mentioned, Santa Barbara County is located in the South Central Coast Air Basin, which is under the jurisdiction of the SBCAPCD. The SBCAPCD is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the basin is in nonattainment. In order to reduce such emissions, the SBCAPCD prepared the 2010 Clean Air Plan, which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population and housing projections prepared by the Santa Barbara County Association of Governments (SBCAG).

SBCAG is the regional planning agency for Santa Barbara County and addresses county issues relating to transportation, economy, community development, and environment. With regard to air quality planning, SBCAG has prepared the Regional Growth Forecast and Regional Transportation Plan that form the basis for the land use and transportation control portions of the 2010 Clean Air Plan. These documents are used in the preparation of the air quality forecasts and consistency analysis included in the Clean Air Plan.

The Santa Barbara County ECAP is a policy-level document that does not include site-specific designs or proposals for development projects, nor does it grant any entitlements for development that would have the potential to increase population. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Land Use Element.

Therefore, the proposed ECAP would not exceed the population projections used by the SBCAPCD to develop the Clean Air Plan.

In addition, the proposed ECAP is intended to reduce GHG emissions generated in the unincorporated county; this will contribute to global efforts to reduce the effects of climate change by, among other things, promoting the use of alternatively fueled vehicles (Measure T3), reducing VMT (Measures T1, T2, T4, T5, T6, T9, LUD1, and LUD2), promoting pedestrian facilities (Measure T6), encouraging the use of renewable energy (Measures BE1, BE8, RE1, RE3, and RE4), promoting water conservation (Measures WE1 through WE3), and reducing waste generation (Measures WR1 through WR5). In addition to reducing GHG emissions, each of these measures would help to reduce criteria air pollutants.

The proposed ECAP would not exceed the population projections used by the SBCAPCD to develop the Clean Air Plan and furthermore is intended to reduce GHG emissions generated in the unincorporated county, which would help to reduce criteria air pollutants as well. Therefore, the proposed ECAP would result in a benefit in terms of air pollutant emissions. No impact would occur concerning conformance with the Clean Air Plan.

### **Conflict with the County of Santa Barbara Comprehensive Plan Air Quality Supplement of the Land Use Element**

The air quality policies in the Comprehensive Plan encourage mixed-use development and alternative transportation modes. Specifically, proposed development projects would be required to consider land development design policies aimed at reducing air pollutant emissions, such as pedestrian-oriented and transit-oriented development (TOD). The TOD concept involves a mixed-use community within a short distance of a transit stop and core commercial area. The design, configuration, and mix of uses emphasize a pedestrian-oriented environment and reinforce the use of alternative modes of transportation. TOD designs can help to reduce the number of auto trips and vehicle miles traveled by creating opportunities to walk and bike, while enhancing the area's quality of life and protecting affordable housing goals.

The proposed ECAP is consistent with the goals of the Comprehensive Plan Air Quality Supplement. ECAP Measure LUD1 proposes to adopt principles and policies that encourage and expedite the permitting of mixed-use, infill, and transit-oriented development, with jobs and housing co-located where feasible, or in close proximity (walking/biking distance) to transit facilities. This measure also proposes to encourage new residential development to be within walking distance (½ mile or less) of public activity centers such as schools, libraries, parks, and community centers. ECAP Measure LUD2 aims to coordinate office, commercial, industrial, and high-density residential developments with mass transit service and existing or proposed bikeways. For these reasons, the proposed ECAP would be in compliance with the goals of the Comprehensive Plan Air Quality Supplement. No impact would occur concerning conformance with the Air Quality Supplement.

### **County of Santa Barbara Environmental Thresholds and Guidelines Manual**

The visual air quality impact guidelines in the County of Santa Barbara Thresholds and Guidelines Manual (2008) provide guidance in determining the importance of air quality. The guidelines identify the questions below, which are intended to provide information to address the criteria specified in Appendix G of the State CEQA Guidelines. Reaching these levels indicates potentially significant impacts to air quality.

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- Interferes with progress toward the attainment of the ozone standard by releasing emissions which equal or exceed the established long-term quantitative thresholds for NO<sub>x</sub> and ROG.
- Equals or exceeds the state or federal ambient air quality standards for any criteria pollutant (as determined by modeling).
- Produces emissions which may affect sensitive receptors (e.g., children, elderly, or acutely ill).
- Produces toxic or hazardous air pollutants in amounts which may increase cancer risk for the affected population.
- Creates odor or another air quality nuisance problem impacting a considerable number of people.

The manual also lists screening criteria for determining the significance of operational (long-term) emissions. Criteria relevant to the proposed project include whether operation of the project would result in any of the following.

- Emit more than 25 pounds per day of NO<sub>x</sub> or ROG from motor vehicle trips only.
- Emit from all project sources, mobile and stationary, more than the daily trigger for offsets set in the APCD New Source Review Rule.
- Cause or contribute to a violation of a California or federal ambient air quality standard (except ozone).
- Contribute more than 800 peak-hour trips (for CO "hotspot" modeling).
- Generate significant long-term operational emissions or air quality impacts that would result in health risks to sensitive receptors.
- Be inconsistent with the adopted federal and state air quality plans.
- Not exceed the APCD health risk public notification thresholds adopted by the APCD Board.

No quantitative thresholds exist for short-term construction emissions. Short-term emissions are considered insignificant by the County of Santa Barbara's Planning and Development Department because construction emissions only comprise approximately 6 percent of the baseline countywide emissions inventory for NO<sub>x</sub> (on a pound-for-pound basis, NO<sub>x</sub> results in greater ozone impacts than ROG), and the emissions are temporary and short term in nature (Santa Barbara 2008).

#### METHODOLOGY

The impact analysis below utilizes the County of Santa Barbara's Comprehensive Plan policy provisions, development standard provisions of the County of Santa Barbara's Land Use and Development Code (LUDC), and SBCAPCD guidance to determine whether implementation of the proposed ECAP measures would result in a significant environmental air quality impact. Specific subsequent activities or projects, their associated locations, and physical effects on the

environment from the implementation of the ECAP measures to reduce GHG emissions are not known at this time. Therefore, this analysis uses a programmatic approach in evaluating possible air quality impacts of implementation of the ECAP.

## IMPACTS AND MITIGATION MEASURES

### Short-Term Construction Emissions

**Impact 3.7.1** Implementation of the proposed ECAP could have a negative effect on air quality as a result of construction-generated air pollutants. However, this impact is considered adverse, but **less than significant (Class III)**, due to standard requirements imposed by the County for all construction projects.

Short-term construction emissions would result in increased emissions of ozone-precursor pollutants (i.e., ROG and NO<sub>x</sub>) and emissions of PM. Emissions of ozone precursors would result from the operation of on-road and off-road motorized vehicles and equipment. Emissions of airborne PM are largely associated with ground-disturbing activities, such as those occurring during site preparation. Localized concentrations of construction-generated emissions, including emissions of particulate matter, can adversely impact nearby sensitive land uses.

The quantity of daily emissions, particularly ROG and NO<sub>x</sub> emissions, generated by construction equipment used to implement ECAP measures would depend on the number of vehicles used and the hours of operation. The significance of fugitive dust (PM) emissions would vary widely and would depend on the following factors: the aerial extent of disturbed soils and the length of disturbance time; whether existing structures are demolished; whether excavation is involved; and whether transport of excavated materials off-site is necessary. The level of hydrocarbon emissions generated by oil-based substances, such as asphalt, is dependent on the type and amount of substance used. Quantifying the air quality impacts from short-term, temporary construction activities of the proposed project is not possible due to project-level variability and uncertainties related to future individual projects.

The majority of proposed ECAP measures are not expected to generate significant short-term impacts because they would result in only minor upgrades to existing uses. Examples of these types of ECAP measures include the incentive of free trees for planting near buildings to reduce heat gain and loss and carbon sequestration efforts (BE5), the encouragement of residents and commercial and industrial building owners to switch to energy-efficient equipment (BE2), and the limiting of heavy-duty commercial vehicle idling (T7). However, other ECAP measures could involve grading and paving or the construction of permanent facilities, such as the facilitation of energy efficiency upgrades and retrofits to existing buildings (BE2, BE4, and RE2), the support of small-scale alternative energy technology installation on existing development (RE1), the encouragement of utility-scale renewable energy generator development (RE4), and the provision of pedestrian and bike paths to encourage people to walk or bike instead of drive (T5 and T6).

Although individual improvements may not generate significant short-term emissions, it is possible that several improvements would be under construction simultaneously in the county and would generate cumulative construction emissions that could affect air quality. The County has promulgated and implemented air quality policies and requirements for construction projects contained in the Santa Barbara County Environmental Thresholds and Guidance Manual (2008). As previously described, no quantitative thresholds exist for short-term construction emissions, as the County considers short-term emissions to be insignificant since construction emissions only comprise approximately 6 percent of the baseline countywide emissions inventory for NO<sub>x</sub>, and

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the emissions are temporary and short term in nature (Santa Barbara 2008). In addition, the County requires that all discretionary construction activities implement standard dust mitigation measures as part of the Environmental Thresholds and Guidance Manual. These standard dust mitigation measures, which ensure the control of PM<sub>10</sub> emissions, are enforced through an applicant-prepared construction management plan that, at a minimum, is required to include the following dust control measures:

- During construction, water trucks or sprinkler systems shall be used 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 shall 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 grown for human consumption.
- Minimize the amount of disturbed area and reduce on-site vehicle speeds to 15 mph per hour or less.
- Gravel pads must be installed at all access points to prevent tracking of mud onto public roads and internal private roads where applicable.
- If importation, exportation, and stockpiling of fill material are 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 covered with a tarp from the point of origin.
- After clearing, grading, earthmoving, or excavation is completed, the disturbed area shall be treated by watering, revegetating, or 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 off-site. 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 SBCAPCD prior to approval of permits for map recordation and for finish grading for any structures.

Implementation of the ECAP could result in short-term emissions of diesel PM, which was identified as a toxic air contaminant by CARB in 1998. Implementation of ECAP measures to reduce GHG emissions would result in the generation of diesel PM emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities. The amount to which receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emissions levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer. Cancer risk associated with exposure to TACs is typically based on calculations over a 70-year period of exposure. The use of diesel-powered construction equipment, however, would be temporary and episodic and would occur over a relatively large area. For these reasons, diesel PM generated by construction activities, in and of itself, would not be a significant impact.



It is also important to note that any future demolition of structures will be subject to SBCAPCD Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities). Compliance with Rule 345 would reduce short-term emissions during demolition activities. In addition, all future demolition and rehabilitation activities involving buildings that are old enough to contain asbestos will be subject to SBCAPCD Rule 1001 (National Emission Standards for Hazardous Air Pollutants (NESHAP) – Asbestos) in order to ensure air toxics associated with asbestos are not released.

As previously mentioned, the quantification of air quality impacts from short-term, temporary construction activities of measures identified in the proposed ECAP is not possible due to project-level variability and uncertainties related to future individual projects. However, all construction projects can produce ozone precursors, diesel PM, and nuisance dust emissions. The County has identified basic construction mitigation measures to reduce construction-generated air pollutants. As previously stated, the County requires that all discretionary construction activities implement these identified standard dust mitigation measures as part of the Environmental Thresholds and Guidance Manual. Therefore, this impact is adverse, but **less than significant (Class III)**.

### **Exposure of Sensitive Receptors to Substantial Concentrations of Toxic Air Contaminants**

**Impact 3.7.2** Subsequent activities associated with implementation of the proposed ECAP would not result in projects that would include sources of toxic air contaminants which could affect surrounding land uses. This is an adverse, but **less than significant (Class III)** impact.

As stated under Impact 3.7.1, construction associated with implementation of ECAP measures to reduce GHG emissions would result in the generation of diesel PM emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities. However, the use of diesel-powered construction equipment would be temporary and episodic and would occur over a relatively large area. As a result, diesel PM generated by construction activities, in and of itself, would not be expected to create conditions that would significantly impact nearby receptors. It is also important to note that any future demolition of structures would be subject to SBCAPCD Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities). Compliance with Rule 345 would reduce short-term emissions during demolition activities.

It should be noted that while there are no physical improvements proposed as part of the ECAP, future actions that would be implemented per the ECAP would be subject to further CEQA analysis of project-specific impacts. Furthermore, none of the subsequent actions proposed as part of ECAP measures would result in a major source of toxic air contaminants, which include industrial processes (e.g., petroleum refining and chrome-plating operations), commercial operations (e.g., gasoline stations and dry cleaners), and motor vehicle exhaust (the ECAP contains several measures seeking to reduce VMT). Therefore, implementation of the proposed ECAP would not result in toxic air contaminant impacts, and impacts on sensitive receptors are adverse, but **less than significant (Class III)**.

### **Create Objectionable Odors Affecting a Substantial Number of People**

**Impact 3.7.3** Subsequent activities associated with implementation of the proposed ECAP would not include sources that could create objectionable odors affecting a substantial number of people or expose new residents to existing sources of odor. Thus, odor-related impacts are adverse, but **less than significant (Class III)**.

### 3.7 AIR QUALITY

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The SBCAPCD does not have a recommended odor threshold for construction activities. For purposes of this analysis, there is recognition that heavy-duty construction equipment used for the construction of future ECAP measures would emit odors. However, construction activity would be short term and finite in nature. Furthermore, equipment exhaust odors would dissipate quickly and are common in an urban environment. For these reasons, construction related to the implementation of proposed ECAP measures is not anticipated to create objectionable odors affecting a substantial number of people.

With respect to operational impacts, future actions that might be encouraged by ECAP measures, such as improving the energy efficiency of existing buildings, encouraging renewable energy generators, and/or promoting the use of alternative fueled vehicles, would not result in objectionable odors. None of the subsequent actions proposed as part of ECAP measures would result in a major source of odors. This is an adverse, but **less than significant (Class III)** impact.

#### CUMULATIVE IMPACTS

The ECAP is intended to reduce GHG emissions generated in the unincorporated county to contribute to global efforts to reduce the effects of climate change by, among other things, promoting the use of fuel-efficient and alternatively fueled vehicles (Measure T3), reducing VMT (Measures T1, T2, T4, T5, T6, T9, LUD1, and LUD2), integrating pedestrian facilities (Measure T6), encouraging the use of renewable energy (Measures BE1, BE8, RE1, and RE4), promoting water conservation (Measures WE1 through WE3), and reducing waste generation (Measures WR1 through WR5). In addition to reducing greenhouse gas emissions, each of these measures would help to reduce criteria air pollutants. Therefore, the proposed ECAP would not contribute to cumulative increases in criteria pollutants. This impact is adverse, but **less than cumulatively considerable (Class III)**.

## **3.8 GREENHOUSE GASES AND CLIMATE CHANGE ADAPTATION**



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## 3.8 GREENHOUSE GASES AND CLIMATE CHANGE ADAPTATION

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This section provides a discussion of the effect of the proposed County of Santa Barbara Energy and Climate Action Plan (ECAP) on greenhouse gas (GHG) emissions and the associated effects of climate change. The California Environmental Quality Act (CEQA) requires that lead agencies consider the reasonably foreseeable adverse environmental effects of projects they are considering for approval.

### 3.8.1 ENVIRONMENTAL SETTING

#### EXISTING CLIMATE SETTING

Since the early 1990s, scientific consensus holds that the world's population is releasing greenhouse gases (GHGs) faster than the earth's natural systems can absorb them. These gases are released as byproducts of fossil fuel combustion, waste disposal, energy use, land use changes, and other human activities. This release of gases, such as carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O), creates a blanket around the earth that allows light to pass through but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as "the greenhouse effect," human activities have accelerated the generation of GHGs beyond natural levels. The overabundance of GHGs in the atmosphere has led to a warming of the earth and has the potential to severely impact the earth's climate system.

While often used interchangeably, there is a difference between the terms "climate change" and "global warming." According to the National Academy of Sciences, climate change refers to any significant, measurable change of climate lasting for an extended period of time that can be caused by both natural factors and human activities. Global warming, on the other hand, is an average increase in the temperature of the atmosphere caused by increased GHG emissions. The use of the term "climate change" is becoming more prevalent because it encompasses all changes to the climate, not just temperature.

To fully understand global climate change, it is important to recognize the naturally occurring greenhouse effect and to define the GHGs that contribute to this phenomenon. Various gases in the earth's atmosphere, classified as atmospheric GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space and a portion of the radiation is absorbed by the earth's surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>).

**Table 3.8-1** provides descriptions of the primary GHGs attributed to global climate change, including a description of their physical properties, primary sources, and contribution to the greenhouse effect.

### 3.8 GREENHOUSE GASES AND CLIMATE CHANGE ADAPTATION

**TABLE 3.8-1  
GREENHOUSE GASES**

Greenhouse Gas	Description
Carbon Dioxide (CO <sub>2</sub> )	Carbon dioxide is a colorless, odorless gas. CO <sub>2</sub> is emitted in a number of ways, both naturally and through human activities. The largest source of CO <sub>2</sub> emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. A number of specialized industrial production processes and product uses such as mineral production, metal production, and the use of petroleum-based products can also lead to CO <sub>2</sub> emissions. The atmospheric lifetime of CO <sub>2</sub> is variable because it is so readily exchanged in the atmosphere. <sup>1</sup>
Methane (CH <sub>4</sub> )	Methane is a colorless, odorless gas that is not flammable under most circumstances. Methane is the major component of natural gas, about 87 percent by volume. It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. Methane is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (intestinal fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of CH <sub>4</sub> to the atmosphere. Natural sources of CH <sub>4</sub> include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. The atmospheric lifetime of CH <sub>4</sub> is about 12 years. <sup>2</sup>
Nitrous Oxide (N <sub>2</sub> O)	Nitrous oxide is a clear, colorless gas with a slightly sweet odor. Nitrous oxide is produced by both natural and human-related sources. Primary human-related sources of N <sub>2</sub> O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. Nitrous oxide is also produced naturally from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N <sub>2</sub> O is approximately 120 years. <sup>3</sup>
Hydrofluorocarbons (HFCs)	Hydrofluorocarbons are man-made chemicals, many of which have been developed as alternatives to ozone-depleting substances for industrial, commercial, and consumer products. The only significant emissions of HFCs before 1990 were of the chemical HFC-23, which is generated as a byproduct of the production of HCFC-22 (or Freon 22, used in air conditioning applications). The atmospheric lifetime for HFCs varies from just over a year for HFC-152a to 260 years for HFC-23. Most of the commercially used HFCs have atmospheric lifetimes less than 15 years (e.g., HFC-134a, which is used in automobile air conditioning and refrigeration, has an atmospheric life of 14 years). <sup>4</sup>
Perfluorocarbons (PFCs)	Perfluorocarbons are colorless, highly dense, chemically inert, and nontoxic. There are seven PFC gases: perfluoromethane (CF <sub>4</sub> ), perfluoroethane (C <sub>2</sub> F <sub>6</sub> ), perfluoropropane (C <sub>3</sub> F <sub>8</sub> ), perfluorobutane (C <sub>4</sub> F <sub>10</sub> ), perfluorocyclobutane (C <sub>4</sub> F <sub>8</sub> ), perfluoropentane (C <sub>5</sub> F <sub>12</sub> ), and perfluorohexane (C <sub>6</sub> F <sub>14</sub> ). Natural geological emissions have been responsible for the PFCs that have accumulated in the atmosphere in the past; however, the largest current source is aluminum production, which releases CF <sub>4</sub> and C <sub>2</sub> F <sub>6</sub> as byproducts. The estimated atmospheric lifetimes for CF <sub>4</sub> and C <sub>2</sub> F <sub>6</sub> are 50,000 and 10,000 years, respectively. <sup>4,5</sup>
Sulfur Hexafluoride (SF <sub>6</sub> )	Sulfur hexafluoride is an inorganic compound that is colorless, odorless, nontoxic, and generally nonflammable. Sulfur hexafluoride is primarily used as an electrical insulator in high voltage equipment. The electric power industry uses roughly 80 percent of all SF <sub>6</sub> produced worldwide. Significant leaks occur from aging equipment and during equipment maintenance and servicing. Sulfur hexafluoride has an atmospheric life of 3,200 years. <sup>4</sup>

Sources: <sup>1</sup>EPA 2011a, <sup>2</sup>EPA 2011b, <sup>3</sup>EPA 2010a, <sup>4</sup>EPA 2010b, <sup>5</sup>EFCTC 2003

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Gases with high global warming potential, such as HFCs, PFCs, and SF<sub>6</sub>, are the most heat-absorbent. Methane traps over 21 times more heat per molecule than CO<sub>2</sub>, and N<sub>2</sub>O absorbs 310 times more heat per molecule than CO<sub>2</sub>. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO<sub>2</sub>e), which weighs each gas by its global warming potential (GWP). Expressing GHG emissions in CO<sub>2</sub>e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO<sub>2</sub> were being emitted. **Table 3.8-2** shows the GWPs for different GHGs for a 100-year time horizon.

**TABLE 3.8-2  
GLOBAL WARMING POTENTIAL FOR GREENHOUSE GASES**

Greenhouse Gas	Global Warming Potential
Carbon Dioxide (CO <sub>2</sub> )	1
Methane (CH <sub>4</sub> )	21
Nitrous Oxide (N <sub>2</sub> O)	310
Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs)	6,500
Sulfur Hexafluoride (SF <sub>6</sub> )	23,900

*Source: California Climate Action Registry 2009a*

As the name implies, global climate change is a global problem. Greenhouse gases are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. California is a significant emitter of CO<sub>2</sub> in the world and produced 452 million gross metric tons of CO<sub>2</sub>e in 2010 (CARB 2013). In 2007, approximately 1,192,970 metric tons of CO<sub>2</sub>e emissions were generated in the unincorporated county without accounting for stationary sources (Santa Barbara 2014). Consumption of fossil fuels in the transportation sector was the single largest source of California’s GHG emissions in 2010, accounting for 38.3 percent of total GHG emissions in the state (CARB 2013). This category was followed by the electric power sector (including both in-state and out-of-state sources) (20.7 percent) and the industrial sector (19.0 percent) (CARB 2013).

#### EFFECTS OF GLOBAL CLIMATE CHANGE

California can draw on substantial scientific research conducted by experts at various universities and research institutions. With more than a decade of concerted research, scientists have established that the early signs of climate change are already evident in the state—as shown, for example, in increased average temperatures, changes in temperature extremes, reduced snowpack in the Sierra Nevada, sea level rise, and ecological shifts.

Many of these changes are accelerating locally, across the country, and around the globe. As a result of emissions already released into the atmosphere, California will face intensifying climate change in coming decades (CNRA 2009a). Generally, research indicates that California should expect overall hotter and drier conditions, with a continued reduction in winter snow (with concurrent increases in winter rains), as well as increased average temperatures and accelerating sea-level rise. In addition to changes in average temperatures, sea level, and precipitation patterns, the intensity of extreme weather events is also changing (CNRA 2009a).

### 3.8 GREENHOUSE GASES AND CLIMATE CHANGE ADAPTATION

Climate change temperature projections identified in the 2009 California Climate Adaptation Strategy suggest the following (CNRA 2009a):

- Average temperature increase is expected to be more pronounced in the summer than in the winter season.
- Inland areas are likely to experience more pronounced warming than coastal regions.
- Heat waves are expected to increase in frequency, with individual heat waves also showing a tendency toward becoming longer and extending over a larger area, thus more likely to encompass multiple population centers in California at the same time.
- As GHGs remain in the atmosphere for decades, temperature changes over the next 30 to 40 years are already largely determined by past emissions. By 2050, temperatures are projected to increase by an additional 1.8 to 5.4°F (an increase one to three times as large as that which occurred over the entire twentieth century).
- By 2100, the models project temperature increases between 3.6 and 9°F.

According to the 2009 California Climate Adaptation Strategy, the impacts of climate change in California have the potential to include, but are not limited to, the areas discussed in **Table 3.8-3**.

**TABLE 3.8-3  
POTENTIAL STATEWIDE IMPACTS FROM CLIMATE CHANGE**

Potential Statewide Impact	Description
Public Health	Climate change is expected to lead to an increase in ambient (i.e., outdoor) average air temperature, with greater increases expected in summer than in winter months. Larger temperature increases are anticipated in inland communities as compared to the California coast. The potential health impacts from sustained and significantly higher than average temperatures include heat stroke, heat exhaustion, and the exacerbation of existing medical conditions such as cardiovascular and respiratory diseases, diabetes, nervous system disorders, emphysema, and epilepsy. Numerous studies have indicated that there are generally more deaths during periods of sustained higher temperatures, and these are due to cardiovascular causes and other chronic diseases. The elderly, infants, and socially isolated people with pre-existing illnesses who lack access to air conditioning or cooling spaces are among the most at risk during heat waves.
Floods and Droughts	The impacts of flooding can be significant. Results may include population displacement, severe psychosocial stress with resulting mental health impacts, exacerbation of pre-existing chronic conditions, and infectious disease. Additionally, impacts can range from a loss of personal belongings, and the emotional ramifications from such loss, to direct injury and/or mortality.  Drinking water contamination outbreaks in the United States are associated with extreme precipitation events. Runoff from rainfall is also associated with coastal contamination that can lead to contamination of shellfish and contribute to food-borne illness. Floodwaters may contain household, industrial, and agricultural chemicals, as well as sewage and animal waste. Flooding and heavy rainfall events can wash pathogens and chemicals from contaminated soils, farms, and streets into drinking water supplies. Flooding may also overload storm and wastewater systems, or flood septic systems, also leading to possible contamination of drinking water systems.  Drought impacts develop more slowly over time. Risks to public health that Californians may face from drought include impacts on water supply and quality, food production (both agricultural and commercial fisheries), and risks of waterborne illness. As surface



### 3.8 GREENHOUSE GASES AND CLIMATE CHANGE ADAPTATION

Potential Statewide Impact	Description
	water supplies are reduced as a result of drought conditions, the amount of groundwater pumping is expected to increase to make up for the water shortfall. The increase in groundwater pumping has the potential to lower the water tables and cause land subsidence. Communities that utilize well water will be adversely affected by drops in water tables or through changes in water quality. Groundwater supplies have higher levels of total dissolved solids compared to surface waters. This introduces a set of effects for consumers, such as repair and maintenance costs associated with mineral deposits in water heaters and other plumbing fixtures, and on public water system infrastructure designed for lower salinity surface water supplies. Drought may also lead to increased concentration of contaminants in drinking water supplies.
Water Resources	The state's water supply system already faces challenges to provide water for California's growing population. Climate change is expected to exacerbate these challenges through increased temperatures and possible changes in precipitation patterns. The trends of the last century, especially increases in hydrologic variability, will likely intensify in this century. The state can expect to experience more frequent and larger floods and deeper droughts. Rising sea level will threaten the Delta water conveyance system and increase salinity in near-coastal groundwater supplies. Planning for and adapting to these simultaneous changes, particularly their impacts on public safety and long-term water supply reliability, will be among the most significant challenges facing water and flood managers this century.
Forests and Landscapes	Global climate change has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, wildfire occurrence statewide could increase from 57% to 169% by 2085. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the state.

Source: CNRA 2009a

#### 3.8.2 REGULATORY SETTING

The adoption of recent legislation has provided a clear mandate that climate change must be included in an environmental review for a project subject to CEQA. Several GHG emission-related laws and regulations are discussed below.

##### FEDERAL REGULATION AND THE CLEAN AIR ACT

In the past, the US Environmental Protection Agency (EPA) has not regulated GHGs under the Clean Air Act because it asserted that the act did not authorize the EPA to issue mandatory regulations to address global climate change and that such regulation would be unwise without unequivocally establishing a causal link between GHGs and the increase in global surface air temperatures. However, the US Supreme Court held that the EPA must consider regulation of motor vehicle GHG emissions. In *Massachusetts v. Environmental Protection Agency et al.*, twelve states and cities, including California, together with several environmental organizations, sued to require the EPA to regulate greenhouse gases as pollutants under the Clean Air Act (127 S. Ct. 1438 [2007]). The US Supreme Court held that the EPA was authorized by the Clean Air Act to regulate CO<sub>2</sub> emissions from new motor vehicles. The court did not mandate that the EPA enact regulations to reduce GHG emissions, but found that the only instances in which the EPA could avoid taking action were if it found that GHG emissions do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHG emissions contribute to climate change.

### 3.8 GREENHOUSE GASES AND CLIMATE CHANGE ADAPTATION

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On December 7, 2009, the EPA issued an “endangerment finding” under the Clean Air Act, concluding that GHG emissions threaten the public health and welfare of current and future generations and that motor vehicles contribute to GHG pollution (EPA 2009). These findings provide the basis for adopting new national regulations to mandate GHG emissions reductions under the federal Clean Air Act. The EPA’s endangerment finding paves the way for federal regulation of greenhouse gas emissions.

It was expected that Congress would enact GHG legislation, primarily for a cap-and-trade system. However, proposals circulated in both the House of Representatives and the Senate were controversial, and it may be some time before Congress adopts major climate change legislation. Under the Consolidated Appropriations Act of 2008 (HR 2764), Congress has established mandatory GHG reporting requirements for some emitters of greenhouse gases. In addition, on September 22, 2009, the EPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires annual reporting to the EPA of greenhouse gas emissions from large sources and suppliers of GHGs, including facilities that emit 25,000 metric tons or more a year of GHGs.

The following discussion summarizes the EPA’s recent regulatory activities with respect to various types of GHG sources.

#### **EPA and National Highway Traffic Safety Administration Joint Rulemaking for Vehicle Standards**

In response to the *Massachusetts v. EPA* ruling discussed above, the Bush Administration issued an Executive Order on May 14, 2007, directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008.

On October 10, 2008, the National Highway Traffic Safety Administration (NHTSA) released a final environmental impact statement (EIS) analyzing proposed interim standards for passenger cars and light trucks in model years 2011 through 2015. The NHTSA issued a final rule for model year 2011 on March 30, 2009 (NHTSA 2009).

On May 7, 2010, the EPA and the NHTSA issued a final rule regulating fuel efficiency and GHG pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016 (EPA 2010c). On May 21, 2010, President Obama issued a memorandum to the Secretaries of Transportation and Energy, and to the Administrators of the EPA and the NHTSA, calling for the establishment of additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and the NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal GHG and fuel economy standards for model year 2017–2025 light-duty vehicles. The agencies’ proposed standards projected to achieve 163 grams per mile of CO<sub>2</sub> in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. California has announced its support of this national program. The final rule was adopted in October 2012, and the NHTSA intends to set standards for model years 2022–2025 in a future rulemaking.

#### STATE REGULATION

California has adopted various administrative initiatives and also enacted a variety of legislation relating to climate change, much of which sets aggressive goals for GHG emissions reductions within the state. However, none of this legislation provides definitive direction regarding the treatment of climate change in the environmental review documents prepared under CEQA. In particular, the amendments to the CEQA Guidelines do not require or suggest specific

methodologies for performing an assessment or specific thresholds of significance and do not specify GHG reduction mitigation measures. Instead, the CEQA amendments continue to rely on lead agencies to choose methodologies and make significance determinations based on substantial evidence, as discussed in further detail below. In addition, no state agency has promulgated binding regulations for analyzing GHG emissions, determining their significance, or mitigating any significant effects in CEQA documents. Thus, lead agencies exercise their discretion determining how to analyze GHGs.

The discussion below provides a brief overview of California Air Resources Board (CARB) and Office of Planning and Research (OPR) documents and of the primary legislation relating to climate change that may affect the emissions associated with the proposed ECAP. It begins with an overview of the primary regulatory acts that have driven GHG regulation and analysis in California.

#### **Executive Order S-3-05 (Statewide GHG Targets)**

California Executive Order S-03-05 (June 1, 2005) mandates a reduction of GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Although the 2020 target has been incorporated into legislation (AB 32), the 2050 target remains only a goal of the Executive Order.

#### **Assembly Bill 32, the California Global Warming Solutions Act of 2006**

The California Global Warming Solutions Act of 2006 (AB 32) (Health and Safety Code Sections 38500, 38501, 28510, 38530, 38550, 38560, 38561–38565, 38570, 38571, 38574, 38580, 38590, 38592–38599) was signed into law in September 2006 after considerable study and expert testimony before the legislature. The law instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. The act directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020 (1990 levels have been estimated to equate to 15 percent below 2005 emission levels). Based on CARB's calculations of emissions levels, California must reduce GHG emissions by approximately 15 percent below 2005 levels to achieve this goal.

The bill required CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. CARB accomplished the key milestones set forth in AB 32, including the following:

- June 30, 2007. Identification of discrete early action GHG emissions reduction measures. On June 21, 2007, CARB satisfied this requirement by approving three early action measures. These were later supplemented by adding six other discrete early action measures.
- January 1, 2008. Identification of the 1990 baseline GHG emissions level, approval of a statewide limit equivalent to that level, and adoption of reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 baseline.

### **3.8 GREENHOUSE GASES AND CLIMATE CHANGE ADAPTATION**

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- January 1, 2009. Adoption of a scoping plan for achieving GHG emission reductions. On December 11, 2008, CARB adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan), discussed in more detail below.
- January 1, 2010. Adoption and enforcement of regulations to implement the discrete actions. Several early action measures have been adopted and became effective on January 1, 2010.
- January 1, 2011. Adoption of GHG emissions limits and reduction measures by regulation. On October 28, 2010, CARB released its proposed cap-and-trade regulations, which would cover sources of approximately 85 percent of California’s GHG emissions (CARB 2010a). CARB’s board ordered CARB’s executive director to prepare a final regulatory package for cap and trade on December 16, 2010.
- January 1, 2012. GHG emissions limits and reduction measures adopted in 2011 become enforceable.

#### **AB 32 Scoping Plan**

As noted above, on December 11, 2008, CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions. At that time, CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as “business as usual”). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. Additional development of these measures and adoption of the appropriate regulations occurred through the end of year 2013. The key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent.
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California’s GHG emissions.
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets.
- Adopting and implementing measures pursuant to existing state laws and policies, including California’s clean car standards, heavy-duty truck measures, and the Low Carbon Fuel Standard.
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California’s long-term commitment to AB 32 implementation (CARB 2008a).

In 2009, a coalition of special interest groups brought a challenge to the Scoping Plan alleging that it violated AB 32 and that the environmental review document (called a “Functional Equivalent Document”) violated CEQA by failing to appropriately analyze alternatives to the proposed cap-and-trade program. On May 20, 2011, the San Francisco Superior Court entered a final judgment ordering that CARB take no further action with respect to cap-and-trade rulemaking until it complies with CEQA. While CARB disagreed with the trial court finding and appealed the decision on May 23, 2011, in order to remove any doubt about the matter and in keeping with CARB’s interest in public participation and informed decision-making, CARB revisited the alternatives. The revised analysis includes the five alternatives included in the original environmental analysis: a “no project” alternative (that is, taking no action at all); a plan relying on a cap-and-trade program for the sectors included in a cap; a plan relying more on source-specific regulatory requirements with no cap-and-trade component; a plan relying on a carbon fee or tax; and a plan relying on a variety of proposed strategies and measures. The public hearing to consider approval of the AB 32 Scoping Plan Functional Equivalent Document and the AB 32 Scoping Plan was held on August 24, 2011. On this date, CARB re-approved the Scoping Plan.

In August 2012, CARB released revised estimates of the expected 2020 emissions reductions. The revised analysis relies on emissions projections updated in light of current economic forecasts which account for the economic downturn since 2008 as well as reduction measures already approved and put in place relating to future fuel and energy demand, as well as other factors. This reduced the projected 2020 emissions from 596 million metric tons (MMT) CO<sub>2</sub>e to 545 MMTCO<sub>2</sub>e. The reduction in projected 2020 emissions means that the revised business-as-usual (BAU) reduction necessary to achieve AB 32’s goal of reaching 1990 levels by 2020 is now only 21.7 percent.

#### **Assembly Bill 1493**

Assembly Bill 1493 (“the Pavley Standard,” or AB 1493) (Health and Safety Code Sections 42823 and 43018.5) required CARB to adopt regulations by January 1, 2005, to reduce GHG emissions from noncommercial passenger vehicles and light-duty trucks of model years 2009–2016. The bill also required the California Climate Action Registry to develop and adopt protocols for the reporting and certification of GHG emissions reductions from mobile sources for use by CARB in granting emissions reduction credits. The bill authorizes CARB to grant emissions reduction credits for reductions in GHG emissions prior to the date of enforcement of regulations, using model year 2000 as the baseline for reduction.

In 2004, CARB applied to the EPA for a waiver under the federal Clean Air Act to authorize implementation of these regulations. The waiver request was formally denied by the EPA in December 2007 after California filed suit to prompt federal action. In January 2008, the California Attorney General filed a new lawsuit against the EPA for denying California’s request for a waiver to regulate and limit GHG emissions from these vehicles. In January 2009, President Barack Obama issued a directive to the EPA to reconsider California’s request for a waiver. On June 30, 2009, the EPA granted the waiver to California for its GHG emission standards for motor vehicles. As part of this waiver, the EPA specified the provision that CARB may not hold a manufacturer liable or responsible for any noncompliance caused by emission debits generated by a manufacturer for the 2009 model year. CARB has adopted a new approach to passenger vehicles—cars and light trucks—by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. These standards will apply to all passenger and light-duty trucks used by the residents of and visitors to the county.

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### **Low Carbon Fuel Standard**

Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the Low Carbon Fuel Standard (LCFS) as a discrete early action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009. In 2009, CARB approved for adoption of the LCFS regulation, which became fully effective in April 2010 and is codified at Title 17, California Code of Regulations, Sections 95480–95490. The LCFS will reduce GHG emissions by reducing the carbon intensity of transportation fuels used in California by at least 10 percent by 2020. Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the “life cycle” of a transportation fuel.

On December 29, 2011, the US District Court for the Eastern District of California issued several rulings in the federal lawsuits challenging the LCFS. One of the district court’s rulings preliminarily enjoined CARB from enforcing the regulation. In January 2012, CARB appealed that decision to the Ninth Circuit Court of Appeals and then moved to stay the injunction pending resolution of the appeal. On April 23, 2012, the Ninth Circuit granted CARB’s motion for a stay of the injunction while it continues to consider CARB’s appeal of the lower court’s decision. In September 2013, the Ninth Circuit Court of Appeals vacated the lower court injunction against the LCFS regulation. The Ninth Circuit concluded that such regulation does not constitute extraterritorial regulation prohibited by the dormant Commerce Clause.

### **Clean Cars**

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model years 2017–2025. The program combines the control of smog, soot, and GHG emissions with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

### **Renewables Portfolio Standard (Senate Bill 1078, Senate Bill 107, and Senate Bill X1-2)**

Established in 2002 under Senate Bill (SB) 1078, and accelerated in 2006 under SB 107 and again in 2011 under SBX1-2, California’s Renewables Portfolio Standard (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. The 33 percent standard is consistent with the RPS goal established in the Scoping Plan. As interim measures, the RPS requires 20 percent of retail sales to be sourced from renewable energy by 2013, and 25 percent by 2016. Initially, the RPS provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to the RPS. The expected growth in the RPS to meet the standards in effect in 2008 is not reflected in the BAU calculation in the AB 32 Scoping Plan. In other words, the Scoping Plan’s 2020 BAU does not take credit for implementation of the RPS that occurred after its adoption.

### **Senate Bill 375**

SB 375 (codified in the Government Code and Public Resources Code<sup>1</sup>), signed in September 2008, provides for a new planning process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established

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<sup>1</sup> Senate Bill 375 is codified at Government Code Sections 65080, 65400, 65583, 65584.01, 65584.02, 65584.04, 65587, 65588, 14522.1, 14522.2, and 65080.01 as well as Public Resources Code Sections 21061.3 and 21159.28 and Chapter 4.2.

in AB 32. SB 375 includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 also requires metropolitan planning organizations (MPOs) to incorporate a sustainable communities strategy (SCS) in their regional transportation plans that will achieve GHG emissions reduction targets by reducing vehicle miles traveled from light-duty vehicles through the development of more compact, complete, and efficient communities. The MPO with jurisdiction in the project area is the Santa Barbara County Association of Governments (SBCAG).

SB 375 is similar to the Regional Blueprint Planning Program, established by the California Department of Transportation (Caltrans), which provides discretionary grants to fund regional transportation and land use plans voluntarily developed by MPOs working in cooperation with councils of governments. The Scoping Plan relies on the requirements of SB 375 to implement the carbon emissions reductions anticipated from land use decisions.

On September 23, 2010, CARB adopted regional targets for the reduction of GHGs applying to the years 2020 and 2035 (CARB 2011a). For the area under SBCAG jurisdiction, CARB adopted regional targets for reduction of GHG emissions by 6 percent for 2020 and by 4 percent for 2035 (CARB 2010b). On February 15, 2011, CARB's executive officer approved the final targets (CARB 2011b).

#### **California Building Energy Efficiency Standards**

Energy conservation standards for new residential and nonresidential buildings were originally adopted by the California Energy Resources Conservation and Development Commission in June 1977 and most recently revised in 2008 (Title 24, Part 6 of the California Code of Regulations). In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11, Title 24) was adopted as part of the California Building Standards Code (Title 24, California Code of Regulations).

Part 11 establishes voluntary standards on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Some of these standards have become mandatory in the 2010 edition of the Part 11 code. Current mandatory standards include:

- Twenty (20) percent mandatory reduction in indoor water use, with voluntary goal standards for 30, 35, and 40 percent reductions.
- Separate water meters for nonresidential buildings' indoor and outdoor water use, with a requirement for moisture-sensing irrigation systems for larger landscape projects.
- Diversion of 50 percent of construction waste from landfills, increasing voluntarily to 65 and 75 percent for new homes and 80 percent for commercial projects.
- Wastewater reduction measures including the requirement that each building reduce the generation of wastewater through the installation of water conservation fixtures or using non-potable water systems.

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- Mandatory inspections of energy systems (i.e., heat furnace, air conditioner, mechanical equipment) for nonresidential buildings over 10,000 square feet to ensure that all are working at their maximum capacity according to their design efficiencies.
- Low-pollutant-emitting interior finish materials such as paints, carpet, vinyl flooring, and particleboard.

The California Energy Commission recently concluded a public process and rulemaking proceeding for the adoption of changes to the 2013 Building Energy Efficiency Standards contained in the California Code of Regulations, Title 24, Part 6 (also known as the California Energy Code) and associated administrative regulations in Part 1 (collectively referred to here as the standards). The amended standards will be adopted in 2014. The 2013 Building Energy Efficiency Standards are 25 percent more efficient than previous standards for residential construction and 30 percent better for nonresidential construction. The standards, which went into effect on July 1, 2014, offer builders better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses. Energy-efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

#### LOCAL

##### **Santa Barbara County Air Pollution Control District**

The Santa Barbara County Air Pollution Control District (SBCAPCD) monitors air quality and regulates stationary emission sources in Santa Barbara County. As a responsible agency under CEQA, the SBCAPCD reviews and approves environmental documents prepared by other lead agencies or jurisdictions to reduce or avoid impacts on air quality and to ensure that the lead agency's environmental document is adequate to fulfill CEQA requirements. As a concerned agency, the SBCAPCD comments on environmental documents and suggests mitigation measures to reduce air quality impacts. The SBCAPCD has not adopted thresholds for determining whether the projected GHG emissions of a proposed project constitute a considerable contribution to global climate change and therefore would be classified as a cumulative significant impact.

##### **County of Santa Barbara Interim GHG Thresholds**

Until such time as the Energy and Climate Action Plan is formally adopted, the County continues to follow an interim approach to evaluating GHG emissions. This interim approach for determining significance of GHG emissions generated by land use development projects is based on established criteria already adopted by the San Luis Obispo County Air Pollution Control District (SLOAPCD). As dictated by the County's interim thresholds, residential and commercial projects need to be evaluated in terms of project compliance with a numeric threshold of 1,150 metric tons of CO<sub>2</sub>e, or a efficiency threshold of 4.9 metric tons of CO<sub>2</sub>e per service population annually (service population equals project residents + employees). Industrial/stationary source projects need to be evaluated in terms of project compliance with a numeric threshold of 10,000 metric tons of CO<sub>2</sub>e. If it is the case that project-generated GHG emissions surpass significance thresholds, the GHG evaluation must identify appropriate actions the proposed project must include in order to mitigate GHG impacts to a level below the threshold.

At such time that the ECAP is formally adopted, the County Interim GHG thresholds will no longer be applied.



### 3.8.3 IMPACTS AND MITIGATION MEASURES

#### STANDARDS OF SIGNIFICANCE

Per Appendix G of the CEQA Guidelines, impacts related to climate change are normally considered significant if implementation of the proposed project would result in any of the following:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

For the purposes of this analysis, the ECAP is compared for consistency with AB 32 reduction targets to determine significance. The AB 32 reduction target has been determined as the reduction of statewide GHG emissions to 1990 levels by 2020. As outlined in the AB 32 Scoping Plan, the functional equivalent of the state goal to reduce GHG emissions to 1990 levels is 15 percent below “existing” (2005–2008) levels by 2020. For the purpose of defining existing emissions levels, the County chose the emissions in the year 2007 as a benchmark for existing emissions conditions.

The proposed ECAP would have to decrease unincorporated county emissions to a level at least 15 percent below existing emissions by the year 2020 in order to be considered less than significant under CEQA. The ECAP includes measures addressing the County’s intent to reduce GHG emissions.

Even with significant efforts to mitigate GHG emissions today, future climate projections and scenarios anticipate that climate change may have significant effects on California’s precipitation, temperature, and weather patterns, including in Santa Barbara County. The potential consequences of climate change for California and Santa Barbara County include those described under the Effects of Global Climate Change subsection above. This section also analyzes the proposed project’s impacts on the County’s ability to adapt to the effects of climate change.

#### METHODOLOGY

The County has determined that the project’s potential for creating an impact on global climate change should be based on a comparative analysis of the ECAP against AB 32 targets in the year 2020. In order for California to meet the goals of AB 32, emissions will need to be reduced by 15 percent below existing levels by 2020. Santa Barbara County would also need to achieve the same GHG targets in order to be consistent with AB 32. CARB states, “ARB recommended a greenhouse gas reduction goal for local governments of 15 percent below today’s levels by 2020 to ensure that their municipal and community-wide emissions match the State’s reduction target.” The County chose the emissions in the year 2007 as a benchmark for existing emissions conditions.

A 2007 baseline GHG emissions inventory was prepared for the County’s ECAP. The 2007 baseline inventory details the sources of emissions from community activities. The unit of measure used is the metric ton of carbon dioxide (CO<sub>2</sub>) equivalent (MTCO<sub>2e</sub>). MTCO<sub>2e</sub> is the international unit that combines the differing impacts of all GHGs into a single unit by multiplying each emitted gas by its global warming potential (see **Table 3.8-2**).

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The inventory includes major sources of GHGs caused by activities in the unincorporated county. The inventory analyzes the following emissions sources:

- **Energy** – residential, commercial, and industrial electricity and natural gas consumed in the unincorporated county
- **Transportation** – vehicle miles traveled (VMT) to, from, or within the unincorporated county
- **Waste** – methane emissions from waste sent to landfills from the community
- **Stationary Sources** – direct emissions from industrial, commercial, and office processes that are permitted by the County of Santa Barbara
- **Off-Road** – emissions from agricultural, construction, lawn and garden, and other industrial equipment/vehicles
- **Agriculture** – emissions from livestock and from fertilizer application
- **Aircraft** – emissions from operations at the Santa Ynez Airport in unincorporated Santa Barbara County
- **Water and Wastewater** – the energy required to extract, filter, move, and treat the water consumed and/or treated in the county

The 2007 baseline inventory does not account for stationary sources. The primary reason for this is that the ECAP addresses community GHG emissions and measures to reduce those emissions. Stationary sources are unique and require special attention and collaboration with the SBCAPCD. The inventory was developed with the best-available tools, data, and methodology.

The measures to reduce GHG emissions identified in the ECAP are a diverse mix of regulatory and incentive-based programs for both new and existing development. The reduction measures also aim to reduce GHG emissions from each source of emissions to avoid reliance on any one strategy or sector to achieve the target. The development of GHG reduction measures was an interactive process with multiple levels of review and refinement. This process included an assessment of existing activities and ongoing involvement of County planning staff, advisory committees, and the public.

The California Natural Resources Agency (CNRA) has noted that impacts of GHG emissions should focus on the cumulative impact on climate change. The public notice states:

*While the Proposed Amendments do not foreclose the possibility that a single project may result in greenhouse gas emissions with a direct impact on the environment, the evidence before [CNRA] indicates that in most cases, the impact will be cumulative. Therefore, the Proposed Amendments emphasize that the analysis of greenhouse gas emissions should center on whether a project's incremental contribution of greenhouse gas emissions is cumulatively considerable. (CNRA 2009c)*

Thus, the CEQA Amendments continue to make clear that the significance of GHG emissions is most appropriately considered on a cumulative level.

#### IMPACTS AND MITIGATION MEASURES

#### Consistency with AB 32 and the AB 32 Scoping Plan

**Impact 3.8.1** The proposed ECAP would not conflict with the goals of AB 32 or the AB 32 Scoping Plan. This impact is adverse, but **less than cumulatively considerable (Class III)**.

According to the ECAP, the forecast of unmitigated emissions at 2020 from operations and growth in the unincorporated county would be 1,365,170 MTCO<sub>2e</sub>.

#### GHG Emissions

The unincorporated county's 2007 emissions and 2020 unmitigated emissions are presented in **Table 3.8-4** by major sector. The largest source of GHG emissions in 2007 is transportation emissions, followed by residential energy use. Unmitigated emissions for the year 2020 are based on current emissions, scaled by sector-specific growth rates.

**TABLE 3.8-4  
GHG EMISSIONS SUMMARY FOR 2007 (BASELINE)  
AND UNMITIGATED YEAR 2020 (MTCO<sub>2e</sub>)**

Existing and Unmitigated Emissions Projections (MTCO <sub>2e</sub> )				
Sector	2007		2020	
	Emissions (per year)	Percentage	Emissions (per year)	Percentage
Residential Energy	195,490	16.3%	202,730	14.8%
Commercial Energy	121,580	10.1%	140,520	10.2%
Industrial Energy	46,780	3.9%	53,360	3.9%
Solid Waste	91,920	7.7%	97,440	6.7%
Off-Road Equipment	102,140	8.5%	91,120	6.6%
Water and Wastewater	49,520	4.1%	52,370	3.8%
Agriculture	62,110	5.2%	68,070	4.9%
Transportation	521,160	43.6%	657,290	48.1%
Aircraft	2,270	0.1%	2,270	0.1%
<b>Total</b>	<b>1,192,970</b>	<b>100</b>	<b>1,365,170</b>	<b>100</b>

Source: Santa Barbara 2014

Note: MTCO<sub>2e</sub> = metric tons of carbon dioxide equivalent emissions

#### GHG Emissions Reduction Measures

As previously mentioned, in order for the County to achieve consistency with AB 32, 2007 baseline emissions will need to be reduced by at least 15 percent by 2020 (to at or below 1,014,024 MTCO<sub>2e</sub> per year).

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The proposed ECAP describes the reduction measures that would be employed by the County, through implementation of the ECAP, and through a variety of state legislation and regulations. The combination of proposed new strategies identified in the ECAP would be assembled into an integrated plan to reduce the countywide GHG emissions level.

The GHG reduction measures of the ECAP would substantially reduce projected unmitigated year 2020 emissions. The ECAP includes measures to address the resultant emissions of buildings (associated with energy use), transportation and land use emissions, solid waste emissions, agriculture emissions, and emissions generated for the energy used to pump water.

For instance, ECAP Measures BE2 (Energy-Efficient Renovations), BE4 (Energy Scoring and Audits), BE8 (Energy Efficiency and Green Building Standards), RE2 (Solar Water Heaters), IEE3 (Efficient Upgrade Incentives), and IEE4 (Efficient Equipment Incentives 2) propose programs for energy efficiency upgrades and retrofits in existing commercial, residential, and industrial buildings by, among other things, connecting residents and businesses with technical and financial assistance. As another example, the proposed ECAP contains measures to benefit neighborhood connectivity in order to reduce vehicle miles traveled and thus, GHG emissions. For instance, ECAP Measure LUD1 (Infill Development) proposes to integrate “complete streets” policies and projects into updates of the County’s Comprehensive Plan. Complete streets are streets designed and operated to enable safe access for all users, including pedestrians, bicyclists, motorists, and transit riders of all ages and abilities. Complete streets make it easy to cross the street, walk to shops, and bicycle to work. Measure LUD1 also encourages new residential development to be within walking distance of public activity centers such as schools and parks, and seeks to retrofit existing, older neighborhoods to improve connectivity, redesign circulation, and create walkable streets.

GHG reduction measures would also result in GHG reductions for the solid waste sector. As outlined in ECAP Measure WR3 (Construction and Demolition Waste Recycling), the County proposes to increase the amount of waste that is recycled during new development projects.

The reader is referred to Section 2.0, Project Description, and the ECAP for a further description of GHG reduction measures.

#### GHG Reduction Quantification

Implementation of the proposed ECAP would result in GHG emissions reductions in the unincorporated county of approximately 186,960 MTCO<sub>2e</sub> by 2020. There is the potential for an additional reduction of 56,610 MTCO<sub>2e</sub> if Community Choice Aggregation (CCA) is successful. In addition, state-led reduction efforts are projected to result in the reduction of another 164,250 MTCO<sub>2e</sub>. The County of Santa Barbara ECAP, in conjunction with State-led efforts such as the Renewables Portfolio Standard, Clean Car Fuel Standard (Pavley), and Building Energy Efficiency Standards, would equal reductions of approximately 351,210 MTCO<sub>2e</sub> by 2020 (plus an additional 56,610 MTCO<sub>2e</sub> if CCA is successful). This amount of GHG emissions reduction is equivalent to a 15 percent reduction from 2007 baseline emissions levels as shown in **Table 3.8-5**, and a 20 percent reduction if CCA is successful. Such reductions meet the goals established in AB 32 and the AB 32 Scoping Plan.

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**TABLE 3.8-5  
ANNUAL GHG EMISSIONS REDUCTIONS FROM  
ECAP MEASURES (MTCO<sub>2</sub>E)**

Emissions Inventory	
2007 Baseline Emissions Inventory	1,192,970
2020 Unmitigated Emissions Inventory	1,365,170
Reductions from 2020 Unmitigated Emissions Inventory	
Santa Barbara County Energy and Climate Action Plan	
Total ECAP Emissions Reductions (without CCA)**	-186,960
California State-Led Reduction Efforts	
Total State-Led Emissions Reductions	-164,250
Combined ECAP and State Reductions (without CCA)**	- 351,210
<b>AB 32 Emissions Target (15% Below 2007 Baseline Inventory)</b>	<b>1,014,020</b>
County of Santa Barbara ECAP and State-Adjusted Inventory**	1,013,960
AB 32 Target Achieved?	Yes

\*Due to rounding, totals may not equal the sum of component parts.

\*\* CCA is not included in the calculated reductions since the feasibility of implementing such a program in Santa Barbara County is not yet known.

The County continues to follow an interim approach to evaluating GHG emissions, as described above. Until such time that the proposed ECAP is formally adopted, the County Interim GHG thresholds will no longer be applied and future development projects in the county would be evaluated for GHG impacts in comparison to the ECAP. The proposed ECAP would be consistent with AB 32 and the AB 32 Scoping Plan, as the GHG inventory for the unincorporated county would experience a 15 percent reduction below 2007 baseline levels required under the provisions of AB 32, and a 20 percent reduction if CCA is successful. The implementation of the proposed project would be consistent with state goals to reduce GHG emissions. Thus, this impact is adverse, but **less than cumulatively considerable (Class III)**, and thus not significant.

#### Climate Change Environmental Effects on Unincorporated Santa Barbara County

**Impact 3.8.2** The effects of climate change could result in the exposure of unincorporated Santa Barbara County to associated environmental effects. While the exact extent of the environmental effects of climate change on the unincorporated county is not known at this time, state provisions, in addition to existing County Comprehensive Plan policy provisions, address these effects. Thus, the proposed project would not result in a new significant impact relating to the effect of climate change on unincorporated Santa Barbara County. This is a **less than significant (Class III)** impact.

#### Impacts on Water Supply

The state's water supply is already under stress and is anticipated to shrink under even the most conservative climate change scenario. Warmer average global temperatures cause more rainfall than snowfall, making the winter snowfall season shorter and accelerating the rate at which the snowpack melts in the spring. The Sierra snowpack is estimated to experience a 25–40

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percent reduction from its average by 2050 (CNRA 2009). With rain and snow events becoming less predictable and more variable, the rate of flooding could increase and California's ability to store and transport fresh water for consumption could decrease. Further, warmer weather will lead to longer growing seasons and increased agricultural demand for water (CNRA 2009).

The proposed ECAP contains measures to improve water conservation efforts. For example, ECAP Measure WE2 (Water-Efficient Building and Landscape Standards) proposes to maximize end-user water efficiency by encouraging the implementation of prescriptive or performance measures included in the California Green Building Code in all new and existing development. ECAP Measure WE3 (Water-Efficient Landscaping) would increase the use of native, drought-tolerant landscaping and smart irrigation technologies in new and renovated developments as well as in public parks.

In addition to the efforts proposed in the ECAP, the California Department of Water Resources (DWR), in collaboration with the State Water Resources Control Board, other state agencies, and numerous stakeholders, has initiated a number of projects to begin climate change adaptation planning for the water sector, including the development of an adaptation strategy entitled *Managing an Uncertain Future: Climate Change Adaptation Strategies for California's Water* (DWR 2008). This report details how climate change is already affecting the state's water supplies and sets forth ten adaptation strategies to help avoid or reduce climate change impacts to water resources, such as water conservation strategies, the enhancement of wetland ecosystems, and the expansion of water storage and conjunctive management of surface and groundwater resources. Other strategies include fixing the Sacramento-San Joaquin Delta water supply system, water quality, and ecosystem conditions, the practice of integrated flood management, and the provision for sustainable funding for statewide and integrated regional water management (DWR 2008).

According to the adaptation strategies of the report (DWR 2008), all urban water management plans must include provisions to fund and implement all economic, feasible, and legal urban best management practices (BMPs) established by the California Urban Water Conservation Council. Best management practices include residential ultra-low-flush toilet replacement programs, conservation pricing, large landscape conservation, and high-efficiency clothes washer rebates (DWR 2008, p. 13). In addition, the Water Conservation in Landscaping Act of 2006 (AB 1881) required the DWR to update the existing Model Water-Efficient Landscape Ordinance (model ordinance) (DWR 2008, p. 13). Under this ordinance, local agencies in the state are required to adopt either the updated model ordinance or their own local landscape ordinance that is at least as effective. The updated model ordinance reflects new technology and advances in landscape water management and seeks to increase outdoor water conservation through improved landscape design, management, and maintenance. In addition, the model ordinance provides guidance to local agencies in developing and adopting landscape ordinances leading to water savings, which will reduce water demand, waste, and water-related energy use (DWR 2008, p. 13). The ultimate goal of the water conservation measures highlighted in the report is to achieve a statewide 20 percent reduction in per capita water use in 2020 (DWR 2008, p. 12).

#### **Increased Severity of Flooding Events, Including from Sea Level Rise**

Regarding the increased threat from flooding, County's Comprehensive Plan Conservation Element Flood Policy 1 states that the County will avoid or minimize risks of flooding to development through the development review process, and Flood Policy 2 requires that the County evaluate whether development should be located in flood hazard zones and identify construction methods or other methods to minimize damage if development is located in flood hazard zones. In addition, the State is in the process of establishing a System Reoperation Task

Force comprising state personnel, federal agency representatives, and appropriate stakeholders that will support the update of flood frequency analyses on major rivers and streams and evaluate the need to amend flow objectives (DWR 2008, pp 17–18). Furthermore, in order to coordinate California’s water supply and flood management operations, state and federal agencies collaboratively established the Joint Operations Center (DWR 2008, p. 18). Year-round, the Joint Operations Center is the focal point for the gathering, analysis, and dissemination of flood- and water-related information to stakeholders.

#### Shoreline Damage

Sea level rise is attributed to the increase of ocean temperatures and the resulting thermal expansion and melting of ice sheets, which contribute to the volume of water held in the oceans. The speed and amount of sea level rise will be determined by the increase in average temperatures and rate of melting of glacial ice. While there is a degree of uncertainty in the magnitude of projections, to date, the actual impacts of climate change have been more severe than the projections. While the unincorporated area of Santa Barbara County has more than 50 miles of coastal shoreline. Changes in sea level could place facilities that are essential to the county function might at risk and sea level rise will probably have negative effects on the coastal shoreline.

The County’s Comprehensive Plan Seismic Safety and Safety Element requires the enforcement of the California Coastal Act of 1976 through the County’s certified Local Coastal Plan, which includes provisions requiring the minimization of risks to life and property in shoreline areas.

#### Increased Wildland Fire Hazards

All development in the unincorporated county that is at risk for wildland fire hazards is required to comply with the California Fire Code (Title 24, Part 9 of the California Code of Regulations), which requires construction methods that mitigate wildfire exposure be applied in geographical areas where wildfire burning in vegetative fuels may readily transmit fire to buildings and threaten to destroy life, overwhelm fire suppression capabilities, or result in large property losses. The California Fire Code establishes minimum standards for materials and material assemblies to provide a reasonable level of exterior wildfire exposure protection for buildings in wildland-urban interface areas and requires the use of ignition-resistant materials and design to resist the intrusion of flame or burning embers projected by a vegetation fire.

According to the County’s Comprehensive Plan Seismic and Safety Element, the County uses planning to minimize these fire hazards by requiring elevated development standards within especially vulnerable areas. These standards include the requirement for fire-resistive construction materials, development of adequate emergency access routes, access to fire suppression water supplies (fire hydrants or water tanks), and zones of vegetation clearance around structures. The implementation of these standards will help minimize, but not entirely eliminate, the hazards from wildland fires.

The California Department of Forestry and Fire Protection (CAL FIRE) has several programs that support vegetation management and fuel hazard reduction activities (mechanical treatments and prescribed burning). These can be used to increase forest health and resilience to climate impacts (CNRA 2009a, p. 114). In recent years, both state and federal fuel reduction priorities have focused on the wildland-urban interface, the area where at-risk forests and rangelands meet structure and human development. In 2001, federal agencies and the Western Governors’ Association approved “A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment,” a 10-year strategy to improve fire suppression, prevention,

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fuels reduction, and recovery and to restore fire-adapted ecosystems through collaboration among states, federal agencies, and stakeholders. The plan includes the use of prescribed fire, mechanical treatments, and wildland fire use, and seeks to reduce barriers to treatments through policies and incentives (CNRA 2009a, p. 115).

As a result, CAL FIRE has increased fire suppression readiness to meet changing climate conditions. Recommendations from the Governor's Blue Ribbon Commission are being implemented to replace aging fire engines and to provide a higher level of firefighter safety. Emerging remote sensing technologies are being tested on major fires to provide real-time planning tools to incident commanders and fire managers, and new air tanker platforms, including the DC-10, are being evaluated for large and remote fires. Governor's Executive Orders have also provided increased staffing, additional aircraft availability, and other support for periods of critical fuel and weather conditions (CNRA 2009a, p. 115).

#### **Loss of Natural Resources**

The Santa Barbara County Land Use and Development Code, the Montecito Land Use and Development Code, and the Article II Coastal Zoning Ordinance (collectively known as the County zoning ordinances) seek to reduce potential impacts to special-status species and habitats such as forestlands and wetlands. For instance, Section 35-907 of the County Code of Ordinances (County Code) regulates the loss of oak trees in the county. Existing oak trees that are removed to accommodate development are required to be replaced according to recommendations of an oak tree management plan, which is required to demonstrate how impacted oak forests would be protected from fragmentation as well as identify on-site replacement planting locations. The intent of Section 35-907 of the County Code is to promote oak forests in the county through appropriate management techniques, conserve the native plant life heritage, and regulate oak tree removal activity.

Beginning in 2009, the California Department of Fish and Game [as of January 1, 2013, the agency is known as the Department of Fish and Wildlife] and California State Parks made climate change a priority in addressing the complex and large-scale challenges needed for conserving biodiversity and habitat (CNRA 2009a, p. 56). Both of these departments are an important part of the climate change solution and are working collaboratively with stakeholders to create strategies for addressing climate change impacts while responding to public needs. Some of these strategies include the development of a system of sustainable habitat reserves. The intent of this strategy is to identify and improve a statewide landscape reserve system to protect the maximum number of representative plant and animal species in California. Another identified strategy proposes the appointment of a permanent team of researchers and land managers to ensure that the best available science is used in management, restoration, and species protection (CNRA 2009a, p. 62).

Urban forestry has a significant role in adaptation to rising temperature and precipitation runoff events. Increased street tree cover provides shade relief to pedestrians and other residents, absorbs pollutants (including ozone and CO<sub>2</sub>) which may increase with climate change, and reduces stormwater pollution and flooding. A 10 percent increase in vegetation cover can reduce ambient temperatures by 1 to 2 degrees (CNRA 2009a, p. 115). Urban forests also provide significant co-benefits, reducing habitat fragmentation and mitigating GHG emissions through sequestration and by reducing energy use for buildings (CNRA 2009a, p. 115). CAL FIRE urban forestry activities, funded through state bonds authorized under Propositions 40 and 84, help plant trees and support local agencies and nonprofits in planning, implementing, and monitoring urban forestry programs (CNRA 2009a, p. 115). CAL FIRE helped develop urban forestry carbon protocols to provide incentives for increased urban forest development and will



continue to work with local and federal agencies and the private and nonprofit sector to expand and enhance urban forests. Additionally, proposed ECAP Measure BE5 (Community Forestry) requires tree planting and shading design for new development.

#### Adverse Impacts on Agricultural Resources

The County Comprehensive Plan includes policies that address potential impacts to agricultural lands. For instance, Policy II.D of the Comprehensive Plan Agriculture Element states that the conversion of highly productive agricultural lands whether urban or rural, is discouraged and that the County will support programs which encourage the retention of highly productive agricultural lands. Furthermore, as mandated by Policy 8.2 of the Coastal Land Use Plan Element, if a parcel in the county coastal zone is designated for agricultural use and is located in a rural area not contiguous with the urban/rural boundary, conversion to nonagricultural use is not permitted unless such conversion of the entire parcel would allow for another priority use under the Coastal Act, e.g., coastal-dependent industry, recreation and access, or protection of an environmentally sensitive habitat. Any proposed conversion of farmland in the coastal areas of the county could not be in conflict with contiguous agricultural operations in the area and must be consistent with Sections 30241 and 30242 of the Coastal Act.

The County zoning ordinances also address potential impacts to agricultural lands. The County zoning ordinances mandate the land uses that are allowed within the agricultural zoning district established by the Comprehensive Plan, determines the type of planning permit/approval required for each use, and provides basic standards for site layout and building size. Development standards for wind energy and solar energy projects, such as height restrictions, setbacks, and unit spacing requirements, are contained in the County zoning ordinances.

In addition to the Comprehensive Plan and the County zoning ordinances, the ECAP contains measures to benefit agriculture. For instance, ECAP Measure AG6 (Agriculture and Open Space Easements) would require the facilitation of an increased amount of agricultural easements through zoning, dedication of public funds, and mitigation fees.

Furthermore, the California Department of Food and Agriculture and the California Department of Conservation are developing strategies to address impacts to state agricultural resources resulting from climate change. Some of these strategies include the support of research and development for more drought-tolerant cultivars, crop rotations, and crop mixtures, increased vigilance and development of a long-term funding strategy at the state's port-of-entry inspection stations to prevent entry of new diseases, pests, and weeds, and the encouragement of crop diversification among farming operations (CNRA 2009a, pp. 101–105).

#### Adverse Impact to Public Health

As mentioned above, public health could be adversely affected by a shifting climate. The Public Health Climate Change Adaptation Work Group, in concert with the Department of Public Health, has identified several priorities for public health adaptation for climate change (CNRA 2009a, p. 40). One of these identified priorities involves the increase of ground cover and shading by expanding urban forests, community gardens, parks, and native vegetation cover, as well as open spaces, in order to reduce urban heat islands, which are prone to develop when high ratios of paving material exist compared with natural ground cover. Another priority involves the improvement of disease reporting, management, and surveillance by replacing the current paper-based system with a secure electronic system. The Centers for Disease Control and Prevention is exploring ways to develop rapid surveillance by coordinating with larger

### **3.8 GREENHOUSE GASES AND CLIMATE CHANGE ADAPTATION**

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entities such as the Regional Health Information Organizations and Health Information Exchanges (CNRA 2009a, p. 42).

Based on consideration of the cited Comprehensive Plan policy provisions and proposed ECAP measures, as well as the extensive statewide strategies and efforts cited above that address and seek to address the environmental effects of climate change, it is reasonably expected that the environmental effects of global climate change on the unincorporated portions of Santa Barbara County would not result in a substantial increase in severity as a result of the proposed ECAP. Thus, this is a **less than significant (Class III)** impact.

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## **4.0 CUMULATIVE IMPACT SUMMARY**

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This chapter summarizes potential cumulative impacts associated with the proposed County of Santa Barbara Energy and Climate Action Plan (ECAP). The purpose of this Final Environmental Impact Report (Final EIR) is to satisfy California Environmental Quality Act (CEQA) requirements by addressing the environmental effects specific to the implementation of the proposed ECAP.

### 4.1 CUMULATIVE IMPACTS

#### INTRODUCTION

CEQA requires that an environmental impact report (EIR) contain an assessment of the cumulative impacts that could be associated with the proposed project. According to CEQA Guidelines Section 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." As defined in CEQA Guidelines Section 15355, a cumulative impact is an impact created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. A cumulative impact occurs from:

*. . . the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

In addition, Section 15130(b) identifies the following elements as necessary for an adequate cumulative impact analysis:

- 1) *Either:*
  - a. *A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or*
  - b. *A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.*
- 2) *A definition of the geographic scope of the area affected by the cumulative effect and a reasonable explanation for the geographic limitation used;*
- 3) *A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and*
- 4) *A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.*

Where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, a lead agency need not consider that effect significant, but is to briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

## 4.0 CUMULATIVE IMPACT SUMMARY

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### Approach to the Cumulative Impact Analysis

CEQA Guidelines Section 15130 requires that an EIR include an analysis of the cumulative impacts of a project when the project's effect is considered cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (CEQA Guidelines Section 15065(a)(3)). The determination of whether the project's impact on cumulative conditions is considerable is based on a number of factors, including consideration of applicable public agency standards, consultation with public agencies, and expert opinion.

The cumulative setting conditions considered in this Final EIR are based on the County of Santa Barbara Comprehensive Plan and any additional impacts that may occur as a result of implementation of the proposed project. The Final EIR cumulative analysis focuses on whether there is a significant cumulative impact and whether the project's contribution to that impact is cumulatively considerable. Each technical section of this Final EIR contains the cumulative discussion for the resources being evaluated.

### 4.2 CUMULATIVE IMPACTS ANALYSIS

Identified below is a compilation of the cumulative impacts that would result from the implementation of the ECAP and future implementation of ECAP measures in the region. As described above, cumulative impacts are two or more effects that, when combined, are considerable or compound other environmental effects.

#### LAND USE

Land use impacts are typically isolated to a jurisdiction, except where land uses may interact or conflict with adjacent jurisdictions. The cumulative context for land use impacts would be development in Santa Barbara County. As previously stated, the proposed ECAP includes measures to reduce GHG emissions by, among other things, promoting increased density and mixed-use development near transit nodes. The development of more dense mixed-use districts in close proximity to transit nodes represents an environmentally preferred method for accommodating a growing population and reducing sprawl. The ECAP would not result in the division of any communities in the county, and as demonstrated above, the ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan Land Use Element and Coastal Land Use Plan. Furthermore, ECAP Measure SCS would ensure that the County participates in the coordinated land use and transportation planning in the region as identified in the 2040 RTP/SCS. Thus, the project's contribution to cumulative land use impacts would be adverse, but **less than cumulatively considerable (Class III)**.

#### TRANSPORTATION AND CIRCULATION

Implementing the proposed ECAP would include implementing a variety of measures and actions to reduce GHG emissions. None of the proposed ECAP measures or actions would cause an increase in vehicle trip generation. Rather, many of the proposed measures and actions are intended to reduce vehicle miles traveled, such as Measures LUD1 (promote infill development), LUD2 (promote transit-oriented development), T1 (expand car-sharing and ride-sharing opportunities), T2 (provide commuter incentives), T4 (enhance alternative transportation), and T6 (improve pedestrian access). Therefore, the proposed ECAP's contribution to cumulative traffic and circulation impacts would be adverse, but **less than cumulatively considerable (Class III)**.

### AESTHETICS AND VISUAL RESOURCES

Implementing the proposed ECAP would include implementing a variety of measures and actions to reduce GHG emissions. As noted above in Impact 3.3.1, indirectly, the proposed ECAP has the potential to result in a limited impact on the county's scenic resources, vistas, scenic highways, and high visual quality and character. Such resources could also be impacted by future development as the county continues to build out in accordance with the Comprehensive Plan. However, the proposed ECAP would not result in a change in land use patterns, land use designations, or development standards. The aesthetic and visual impacts of the ECAP would be largely limited to changes resulting from future improvements to the bicycle network, residential unit and industrial facility energy efficiency upgrades, GHG reduction features in new development (e.g., transit and pedestrian amenities, on-site alternative energy improvements), and other indirect improvements promoted by the ECAP. Similarly, the ECAP's influence on future development would be ancillary to the development itself, having little if any effect on the scale or visual character of such development. Thus, the project's contribution to cumulative aesthetics or visual resource impacts would be adverse, but **less than cumulatively considerable (Class III)**.

### AGRICULTURAL RESOURCES

The cumulative context for the impacts on agriculture resources would be from urban development within Santa Barbara County. The loss of productive agricultural land has occurred over the last several decades as urban development expands into agricultural areas. It is reasonable to assume that present and future development activities would continue to result in additional impacts. The County has strong policies to deter and minimize urban encroachment on agricultural lands; however, requests for annexations from incorporated cities for may continue into the future. As previously demonstrated, the proposed ECAP would not result in significant impacts on farmland. As described above, the ECAP only promotes utility-scale renewable energy generation and does not propose to entitle, fund, or approve any specific energy generating facility projects. Thus, the contribution to cumulative impacts on agricultural resources is considered to be adverse, but **less than cumulatively considerable (Class III)** and thus not significant. Biological Resources

The cumulative context for the biological resources analysis for the proposed ECAP is Santa Barbara County. As development in the county continues, habitat for plant and wildlife species native to the region is lost through conversion to urban development. Although more mobile species may be able to survive these changes in their environment by moving to new areas, less mobile species would be extirpated. With continued conversion of natural habitat to human use, the availability and accessibility of remaining foraging and natural habitats in this ecosystem would dwindle and those remaining natural areas would not be able to support additional plant or animal populations above their current carrying capacities through increased competition for resources, displacement, and development-induced introduction of non-native species. The conversion of plant and wildlife habitat and loss of protected species on a regional level could therefore result in a cumulatively significant impact on biological resources.

As discussed above, improvements associated with implementation of the ECAP would generally not be extensive and would not contribute substantially to the loss of species or habitat. Furthermore, implementation of future ECAP measures would be required to comply with the environmental reporting requirements of CEQA following submittal of a specific development proposal, including the need to evaluate potential biological impacts for both short- and long-term impacts in the form of site-specific biological studies on a case-by-case

## 4.0 CUMULATIVE IMPACT SUMMARY

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basis. With adherence to the requirements of CEQA as well as the mitigation measures noted above, the impacts of proposed ECAP on biological resources would be adverse, but **less than cumulatively considerable (Class III)** and thus not significant.

### NOISE

The cumulative setting for noise consists of Santa Barbara County and proposed, approved, and conceptual development anticipated in the county. At the time of specific project-level environmental review, implementation of certain ECAP measures, in combination with other future development in the region, has the potential to temporarily increase noise levels due to construction activities and permanently increase noise levels due to more developed circulation systems. It is anticipated that potential impacts would be addressed on a case-by-case project-level basis through compliance with County Comprehensive Plan and zoning ordinance policy provisions. With the incorporation of these policy provisions, no cumulatively considerable noise or vibration impacts would occur from temporary construction or operational activities associated with implementation of the proposed ECAP. Impacts are adverse, but **less than cumulatively considerable (Class III)**.

### AIR QUALITY

The ECAP is intended to reduce GHG emissions generated in the unincorporated county to contribute to global efforts to reduce the effects of climate change by, among other things, promoting the use of fuel-efficient and alternatively fueled vehicles (Measure T3), reducing VMT (Measures T1, T2, T4, T5, T6, T9, LUD1, and LUD2), integrating pedestrian facilities (Measure T6), encouraging the use of renewable energy (Measures BE1, BE8, RE1, and RE4), promoting water conservation (Measures WE1 through WE3), and reducing waste generation (Measures WR1 through WR5). In addition to reducing greenhouse gas emissions, each of these measures would help to reduce criteria air pollutants. Therefore, the proposed ECAP would not contribute to cumulative increases in criteria pollutants. This is an adverse, but **less than cumulatively considerable (Class III)** impact.

### GREENHOUSE GASES AND CLIMATE CHANGE ADAPTATION

As stated in Section 3.8, in order for the County to achieve consistency with AB 32, 2007 baseline emissions will need to be reduced by at least 15 percent by 2020 (to at or below 1,014,024 MTCO<sub>2e</sub> per year).

The proposed ECAP describes the reduction measures that would be employed by the County, through implementation of the ECAP, and through a variety of state legislation and regulations. The combination of proposed new strategies identified in the ECAP would be assembled into an integrated plan to reduce the countywide GHG emissions level.

The GHG reduction measures of the ECAP would substantially reduce projected unmitigated year 2020 emissions. The ECAP includes measures to address the resultant emissions of buildings (associated with energy use), transportation and land use emissions, solid waste emissions, agriculture emissions, and emissions generated for the energy used to pump water.

For instance, ECAP Measures BE2 (Energy-Efficient Renovations), BE4 (Energy Scoring and Audits), BE8 (Energy Efficiency and Green Building Standards), RE2 (Solar Water Heaters), IEE3 (Efficient Upgrade Incentives), and IEE4 (Efficient Equipment Incentives 2) propose programs for energy efficiency upgrades and retrofits in existing commercial, residential, and industrial buildings by, among other things, connecting residents and businesses with technical and financial



assistance. As another example, the proposed ECAP contains measures to benefit neighborhood connectivity in order to reduce vehicle miles traveled and thus, GHG emissions. For instance, ECAP Measure LUD1 (Infill Development) proposes to integrate “complete streets” policies and projects into updates of the County’s Comprehensive Plan. Complete streets are streets designed and operated to enable safe access for all users, including pedestrians, bicyclists, motorists, and transit riders of all ages and abilities. Complete streets make it easy to cross the street, walk to shops, and bicycle to work. Measure LUD1 also encourages new residential development to be within walking distance of public activity centers such as schools and parks, and seeks to retrofit existing, older neighborhoods to improve connectivity, redesign circulation, and create walkable streets.

GHG reduction measures would also result in GHG reductions for the solid waste sector. As outlined in ECAP Measure WR3 (Construction and Demolition Waste Recycling), the County proposes to increase the amount of waste that is recycled during new development projects.

The reader is referred to Section 2.0, Project Description, and the ECAP for a further description of GHG reduction measures.

### **GHG Reduction Quantification**

Implementation of the proposed ECAP would result in GHG emissions reductions in the unincorporated county of approximately 186,960 MTCO<sub>2</sub>e by 2020. There is the potential for an additional reduction of 56,610 MTCO<sub>2</sub>e if CCA is successful. In addition, state-led reduction efforts are projected to result in the reduction of another 164,250 MTCO<sub>2</sub>e. The County of Santa Barbara ECAP, in conjunction with State-led efforts such as the Renewables Portfolio Standard, Clean Car Fuel Standard (Pavley), and Building Energy Efficiency Standards, would equal reductions of approximately 351,210 MTCO<sub>2</sub>e by 2020 (plus an additional 56,610 MTCO<sub>2</sub>e if CCA is successful). This amount of GHG emissions reduction is equivalent to a 15 percent reduction from 2007 baseline emissions levels as shown in **Table 3.8-5**, and a 20 percent reduction if CCA is successful. Such reductions meet the goals established in AB 32 and the AB 32 Scoping Plan.

## 4.0 CUMULATIVE IMPACT SUMMARY

**TABLE 3.8-5  
ANNUAL GHG EMISSIONS REDUCTIONS FROM  
ECAP MEASURES (MTCO<sub>2</sub>E)**

Emissions Inventory	
2007 Baseline Emissions Inventory	1,192,970
2020 Unmitigated Emissions Inventory	1,365,170
Reductions from 2020 Unmitigated Emissions Inventory	
Santa Barbara County Energy and Climate Action Plan	
Total ECAP Emissions Reductions (without CCA)**	-186,960
California State-Led Reduction Efforts	
Total State-Led Emissions Reductions	-164,250
Combined ECAP and State Reductions (without CCA)**	- 351,210
<b>AB 32 Emissions Target (15% Below 2007 Baseline Inventory)</b>	<b>1,014,020</b>
County of Santa Barbara ECAP and State-Adjusted Inventory**	1,013,960
AB 32 Target Achieved?	Yes

*\*Due to rounding, totals may not equal the sum of component parts.*

*\*\* CCA is not included in the calculated reductions since the feasibility of implementing such a program in Santa Barbara County is not yet known.*

The County continues to follow an interim approach to evaluating GHG emissions, as described above. Until such time that the proposed ECAP is formally adopted, the County Interim GHG thresholds will no longer be applied and future development projects in the county would be evaluated for GHG impacts in comparison to the ECAP. The proposed ECAP would be consistent with AB 32 and the AB 32 Scoping Plan, as the GHG inventory for the unincorporated county would experience a 15 percent reduction below 2007 baseline levels required under the provisions of AB 32, and a 20 percent reduction if CCA is successful. The implementation of the proposed project would be consistent with state goals to reduce GHG emissions. Thus, this impact is adverse, but **less than cumulatively considerable (Class III)**, and thus not significant.

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## **5.0 ALTERNATIVES**

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## **5.1 INTRODUCTION TO THE ALTERNATIVES ANALYSIS**

California Environmental Quality Act (CEQA) Guidelines Section 15126.6(a) states that an environmental impact report (EIR) shall describe and analyze a range of reasonable alternatives to a project. These alternatives should feasibly attain most of the basic objectives of the project, while avoiding or substantially lessening one or more of the significant environmental impacts of the project. An EIR need not consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. The discussion of alternatives is to focus on those which are capable of avoiding or substantially lessening any significant effects of the project, even if they impede the attainment of the project objectives to some degree or would be more costly (CEQA Guidelines Section 15126.6[b]).

When addressing feasibility, CEQA Guidelines Section 15126.6 states that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites.” The CEQA Guidelines also specify that the alternatives discussion should not be remote or speculative; however, the alternatives need not be presented in the same level of detail as the assessment of the proposed project.

The CEQA Guidelines indicate that several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed project; (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project; (3) the ability of the alternatives to meet the objectives of the project; and (4) the feasibility of the alternatives. These factors would be unique for each project.

## **5.2 RATIONALE FOR SELECTING ALTERNATIVES**

CEQA Guidelines Section 15126.6(c) states that the alternatives analyzed in an EIR “shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” Thus, the project objectives and the project’s significant environmental impacts are the two primary criteria considered in selecting alternatives.

### **PROJECT OBJECTIVES**

As detailed in Chapter 2.0, Project Description, the County’s project objective is to outline a clear path to successfully implementing measures that will achieve the County’s greenhouse gas (GHG) reduction targets, including the following specific objectives:

- Create a GHG emissions baseline from which to benchmark GHG emissions reductions.
- Reduce the county’s GHGs by 15 percent from baseline emissions by 2020 to be consistent with the reduction target of AB 32.
- Increase the community’s resilience to the effects of climate change.
- Provide a policy document with specific implementation measures to be considered as part of the planning process for future development projects.

## 5.0 ALTERNATIVES

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- Provide a list of specific actions that will reduce GHG emissions, with the highest priority given to actions that provide the greatest reduction in GHG emissions and benefit the community at the least cost.
- Identify energy efficiency goals and targets.
- Create an energy efficiency strategy to meet the County's energy reduction goals.
- Implement programs to comply with the State of California's GHG reduction and long-term energy efficiency goals.
- Establish a qualified reduction plan from which future development within the unincorporated county can tier and thereby streamline the environmental analysis necessary under CEQA, as identified in CEQA Guidelines Section 15183.5(b).

### SIGNIFICANT EFFECTS

As evaluated in Chapter 3.0, the proposed County of Santa Barbara Energy and Climate Action Plan (ECAP) would not cause any significant environment effects. CEQA Guidelines Section 15126.6(b), which describes the purpose of alternatives, states that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project." Since the proposed project would not cause any significant effects, there are no alternatives that would be required to be evaluated under CEQA for this project. This EIR nevertheless includes an alternatives analysis to foster informed decision-making and public participation.

### 5.3 ALTERNATIVES DISMISSED FROM EVALUATION

On March 12, 2013, the County Board of Supervisors (BOS) considered five options for GHG reduction measures for the proposed ECAP. The Board directed staff to evaluate Option 4, with the addition of the Community Choice Aggregation measure, as the proposed project in the EIR. This EIR also evaluates Option 5 as Alternative 2. Options 1 through 3 were dismissed from further evaluation for the reasons stated below.

- Board of Supervisors Option 1 – 10% Reduction Target (Includes Voluntary Measures): Option 1 considered by the BOS consisted of a completely voluntary approach to the ECAP. This option primarily relied on providing incentives and education to encourage residents and businesses to participate in programs and make decisions about their lifestyles that result in lower GHG emissions. As this option would not meet the goals of AB 32 and lacks required, specific performance standards, this approach does not meet the minimum requirements to allow the ECAP to be used for programmatic CEQA tiering of future projects. Option 1 would not meet the basic project objectives of meeting the AB 32 target and providing for tiered GHG analysis in future CEQA documents and is therefore dismissed from evaluation in this EIR.
- Board of Supervisors Option 2 – 15% GHG Reduction Target (Includes Voluntary Measures, Sustainable Communities Strategy [SCS], and Community Choice Aggregation [CCA]): The second option considered by the Board of Supervisors on March 12, 2013, utilized the same measures as Option 1 and added implementation of the SCS and CCA. This approach is estimated to achieve a 17 percent reduction in GHG emissions from the baseline year. However, with the lack of required, specific performance standards, it is unlikely the plan would meet the minimum requirements to allow the ECAP to be used for

programmatic tiering for future projects. In addition, Option 2 would only achieve a 15 percent reduction in GHG emissions with CCA, and the feasibility of implementing a CCA program in Santa Barbara County is not yet known. If CCA is not developed and implemented by the 2020 target date, Option 2 would not meet the basic project objective of meeting the AB 32 reduction target. Therefore, Option 2 was dismissed from evaluation in this EIR.

- Board of Supervisors Option 3: 15% GHG Reduction Target (Includes Phased Measures and CCA): The third option considered by the BOS on March 12, 2013, builds off the voluntary approach utilizing the same measures as Option 1 but phases in mandatory requirements for four measures (BE2 – Energy-Efficient Renovations, BE4 – Energy Scoring and Audits, BE8 – Energy Efficiency and Green Building Standards, and IEE3 – Energy Upgrade Incentives) and includes CCA. Measures BE2, BE4, and BE8 are related to efficiency of buildings, both existing and new construction. Measure IEE3 targets energy efficiency in the industrial sector. Phased measures would initially be implemented on a voluntary basis until the designated check-in year of 2015 when the measures are evaluated for effectiveness and considered for required implementation if the voluntary option is not successful. Additionally, this approach includes CCA. Only with CCA would this alternative achieve a 15 percent reduction in GHG emissions. If fully implemented, Option 3 could allow the County to use the ECAP for programmatic CEQA tiering. However, the feasibility of implementing a CCA program in Santa Barbara County is not yet known. If CCA is not developed and implemented by the 2020 target date, Option 3 would not meet the basic project objective of meeting the AB 32 reduction target. Therefore, Option 3 was dismissed from evaluation in this EIR.

#### **5.4 ANALYSIS OF ALTERNATIVES**

The alternatives selected for analysis are:

- Alternative 1: No Project
- Alternative 2: 20% or More GHG Reduction Alternative (Includes Required Measures, Community Choice Aggregation, and Sustainable Communities Strategy)
- Alternative 3: Modification of Measures BE2 (Energy-Efficient Renovations) and BE4 (Energy Scoring and Audits)

These alternatives are described in the following subsections, along with the rationale for selecting these alternatives for evaluation and the corresponding environmental analysis.

##### **ALTERNATIVE 1: NO PROJECT**

CEQA Guidelines Section 15126.6(e) requires the analysis of a “no project” alternative. This section explains, “The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.”

Under this alternative, the proposed ECAP and corresponding amendment to the Energy Element of the County of Santa Barbara’s Comprehensive Plan would not be adopted. This alternative is consistent with CEQA Guidelines Section 15126.6(e)(3)(A).

## 5.0 ALTERNATIVES

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### **Rationale for Selecting the Alternative for Evaluation**

As previously discussed, evaluation of the no project alternative is required by CEQA.

### **Environmental Evaluation**

#### Land Use

The no project alternative would have no impacts on land use. Like the proposed project, the no project alternative would not result in the division of an existing community, would not lead to an inconsistency with land use plans or ordinances, and would have no effect on habitat conservation plans or natural community conservation plans.

#### Transportation and Circulation

The no project alternative would have no impacts on transportation or circulation. The no project alternative would not generate vehicle trips, would not cause any construction-related traffic delays, would not cause any hazardous circulation conditions, and would not impede air travel. The no project alternative would not cause any adverse impacts on transportation and circulation, similar to the proposed project; however, the no project alternative would not achieve the project's benefits of improved pedestrian, bicycle, and transit circulation.

#### Aesthetics and Visual Resources

The no project alternative would have no adverse impacts on aesthetics and visual resources. As such, this alternative would avoid the less than significant project impact of glare from future renewable energy facility improvements promoted by the proposed ECAP. Similarly, the no project alternative would avoid the project's less than significant impacts on views and visual character and quality related to future improvement projects promoted by the proposed ECAP.

#### Agricultural Resources

The no project alternative would have no adverse impacts on agricultural resources. As such, this alternative would avoid the project's less than significant impact on agricultural resources that could occur if future improvement projects implementing the ECAP, such as renewable energy facilities potentially occurring on agricultural land.

#### Biological Resources

The no project alternative would have no adverse impacts on biological resources. As such, this alternative would avoid the less than significant project impact on sensitive species (particularly bird and bat species) that could result from future renewable energy facility improvements promoted by the proposed ECAP. Similarly, the no project alternative would avoid the less than significant impacts on wetlands and riparian habitat that could result from future improvement projects promoted by the proposed ECAP.

#### Noise

The no project alternative would have no adverse impacts on noise or vibration. As such, the no project alternative would avoid the project's less than significant impacts related to construction noise and vibration that could result from future improvement projects promoted by the proposed ECAP.



### Air Quality

The no project alternative would have no adverse impacts on quality. As such, the no project alternative would avoid the project's less than significant air quality impacts related to construction and operational activities that could result from future improvement projects promoted by the proposed ECAP. However, the no project alternative would not achieve the ECAP's beneficial impacts on air quality related, in part, to the ECAP's reduction in vehicle miles traveled (VMT), energy conservation programs, and support for renewable energy sources. Therefore, the no project alternative would result in greater impacts on air quality than the proposed project.

### Greenhouse Gases and Climate Change Adaptation

As identified in Section 3.8, the proposed ECAP would establish multiple measures to reduce GHG emissions by more than 15 percent below baseline emissions, which would achieve AB 32 targets. Thus, no significant greenhouse gas or climate change impacts were identified for the proposed project. The no project alternative would not establish GHG reduction measures; thus, it would not reduce the amount of GHG emissions generated in the county. Therefore, the no project alternative would result in a significant GHG emissions impact, since the County of Santa Barbara would not achieve the AB 32 reduction target (identified as 15 percent below "existing" (2007) levels by 2020).

#### **ALTERNATIVE 2: 20% OR MORE GHG REDUCTION ALTERNATIVE (INCLUDES REQUIRED MEASURES, COMMUNITY CHOICE AGGREGATION, AND SUSTAINABLE COMMUNITIES STRATEGY)**

Alternative 2 includes all of the GHG reduction measures and actions of the proposed ECAP and further strengthens the implementation actions related to the following measures: BE2 – Energy-Efficient Renovations, BE4 – Energy Scoring and Audits, WR1 – Waste Reduction, WR2 – Increased Recycling Opportunities, WR3 – Construction and Demolition Waste Recycling. The changed implementation actions from the proposed ECAP consist of the following:

- BE2 – Energy-Efficient Renovations
  - Implement an energy conservation ordinance requiring all residential and nonresidential properties to complete an energy audit and retrofit to reduce energy use by 30% or verify their participation and savings in other energy conservation programs by 2020 (additional action beyond the proposed ECAP).
- BE4 – Energy Scoring and Audits
  - Require all residential properties that are greater than 10 years old to provide an energy audit or EPA Home Energy Score to interested buyers at the time of sale.
  - Require residential property owners to implement recommended energy efficiency measures provided by the energy audit, home energy score, or similar program. (In comparison, the proposed ECAP requires that a prescribed set of energy efficiency upgrades be undertaken at the time of building sale or within one year from the close of escrow).
  - Require all nonresidential properties, even those not covered by AB 1103, to provide buyers or tenants with the previous year's energy use by documenting use through the EPA's EnergyStar Portfolio Manager (this is a phased measure in the proposed ECAP).

## 5.0 ALTERNATIVES

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- WR1 – Waste Reduction
  - Establish a net zero waste goal (additional action beyond the proposed ECAP).
- WR2 – Increased Recycling Opportunities
  - Establish a net zero waste goal (additional action beyond proposed ECAP).
- WR3 – Construction and Demolition Waste Recycling
  - Establish a net zero waste goal (additional action beyond proposed ECAP).

### **Rationale for Selecting the Alternative for Evaluation**

Alternative 2 was selected for evaluation as a means to foster informed decision-making. Alternative 2 provides an additional option to achieving all of the basic project objectives.

### **Environmental Evaluation**

#### Land Use

Alternative 2 would have the same impacts on land use as the proposed project. Like the proposed project, Alternative 2 would not result in the division of an existing community, would not lead to an inconsistency with land use plans or ordinances, and would have no effect on habitat conservation plans or natural community conservation plans.

#### Transportation and Circulation

Alternative 2 would have the same impacts on transportation and circulation as the proposed project. Like the proposed project, Alternative 2 could result in less than significant impacts related to construction-related traffic delays, trip generation, circulation conditions, and air travel. Alternative 2 would have no significant impacts on transportation and circulation. Furthermore, like the proposed project, Alternative 2 would result in beneficial impacts related to improved pedestrian, bicycle, and transit circulation.

#### Aesthetics and Visual Resources

Alternative 2 would have the same impacts on aesthetics and visual resources as the proposed project. As such, like the proposed project, this alternative would have a less than significant impact related to glare from future renewable energy facility improvements promoted by the proposed ECAP. Similarly, Alternative 2 would have the same impacts as the proposed project on views and visual character and quality related to future improvement projects promoted by the proposed ECAP.

#### Agricultural Resources

Alternative 2 would have the same impacts on agricultural resources as the proposed project. As such, like the proposed project, this alternative would have less than significant impacts on agricultural resources related to the potential for future improvement projects implementing the ECAP, such as renewable energy facilities, occurring on agricultural land.

### Biological Resources

Alternative 2 would have the same impacts on biological resources as the proposed project. As such, like the proposed project, this alternative would have a less than significant impact on sensitive species that could result from future renewable energy facility improvements promoted by the proposed ECAP. Similarly, Alternative 2 would result in the same less than significant impact as the proposed project on wetlands and riparian habitat that could result from future improvement projects promoted by the proposed ECAP.

### Noise

Alternative 2 would have the same noise impacts as the proposed project. As such, like the proposed project, this alternative would result in less than significant impacts related to construction noise and vibration that could result from future improvement projects promoted by the proposed ECAP.

### Air Quality

Alternative 2 would have the same air quality impacts as the proposed project. As such, like the proposed project, this alternative would result in less than significant impacts related to construction and operational activities that could result from future improvement projects promoted by the proposed ECAP. Additionally, Alternative 2 would achieve the ECAP's beneficial impacts on air quality related, in part, to the ECAP's reduction in vehicle miles traveled (VMT), energy conservation programs, and support for renewable energy sources.

### Greenhouse Gases and Climate Change Adaptation

As identified in Section 3.8, the proposed ECAP would establish multiple measures to reduce GHG emissions by more than 15 percent below baseline emissions, which would achieve AB 32 targets. Thus, no significant greenhouse gas or climate change impacts were identified for the proposed project. Alternative 2 would result in a greater reduction of GHG emissions than the proposed project (estimated to result in a 24.2 percent reduction).

### **ALTERNATIVE 3: MODIFICATION OF MEASURES BE2 (ENERGY-EFFICIENT RENOVATIONS) AND BE4 (ENERGY SCORING AND AUDITS)**

This alternative consists of implementing the same ECAP as the proposed project, with the following revisions to the implementation actions of BE2 – Energy-Efficient Renovations and BE4 – Energy Scoring and Audits:

- BE2 – Energy-Efficient Renovations
  - Require energy audits for all building permits valued greater than \$15,000 and offer expedited building permit plan check for implementing audit recommendations, and consider providing a rebate for completing the audit or a waiver of building permit fees if upgrades were completed. (In comparison, the proposed ECAP requires such audits for all building permits valued greater than \$10,000.)
- BE4 – Energy Scoring and Audits
  - Require residential property owners to complete energy audits at the time of building sale. (In comparison, the proposed ECAP requires that a prescribed set of energy efficiency upgrades be undertaken at the time of building sale or within one year from the close of escrow.)

## 5.0 ALTERNATIVES

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### **Rationale for Selecting the Alternative for Evaluation**

Alternative 3 was selected for evaluation as a means to foster meaningful public participation and informed decision-making. Concerns related to the implementation actions of BE2 and BE4 were raised during the project's Notice of Preparation/scoping process.

### **Environmental Evaluation**

#### Land Use

Alternative 3 would have the same impacts on land use as the proposed project. Like the proposed project, Alternative 3 would not result in the division of an existing community, would not lead to an inconsistency with land use plans or ordinances, and would have no effect on habitat conservation plans or natural community conservation plans.

#### Transportation and Circulation

Alternative 3 would have the same impacts on transportation and circulation as the proposed project. Like the proposed project, Alternative 3 could result in less than significant impacts related to construction-related traffic delays, trip generation, circulation conditions, and air travel. Alternative 3 would have no significant impacts on transportation and circulation. Furthermore, like the proposed project, Alternative 3 would result in beneficial impacts related to improved pedestrian, bicycle, and transit circulation.

#### Aesthetics and Visual Resources

Alternative 3 would have the same impacts on aesthetics and visual resources as the proposed project. As such, like the proposed project, this alternative would have a less than significant impact related to glare from future renewable energy facility improvements promoted by the proposed ECAP. Similarly, Alternative 3 would have the same impacts as the proposed project on views and visual character and quality related to future improvement projects promoted by the proposed ECAP.

#### Agricultural Resources

Alternative 3 would have the same impacts on agricultural resources as the proposed project. As such, like the proposed project, this alternative would have less than significant impacts on agricultural resources related to the potential for future improvement projects implementing the ECAP, such as renewable energy facilities, occurring on agricultural land.

#### Biological Resources

Alternative 3 would have the same impacts on biological resources as the proposed project. As such, like the proposed project, this alternative would have a less than significant impact on sensitive species that could result from future renewable energy facility improvements promoted by the proposed ECAP. Similarly, Alternative 3 would result in the same less than significant impact as the proposed project on wetlands and riparian habitat that could result from future improvement projects promoted by the proposed ECAP.

### Noise

Alternative 3 would have the same noise impacts as the proposed project. As such, like the proposed project, this alternative would result in less than significant impacts related to construction noise and vibration that could result from future improvement projects promoted by the proposed ECAP.

### Air Quality

Alternative 3 would have the same air quality impacts as the proposed project. As such, like the proposed project, this alternative would result in less than significant impacts related to construction and operational activities that could result from future improvement projects promoted by the proposed ECAP. Additionally, Alternative 3 would achieve the ECAP's beneficial impacts on air quality related, in part, to the ECAP's reduction in vehicle miles traveled (VMT), energy conservation programs, and support for renewable energy sources.

### Greenhouse Gases and Climate Change Adaptation

As identified in Section 3.8, the proposed ECAP would establish multiple measures to reduce GHG emissions by more than 15 percent below baseline emissions, which would achieve AB 32 targets. Thus, no significant GHG or climate change impacts were identified for the proposed project. Alternative 3 would result in a smaller reduction of GHG emissions than the proposed project. More specifically, the change in Measure BE2 would decrease the estimated GHG savings by 2,130 MTCO<sub>2e</sub> per year, and the change in Measure BE4 would decrease the estimated GHG savings by 1,780 MTCO<sub>2e</sub> per year. The two changes proposed in Alternative 3 would reduce the overall effectiveness of the ECAP by an estimated 3,900 MTCO<sub>2e</sub> per year, bringing total anticipated emission reductions from implementing Alternative 3 to 239,670 MTCO<sub>2e</sub> per year. The resulting emissions levels from this alternative, assuming the full effectiveness of CCA, would be 961,510 MTCO<sub>2e</sub> per year or a 19.5 percent reduction. However, as previously noted, the feasibility of implementing a CCA program in Santa Barbara County is not yet known. If CCA is not implemented, this alternative would achieve a 14.7% reduction from 2007 baseline based on current GHG emission reduction estimates provided in the ECAP. However, the ECAP and proposed changes to the Comprehensive Plan would commit the County to meeting a 15% reduction. The County will be conducting regular monitoring of community emissions and the implementation of reduction measures, as specified in Chapter VI of the ECAP. If the County determines that emissions are not being reduced as anticipated, the implementation and monitoring protocols in the ECAP will require County staff and decision makers to develop additional reduction measures and to increase implementation of existing strategies to meet the 15% reduction target. For example, the ECAP estimates the benefit to the County of the achievement of the state's Renewables Portfolio Standard (RPS). Established in 2002 under Senate Bill 1078, accelerated in 2006 under Senate Bill 107 and expanded in 2011 under Senate Bill 2, California's Renewables Portfolio Standard (RPS) requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33% of total procurement by 2020. Santa Barbara County is served by two investor owned utilities, Pacific Gas & Electric Company (PG&E) and Southern California Edison (SCE). The analysis in the ECAP relied on reporting documents from the utilities that presented current and projected progress toward the target at the time of preparation of the inventory and forecast. Based on the reports and consistent with the conservative approach to calculations in the ECAP, the ECAP assumed that PG&E and SCE would increase procurement from eligible renewable energy resources to 28% of total procurement by 2020 rather than 33%. Based on current reporting by the utilities, the California Public Utilities Commission, and the California Energy Commission, PG&E and SCE appear to be

## 5.0 ALTERNATIVES

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on track achieve the 33% target by 2020. The progress of PG&E and SCE will be factored into the annual reporting and monitoring of the ECAP and would bring the County closer to meeting the required 15% reduction target than assumed in the current ECAP.

Thus, this alternative would also result in a less than significant GHG emission impact similar to the proposed project.

### 5.5 ALTERNATIVE COMPARISON

**Table 5.0-1** provides a summary of the potential impacts of the alternatives evaluated in this Final EIR, as compared with the potential impacts of the proposed ECAP. The impact significance is identified for each of the alternatives as well as the ranking of the impact as compared to the proposed project. A “-” ranking means the alternative would result in a greater impact; a “+” ranking means the alternative would result less impact; and an “S” ranking identifies where the alternative has a similar impact to the proposed project.

**TABLE 5-1  
SUMMARY COMPARISON OF ALTERNATIVES**

<b>Environmental Impacts</b>	<b>Proposed Project</b>	<b>Alternative 1 (No Project)</b>	<b>Alternative 2 (Option 5)</b>	<b>Alternative 3 (Modification of BE 2 and BE 4)</b>
Land Use: Consistency with land use plans and ordinances	Less than significant	No impact +	Less than significant S	Less than significant S
Transportation and Circulation: Traffic impacts during construction and trip generation	Less than significant	No impact +	Less than significant S	Less than significant S
Transportation and Circulation: Safety of design features	Less than significant	No impact +	Less than significant S	Less than significant S
Aesthetics and Visual Resources: Scenic resources, vistas, scenic highways, and high visual quality and character	Less than significant	No impact +	Less than significant S	Less than significant S
Aesthetics and Visual Resources: New sources of light or glare	Less than significant	No impact +	Less than significant S	Less than significant S
Agricultural Resources: Conversion of agricultural land	Less than significant	No impact +	Less than significant S	Less than significant S
Biological Resources: Impact on special-status species	Less than significant	No impact +	Less than significant S	Less than significant S
Biological Resources: Impact on wetlands and riparian habitat	Less than significant	No impact +	Less than significant S	Less than significant S
Noise: Construction-related noise impacts	Less than significant	No impact +	Less than significant S	Less than significant S
Noise: Construction-related vibration impacts	Less than significant	No impact +	Less than significant S	Less than significant S
Noise: Operation-related noise impacts	Less than significant	No impact +	Less than significant S	Less than significant S
Air Quality: Construction-related air pollutant emissions	Less than significant	No impact +	Less than significant S	Less than significant S
Air Quality: Operation-related air pollutant emissions	Less than significant	Less than significant S	Less than significant S	Less than significant S
Air Quality: Toxic air contaminants	Less than significant	No impact +	Less than significant S	Less than significant S

## 5.0 ALTERNATIVES

Environmental Impacts	Proposed Project	Alternative 1 (No Project)	Alternative 2 (Option 5)	Alternative 3 (Modification of BE 2 and BE 4)
Air Quality: Exposure to odors	Less than significant	No impact +	Less than significant S	Less than significant S
GHG Emissions: Consistency with AB 32	Less than significant	Significant impact -	Less than significant +	Less than significant impact S

Notes:

S Alternative would result in similar conditions as the proposed project.

- Alternative would result in greater impacts than the proposed project.

+ Alternative would result in less impact than the proposed project.

### 5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based on the evaluation described in this section, Alternative 2 is the environmentally superior alternative. Alternative 2 would have nearly the same impacts as the proposed project, but would have greater beneficial impacts related to GHG emissions. Alternative 3 would have largely the same impacts as Alternative 2 and the proposed project, except for GHG emissions impacts, which would be significant and unmitigable. Alternative 1 (the no project alternative) would avoid most of the impacts associated with the project and Alternative 2, but it would result in a significant and unmitigable impact related to GHG emissions.



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## **6.0 OTHER CEQA ANALYSIS**

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This section discusses significant unavoidable impacts, growth-inducing impacts, and significant irreversible environmental changes. The purpose of this Final Environmental Impact Report (Final EIR) is to satisfy California Environmental Quality Act (CEQA) requirements by addressing the environmental effects specific to the implementation of the proposed County of Santa Barbara Energy and Climate Action Plan (ECAP).

### 6.1 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, including those that cannot be reduced to less than significant with the implementation of feasible mitigation measures. The environmental effects of the proposed project on various aspects of the environment are discussed in detail in Chapter 3 of this Final EIR. There are no project-specific impacts that cannot be avoided if the ECAP is approved.

### 6.2 GROWTH-INDUCING IMPACTS

Implementation of the proposed project would not alter the growth potential of the County of Santa Barbara Comprehensive Plan. The proposed project does not propose any changes to land use or zoning designations that would alter the planned population or job growth anticipated under the Comprehensive Plan. Additionally, there are no components of the proposed ECAP that would remove an obstacle to additional growth or development, such as removing a constraint on a required public service.

### 6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Public Resources Code Section 21100(b)(2), a part of CEQA, requires that EIRs prepared for the adoption of a plan, policy, or ordinance of a public agency must include a discussion of significant irreversible environmental changes of project implementation. CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes as follows:

*Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

In addition, Public Resources Code Section 21100(b)(3) requires that lead agencies consider “measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.” Appendix F of the CEQA Guidelines further states, “Potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project.”

As noted above, the proposed ECAP does not propose any changes to land use or zoning designations that would alter the planned population or job growth anticipated under the County’s Comprehensive Plan such that there would be additional growth. The proposed ECAP does not propose new development; the ECAP encourages transit-oriented and mixed-use development in appropriate locations. The ECAP also encourages construction of renewable energy generating facilities and energy retrofits on existing structures, which during construction would entail a small commitment of energy and building materials. This commitment of energy and building materials would be commensurate with that of other projects of similar magnitude

## 6.0 OTHER CEQA ANALYSIS

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and in the long term would result in a reduction of energy consumption from the business-as-usual (BAU) scenario and a reduction in the use of nonrenewable energy sources. Operation and maintenance of new facilities resulting from the proposed ECAP may entail a further commitment of energy resources in the form of natural gas, electricity, and water resources. However, this commitment would be minimal, consisting largely of routine maintenance of solar panels, wind turbines, bicycle infrastructure, and similar facilities. The ECAP does not propose any development that would otherwise entail commitment of energy resources.

Furthermore, a primary intent of the ECAP is to reduce energy consumption in the county. To that end, the ECAP proposes various measures to reduce greenhouse gas (GHG) emissions and correspondingly promote energy efficiency. For instance, ECAP Measures BE2 (Energy-Efficient Renovations), BE4 (Energy Scoring and Audits), BE8 (Energy Efficiency and Green Building Standards), RE2 (Solar Water Heaters), IEE3 (Efficient Upgrade Incentives), and IEE4 (Efficient Equipment Incentives 2) propose programs for energy efficiency upgrades and retrofits in existing commercial, residential, and industrial buildings by, among other things, connecting residents and businesses with technical and financial assistance. As another example, the proposed ECAP contains measures to benefit neighborhood connectivity in order to reduce vehicle miles traveled and thus energy consumption from transportation. For instance, ECAP Measure LUD1 (Infill Development) proposes to integrate “complete streets” policies and projects into updates of the County’s Comprehensive Plan. Complete streets are streets designed and operated to enable safe access for all users, including pedestrians, bicyclists, motorists, and transit riders of all ages and abilities. Complete streets make it easy to cross the street, walk to shops, and bicycle to work. Measure LUD1 also encourages new residential development to be within walking distance of public activity centers such as schools and parks, and seeks to retrofit existing, older neighborhoods to improve connectivity, redesign circulation, and create walkable streets. These measures are consistent with the Santa Barbara County Association of Governments (SBCAG) Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and would result in an integration of land use patterns and the transportation network in a manner that reduces vehicle miles traveled (VMT), which in turn reduces energy consumption from transportation. The RTP/SCS is projected to reduce overall VMT by 16 percent and vehicle hours traveled by 15 percent from BAU.

Implementation of the proposed ECAP would increase the county’s use of renewable energy sources, promote energy-efficient design in new development, and provide for the retrofitting of existing building stock, all of which would reduce the overall energy consumption and reliance on nonrenewable resources. As such, the proposed ECAP would not result in inefficient, wasteful, and unnecessary consumption of energy.

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## 7.0 REFERENCES

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- . 2014. *Draft Energy and Climate Action Plan*.

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## **8.0 REPORT PREPARERS**

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**COUNTY OF SANTA BARBARA**

Deputy Director ..... Matt Schneider  
Supervising Planner ..... David Lackie  
Senior Planner ..... Lorianne DeFalco  
Associate Planner..... Heather Allen  
Planner ..... Katie Hentrich

**PMC**

Principal-in-Charge ..... Patrick Angell  
Project Manager ..... John Bellas  
Environmental Planner ..... Seth Myers  
Creative Services (Graphics) ..... Louis Lillegard  
Technical Editor ..... Suzanne Wirth  
Internal Service Provider .....Stephanie Wolfe

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## **9.0 RESPONSE TO COMMENTS ON THE DEIR**

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## 9.0 RESPONSES TO COMMENTS ON THE DEIR

As prescribed by State CEQA Guidelines Sections 15088 and 15132, the lead agency, the County of Santa Barbara, is required to evaluate significant environmental points raised by individuals, agencies, and organizations in comments on the Draft EIR and to prepare written responses to those comments. The Response to Comments together with the DEIR, will comprise the Final Environmental Impact Report (FEIR) for this project.

The Responses to Comments contains individual responses to each written and verbal comment received during the public review period for the DEIR. In accordance with State CEQA Guidelines Section 15088(b), the written responses describe the disposition of significant environmental issues raised. The County of Santa Barbara and its consultants have provided a good faith effort to respond in detail to all significant environmental points raised by the comments.

### 9.1 LIST OF COMMENTERS

The following individuals and representatives of organizations and agencies submitted written comments on the Draft EIR:

**TABLE 9-1  
WRITTEN COMMENTS ON THE DRAFT EIR**

Committer Number	Individual or Signatory	Affiliation	Date
1	Carly Wilburton	Santa Barbara County Air Pollution Control District	6/17/14
2	Carlyle A. Johnston	Santa Barbara County, Department of Public Works, Resource Recovery & Waste Management Division	6/23/14
3	Ed Fuller Bobbie Ranney Sharon Currie Gina Gluyas	Santa Barbara Association of Realtors Lompoc Valley Association of Realtors Santa Ynez Valley Association of Realtors Santa Maria Association of Realtors	6/23/14
4	Dave Davis Michael Chiacos	Community Environmental Council	6/24/14
5	Miguel Checa	Individual	6/24/13

The following individuals and representatives of organizations and agencies provided verbal comments on the Draft EIR:

**TABLE 9-2  
VERBAL COMMENTS ON THE DRAFT EIR**

Committer Number	Individual	Affiliation	Date
6	Timothy Mahoney	Southern California Gas Company	6/11/14
7	Laurie Tamura	Individual	6/11/14

## **9.0 RESPONSES TO COMMENTS ON THE DEIR**

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### **9.2 WRITTEN COMMENTS AND REPOSES**

**Table 9-1** identifies the written comment letters received on the Draft EIR. These comment letters and the lead agency's corresponding responses are provided below in the same order as they are listed in **Table 9-1**.

Letter 1



Santa Barbara County  
Air Pollution Control District

Our Vision Clean Air

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S.B. COUNTY  
PLANNING & DEVELOPMENT

June 17, 2014

Heather Allen  
Long Range Planning  
County of Santa Barbara  
123 E. Anapamu Street  
Santa Barbara, CA 93101

Re: **APCD Comments on the Draft Program Environmental Impact Report for the Energy and Climate Action Plan, 14EIR-00000-00002, 14GPA-00000-00003, SCH No. 20144021021**

Dear Ms. Allen:

The Santa Barbara County Air Pollution Control District (APCD) has reviewed the Draft Environmental Impact Report (EIR) for the County of Santa Barbara's Energy and Climate Action Plan (ECAP). The County of Santa Barbara proposes to adopt an ECAP that includes a 2007 baseline inventory of community-wide GHG emissions, a forecast of emissions to the years 2020 and 2035, a GHG reduction target of 15% below baseline emissions by 2020, a set of emission reduction measures to meet the target, and a methodology for tracking and reporting emissions in the future. The emission reduction measures in the ECAP are made of a combination of voluntary, phased, and mandatory measures.

1-1

APCD has no comment on the Draft EIR.

If you have any questions, please feel free to contact me at (805) 961-8890 or via email at [cw@sbcapcd.org](mailto:cw@sbcapcd.org).

Sincerely,

Carly Wilburton,  
Air Quality Specialist  
Technology and Environmental Assessment Division

cc: Project File  
TEA Chron File

Louis D. Van Mullem, Jr. • Air Pollution Control Officer  
260 North San Antonio Road, Suite A • Santa Barbara, CA • 93110 • 805.961.8800  
[OurAir.org](http://OurAir.org) • [twitter.com/OurAirSBC](https://twitter.com/OurAirSBC)

## **9.0 RESPONSES TO COMMENTS ON THE DEIR**

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**LETTER 1: CARLY WILBURTON, AIR QUALITY SPECIALIST, SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT**

RESPONSE TO COMMENT 1-1

This letter acknowledges that the Santa Barbara County Air Pollution Control District (APCD) has reviewed the subject Draft EIR and ECAP and states that the APCD has no comment on the Draft EIR. Comment is noted.

## Letter 2

**From:** Johnston, Carlyle  
**Sent:** Monday, June 23, 2014 11:55 AM  
**To:** Allen, Heather  
**Cc:** Leipner, Joddi; Wells, Leslie  
**Subject:** Comments on the Draft EIR Energy & Climate Action Plan

Heather:

The Division's primary comments on the Energy and Climate Action Plan (ECAP) relate to the lack of future solid waste management plans that would reduce the region's GHG impacts, specifically the Resource Recovery Project (RRP) at the Tajiguas Landfill. The Division will be releasing a draft EIR on the RRP later this summer. Information on the RRP has been previously submitted to P&D during the original development of the Climate Action Plan. We would request that P&D include the information previously submitted and incorporate it into this EIR.

Project Summary: The Santa Barbara County Department of Public Works, in collaboration with the cities of Santa Barbara, Goleta, Solvang and Buellton, is proposing to develop a **Resource Recovery Project** (RRP) that would process municipal solid waste (MSW) currently disposed at the County owned and operated Tajiguas Landfill. The processing of waste would include diverting over 98% of organics and over 90% of recyclables still being buried at the Tajiguas Landfill even with existing recycling and diversion programs in place. Organics would be further processed at an anaerobic digestion facility to create electricity (over 1MW net for the community) and compost. Recyclables would be bailed and then sent to market for reuse. Currently, the diversion rate for the unincorporated region is around 75%. This project would bring the diversion rate closer to 85%, by diverting and recycling more than half of what is currently buried.

The ECAP estimates the GHG impact of waste buried at the Tajiguas Landfill at 91,920 MTCO<sub>2</sub>E (no methodology for generating this number appears in the appendix, so we cannot comment on this specifically). This particular GHG impact is primarily caused by buried organics generating methane. The RRP would divert over 98% of organics from the landfill, thereby eventually reducing this amount by at least 98% over time as the Landfill stabilizes. Our own estimates are that the RRP would be completed by 2016 allowing for a 98% decline in GHG's generated by buried organics over the next 40 years.

More immediate GHG reductions come from the added recycling and compost material generated by the RRP, that the EPA WARM model projects would result in a reduction of 136,858 MTCO<sub>2</sub>E.

Recognizing the impact our community's waste has on GHG generation, the Division will continue to seek and develop new programs to reduce waste and increase recycling in the future.

For more information on the RRP or waste reduction, please contact me directly or check out the project website [www.ResourceRecoveryProject.com](http://www.ResourceRecoveryProject.com).

Thanks,

2-1

## Letter 2 Continued

Carlyle

Carlyle A. Johnston  
Project Leader



SANTA BARBARA COUNTY  
**Resource Recovery &  
Waste Management Division**  
*Innovative Environmental Solutions*

130 East Victoria Street, Suite 100  
Santa Barbara CA 93101

O - 805 882-3617  
F - 805 882-3633

**Doing something different with our waste:**  
[www.ResourceRecoveryProject.com](http://www.ResourceRecoveryProject.com)

**THE local recycling resource:**  
[www.LessIsMore.org](http://www.LessIsMore.org)



**LETTER 2: CARLYLE A. JOHNSTON, PROJECT LEADER, SANTA BARBARA COUNTY, DEPARTMENT OF PUBLIC WORKS, RESOURCE RECOVERY & WASTE MANAGEMENT DIVISION**

RESPONSE TO COMMENT 2-1

The Resource Recovery & Waste Management Division provides details regarding the County's Resource Recovery Project (RRP) at the Tajiguas Landfill, including anticipated reductions in greenhouse gas (GHG) emissions that would result from the project. The division further requests that the RRP be incorporated into the project. To the extent information was available at the time, the RRP is accounted for in Measure WR4, with GHG emission reductions based on the April 2012 *Resource Recovery Project at the Tajiguas Landfill Subsequent EIR Scoping Document*. Chapter 4 of the final version of the ECAP includes an updated description of the RRP. Through the ECAP's required monitoring and updating, GHG reductions from the RRP will be further considered. With updates to the ECAP scheduled for 5-year increments, it is anticipated that the next update to the ECAP, which will occur after the RRP is in operation, will include GHG emission reductions from the RRP based on empirical data and corresponding projections.

## 9.0 RESPONSES TO COMMENTS ON THE DEIR



June 23, 2014

### Letter 3

Heather Allen  
County of Santa Barbara  
Planning and Development Department  
Long Range Planning Division  
123 E. Anapamu Street  
Santa Barbara, CA 93101-2058

Dear Ms. Allen:

The four Association of REALTORS® that protect and promote homeownership within Santa Barbara County would like to take this opportunity to comment on the Draft Environmental Impact Report (EIR) for the Energy and Climate Action Plan (ECAP). We are proud to have been an active stakeholder in this process since its inception and are pleased with many of the countywide measures that are based upon encouragement and voluntary actions. However, while reviewing the Draft EIR for the ECAP, we were disappointed with mandated measures which place undue burdens upon residential owners at the time of sale.

3-1

As mentioned above, we are pleased with education and encouragement of energy efficiency, but we cannot support BE 4 – Energy Scoring and Audits which has mandates that burden property owners. Having any type of time of sale communitywide measures unfairly burden home sale transactions and to place the burden of the whole community on only homebuyers and sellers is inequitable. These types of mandates are highly inefficient in getting all members of the community to comply with new standards. According to our data, by the year 2020 less than 32% of homes will have been sold for the first time since 2013 and by the year 2030 less than 45% of homes will have sold for the first time since 2013. While some homes are sold every few years, many others remain with the same owner for many years, or even decades. Therefore, if new standards are important enough to be mandated by law, then the implementation of those standards should be applied to all homes in the community. These mandates also add complications to sales transactions. Another step only delays the escrow process and adds more stress and cost to the homebuyer and seller. The cost of retrofitting or of an inspection can cause the home sales price to increase drastically, leaving the potential homebuyer with an added expense, and possibly, the inability to purchase a home. Government mandates should be implemented, overseen, administered and applied evenly to the entire community. They should not target home sellers and home buyers.

3-2

Organized real estate supports reducing greenhouse gas emissions (GHG) and we encourage property owners to obtain an energy audit during the transaction and we promote the benefits of green building and/or wise energy use through our marketing efforts. What organized real estate does not support are mandates done at the time of sale. As mentioned above, we have been an active stakeholder in this process, believe that GHG reduction is important, and as such **we request that you remove the time of sale provision from this document.**

Sincerely,

Ed Fuller  
President  
Santa Barbara  
Association of REALTORS®

Bobbie Ranney  
President  
Lompoc Valley  
Association of REALTORS®

Sharon Currie  
President  
Santa Ynez Valley  
Association of REALTORS®

Gina Gluyas  
President  
Santa Maria  
Association of REALTORS®

**LETTER 3: ED FULLER, PRESIDENT, SANTA BARBARA ASSOCIATION OF REALTORS  
BOBBIE RANNEY, PRESIDENT, LOMPOC VALLEY ASSOCIATION OF REALTORS  
SHARON CURRIE, PRESIDENT, SANTA YNEZ VALLEY ASSOCIATION OF REALTORS  
GINA GLUYAS, PRESIDENT, SANTA MARIA ASSOCIATION OF REALTORS**

RESPONSE TO COMMENT 3-1

The four associations of realtors provide introductory remarks, including noting their participation in the ECAP process since its inception, their support of countywide measures that are based on encouragement and voluntary actions, and their disappointment with measures that place burdens on residential owners at the time of sale. Introductory remarks are noted. See Response to Comment 3-2 regarding measures that include time of sale provisions.

RESPONSE TO COMMENT 3-2

The commenters provide details and opinions regarding their opposition to measures that include time of sale provisions (measure BE4) and request that such provisions be removed from the proposed ECAP. The commenter's request is similar to Draft EIR Alternative 3 (Modification of Measures BE2 and BE4), which would change BE2 to require energy audits for all building permits valued greater than \$15,000 (rather than \$10,00 in the proposed ECAP) and change BE4 to only require energy audits at the time of building sale (it would eliminate the proposed ECAP provisions of requiring a prescribed set of energy efficiency upgrades at the time of building sale). The Draft EIR identified that this change would reduce the effectiveness of the ECAP to reduce GHG emissions and would result in a 14.7% reduction from 2007 baseline and not achieve the AB 32 reduction target of 15% (see Draft EIR page 5-9).

However, this conclusion of the Draft EIR did not recognize that the ECAP includes the adoption of Comprehensive Plan amendments that would commit the County to meeting the 15 % emission reduction performance standard as identified on Draft EIR page 2-19 and identified below. State CEQA Guidelines Section 15126.6(a)(1)(B) allows the use of performance standards to mitigate environmental effects that may be accomplished in more than one specified way. Public court decisions that support the use of performance standard mitigation include *Kings County Farm Bureau v. City of Hanford* (5<sup>th</sup> District 1990) 221 Cal.App.3d 692 [270 Cal. Rptr. 650], and *Rio Vista Farm Bureau Center v. County of Solano* (1<sup>st</sup> District 1992) 5 Cal.App.4th 351 [7 Cal. Rptr. 2d 307].

***Policy 8.3: ECAP Implementation:*** *The County shall implement the Energy and Climate Action Plan (ECAP) to reduce greenhouse gas (GHG) emissions from community-wide sources by a minimum of 15% from the 2007 baseline emissions by 2020.*

***Research 8.3.1:*** *Established in the ECAP, the County shall monitor progress towards achieving GHG reductions every five years. Monitoring of the County's ECAP shall include an update to the GHG emissions from community-wide sources. If it is determined that the ECAP is not achieving specified levels of GHG emission reductions, the ECAP will be updated as needed.*

The GHG inventory, forecast, and emissions reductions from ECAP reduction measures were quantified following protocols and industry best practices in place at the time when the analyses were conducted. In order to reduce the likelihood of emissions being underestimated, or emission reductions being overestimated, these analyses generally relied on conservative assumptions. Forecasts of emissions are an estimate of future GHG emissions based on

## 9.0 RESPONSES TO COMMENTS ON THE DEIR

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anticipated changes in population, jobs, households, commercial activity, and driving patterns. As individuals, private companies, and state and local governments take increasing action to address climate change, it is possible that future emissions will be lower than anticipated, or that the emission savings from a reduction measure will be greater than estimated in the ECAP. Due to these conservative assumptions and ability to implement additional reductions if deemed necessary by the ECAP monitoring process, it is reasonable to assume that the County may modify reduction measures or actions in the ECAP, while remaining confident of achieving the 2020 GHG reduction target identified in the ECAP.

Santa Barbara County will be conducting regular monitoring of community emissions and the implementation of reduction measures, as specified in Chapter VI of the ECAP. If the County determines that emissions are not being reduced as anticipated, the implementation and monitoring protocols in the ECAP will require County staff and decision makers to develop additional reduction measures and to increase implementation of existing strategies. For example, the ECAP estimates the benefit to the County of the achievement of the state's Renewables Portfolio Standard (RPS). Established in 2002 under Senate Bill 1078, accelerated in 2006 under Senate Bill 107 and expanded in 2011 under Senate Bill 2, California's RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33% of total procurement by 2020. Santa Barbara County is served by two investor owned utilities, Pacific Gas & Electric Company (PG&E) and Southern California Edison (SCE). The analysis in the ECAP relied on reporting documents from the utilities that presented current and projected progress toward the target at the time of preparation of the inventory and forecast. Based on the reports and consistent with the conservative approach to calculations in the ECAP, the ECAP assumed that PG&E and SCE would increase procurement from eligible renewable energy resources to 28% of total procurement by 2020 rather than 33%. Based on current reporting by the utilities, the California Public Utilities Commission, and the California Energy Commission, PG&E and SCE appear to be on track to achieve the 33% target by 2020. The progress of PG&E and SCE will be factored into the annual reporting and monitoring of the ECAP and would bring the County closer to meeting the required 15% reduction target than assumed in the current ECAP.

Thus, Alternative 3 is a feasible alternative that includes modification of Measure BE4 that could meet the 15% reduction. The following text changes are made to the Draft EIR to address this.

- Draft EIR page 5-9, the following text change is made:

### "Greenhouse Gases and Climate Change Adaptation

As identified in Section 3.8, the proposed ECAP would establish multiple measures to reduce GHG emissions by more than 15 percent below baseline emissions, which would achieve AB 32 targets. Thus, no significant GHG or climate change impacts were identified for the proposed project. Alternative 3 would result in a smaller reduction of GHG emissions than the proposed project. More specifically, the change in Measure BE2 would decrease the estimated GHG savings by 2,130 MTCO<sub>2e</sub> per year, and the change in Measure BE4 would decrease the estimated GHG savings by 1,780 MTCO<sub>2e</sub> per year. The two changes proposed in Alternative 3 would reduce the overall effectiveness of the ECAP by an estimated 3,900 MTCO<sub>2e</sub> per year, bringing total anticipated emission reductions from implementing Alternative 3 to 239,670 MTCO<sub>2e</sub> per year. The resulting emissions levels from this alternative, assuming the full effectiveness of CCA, would be 961,510 MTCO<sub>2e</sub> per year or a 19.5 percent reduction. However, as previously noted, the feasibility of implementing a CCA program in Santa Barbara County is not yet known. If

CCA is not implemented, this alternative would achieve a 14.7% percent reduction from 2007 baseline based on current GHG emission reduction estimates provided in the ECAP. However, the ECAP and proposed changes to the Comprehensive Plan would commit the County to meeting a 15% reduction. The County will be conducting regular monitoring of community emissions and the implementation of reduction measures, as specified in Chapter VI of the ECAP. If the County determines that emissions are not being reduced as anticipated, the implementation and monitoring protocols in the ECAP will require County staff and decision makers to develop additional reduction measures and to increase implementation of existing strategies to meet the 15% reduction target. For example, the ECAP estimates the benefit to the County of the achievement of the state's Renewables Portfolio Standard (RPS). Established in 2002 under Senate Bill 1078, accelerated in 2006 under Senate Bill 107 and expanded in 2011 under Senate Bill 2, California's Renewables Portfolio Standard (RPS) requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33% of total procurement by 2020. Santa Barbara County is served by two investor owned utilities, Pacific Gas & Electric Company (PG&E) and Southern California Edison (SCE). The analysis in the ECAP relied on reporting documents from the utilities that presented current and projected progress toward the target at the time of preparation of the inventory and forecast. Based on the reports and consistent with the conservative approach to calculations in the ECAP, the ECAP assumed that PG&E and SCE would increase procurement from eligible renewable energy resources to 28% of total procurement by 2020 rather than 33%. Based on current reporting by the utilities, the California Public Utilities Commission, and the California Energy Commission, PG&E and SCE appear to be on track achieve the 33% target by 2020. The progress of PG&E and SCE will be factored into the annual reporting and monitoring of the ECAP and would bring the County closer to meeting the required 15% reduction target than assumed in the current ECAP.

Thus, this alternative would also result in a less than significant GHG emission impact similar to the proposed project, and thus would not achieve the AB 32 reduction target (identified as 15 percent below "existing" (2007) levels by 2020). Therefore, Alternative 3 would result in a significant GHG emissions impact."

- Draft EIR page 5-10 and -11, the following changes are made to Table 5-1:

**TABLE 5-1  
SUMMARY COMPARISON OF ALTERNATIVES**

<b>Environmental Impacts</b>	<b>Proposed Project</b>	<b>Alternative 1 (No Project)</b>	<b>Alternative 2 (Option 5)</b>	<b>Alternative 3 (Modification of BE 2 and BE 4)</b>
Land Use: Consistency with land use plans and ordinances	Less than significant	No impact +	Less than significant S	Less than significant S
Transportation and Circulation: Traffic impacts during construction and trip generation	Less than significant	No impact +	Less than significant S	Less than significant S
Transportation and Circulation: Safety of design features	Less than significant	No impact +	Less than significant S	Less than significant S

## 9.0 RESPONSES TO COMMENTS ON THE DEIR

Environmental Impacts	Proposed Project	Alternative 1 (No Project)	Alternative 2 (Option 5)	Alternative 3 (Modification of BE 2 and BE 4)
Aesthetics and Visual Resources: Scenic resources, vistas, scenic highways, and high visual quality and character	Less than significant	No impact +	Less than significant S	Less than significant S
Aesthetics and Visual Resources: New sources of light or glare	Less than significant	No impact +	Less than significant S	Less than significant S
Agricultural Resources: Conversion of agricultural land	Less than significant	No impact +	Less than significant S	Less than significant S
Biological Resources: Impact on special-status species	Less than significant	No impact +	Less than significant S	Less than significant S
Biological Resources: Impact on wetlands and riparian habitat	Less than significant	No impact +	Less than significant S	Less than significant S
Noise: Construction-related noise impacts	Less than significant	No impact +	Less than significant S	Less than significant S
Noise: Construction-related vibration impacts	Less than significant	No impact +	Less than significant S	Less than significant S
Noise: Operation-related noise impacts	Less than significant	No impact +	Less than significant S	Less than significant S
Air Quality: Construction-related air pollutant emissions	Less than significant	No impact +	Less than significant S	Less than significant S
Air Quality: Operation-related air pollutant emissions	Less than significant	Less than significant S	Less than significant S	Less than significant S
Air Quality: Toxic air contaminants	Less than significant	No impact +	Less than significant S	Less than significant S
Air Quality: Exposure to odors	Less than significant	No impact +	Less than significant S	Less than significant S
GHG Emissions: Consistency with AB 32	Less than significant	Significant impact -	Less than significant +	<u>Less than</u> <u>significant</u> impact S <sub>+</sub>

Notes:

- S Alternative would result in similar conditions as the proposed project.
- Alternative would result in greater impacts than the proposed project.
- + Alternative would result in less impact than the proposed project.



**Community  
Environmental  
Council**

26 West Anapamu St., 2nd Floor  
Santa Barbara, CA 93101  
tel: 805.963.0583 fax: 805.962.9080 • [www.cecsb.org](http://www.cecsb.org)

## Letter 4

June 24th, 2014  
Heather Allen, Planning and Development Department  
123 East Anapamu Street  
Santa Barbara, CA, 93101

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Dr. Barbara S. Lindemann  
Jenny Kearns  
Eric Lohela  
Ruth Loomer  
Dawn Mitcham  
Bret A. Stone  
Jacob Tell  
Elizabeth Wagner  
Randy Weiss  
Jules Zimmer

**RE: Comments on Climate Action Plan Draft Environmental Impact Report**

Dear Ms. Allen,

The Community Environmental Council (CEC) is a solutions oriented environmental non-profit, founded in 1970. We focus entirely on clean energy – renewable energy, sustainable transportation, and energy efficiency, and thus take great interest in the County of Santa Barbara’s Climate Action Plan Draft EIR. **The Draft EIR states that Alternative 2, with a 20% or More GHG Reduction Target is the environmentally superior alternative, and CEC urges the County to choose Alternative 2.** The City of Santa Barbara, a neighboring jurisdiction, adopted a target of a 25% reduction by 2020, and the County should adopt a similar target. Additionally, our region is a slow growth area, and thus should be planning for higher targets than other, faster growing regions of the state.

4-1

CEC would also like to see the following material in the Final EIR:

- The DEIR published public comment letters from the scoping document, with very brief one or two sentence responses. More detailed responses should be included so that the public can see if our comments are incorporated into the document.
- A technical appendix was released, but has very vague calculations that don’t allow the public to see how different measures’ effectiveness and GHG reduction potential are calculated. Additionally, assumptions about how each measure’s effectiveness is calculated aren’t provided. For example, BE-2 states that by 2020, 30% of Santa Barbara County homes will have energy efficiency upgrades, leading to 24,300 MTCO<sub>2e</sub> by 2020. This seems to be a very aggressive target for the next 6 years, considering the County has spent almost this much time developing their Climate Action Plan. A more complete technical appendix should be released that includes a justification of assumptions and calculations of how each measure’s effectiveness was calculated.

4-2

4-3

CEC looks forward to seeing our suggestions incorporated into the final document. Please contact us if we can help the County in any way with the Climate Action Plan.

Sincerely,

Dave Davis  
President and CEO

Michael Chiacos  
Energy and Transportation Manager

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## **9.0 RESPONSES TO COMMENTS ON THE DEIR**

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**LETTER 4:      DAVE DAVIS, PRESIDENT AND CEO, COMMUNITY ENVIRONMENTAL COUNCIL  
MICHAEL CHIACOS, ENERGY AND TRANSPORTATION MANAGER, COMMUNITY  
ENVIRONMENTAL COUNCIL**

### **RESPONSE TO COMMENT 4-1**

The Community Environmental Council provides introductory remarks and recommends that the County choose Alternative 2, which has a 20 percent or more GHG reduction target and is identified in the EIR as the environmentally superior alternative. Remarks and recommendations will be forwarded to the Planning Commission and Board of Supervisors for decision-maker consideration.

### **RESPONSE TO COMMENT 4-2**

The commenter requests that the EIR include more detailed responses to the comment letters provided during the EIR scoping period. CEQA does not require responses to comments provided during an EIR's Notice of Preparation/scoping period. The intention of such comments is to inform the preparation of the Draft EIR and identify issues that should be addressed in the EIR. Nonetheless, in excess of CEQA requirements, the County provided responses to the comments received during the Notice of Preparation/scoping period in Appendix B of the Draft EIR that direct the reader to the appropriate portion of the Draft EIR which considers the environmental points raised.

### **RESPONSE TO COMMENT 4-3**

The commenter requests that the EIR's technical appendix include detailed calculations of the GHG reductions achieved by each proposed measure. Comment noted. The Technical Appendix to the Draft ECAP includes details regarding the calculations and reductions estimated in the document. The Energy and Climate Action Plan Technical Appendix: Methods and Assumptions for GHG Quantification was updated in July 2014 to provide a narrative description of the calculation process used to determine performance indicators and activity and GHG reductions for each measure. This revision is intended to provide additional transparency and detail to County officials, County staff, and community members.



## Letter 5

**From:** Miguel Checa L. <[m\\_a\\_checa@yahoo.com](mailto:m_a_checa@yahoo.com)>  
**To:** "[hallen@countyofsb.org](mailto:hallen@countyofsb.org)" <[hallen@countyofsb.org](mailto:hallen@countyofsb.org)>  
**Cc:** Miguel Checa <[m\\_a\\_checa@yahoo.com](mailto:m_a_checa@yahoo.com)>  
**Sent:** Tuesday, June 24, 2014 12:19 PM  
**Subject:** Citizen-resident Comment to the DEIR for the County of SB Energy and Climate Action Plan - SCH #20144021021

TO:  
Heather Allen, Associate Planner  
County of Santa Barbara  
Planning and Development Department

FROM:  
Michael "Miguel" Checa  
1085 Cramer Road  
Carpinteria CA 93013-1817  
Tel.: 805-566-0909

Below I submit two Citizen-resident inputs that apply to all strategic and operational evaluations and planning that our County undertakes. They are "biggest-picture" items that must be used as a compass for all decision. | 5-1

### INPUT ITEM 1

The Natural Step's (TNS) Framework for Strategic Sustainable Development (FSSD) and the American Planning Association's Policy Guide on Planning for Sustainability (adopted in April 2000 and based on TNS-FSSD) is the most encompassing strategic-level systems-thinking and planning tool for Environmental Sustainability. Under it you can use other more operational or tactical tools. I urge you to educate our County elected and appointed officials on TNS's FSSD and the APA's PGPS. The problems of our biosphere are monumental, running against the clock---and they require strong tools. | 5-2

The purpose of this Citizen-resident input is to strongly recommend that our County officially adopt the American Planning Association's Policy Guide\* on Planning for Sustainability (PGPS). APA's policy guides outline official association positions. This specific PGPS is based on The Natural Step's Framework for Strategic Sustainable Development (FSSD) for businesses and organizations of all types, which is a highest-level (and simple to use) strategic planning tool based on systems thinking\*\*\*. Your planning thinking process will be sharpened when using this tool. | 5-3

I have been familiar with TNS since 1997; and with the PGPS since it was adopted in 2000. Should you have any questions, please let me know. | 5-4

\* <http://www.planning.org/policy/guides/adopted/sustainability.htm>

## Letter 5 Continued

\*\* The Four System Conditions of a Sustainable Society | The Natural Step

<http://www.thenaturalstep.org/en/the-system-conditions>

\*\*\* "Some of the biggest problems facing the world--war, hunger, poverty, and environmental degradation--are essentially system failures. They cannot be solved by fixing one piece in isolation from the others, because even seemingly minor details have enormous power to undermine the best efforts of too-narrow thinking." --In: Thinking in Systems: A Primer by Donella Meadows

5-4  
cont.

### INPUT ITEM 2

Please incorporate the dramatic NASA graph\* that plots the increase in concentration of CO2 in our atmosphere for many hundreds of thousands of years. All human activity --everywhere-- ought to have this graph allways in mind. The course to take is obvious: WE MUST DECREASE CO2 TO 350 PPM ASAP. [Please display the graph when you print this message.]

\*<http://climate.nasa.gov/evidence>

#### Evidence

Vital Signs of the Planet: Global Climate Change and Global Warming. How do we know it's happening? Here's the evidence.

[View on climate.nasa.gov](http://climate.nasa.gov)

Preview  
by  
Yahoo

5-5

"This graph, based on the comparison of atmospheric samples contained in ice cores and more recent direct measurements, provides evidence that atmospheric CO2 has increased since the Industrial Revolution. (Source: [[LINK|<http://www.ncdc.noaa.gov/paleo/icecore/>]])"

**LETTER 5: MIGUEL CHECA**

## RESPONSE TO COMMENT 5-1

Introductory remarks are provided. No response is required.

## RESPONSE TO COMMENT 5-2

Mr. Checa suggests that the Natural Step's Framework for Strategic Sustainable Development and the American Planning Association's Policy Guide on Planning for Sustainability be utilized for sustainability efforts in the county. The proposed ECAP utilizes the appropriate tools available to identify GHG reduction strategies and to calculate the effectiveness of such measures, including the following referenced guidance documents:

Boswell, M. R., A. I. Greve, and T. L. Seale. 2012. *Local Climate Action Planning*. Island Press.

California Air Pollution Control Officers Association (CAPCOA). 2010. Quantifying Greenhouse Gas Mitigation Measures. <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

California Air Resources Board (CARB). 2006. OFFROAD 2007. <http://www.arb.ca.gov/msei/categories.htm>.

———. 2011. AB 118 Air Quality Improvement Program. <http://www.arb.ca.gov/msprog/aqip/aqip.htm>.

———. 2011. EMFAC Emission Rates Database. [http://www.arb.ca.gov/jpub/webapp/EMFAC2011WebApp/rateSelectionPage\\_1.jsp](http://www.arb.ca.gov/jpub/webapp/EMFAC2011WebApp/rateSelectionPage_1.jsp).

California Building Standards Commission (BSC). 2010. Title 24, Part 11. California Green Building Code. <http://www.bsc.ca.gov/home/calgreen.aspx>

California Department of Resources Recovery and Recycling (CalRecycle). 2009. Waste Disposal Characterization. <http://www.calrecycle.ca.gov/Publications/General/Extracts/2009023/Tables.pdf>.

California Energy Commission (CEC). 2006. Refining Estimates of Water-Related Energy Use in California. <http://www.energy.ca.gov/2006publications/CEC-500-2006-118/CEC-500-2006-118.PDF>.

———. 2010. 2009 California Residential Appliance Saturation Study. Volume 2: Results. <http://www.energy.ca.gov/2010publications/CEC-200-2010-004/CEC-200-2010-004-V2.PDF>.

Institute of Transportation Engineers (ITE). 2007. Trip Generation Manual.

———. 2010. Parking Generation, 4th Edition: An ITE Informational Report. <http://www.ite.org/emodules/scriptcontent/orders/ProductDetail.cfm?pc=IR-034C>.

## 9.0 RESPONSES TO COMMENTS ON THE DEIR

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### RESPONSE TO COMMENT 5-3

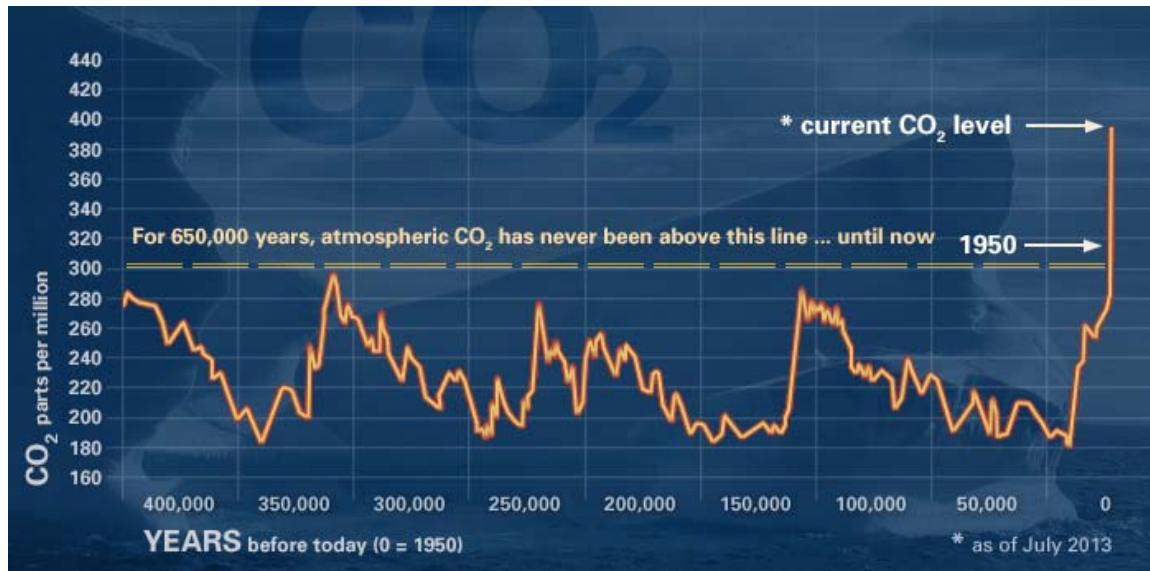
Mr. Checa recommends that the County adopt the American Planning Association's Policy Guide on Planning for Sustainability. This recommendation pertains to the merits of the project rather than the adequacy of the EIR. The comment will be forwarded to the Planning Commission and Board of Supervisors for decision-maker considerations.

### RESPONSE TO COMMENT 5-4

Mr. Checa provides Internet links to the American Planning Association's Policy Guide on Planning for Sustainability and the Natural Step's document entitled The Four System Conditions of a Sustainable Society, as well as a quote from Donella Meadows. Information noted; no response is required.

### RESPONSE TO COMMENT 5-5

Mr. Checa requests that NASA's graph that plots the increase in concentration of carbon dioxide in the atmosphere be included. In response, the graph is presented below.



2.2 VERBAL COMMENTS AND REPOSSES

The County of Santa Barbara held a public hearing to receive comments on the Draft EIR on Wednesday, June 11, 2014, at the County Planning Commission Hearing Room #17, 123 East Anapamu Street, Santa Barbara. At this public hearing, County staff provided a summary presentation of the proposed ECAP and the Draft EIR, which was followed by a public comment session. The following table summarizes the verbal comments made at this public hearing.

**TABLE 2-1  
DRAFT EIR PUBLIC HEARING VERBAL COMMENT SUMMARY**

Committer Number	Speaker, Affiliation	Summary of Discussion Topics
6	Timothy Mahoney, Southern California Gas Company	<ol style="list-style-type: none"> <li>1. Would like the EIR to recognize the diversity in the energy portfolio and consider natural gas in meeting climate goals both now and in the future. Marbourg fleet of trucks are natural gas-fired (CNG) instead of diesel. This can be pointed out as a transportation alternative fuel for heavy-duty trucks and vehicles. Hearst Castle has 16 natural gas buses.</li> <li>2. Cannot say enough about energy efficiency as a first line of defense. The EIR does a good job of considering energy efficiency.</li> <li>3. Setting a low carbon goal is often better than technology mandates. This will allow a broader array of energy strategies that can be implemented to achieve goals.</li> <li>4. Renewable natural gas (biomethane) is a good source of alternative power for both electricity and transportation.</li> <li>5. EIR needs to recognize that solar and wind power are dependent on sun and wind, whereas natural gas and biogas can be the foundation fuel when the sun is not shining or the wind blowing. Biogas is considered renewable.</li> <li>6. EIR should recognize distributed generation, which is for small-scale electrical generation (e.g., fuel cells) to produce on-site electricity.</li> <li>7. EIR should recognize combined heat and power system. Capture waste heat from gas power generation (e.g., fuel cells) and use for water heating.</li> </ol>
7	Laurie Tamura	<ol style="list-style-type: none"> <li>1. 15% reduction is the fair and balanced approach to GHG reduction.</li> <li>2. Energy audit and retrofit requirement for single-family homes at the point of sale is arduous; commenter hopes it will not become one of the policies.</li> <li>3. Concerned about how the math is done in Tables 2.2 and 2.3 of the Project Description. Surprised at how low the reductions are for actions at the state level. Innovation is happening daily in regard to the energy portfolio and vehicle emission requirements at the state level and should be reflected. Consider new CARB Scoping Plan in regard to statewide reductions.</li> <li>4. In Table 2.3, the Community Choice Aggregation (CCA) program is shown as the largest reduction. CCA is costly, and few agencies have utilized. With the state mandate for renewable energy sources, CCA becomes moot. Concerned</li> </ol>

## 9.0 RESPONSES TO COMMENTS ON THE DEIR

Committer Number	Speaker, Affiliation	Summary of Discussion Topics
		<p>that the same option is included twice—California Renewable Portfolio and CCA—both are going after the same energy source. EIR needs to identify and explain the difference. What is the CCA going to cost?</p> <p>5. There are a number of mitigation measures in the document—how much GHG reduction is tied to each measure?</p>

### COMMITTER 6: TIMOTHY MAHONEY, SOUTHERN CALIFORNIA GAS COMPANY

#### RESPONSE TO COMMENT 6-1

Comments regarding the potential of natural gas to be part of the energy portfolio that achieves climate goals are duly noted. None of the proposed measures include an increase in natural gas production. However, Measure WR4 proposes implementation of the Resource Recovery Project (RRP), which would produce biogas from organic waste for the purpose of electricity production. Measures BE10 and WR5 address converting construction equipment and waste collection vehicles from diesel to compressed natural gas (CNG). Measures BE1, BE2, BE3, BE4, BE8, RE2, IEE1, IEE2, IEE3, and IEE4 are estimated to reduce natural gas use.

#### RESPONSE TO COMMENT 6-2

Comments and opinions regarding energy efficiency are noted.

#### RESPONSE TO COMMENT 6-3

Comments and opinions regarding setting a carbon goal rather than technological mandates are noted. This comment pertains to the merits of the project rather than the adequacy of the EIR. The comment will be forwarded to the Planning Commission and Board of Supervisors for decision-maker considerations.

#### RESPONSE TO COMMENT 6-4

The commenter provides information about renewable natural gas (biomethane), which is noted.

#### RESPONSE TO COMMENT 6-5

Comments regarding the climatic factors needed for solar and wind power are noted. The GHG reductions estimated in the ECAP account for the typical climatic conditions experienced in Santa Barbara County. Measures provide credits for offsetting electricity use with energy generated from on-site solar photovoltaic facilities. Measures RE1 and RE3 adjust annual kWh production based on regional variation in solar potential. Measure RE4 calculates annual kWh production based on an annualized average of energy production.

### RESPONSE TO COMMENT 6-6

Comments regarding small-scale electrical generation are duly noted. ECAP Measure RE3 encourages small-scale renewable electricity generation.

### RESPONSE TO COMMENT 6-7

Comments regarding combined heat and power systems are duly noted. While not specifically identified, the proposed ECAP measures that promote building energy efficiency (e.g., BE2, BE4, and BE8) would support such systems.

### COMMENTS BY: LAURIE TAMURA

#### RESPONSE TO COMMENT 7-1

Comments and opinions regarding the 15 percent reduction approach are noted. This comment pertains to the merits of the project rather than the adequacy of the EIR. The comment will be forwarded to the Planning Commission and Board of Supervisors for decision-maker considerations.

#### RESPONSE TO COMMENT 7-2

The commenter provides opinions regarding her opposition to measures that include time of sale provisions. Comments and opinions are noted. This comment pertains to the merits of the project rather than the adequacy of the EIR. The comment will be forwarded to the Planning Commission and Board of Supervisors for decision-maker considerations.

#### RESPONSE TO COMMENT 7-3

The reductions identified in Tables 2.2 and 2.3 were quantified using modeling tools, program guidance and progress reports, and various studies produced by state agencies. See Response to Comment 5-2. The reductions do not include the effects of specific innovations and improvements, but assume that any such innovations will contribute toward achieving the identified state-level reduction. The reductions focus on scoped programs and regulations being implemented or planned with certainty by the California Air Resources Board as identified in the AB 32 Scoping Plan. These include conservative estimates of reductions from increases in renewable energy production, fuel-efficient vehicles, and energy efficiency in new buildings.

#### RESPONSE TO COMMENT 7-4

Since the feasibility of implementing Community Choice Aggregation in Santa Barbara County is not yet known, GHG reductions from such a program are not relied upon in either the proposed ECAP or the EIR. Thus, CCA is identified as an optional measure to potentially further reduce GHG emissions.

California's Renewables Portfolio Standard (RPS) establishes the minimum percentage of electricity that must be procured from renewable sources (33 percent of total procurement by 2020). A CCA program in Santa Barbara County would be required to meet this minimum standard, but could also exceed this standard. In fact, both operating CCAs in California

## **9.0 RESPONSES TO COMMENTS ON THE DEIR**

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currently exceed the 2020 RPS standard. If a Santa Barbara County CCA exceeded the RPS, any GHG reductions from an increase in renewable electricity beyond the RPS minimum would not be duplicative and thus attributable to the CCA.

For purposes of the ECAP, the CCA quantification assumes a minimum of 50 percent of electricity from renewable sources. The GHG reductions presented in Table 2-3 only account for renewable energy beyond the minimum Renewables Portfolio Standard. Regardless, as previously noted, due to the uncertainties regarding a potential CCA program in Santa Barbara County, the proposed ECAP's total GHG reductions shown in Table 2-3 do not include the reductions attributable to the CCA measure.

### **RESPONSE TO COMMENT 7-5**

See Response to Comment 4-3. The Technical Appendix to the Draft ECAP includes details regarding the calculations and reductions estimated in the document. The Energy and Climate Action Plan Technical Appendix: Methods and Assumptions for GHG Quantification was updated in July 2014 to provide a narrative description of the calculation process used to determine performance indicators and activity and GHG reductions for each measure. This revision is intended to provide additional transparency and detail to County officials, County staff, and community members.



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## **10.0 REFINED PROJECT ANALYSIS**

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### 10.1 INTRODUCTION

The County of Santa Barbara completed the preparation of a Draft Environmental Impact Report (EIR) to analyze the potential environmental effects of implementing the Energy and Climate Action Plan (ECAP) in May 2014. The public review and comment period was 45 days, commencing on May 11, 2014, and ending on June 24, 2014. The County received written and verbal comments during the public review period. In response to comments received, particularly community concerns to potentially burdensome requirements contained in the ECAP to home owners and sellers, County staff has refined several of the greenhouse gas (GHG) emissions reduction measures identified in the Draft EIR. The project incorporating the refinements is referred to hereafter as the Refined Project. This section of the Final EIR comprises two main sections—the Description of the Refined Project and the Environmental Analysis of the Refined Project. The Description of the Refined Project identifies those aspects of the Refined Project that are different than what was presented in the Draft EIR's project description (referred to hereafter as the Draft EIR Project). The Environmental Analysis of the Refined Project presents an analysis of each environmental topic evaluated in the Draft EIR and describes the incremental changes in impacts between the Draft EIR Project and the Refined Project.

### 10.2 DESCRIPTION OF THE REFINED PROJECT

The Refined Project consists of refinements to the GHG reduction measures and more detail to certain elements of the ECAP than what was analyzed in the Draft EIR. Refinements to the ECAP focused on the following items:

- Quantification of government operation reduction measures that were not considered in the Draft EIR.
- Refinements to community GHG reduction measure quantification using new activity data, including building permit and housing sales data.
- Addressing community concerns in response to potential burdensome ECAP requirements to home owners and sellers.
- Text edits to GHG emissions reduction measure language.

In addition, the Refined Project evaluated in the chapter includes a proposed amendment to the Santa Barbara County Code, Chapter 10 – Building Regulations, to include the following new requirements, which would begin to implement some of the ECAP measures:

1. Require new one- and two-family homes to install conduit for future installation of an electric vehicle (EV) charging station and single-family residences to be built "solar ready."
2. Require new single-family homes to install electric panel sized to accommodate future improvements.
3. Require new single-family homes to install conduit for future roof-mounted photovoltaic (PV).
4. Require new single-family homes to reserve a minimum of 250 square feet of the south-facing roof for future installation of a roof-mounted PV or solar water heating system.

## 10.0 REFINED PROJECT ANALYSIS

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As is the case with the ECAP analyzed in the Draft EIR, the Refined Project includes a baseline GHG emissions inventory, a forecast of future GHG emissions, a GHG reduction target of 15 percent below baseline emissions by 2020, a set of emissions reduction measures to meet the target, and a methodology for tracking and reporting emissions in the future. As is the case with the original ECAP analyzed in the Draft EIR, the Refined Project is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the environment. The Refined Project does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the County Comprehensive Plan, Coastal Land Use Plan, and Land Use Element.

In total, the Refined Project evaluated in the chapter includes:

1. GHG reduction measures pertaining to County government facilities and operations. The originally drafted ECAP analyzed in the Draft EIR did not contain any such measures. As such, all the reduction values attributable to these measures represent new calculations under the Refined Project. The Refined Project contains six Government Facilities and Operations GHG reduction measures under the stated goal to "provide for cost-effective and efficient use of energy in the facilities and operations owned by the County of Santa Barbara in order to reduce operating costs, mitigate adverse environmental impacts and set a good example in the community."
2. The re-quantification of the emissions reduction values of seven ECAP reduction measures in order to reflect both additional new data sources and textual edits that influence their emission reduction values. **Table 10-1** identifies these seven reduction measures and includes a description of the changes that instigated a re-quantification of their reduction values.
3. Textual edits to numerous reduction measures. In general, textual edits are intended to change certain reduction measure actions from "required" to "optional" in response to public concerns about potentially burdensome ECAP requirements. The change to increase the number of optional measures and decrease the number of required measures was strategically implemented in order to both reduce potential burdens and still achieve the County GHG emissions reduction target. Textual edits to ECAP reduction measures are included in **Table 10-6**. ECAP reduction measure changes in **Table 10-6** are demarcated with revision marks (underline for new text, ~~strikeout~~ for deleted text).
4. The proposed amendment to the Santa Barbara County Code, Chapter 10 – Building Regulations, in order to implement Renewable Energy measures and actions items in the ECAP.

**TABLE 10-1  
RE-QUANTIFIED GHG REDUCTION MEASURES**

ECAP Reduction Measure with Updated Reduction Value	Description of Updated Data Inputs
Measure BE 2 – Energy-Efficient Renovations	<ul style="list-style-type: none"> <li>• Rather than requiring professional energy audits at the building permit level, the Refined Project requires energy checklists for residential building permits for additions and/or alterations excluding repair and maintenance. The measure proposes offering a tutorial on how to complete the energy checklist and providing information on potential cost savings and available rebates or other incentives for completing energy upgrades.</li> <li>• Previously, an assumption about the percentage of homes renovated was applied to total home energy usage to estimate benefits from renovations. The Refined Project uses County building permit data to estimate the number of energy checklists that would be completed.</li> <li>• The Refined Project uses new County-provided data to account for the number of homes retrofitted (a 20% rate of participation for building permits subject to the energy checklist).</li> <li>• The Refined Project uses data on new home sales to adjust for double-counting from Measure BE 4.</li> <li>• The Refined Project uses baseline year commercial parcels, and a forecast of future commercial parcels based on anticipated nonresidential energy use, to calculate the benefit of audits and retrofits in the commercial sector.</li> </ul>
Measure BE 4 – Energy Scoring and Audits	<ul style="list-style-type: none"> <li>• Rather than requiring energy upgrades at the time of sale, the Refined Project encourages new homeowners to make energy-efficient upgrades when remodeling or repairing their homes, encourages all nonresidential properties to provide buyers or tenants with the previous year’s energy use, and provides resources for individuals self-auditing their home or business energy efficiency.</li> <li>• The Refined Project uses new County data regarding housing units sold per year instead of 2007 existing household data and forecasted 2020 households.</li> <li>• The Refined Project uses new County-provided data for residential retrofit participation estimates.</li> <li>• The Refined Project uses new County-provided data for expected energy savings per retrofit.</li> <li>• The Refined Project uses new commercial parcel data to estimate the number of nonresidential retrofits.</li> </ul>
Measure BE 8 – Energy Efficiency and Green Building Standards	<ul style="list-style-type: none"> <li>• The Refined Project uses updated information regarding residential participation to rely on building permits rather than a percentage of total residential energy use.</li> <li>• The Refined Project uses updated information regarding commercial participation to rely on building permits rather than a percentage of total nonresidential energy use.</li> </ul>
Measure RE 1 – Alternative Energy Development	<ul style="list-style-type: none"> <li>• The Refined Project accounted for a lower number of renewable energy systems installed (300 systems as compared to 350 in the original document) to account for the accurate number of implementation years available before 2020.</li> </ul>
Measure RE 2 – Solar Water Heaters	<ul style="list-style-type: none"> <li>• The Refined Project uses updated information regarding residential participation based on building permit data supplied by the County.</li> <li>• The Refined Project uses updated information regarding the estimated savings from switching from a traditional water heater to solar water heater based on EPA average estimates.</li> </ul>
Measure RE 3 – Alternative Energy Incentives	<ul style="list-style-type: none"> <li>• The Refined Project omits action #2 previously associated with this measure, which proposed to develop an ordinance for the development of small commercial solar projects. This omission results in no change of the measure’s emission reduction value.</li> </ul>
Measure IEE 3 – Efficient Upgrade Incentives	<ul style="list-style-type: none"> <li>• The Refined Project includes a calculation adjustment.</li> </ul>

## 10.0 REFINED PROJECT ANALYSIS

In the ECAP analyzed in the Draft EIR, the State-led GHG-reducing action, Renewables Portfolio Standard (RPS), was estimated to achieve emissions reductions based on procuring 28 percent of all statewide energy needs from renewable energy generators. The Refined project has been adjusted to account for procuring 33 percent of all statewide energy needs from renewable energy generators, consistent with the most up-to-date data. As shown in **Table 10-2**, this refinement results in a projected increase in the amount of GHG emissions reductions attributable to the RPS and a projected decrease in the amount of GHG emissions reductions attributable to Title 24 Standards and the California Solar Initiative.

**TABLE 10-2  
COMPARISON OF STATE-LED GHG EMISSIONS-REDUCING ACTIONS**

	Original ECAP as Analyzed in Draft EIR	Refined Project
Renewable Portfolio Standard	-23,850	-43,880
Pavley (Clean Car Standard)	-97,550	-97,550
Low Carbon Fuel Standard	-40,300	-40,300
Title 24 Standards	-2,290	-2,230
California Solar Initiative	-260	-240
<b>Total</b>	<b>-164,250</b>	<b>-184,200</b>

In the ECAP analyzed in the Draft EIR, total emissions reductions from ECAP measures were identified as 186,960. (The Community Choice Aggregation reduction measure, described in the Draft EIR, is not included in the total reductions since the feasibility of implementing such a program in Santa Barbara County is not yet known.) This value has been adjusted under the Refined Project, accounting for additional new data sources and textual edits that influence their emissions reduction values. Furthermore, the Refined Project includes GHG emissions reductions from the new Government Facilities and Operations reduction category (see **Table 10-6**). As shown in **Table 10-3**, emissions reductions are greater under the Refined Project. The Refined Project meets the GHG reduction target of 15 percent below baseline emissions by 2020.

**TABLE 10-3  
COMPARISON OF COUNTY GHG EMISSIONS-REDUCING MEASURES**

Reduction Measure Topic	Original ECAP as Analyzed in Draft EIR	Refined Project
Sustainable Communities Strategy	-32,410	-31,920
Land Use Design	-2,480	-2,480
Transportation	-24,770	-24,590
Built Environment	-51,950	-46,610
Renewable Energy	-13,360	-13,790
Industrial Energy Efficiency	-8,840	-8,980
Waste Reduction	-47,120	-47,310
Agriculture	-5,570	-7,460
Water Efficiency	-460	-580
Government Facilities & Operations	—	-4,310
<b>Total</b>	<b>-186,960</b>	<b>-188,030</b>

### **10.3 ENVIRONMENTAL ANALYSIS OF THE REFINED PROJECT**

#### **LAND USE**

##### **Previous Analysis in the Draft EIR**

The Draft EIR land use analysis addressed the potential for the ECAP to physically divide an established community (Impact 3.1.1) as well as its potential to conflict with adopted land use plans, policies, and/or regulations (Impact 3.1.2). The analysis of consistency with land use plans, policies, and/or regulations under Impact 3.1.2 considered the County Comprehensive Plan and the 2040 Santa Barbara Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). These impacts were addressed in the Draft EIR on pages 3.1-5 through -7. As stated in the Draft EIR, the proposed ECAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development. The ECAP does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Comprehensive Plan, Coastal Land Use Plan, and Land Use Element. Implementation of the proposed measures under the ECAP would be subject to all County development and land use standards, as well as further CEQA analysis of project-specific impacts.

The analysis concluded that Impact 3.1.1 would be less than significant since the ECAP does not propose changing existing land use designations or development standards, and there are currently land uses and zoning designations under the County's jurisdiction that are able to accommodate higher-density mixed-use development encouraged by the ECAP. Similarly, while ECAP Measure RE4 (Utility-Scale Renewable Energy Projects) supports utility-scale renewable energy generating facilities, existing land uses and zoning designations are able to accommodate this kind of land use. The analysis also concluded that Impact 3.1.2 would be less than significant, as it was determined that future implementation projects of ECAP measures will require compliance with Comprehensive Plan policies related to land use and thus would not conflict with the Comprehensive Plan. In terms of the 2040 Santa Barbara RTP/SCS, the ECAP specifically proposes Measure SCS, which supports implementation of the 2040 RTP/SCS in order to reduce per capita GHG emissions from transportation sources. Therefore, the ECAP would not conflict with the RTP/SCS.

##### **Refined Project**

Under the Refined Project, there is no change to the proposed project land use characteristics. As is the case with the ECAP analyzed in the Draft EIR, the Refined Project includes a baseline GHG emissions inventory, a forecast of future GHG emissions, a GHG reduction target of 15 percent below baseline emissions by 2020, a set of emissions reduction measures to meet the target, and a methodology for tracking and reporting emissions in the future. As is the case with the original ECAP analyzed in the Draft EIR, the Refined Project is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the environment. The Refined Project does not propose to change existing land use designations or zoning and anticipates that land uses will be consistent with the designations established by the Coastal Land Use Plan and Land Use Element of the County Comprehensive Plan. Future implementation projects of GHG-reducing measures under the Refined Project will require compliance with Comprehensive Plan policies related to land use and thus would not lead to the physical division of an established community or otherwise conflict with the Comprehensive Plan. In terms of potential conflicts with the 2040 Santa Barbara RTP/SCS, the Refined Project specifically proposes Measure SCS, which

## 10.0 REFINED PROJECT ANALYSIS

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supports implementation of the 2040 RTP/SCS in order to reduce per capita GHG emissions from transportation sources.

As is the case with the ECAP analyzed in the Draft EIR, the proposed measures under the Refined Project would be subject to further CEQA analysis of project-specific impacts on a case-by-case basis. Based on the preceding analysis, the Refined Project does not result in a new significant impact or a substantial increase in the severity of the less than significant Class III impacts identified in the Draft EIR.

### TRANSPORTATION AND CIRCULATION

#### Previous Analysis in the Draft EIR

The Draft EIR transportation and circulation analysis addressed the potential for the ECAP to negatively impact the County circulation system (Impact 3.2.1) as well as its potential to instigate roadway and traffic hazards (Impact 3.2.2). These impacts were addressed in the Draft EIR on pages 3.2-6 through -7. In the analysis of Impact 3.2.1, the Draft EIR concluded that, inasmuch as the proposed ECAP would instigate construction activities, temporary minor traffic increases could occur as a result of construction equipment vehicles and employee vehicle trips to and from construction sites; however, such traffic would be temporary in nature and would end on completion of construction. In the long term, it was determined that none of the proposed ECAP measures or actions would cause an increase in vehicle trip generation. Rather, many of the proposed measures and actions are intended to reduce vehicle miles traveled. The Draft EIR further concluded that the ECAP would not conflict with an applicable plan, program, ordinance, or policy establishing measures of effectiveness for the performance of mass/public transit, bicycle, pedestrian, or non-motorized travel. In the analysis of Impact 3.2.2, the Draft EIR determined the ECAP would not result in any new development potential or construction of facilities that would propose land use changes that are expected to alter roadway designs that would increase hazards. Conversely, the Draft EIR determined that ECAP measures would promote traffic efficiency. It was further determined that any future construction implementing ECAP measures and actions that involve roadway improvements would remain subject to County roadway design standards, such as sight distance requirements and curb-to-curb separation distances.

#### Refined Project

As is the case with the original ECAP analyzed in the Draft EIR, the Refined Project is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the environment. While the Refined Project includes GHG reduction measures that address government facilities and operations which were not included in the original ECAP, refinements to the emissions quantification methodology, and textual edits to certain reduction measures (see **Table 10-6**), none of these changes would affect transportation and circulation beyond the effects identified in the Draft EIR. The single Government Facilities and Operations measure that relates to traffic, GO 4, states that "the County shall continue to make every effort to meet its Transportation Demand Management (TDM) objectives to reach its designated rate of participation specified in the TDM Ordinance, and to reduce fuel use during business activities." The reduction measure GO 4, the refinements to quantification methodology, and the textual edits to certain reduction measures shown in **Table 10-6**, which generally are intended to change certain reduction measure actions from "required" to "optional," would not result in a new significant impact or a substantial increase in the severity of the less than significant Class III impacts identified in the Draft EIR.



**AESTHETICS AND VISUAL RESOURCES****Previous Analysis in the Draft EIR**

The Draft EIR aesthetics and visual resource analysis addressed the potential for the ECAP to negatively impact a scenic vista, scenic resources, scenic highways, and the county's existing visual character and quality (Impact 3.3.1). This analysis also addressed the potential to create light and glare (Impact 3.3.2). These impacts were addressed in the Draft EIR on pages 3.3-6 through -8.

In the analysis of Impact 3.3.1, the Draft EIR concluded that the aesthetic and visual impacts of the proposed ECAP would be largely limited to changes resulting from future improvements to the bicycle network, residential unit and industrial facility energy efficiency upgrades, GHG reduction features in new development (e.g., transit and pedestrian amenities, on-site alternative energy improvements), and other indirect improvements promoted by the ECAP. However, none of the improvements that would result from approval of the proposed ECAP would themselves be expected to substantially obstruct views or degrade visual character or quality. Future improvements to the bicycle network, as identified in the County's Bicycle Master Plan, would be primarily ground-level riding facilities and associated improvements (e.g., signage, safety improvements). Energy efficiency upgrades to existing structures would primarily involve improvements to the interior and shell of structures, and only minor external improvements are anticipated, such as replacing heating, ventilation, and air conditioning units, water heaters, and similar equipment. Similarly, the ECAP's influence on future development would be ancillary to the development itself, having little if any effect on the scale or visual character of such development. Therefore, while Santa Barbara County contains notable scenic resources, vistas, and scenic highways and has a high visual quality overall, adoption of the ECAP would not significantly interfere with the public's enjoyment of visual resources, would not conflict with policies or plans to protect views, and would not result in changes to the environment that would significantly obstruct views, change land use intensity, change vegetative cover, or reduce the county's open space or alter its natural character.

In the analysis of Impact 3.3.2, the Draft EIR determined that some physical changes could be facilitated by the ECAP that promotes installation of utility-scale renewable energy generators, which could result in glare impacts by introducing anthropogenic features that have reflective potential and by possible removal of vegetation that provides shading and shielding. However, by design, solar power generation facilities limit glare because lost reflected light results in reduced electricity production. For example, photovoltaic (PV) solar panels are designed to absorb solar radiation and thus by design are non-reflective. Nonetheless, the intensity of potential glare impacts would differ under atmospheric conditions, time of day, and time of year, and based on proximity to the source of glare. Sensitive viewers could experience direct reflection from the arrays; however, they may experience little or no glare for the majority of the day. Any potential direct reflection may only occur for a short period of the day (as the sun rises and sets) and during certain times of the year. As identified in the Draft EIR, the ECAP is a policy-level document that does not include site-specific designs or proposals for development projects, nor does it grant any entitlements for development that would have the potential to result in light and glare impacts. Future individual projects instigated by the ECAP would be reviewed on a case-by-case basis, subject to project-specific environmental review consistent with the County Environmental Thresholds and Guidelines Manual and zoning ordinances, and would have to be found consistent with state law and County policies and standard conditions of approval. Future project characteristics and locations are unknown, and any impact analysis and conclusion on level of significance would be speculative for such project-specific impacts.

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### Refined Project

The Refined Project does not change any land use designations and does not relieve any development standards for land development or infrastructure improvements. As is the case with the original ECAP analyzed in the Draft EIR, the Refined project is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the environment. While the Refined Project includes GHG reduction measures that address government facilities and operations which were not included in the original ECAP, refinements to the emissions quantification methodology, and textual edits to certain reduction measures (see **Table 10-6**), none of these changes would affect aesthetic resources beyond the effects identified in the Draft EIR. The six new Government Facilities and Operations measures (see **Table 10-6**) involve energy efficiency retrofits for existing County buildings, zero net energy design for new County buildings, the purchase of fuel-efficient/alternative-fuel automobiles for the County fleet, as needed, the procurement of products made from recycled materials, and water conservation. None of these measures would be expected to substantially obstruct views or degrade visual character or quality or create light/glare impacts. The six new Government Facilities and Operations measures, the refinements to quantification methodology, and the textual edits to certain reduction measures shown in **Table 10-6**, which generally are intended to change certain reduction measure actions from "required" to "optional," would not result in a new significant impact or a substantial increase in the severity of the less than significant Class III impacts identified in the Draft EIR.

### AGRICULTURAL RESOURCES

#### Previous Analysis in the Draft EIR

The Draft EIR addressed the potential for the ECAP to negatively impact agricultural resources (Impact 3.4.1) and concluded that, inasmuch as the proposed GHG reduction measures would encourage future physical improvement projects, such as renewable energy facilities, the proposed ECAP could indirectly result in impacts on agricultural land. This impact was addressed in the Draft EIR on pages 3.4-10 through -13. However, while the potential location of future energy generating facilities on agricultural land would result in the conversion of agricultural land and possibly the conversion of lands with Williamson Act contracts, the ECAP is not proposing to entitle or approve any specific energy generating facility projects. In addition, energy generating facilities promoted by the ECAP are already allowed on agricultural lands under existing conditions. The ECAP was determined to pose less than significant Class III impacts to agricultural resources.

#### Refined Project

There is no change in the Refined Project that would affect agricultural resources beyond that addressed in the Draft EIR. The six new Government Facilities and Operations measures involve energy efficiency retrofits for existing County buildings, zero net energy design for new County buildings, the purchase of fuel-efficient/alternative-fuel automobiles for the County fleet, as needed, the procurement of products made from recycled materials, and water conservation. None of these measures would affect agriculture. Similarly, the refinements to quantification methodology have no bearing on agriculture in the county. The textual edits to certain reduction measures are intended to change certain reduction measure actions from "required" to "optional," and thus would also not affect agriculture. Like the ECAP analyzed in the Draft EIR, the Refined Project is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to

degrade the environment. Based on the preceding analysis, the Refined Project does not result in a new significant impact or a substantial increase in the severity of the less than significant Class III impacts identified in the Draft EIR.

### BIOLOGICAL RESOURCES

#### Previous Analysis in the Draft EIR

The Draft EIR addressed the potential for the ECAP to negatively impact biological resources, specifically, natural habitat areas, sensitive species, and wildlife corridors (Impact 3.5.1), as well as wetlands and riparian habitats (Impact 3.5.2). These impacts were addressed in the Draft EIR on pages 3.5-10 through -16. The analysis of Impact 3.5.1 in the Draft EIR concluded that inasmuch as the proposed GHG reduction measures would encourage physical improvement projects, such as renewable energy facilities, the proposed ECAP would not result in impacts on sensitive and special-status species or their associated habitat and migratory corridors. This is because implementation of future ECAP measures would be required to comply with the environmental reporting requirements of CEQA following submittal of a specific development proposal, including the need to evaluate potential biological impacts for both short- and long-term impacts in the form of site-specific biological studies on a case-by-case basis consistent with the County Environmental Thresholds and Guidelines Manual and zoning ordinances. Future site-specific biological studies associated with the future implementation of ECAP measures, as required by the County Environmental Thresholds and Guidelines Manual, would identify specific impacts and mitigation measures in accordance with the County Comprehensive Plan policies and Guidelines for Assessment of Biological Resources Impacts in the Environmental Thresholds and Guidelines Manual. Potential mitigation measures could include avoiding sites with known sensitive and special-status plant species or communities and/or replacing and compensating for the loss of sensitive communities. Future individual projects would also be required to be consistent with state law and County policies and standard conditions of approval.

In terms of Impact 3.5.2, ECAP measure-supported projects in the vicinity of riparian and/or wetland areas would nearly always require a site-specific review to definitively determine the extent of impacts and the types of mitigation necessary. Implementation of future ECAP measures would be required to comply with the environmental reporting requirements of CEQA following submittal of a specific development proposal, including the need to evaluate potential biological impacts for both short- and long-term impacts in the form of site-specific biological studies on a case-by-case basis. Section D of the County Environmental Thresholds and Guidelines Manual includes habitat-specific impact assessment guidelines, which provide additional impact assessment guidelines specific to several biological communities to determine whether impacts would be significant. The County of Santa Barbara Environmental Thresholds and Guidelines Manual also contains a mitigation hierarchy. In addition to the biological analysis guidelines and mitigation hierarchy contained in the County Environmental Thresholds and Guidelines Manual, a number of regulatory mechanisms, as discussed in the Regulatory Framework section of the Draft EIR, address various types of construction-related impacts to wetlands. The Draft EIR concluded that less than significant impacts would result.

#### Refined Project

As in the case of the ECAP analyzed in the Draft EIR, the Refined Project would not result in impacts to biological resources. Implementation of reduction measures under the Refined Project would be required to comply with the environmental reporting requirements of CEQA following submittal of a specific development proposal, including the need to evaluate

## 10.0 REFINED PROJECT ANALYSIS

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potential biological impacts for both short- and long-term impacts, in the form of site-specific biological studies on a case-by-case basis consistent with the County Environmental Thresholds and Guidelines Manual and zoning ordinances. Future site-specific biological studies associated with the future implementation of ECAP measures, as required by the County Environmental Thresholds and Guidelines Manual, would identify specific impacts and mitigation measures in accordance with the County Comprehensive Plan policies and Guidelines for Assessment of Biological Resources Impacts in the Environmental Thresholds and Guidelines Manual. As stated previously, potential mitigation measures could include avoiding sites with known sensitive and special-status plant species or communities and/or replacing and compensating for the loss of sensitive communities. Individual projects would also be required to be consistent with state law and County policies and standard conditions of approval.

There is no change in the Refined Project that would affect biological resources beyond that addressed in the Draft EIR. The six new Government Facilities and Operations measures involve energy efficiency retrofits for existing County buildings, zero net energy design for new County buildings, the purchase of fuel-efficient/alternative-fuel automobiles for the County fleet, as needed, the procurement of products made from recycled materials, and water conservation. None of these measures would negatively affect biological resources. Similarly, the refinements to quantification methodology have no bearing on biological resources. The textual edits to certain reduction measures are intended to change certain reduction measure actions from "required" to "optional," and thus would also not affect biological resources. Like the ECAP analyzed in the Draft EIR, the Refined Project is a policy-level document that does not include any site-specific designs or proposals. Likewise, it does not grant any entitlements for development that would have the potential to degrade the environment. Based on the preceding analysis, the Refined Project does not result in a new significant impact or a substantial increase in the severity of the less than significant Class III impacts identified in the Draft EIR.

### NOISE

#### Previous Analysis in the Draft EIR

The Draft EIR addressed the potential for the ECAP to generate short-term construction-related noise impacts (Impact 3.6.1), groundborne vibration impacts (Impact 3.6.2), and long-term operational noise impacts (Impact 3.6.3). These impacts were addressed in the Draft EIR on pages 3.6-7 through -12. The analysis of Impact 3.6.1 in the Draft EIR concluded that short-term construction-related noise impacts would be less than significant due to the short-term nature of construction noise, the intermittent frequency of construction noise, and required compliance with the construction noise standards established as part of the Environmental Thresholds and Guidance Manual. Groundborne vibrations analyzed under Impact 3.6.2 were determined to be less than significant during construction activities due to the short-term nature and intermittent frequency of construction vibrations, the required compliance with the County Code's hourly restrictions for construction-related activities and vibration standards to avoid vibrations during times when it could potentially be more of a nuisance, and adherence to the Environmental Thresholds and Guidance Manual. It was concluded that the ECAP would not result in sources of long-term operational groundborne vibrations. The analysis of Impact 3.6.3 in the Draft EIR concluded less than significant long-term operational noise impacts with continued implementation of the County Comprehensive Plan and enforcement of County zoning ordinance standards which ensure that future development meets applicable noise criteria for land use compatibility and/or includes noise attenuation features to meet applicable noise standards.

## **Refined Project**

As is the case with the original ECAP analyzed in the Draft EIR, the Refined Project is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to increase noise levels. While the Refined Project includes GHG reduction measures that address government facilities and operations which were not included in the original ECAP, refinements to the emissions quantification methodology, and textual edits to certain reduction measures (see **Table 10-6**), none of these changes would affect county noise levels beyond the effects identified in the Draft EIR.

As in the case of the ECAP analyzed in the Draft EIR, implementation of reduction measures under the Refined Project would instigate short-term construction-related noise and groundborne vibration impacts that would be less than significant due to the short-term nature of construction noise, the intermittent frequency of construction noise, and required compliance with the construction noise standards established as part of the Environmental Thresholds and Guidance Manual. The Refined Project would not result in long-term sources of groundborne vibrations, and all resultant long-term operational noise sources would be required to comply with the County Comprehensive Plan and County zoning ordinance standards which ensure that future development meets applicable noise criteria for land use compatibility and/or includes noise attenuation features to meet applicable noise standards. Based on the preceding analysis, the Refined Project does not result in a new significant impact or a substantial increase in the severity of the less than significant Class III impacts identified in the Draft EIR.

## **AIR QUALITY**

### **Previous Analysis in the Draft EIR**

The Draft EIR addressed the potential for the ECAP to generate short-term construction-generated emissions (Impact 3.7.1), expose sensitive receptors to substantial concentrations of air toxics (Impact 3.7.2), and create objectionable odors affecting a substantial number of people (Impact 3.7.3). These impacts were addressed in the Draft EIR on pages 3.7-7 through -12. The analysis of Impact 3.7.1 in the Draft EIR concluded that short-term construction-generated air pollutant emissions would be less than significant since the County has air quality policies and requirements for construction projects as contained in the Santa Barbara County Environmental Thresholds and Guidance Manual. For instance, the County requires that all discretionary construction activities implement standard dust mitigation measures contained in the Environmental Thresholds and Guidance Manual. These standard dust mitigation measures, which ensure the control of coarse particulate matter (PM<sub>10</sub>) emissions, are enforced through an applicant-prepared construction management plan. The analysis of Impact 3.7.2 in the Draft EIR concluded that none of the subsequent actions proposed as part of ECAP measures would result in a major source of toxic air contaminants, which include industrial processes (e.g., petroleum refining and chrome-plating operations), commercial operations (e.g., gasoline stations and dry cleaners), and diesel-powered vehicle exhaust (the ECAP contains several measures seeking to reduce vehicle miles traveled). None of the subsequent actions proposed as part of ECAP measures were determined to be a major source of odors.

## **Refined Project**

As is the case with the original ECAP analyzed in the Draft EIR, the Refined Project is a policy-level document that does not include any site-specific designs or proposals, nor does it grant

## 10.0 REFINED PROJECT ANALYSIS

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any entitlements for development that would have the potential to generate air pollutants. While the Refined Project includes GHG reduction measures that address government facilities and operations which were not included in the original ECAP, refinements to the emissions quantification methodology, and textual edits to certain reduction measures (see **Table 10-6**), none of these changes would affect air quality beyond the effects identified in the Draft EIR.

As in the case of the ECAP analyzed in the Draft EIR, implementation of reduction measures under the Refined Project would instigate short-term construction-generated air quality impacts that would be less than significant due to County policies and requirements for construction projects as contained in the Environmental Thresholds and Guidance Manual. The Refined Project would not result in long-term sources of toxic air contaminants or odors. As is the case with the ECAP analyzed in the Draft EIR, the proposed measures under the Refined Project would be subject to further CEQA analysis of project-specific impacts on a case-by-case basis. Based on the preceding analysis, the Refined Project does not result in a new significant impact or a substantial increase in the severity of the less than significant Class III impacts identified in the Draft EIR.

### GREENHOUSE GASES AND CLIMATE CHANGE ADAPTATION

#### Previous Analysis in the Draft EIR

The Draft EIR addressed the potential for the ECAP to conflict with Assembly Bill (AB) 32 and the AB 32 Scoping Plan (Impact 3.8.1) as well as the effects of climate change on the unincorporated county (Impact 3.8.2). The Draft EIR determined that the ECAP would be consistent with AB 32 and the AB 32 Scoping Plan since the GHG inventory for the unincorporated county would experience a 15 percent reduction below 2007 baseline levels required under the provisions of AB 32. In terms of the effects of climate change, the Draft EIR concluded that while the exact extent of the environmental effects of climate change on the unincorporated county is not known, state provisions, in addition to existing County Comprehensive Plan policy provisions, address potential negative effects. Thus, the ECAP would not result in a significant impact relating to the effect of climate change on unincorporated Santa Barbara County.

#### Refined Project

As is the case with the ECAP analyzed in the Draft EIR, the Refined Project includes a baseline GHG emissions inventory, a forecast of future GHG emissions, a GHG reduction target of 15 percent below baseline emissions by 2020, a set of emissions reduction measures to meet the target, and a methodology for tracking and reporting emissions in the future.

The 2007 baseline emissions value attributable to the unincorporated county has been identified as 1,192,970 metric tons of carbon dioxide equivalents (MTCO<sub>2e</sub>). In order for the County to achieve consistency with AB 32, 2007 baseline emissions would need to be reduced by at least 15 percent by 2020 (to at or below 1,014,020 MTCO<sub>2e</sub> per year).

Based on the refinements to the emissions quantification methodology, the forecast of unmitigated emissions at 2020 from operations and growth in the unincorporated county would be 1,180,970 MTCO<sub>2e</sub>.

Implementation of the Refined Project would result in GHG emissions reductions in the unincorporated county of approximately 188,030 MTCO<sub>2e</sub> by 2020. In addition, State-led reduction efforts are projected to result in the reduction of another 184,200 MTCO<sub>2e</sub>. The

proposed County of Santa Barbara ECAP, in conjunction with State-led efforts such as the Renewables Portfolio Standard, Clean Car Fuel Standard (Pavley), and Building Energy Efficiency Standards, would equal reductions of approximately 372,230 MTCO<sub>2</sub>e by 2020. This amount of GHG emissions reduction is more than a 15 percent reduction from 2007 baseline emissions levels as shown in **Table 10-4**. Such reductions meet the goals established in AB 32 and the AB 32 Scoping Plan.

**TABLE 10-4  
ANNUAL GHG EMISSIONS REDUCTIONS FROM  
REFINED ECAP MEASURES (MTCO<sub>2</sub>E)**

<b>Emissions Inventory</b>	
2007 Baseline Emissions Inventory	1,192,970
2020 Unmitigated Emissions Inventory with State Reductions	1,180,970
<b>Reductions from 2020 Unmitigated Emissions Inventory</b>	
<b>Santa Barbara County Refined Energy and Climate Action Plan</b>	
Total Refined ECAP Emissions Reductions (without CCE)**	-188,030
<b>AB 32 Emissions Target (15% Below 2007 Baseline Inventory)</b>	<b>1,014,020</b>
County of Santa Barbara Refined ECAP**	992,940
AB 32 Target Achieved?	Yes

\* Due to rounding, totals may not equal the sum of component parts.

\*\* CCE (community choice energy) is not included in the calculated reductions since the feasibility of implementing such a program in Santa Barbara County is not yet known.

Based on the preceding analysis, the Refined Project does not result in a new significant impact or a substantial increase in the severity of the less than significant Class III impacts identified in the Draft EIR.

**10.4 ALTERNATIVES**

The Draft EIR includes a detailed analysis of three alternatives. Table 5-1 on page 5-11 of the Draft EIR compares the impacts of the project with the impacts of each of the three alternatives. This table has been revised to include the Refined Project, as shown in **Table 10-5**.

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**TABLE 10-5  
SUMMARY COMPARISON OF ALTERNATIVES**

<b>Environmental Impacts</b>	<b>Draft EIR Project</b>	<b>Refined Project</b>	<b>Alternative 1 (No Project)</b>	<b>Alternative 2 (Option 5)</b>	<b>Alternative 3 (Modification of BE 2 and BE 4)</b>
Land Use: Consistency with land use plans and ordinances	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Transportation and Circulation: Traffic impacts during construction and trip generation	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Transportation and Circulation: Safety of design features	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Aesthetics and Visual Resources: Scenic resources, vistas, scenic highways, and high visual quality and character	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Aesthetics and Visual Resources: New sources of light or glare	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Agricultural Resources: Conversion of agricultural land	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Biological Resources: Impact on special-status species	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Biological Resources: Impact on wetlands and riparian habitat	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Noise: Construction-related noise impacts	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Noise: Construction-related vibration impacts	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Noise: Operation-related noise impacts	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Air Quality: Construction-related air pollutant emissions	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Air Quality: Operation-related air pollutant emissions	Less than significant	Less than significant +	Less than significant S	Less than significant S	Less than significant S



## 10.0 REFINED PROJECT ANALYSIS

Environmental Impacts	Draft EIR Project	Refined Project	Alternative 1 (No Project)	Alternative 2 (Option 5)	Alternative 3 (Modification of BE 2 and BE 4)
Air Quality: Toxic air contaminants	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
Air Quality: Exposure to odors	Less than significant	Less than significant S	No impact +	Less than significant S	Less than significant S
GHG Emissions: Consistency with AB 32	Less than significant	Less than significant +	Significant impact -	Less than significant +	Less than significant impact S

*Notes:*

- S Alternative would result in similar conditions as the proposed project.
- Alternative would result in greater impacts than the proposed project.
- + Alternative would result in less impact than the proposed project.

Based on the information presented in **Table 10-5**, the Refined Project on an overall basis would result in impacts that are either similar or less than those of the Draft EIR Project. The Refined Project's impacts are less than those of the Draft EIR Project with regard to operation-related air quality impacts and impacts associated with consistency with AB 32. As shown in **Table 10-3**, the Draft EIR Project would result in reductions of 186,960 MTCO<sub>2</sub>e by 2020 and the Refined Project would result in reductions of 188,030 MTCO<sub>2</sub>e by 2020. The increased reduction of GHG emissions would also result in a reduction of operational criteria air pollutant emissions, as these emissions result from most of the same sources as GHG emissions.

The Refined Project, in comparison to the other three alternatives, is similar to Alternative 2 in terms of reducing GHG emissions. Alternative 2 would seek to strengthen some of the proposed implementation actions in terms of their emission reduction potential. These implementation actions include BE 2 – Energy-Efficient Renovations, BE 4 – Energy Scoring and Audits, WR 1 – Waste Reduction, WR 2 – Increased Recycling Opportunities, and WR 3 – Construction and Demolition Waste Recycling. Alternative 2 would result in a greater reduction of GHG emissions than both the Draft EIR Project and the Refined Project. The Refined Project is similar to Alternative 3 in terms of addressing community concerns in response to potential burdensome ECAP requirements to home owners and sellers. Alternative 3 would adjust the requirements of ECAP Measures BE 2 and BE 4 to be less stringent, thereby reducing the overall effectiveness of the ECAP. The Refined Project further incorporates improvements to GHG reductions, such as adding government facilities and operations measures, thus further reducing GHG emissions. These types of changes to a project are recognized and encouraged by CEQA as a part of a project's environmental review process. (See, for example, CEQA Guidelines Section 15002 (a)(2) and Section 15002 (j) stating that the basic purposes of CEQA include ways to “identify ways that environmental damage can be avoided or significantly reduced” and that “under CEQA, an agency must solicit and respond to comments from the public and other agencies concerned with the project.”)

Although the Refined Project results in impacts that are less than those of the Draft EIR Project and Alternative 3, Alternative 2 remains the environmentally superior alternative, as it would result in a greater reduction of GHG emissions from the 2007 baseline.

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**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
CCA <del>E</del>	Community Choice Aggregation <u>Energy</u>	Increase the amount of renewable energy used to a minimum of 50% by 2020 through community choice aggregation program or other renewable energy procurement programs.	See "Measure" box.
SCS	Sustainable Communities Strategy	Support SBCAG's Implementation of the 2040 Regional Transportation Plan and Sustainable Communities Strategy to reduce per-capita GHG emissions from transportation.	See "Measure" box.
LUD 1	Infill Development	Promote infill development.	<p>1) Support strategies for sustainable new development by adopting principles and policies which <u>that</u> encourage and expedite the permitting of mixed-use, infill, and transit-oriented development, with jobs and housing co-located together, where feasible, or in close proximity (walking/biking distance) to transit facilities.</p> <p>2) Review the Comprehensive Plan to determine the extent to which it promotes GHG emissions reductions. Recommend amendments to improve policies and implementation measures to promote GHG emissions</p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
			<p>reductions.</p> <p>3) Integrate complete streets policies and projects into updates of the Land Use Element and Circulation Elements and into new and existing <del>Community Plans</del> <u>community plans</u>.</p> <p>4) Promote the use of ground-floor or street-oriented space in commercial and mixed-use centers for retail, food service, financial institutions, and other high-volume commercial uses.</p> <p>5) Encourage new residential development to be within walking distance (<del>1/2</del> <u>half</u>-mile or less) of public activity centers such as schools, libraries, parks, and community centers.</p> <p>6) Retrofit existing, older neighborhoods to improve connectivity, redesign circulation, and create walkable streets.</p> <p>7) <del>Establish</del> <u>Consider developing</u> a program where energy-efficient mixed-use, infill, and transit-oriented development projects can trade GHG credits.</p>
LUD 2	Transit-Oriented Development	Coordinate office, commercial, industrial, and high-density residential developments with mass transit service and existing or proposed bikeways.	<p>1) Encourage employers to provide funding for reliable mass transit.</p> <p>2) Coordinate new, proposed, and existing commuter rail, mass transit service, and bikeways so that alternative transportation modes complement one another.</p> <p>3) Expand <del>the</del> existing bike network around existing development as proposed in the <u>Santa Barbara County Bicycle Master Plan</u>.</p>
LUD 3	Affordable Housing	Work to increase workforce and affordable housing in Santa Barbara County.	<p>1) Continue to provide programs, incentives, and regulations for affordable housing through the County's affordable housing requirements and inclusionary housing program.</p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
T 1	Car Sharing and Ride Sharing	Create new, additional, or improve existing, car-sharing and ride-sharing programs.	<ol style="list-style-type: none"> <li>1) Work with Traffic Solutions to expand North County Santa Barbara <del>car-pool/van-pool</del><u>carpool/vanpool</u> programs and increase bus line options.</li> <li>2) Explore expanding car-sharing options in Santa Barbara County with Traffic Solutions and the Community Environmental Council.</li> <li>3) Work to <del>effective</del><u>effectively</u> implement the CalVans program in Santa Barbara County.</li> <li>4) Support SBCAG's Park and Ride Program, <u>such as by coordinating with SBCAG during the County's land use approval process.</u></li> </ol>
T 2	Commuter Incentives	Work cooperatively with major local employers <u>and/or Traffic Solutions</u> to offer incentives and services that decrease single-occupant <del>occupant</del> <u>occupancy</u> automobile commuting.	<ol style="list-style-type: none"> <li>1) Encourage and support employers, especially small and medium-sized employers, to voluntarily prepare and implement a Transportation Demand Management (<u>TDM</u>) program for their employees.</li> <li>2) Provide TDM program education and community briefings annually and/or semi-annually.</li> </ol>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
T 3	Alternative-Fuel Vehicles and Incentives	Increase the use of alternative-fuel vehicles, and plan for the development of alternative-fuel infrastructure.	<p>1) <del>Require pre-wiring for</del> <u>Develop new electric vehicle (EV) ready ordinance requiring new one- and two-family dwelling units to install conduit for future installation of an EV charging stations in new developments.</u></p> <p>2) <del>Support the efforts of Plug In Santa Barbara to</del> <u>to plan for and deploy electric vehicle and alternative-fuel infrastructure in Santa Barbara County.</u></p> <p>3) <del>Revise parking requirements for</del> <u>Encourage public and new commercial developments to include designated stalls for low-emitting, fuel-efficient vehicles and carpool/vanpool vehicles for a minimum of 8% of total parking capacity and to pre-wire stalls for future electric vehicle charging stations for 2% of total parking capacity.</u></p> <p>4) <del>Amend zoning ordinance to ensure</del> <u>Ensure that alternative-fuel stations and support facilities are allowed uses in land use designations which that currently allow gas and service stations.</u></p> <p>5) Identify alternative-fuel projects to seek funding through <del>Measure A.</del> <u>the CEC, for example.</u></p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
T 4	Alternative and <u>Active</u> Transportation	Enhance alternative and <u>active</u> transportation.	<p>1) <del>Promote</del><u>Continue to promote</u> the efforts of the Santa Barbara Car Free program.</p> <p>2) <del>Require</del><u>Continue to require</u> reduced-fare or free transit passes to residents or <del>employees</del><u>employers</u> as mitigation of significant traffic impacts for projects.</p> <p>3) <del>Require</del><u>Continue to require</u> projects to include mass transit improvements, such as bus stops, <del>pull-outs</del><u>pullouts</u>, and shelters, or funding to assist in the installation of mass transit improvements as mitigation for significant impacts.</p> <p>4) Continue to identify alternative transportation projects for funding under Measure A.</p> <p>5) <del>Continue to expand</del><u>Expand</u> transit opportunities in northern Santa Barbara County and <u>explore expansion</u> in agricultural communities.</p> <p>6) Encourage bus service providers in the county to <del>expand express services</del><u>provide more frequent service</u> and to purchase <del>alternatively fueled</del><u>alternative-fuel</u> and <del>accordion</del><u>articulated</u> buses <u>for greater capacity</u>.</p> <p>7) Work with the <del>chamber</del><u>Chamber of commerce</u><u>Commerce</u> to encourage alternative and active transportation opportunities <del>in</del><u>within</u> the tourism industry.</p> <p>8) <del>Work</del><u>Collaborate</u> with <del>Traffic Solutions</del><u>interested organizations</u> to establish a bike-sharing program.</p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

Measure		Actions for 15% GHG Reduction	
#	Title	Measure	
T 5	Integrated Bikeway System	Complete an integrated bikeway system, linking residences with commercial centers, work locations, schools, parks, and mass transit facilities; to be a high priority for promoting the use of the bicycle as a primary mode of transportation.	<p>1) <del>Fully</del> <u>Continue to</u> implement the Santa Barbara County Bicycle Master Plan.</p> <p>2) <del>Support</del> <u>Continue to support</u> educational programs for safe and lawful biking, <u>such as through the Santa Barbara Bicycle Coalition and the Coalition for Sustainable Transportation (COAST).</u></p> <p>3) Install signage to promote safe biking and discourage actions such as biking on sidewalks.</p> <p>4) <del>Expand</del> <u>Continue to seek funding to expand</u> the existing bicycle network, especially in <u>the North County.</u></p> <p>5) <del>Add</del> <u>Continue to add</u> more Class I and II bike lanes, <u>through local Measure A funding and innovative treatments for buffered and protected lanes.</u></p>



**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
T 6	Pedestrian Improvements	Improve pedestrian convenience, comfort, and safety.	<ol style="list-style-type: none"> <li>1) Update the <u>Circulation Element</u> countywide <u>and community plan</u> design guidelines to create maximum connectivity between neighborhoods, streets, and projects for pedestrian and bicycle travel.</li> <li>2) Work with COAST to support the expansion of Safe Routes to School programs to all elementary and middle schools in the county, and assess potential roadway improvements for increased safety in school zones.</li> <li>3) <del>Amend applicable ordinances to</del> <u>Where appropriate,</u> direct new development to construct <u>walkable</u> paths that connect land uses and other non-motorized routes and <u>provide safe road crossings, marked, high-visibility crosswalks</u> at major intersections.</li> <li>4) <del>Facilitate pedestrian needs, and provide</del> <u>Provide</u> and ensure well-lit, safe, <del>well connected,</del> accessible <u>connections (e.g. walkways and sidewalks)</u> to commercial nodes, schools, and recreation <u>areas</u> to increase the walkability of communities in the county, <u>especially considering the needs of the growing senior population.</u></li> <li>5) Continue to complete gaps in the existing sidewalk system and improve pedestrian crossings <u>at intersections with roadways and train tracks.</u></li> <li>6) Support enforcement of <u>the need for vehicles yielding to yield</u> for pedestrians in crosswalks.</li> </ol>
T 7	Vehicle Idling	Reduce vehicle idling through enforcement and education targeted toward commercial vehicle operators, school parents, and government employees.	<ol style="list-style-type: none"> <li>1) Support enforcement and education to reduce vehicle idling.</li> </ol>
T 8	Traffic Signal Synchronization Efficiencies	Implement traffic signal synchronization <u>and</u> <u>detection</u> technologies or traffic calming measures to reduce idling emissions.	<ol style="list-style-type: none"> <li>1) <del>Work</del> <u>Continue to review to install</u> traffic signal synchronization and video signal detection <u>technologies</u> for cyclists and off-peak traffic light prompts for cyclists, pedestrians, and cars on minor connector <u>traffic through intersections.</u></li> <li>2) <u>Continue to transition to LED lights in both traffic signals and overhead lamps where feasible.</u></li> </ol>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
T 9	Commuter Rail Connections	Develop commuter rail connections between employment centers.	<p>1) Continue to <del>work</del> <u>support SBCAG in working with Union Pacific to accommodate commuter rail</u> <del>reach agreement on track sharing.</del></p> <p>2) Work with <del>Traffic Solutions</del> <u>local jurisdictions and transit providers</u> to provide <u>connecting (e.g. jitney)</u> services from station to final destination.</p> <p>3) <del>Provide</del> <u>Work with Amtrak to provide amenities at rail connection-stations such as comfort stations and bike racks.</u></p>
BE 1	Energy Efficiency Education and Outreach	<p>Increase public energy conservation and awareness. <del>Provide</del> <u>provide</u> information and education to the general public, businesses, and organizations on the importance of energy conservation and available programs, products, and incentives regarding energy efficiency and alternatives. <del>Promote</del> <u>promote</u> existing low-income energy conservation and weatherization programs; and coordinate with local utility providers and nonprofit corporations to develop additional energy-efficiency programs.</p>	<p>1) <del>Work</del> <u>Continue to work</u> with public utilities, private businesses, organizations, and governmental agencies to develop guidelines on energy-efficient design. These guidelines should be disseminated as early in the planning process as possible (e.g., include the guidelines with all initial permit applications, disseminate at the permit zoning counter and at pre-application meetings).</p> <p>2) <del>Work</del> <u>Continue to work</u> with public utilities, educational facilities, County departments, city departments, and others that have existing outreach programs to disseminate materials about energy conservation and programs available to the general public, <u>particularly via a new countywide sustainability website.</u></p> <p>3) <del>Work</del> <u>Continue to work</u> with public utilities, private businesses, organizations, and governmental agencies to develop outreach programs designed to inform the general public about the cost and benefits of energy efficiency, including technical options, funding, and incentive programs.</p> <p>4) <del>Establish</del> <u>Continue</u> public outreach (elementary school component, public workshops, etc.) and employee education mechanisms <u>(e.g. lunch and learns)</u> to teach about energy-efficiency and other climate-related initiatives.</p> <p>5) Continue to encourage and promote utility provider energy conservation programs for residential, commercial, industrial, agricultural, and governmental buildings.</p> <p>6) <del>Encourage</del> <u>Continue to encourage</u> the development of green building and weatherization training programs.</p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
			<p>7) <del>Encourage</del><u>Continue to encourage</u> builders to make all new construction solar-ready and to inform their clients about the option to install both solar water heating and photovoltaics.</p> <p>8) <del>Support</del><u>Continue to support</u> programs like the Community Action Commission of Santa Barbara County, which provide free energy services to low-income households, including weatherization, furnace repair, and water heater replacement.</p>
BE 2	Energy-Efficient Renovations	Incentivize homeowners and commercial and industrial building owners to improve the energy efficiency of existing buildings upon renovation or alteration. <u>Support; support</u> and provide resources for tax credits, grants, loans, and other incentives to assist the public, businesses, and local agencies with the purchase of energy-efficient equipment.	<p>1) <del>Maintain a countywide website with resources for tax credits, grants, loans, and other incentives for the purchase of energy efficient equipment that can build on existing department websites. Require that applicable non-residential alterations or additions comply with current minimum CALGreen standards as they apply to new construction.</del></p> <p>2) <del>Require energy audits checklist for all residential building permits valued greater than \$10,000, offer for additions and/or alterations excluding repair and maintenance. Offer tutorial on how to complete the energy checklist. Provide information on potential cost savings and available rebates or other incentives. Explore expedited building permit plan check for implementing audit recommendations, and consider providing a rebate for completing the audit or or a waiver of building permit fees if upgrades were completed. for implementing checklists recommendations. Applicants will also be directed to emPower’s Energy Coach program, which provides free home energy site visits.</del></p> <p>3) <del>Provide energy-audit information on different residential building types in each community. These pilot audits would provide general information about efficient retrofits in different building types without requiring each building to complete an audit.</del></p> <p>4) <del>Investigate incentivizing</del><u>Continue to incentivize</u> energy-efficient retrofits through direct <del>financial</del><u>rebates and</u></p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
			<p><del>financing, and investigate additional</del> incentives, such as property tax rebates <del>or subsidies.</del></p> <p>5) Encourage participation in the <del>County's emPowerSB</del>County's emPower Central Coast Program and Energy Upgrade California.</p> <p>6) <del>Maintain a website with resources for tax credits, grants, loans, and other incentives for the purchase of energy-efficient equipment</del></p> <p><u>Reconsider pursuing</u> participation in an established program or development of a County program, such as commercial PACE, to incentivize energy-<u>efficiency</u> upgrades in commercial and multi-family buildings.</p>
BE 3	Green Business Participation	Increase participation in the Santa Barbara County Green Business Program ( <u>GBP</u> ).	<p>1) Highlight the efforts of businesses participating in the Santa Barbara County Green Business Program.</p> <p>2) Provide information about the Santa Barbara County Green Business Program when new business licenses are received by the County Treasurer/Tax Collector.</p> <p>3) Support the Green Business Program <del>through additional funding and dedicated staff time.</del></p>
BE 4	<u>Energy Scoring and Audits</u> <u>Energy Efficiency Education and Outreach to New Homeowners</u>	<del>Improve</del> <u>Promote</u> energy efficiency <u>upgrades</u> of buildings <del>at the time of sale for all residential buildings, and disclose, and encourage disclosure of</del> energy use history when nonresidential buildings are leased or sold.	<p>1) <del>Require residential property owners to complete or comply with a specified set of energy efficiency upgrades to their home at the time of building sale or within one year from the close of escrow including:</del></p> <ul style="list-style-type: none"> <li>•<del>Toilets</del> — 1.28 gallons per flush, or flow reduction devices</li> <li>•<del>Showerheads</del> — 2.0 gallons per minute at 80 psi flow rate</li> <li>•<del>Faucet aerators</del> — 1.8 gallons per minute flow at 60 psi rate for kitchens and 1.5 gallons per minute flow at 60 psi rate for bathrooms</li> <li>•<del>Water heater blankets</del> — insulation wrap of R-12 value</li> <li>•<del>Hot &amp; cold water piping</del> — insulate the first two feet from the heater to R-3 value</li> </ul>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
	<p><u>and</u> <u>Nonresidential</u> <u>Building Owners</u></p>		<ul style="list-style-type: none"> <li>• Hot water piping in pumped, re-circulating heating systems—insulate all pipes to R-3 value</li> <li>• Exterior door weatherstripping—permanently affix weather stripping and door sweeps or door shoes</li> <li>• Furnace duct work—seal duct joints and add insulation wrap to R-6 value</li> <li>• Fireplace chimneys—must have dampers, doors, or closures</li> <li>• Ceiling insulation—insulate to R-30 value or greater</li> <li>• Common area lighting (multi-unit buildings)—replace incandescent bulbs with compact fluorescent lamps (CFL) of at least 25 lumens.</li> </ul> <p><u>Develop an outreach program to encourage new homeowners to make energy-efficient upgrades when remodeling or repairing their homes. Outreach will include coordination with local contractors and realtor associations. New homeowners will be encouraged to utilize emPower’s Energy Coach program, which provides free energy site visits.</u></p> <p>2) Encourage all nonresidential properties, even those not covered by AB 1103, to provide buyers or tenants with the previous year's energy use by documenting use through the EPA's EnergyStar Portfolio Manager with a 50% participation rate goal by 2016. If a 50% participation rate is not achieved by <del>2020</del><u>2016</u>, the County will consider requiring participation of building owners by 2020.</p> <p>3) Provide resources for individuals self-auditing their <del>home's</del><u>home</u> or <del>business's</del><u>business</u> energy efficiency.</p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
BE 5	Community Forestry	Maintain and expand the <u>drought-tolerant and native tree population</u> to enhance the cooling benefits.	<ol style="list-style-type: none"> <li>1) Consider developing a shade tree program that provides free native <u>or drought-tolerant</u> trees to residents and businesses for planting adjacent to buildings to reduce building heat gain.</li> <li>2) <del>Require</del> <u>Amend zoning ordinance to require</u> landscape plans to include shade trees in parking lots and street trees, where appropriate.</li> <li>3) Assess existing trees on a proposed project site to determine compatibility with landscaping, shading, and solar access goals, and protect existing trees to the maximum extent feasible.</li> <li>4) Develop a comprehensive community tree program <u>or adopt the Street Tree Policy</u> for planting and maintaining <u>drought-tolerant or native</u> trees on County-maintained roads, medians, and public parking lots.</li> <li>5) Continue tree replacement and mitigation <del>requirements</del> when removing trees with new development.</li> <li>6) Continue to require the protection of native trees on land with proposed development.</li> <li>7) Form partnerships with local advocacy and community groups to fund the planting and maintenance of native <u>or drought-tolerant</u> street trees.</li> </ol>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
BE 6	Smart Grid Technology	Support the local utility providers' implementation of smart grid technology in new and existing residential and nonresidential properties.	<ol style="list-style-type: none"> <li>1) Encourage the installation of real-time energy monitoring (such as smart meters) for natural gas, electricity, and water meters on all residential and nonresidential buildings.</li> <li>2) Work with the utility companies to develop a web-based application to provide customers with real-time feedback on their energy consumption and related costs.</li> <li>3) Encourage building users to install smart grid integrated appliances that can be automated to run when electricity costs are lowest and controlled remotely through a web or phone application.</li> <li>4) Encourage the installation of energy monitors and smart grid appliances in new residential and nonresidential buildings as such appliances become commercially available and economically feasible.</li> </ol>
BE 7	Lawn and Garden Equipment	Increase the use of electric or alternative-fuel lawn and garden equipment through the development of an exchange or rebate program.	<ol style="list-style-type: none"> <li>1) Work with the local APCD <del>Local APCD</del> <u>Santa Barbara County Air Pollution Control District (SBCAPCD)</u> to include lawn and garden equipment in the Cash for Cleaner Engines program.</li> <li>2) Discourage the use of lawn and garden equipment with two-stroke engines.</li> </ol>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
BE 8	Energy Efficiency and Green Building Standards	Implement energy-efficiency and green building practices in new and existing developments to exceed the California Green and Building Standards Code (Title 24) standards.	<p>1) Continue to use the Smart Build Santa Barbara (<u>SB<sup>2</sup></u>) Committee, designated by the County Building Official, to incentivize green building practices. The committee will function on a voluntary basis and comprise professionals with specific expertise in energy-efficient building, including the gas and electric utilities, <u>as well as architects</u>, and energy specialists. Its membership <del>shall</del><u>will</u> be approved by the County Building Official.</p> <p>2) <del>Develop and apply permit streamlining for solar energy systems.</del></p> <p>2) <del>3) Require</del><u>Encourage</u> applicants to exceed the California <del>Green Building</del><u>Energy</u> Standards Code (Title 24, Part 6) by 15% and earn 25 points for residential buildings or 15 points for nonresidential buildings from the County's <del>Smart Build Santa Barbara</del><u>SB<sup>2</sup></u> checklist.</p> <p>3) <del>4) Encourage</del> the installation of energy-efficient materials and equipment that <del>substantially</del> exceed the requirements of Title 24 for all new and existing development.</p> <p>4) <del>5) Provide</del><u>Explore providing</u> incentives <del>like</del><u>such as</u> expedited building permit plan check and energy plan check fee reductions to development projects that achieve CALGreen's Tier 2 standard or beyond. Investigate providing additional incentives for implementing <del>environmental</del><u>energy</u> efficiency and green building practices.</p> <p>5) <del>6) Provide</del><u>Continue to provide</u> homeowners and commercial building owners with information on <del>cost/ and benefit analysis</del> for energy-efficient measures and available audit and rebate programs. The information would be disseminated early in the planning process <u>and may be available via a countywide sustainability website.</u></p> <p>6) <del>7) Encourage</del><u>Continue to encourage</u> energy-efficient upgrades on all development projects.</p> <p>7) <del>8) Encourage</del> the use of post-consumer recycled content and/or certified sustainable production in building materials.</p>



**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
			<p>8) <del>9)</del> Encourage building design, materials production, and construction practices that minimize waste.</p> <p><del>9) 10)</del> <del>Provide</del> Continue to provide resources and explore providing incentives to residents and businesses on carbon-reduction actions in existing buildings, including energy efficiency, renewable energy, choice of materials, and building reuse.</p>
BE 9	Efficient Building Design	Assist architects, builders, and others in using state-of-the-art energy technology, design, and spatial orientation for more efficient buildings. <del>Increase; increase</del>	<p>1) <del>Encourage</del> Continue to encourage the use of energy-efficient equipment, including but not limited to <del>Energy Star</del> EnergyStar appliances, high-energy efficiency equipment, heat recovery equipment, and building energy management systems, in all new and existing development.</p> <p>2) Encourage new development projects to utilize cool pavement materials, provide shade from structures covered by solar panels, or use an open-grid pavement system to reduce the heat island effect.</p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
		<p>the use of passive, solar design and <del>day lighting</del> <u>daylighting</u> in existing and new structures.</p>	<p>3) Encourage the use of alternative, energy-efficient construction types (straw bale, insulated block, rammed earth, pumice-crete, etc.), especially using locally available materials.</p> <p>4) Encourage projects to install solar energy systems for heating swimming pools.</p> <p>5) Encourage the installation of green roofs or cool roofs or minimizing the use of dark materials on roofs to achieve a minimum solar reflectivity.</p> <p>6) <del>Encourage</del> <u>Continue to encourage</u> the replacement of inefficient appliances, such as natural gas and propane space and water heating/<u>furnaces</u>, with more efficient and/or alternative-fuel appliances.</p> <p>7) Promote the following design techniques to maximize solar resources:</p> <ul style="list-style-type: none"> <li>a. Passive solar design, thermal mass, and insulation to reduce space heating and cooling needs.</li> <li>b. Shading on east, west, and south windows with overhangs, awnings, or deciduous trees.</li> <li>c. Sustainable site design and landscaping to create comfortable microclimates.</li> <li>d. Use of lighting shelves, exterior fins, skylights, atriums, courtyards, or other features to enhance natural light penetration.</li> </ul> <p>8) Develop an informational sheet that describes passive solar designs (orientation of buildings, vegetative shading, light-colored roofs, daylighting, etc.) and other energy efficiency features. This sheet would be disseminated early in the planning process and should refer applicants to the <u>Smart Build Santa Barbara<sup>2</sup> Program</u> for further information and guidance.</p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
BE 10	Construction Equipment Operations	Implement best management practices ( <u>BMPs</u> ) for construction equipment operation. <del>Examples;</del> <u>examples</u> of BMPs include reduced equipment idling, use of alternative fuels or electrification of equipment, and proper maintenance and labeling of equipment.	1) Develop <u>informational resources, such as a brochure</u> , for best practices for construction equipment operation.
BE 11	Energy Code Training	Maintain and strengthen the existing training of Planning and Development, Building <del>&amp;</del> and Safety Division personnel to remain proficient and consistent in reviewing plans for compliance with the energy code.	1) Continue to educate staff and the public about green building through partnerships with local nonprofit organizations and professional planning and building organizations.

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
RE 1	Alternative Energy Development	Increase the use of alternative energy technology in appropriate new and existing development.	<p>1) Support the establishment of federal and state funds to provide low-interest loans for alternative energy technology.</p> <p>2) Expand <del>emPowerSB</del><u>emPower Central Coast</u> to allow for funding of multi-family housing and alternative energy packages, <u>such as solar-only projects on single-family housing.</u></p> <p>3) Where appropriate and feasible, remove impediments (e.g., prolonged review due to a proposal including a new or different technology) to the utilization of alternative energy technologies that are cost-effective and contribute to improved environmental conditions.</p> <p>4) Reconsider <del>Commercial</del><u>commercial</u> PACE programs to finance energy efficiency and renewable energy improvements.</p> <p>5) Encourage the use of <del>anaerobic</del><u>anaerobic</u> digesters in agriculture, <u>wastewater treatment, and solid waste management.</u></p> <p>6) Identify policies and practices to attract businesses that develop or market alternative energy technologies.</p> <p>7) Require new buildings to install renewable energy systems or be built "renewable energy ready" as follows:  <del>Single family residential projects, multi-family projects under 4 units, and commercial projects less than 10,000 square feet must be built in a manner that future photovoltaic installation could be installed.</del>  <del>Multifamily residential projects greater than 4 units, and commercial projects larger than 10,000 square feet must provide at least 1 kW of renewable energy per 1,000 square feet.</del> <u>Develop the solar photovoltaic (PV) ready construction ordinance to require new single-family dwelling units to be built to accommodate future solar PV system installation. The ordinance will include regulations requiring electric panel sizing to accommodate future improvements, the installation of conduit for future roof-mounted solar PV system, and the reservation of a minimum of 250 square feet of the south-facing roof for future installation of a solar PV or solar water-heating system.</u></p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
RE 2	Solar Water Heaters	Increase the replacement of existing water heaters with <u>high-efficiency, tankless, or solar water heaters.</u>	1) <del>Require</del> <u>Continue to require</u> new residential development <u>to use high-efficiency water heaters or tankless heaters and continue to encourage new and existing development to participate in the State's State's CSI-Thermal program, which provides rebates to utility customers who install solar thermal systems to replace water-heating systems powered by electricity or natural gas.</u>
RE 3	Alternative Energy Incentives	Adopt a policy or program that offers incentives (such as streamlined permitting, permit waivers, or fee waivers) to encourage a switch in electricity generation from fossil fuels to renewable sources through small-scale renewable electricity generation.	1) <del>Expedite</del> <u>Continue to expedite</u> review of solar projects by <del>the Building &amp; Safety, County Fire, and Montecito Fire Division.</del> 2) <del>Develop an ordinance for the development of small commercial solar projects.</del> <u>Pursue updates to the small wind ordinance to include areas subject to Coastal Commission review.</u> 3) <del>Encourage the use of</del> <u>Provide information on</u> group purchasing programs of solar equipment <u>and other funding options</u> to encourage renewable energy installations. 4) <del>Implement</del> <u>Consider implementing</u> a group purchasing program in partnership with local solar installers, green builders, or <del>a non-profit</del> <u>nonprofit organizations</u> to implement solar electricity on single-family residential, multi-family residential, and commercial properties.
RE 4	Utility-Scale Renewable Energy Projects	Promote the use of clean alternative energy production by encouraging development of utility-scale renewable electrical generation facilities.	1) Support the use of renewable energy sources such as sun, wind, and wave, and waste-to-energy production <u>(such as the Resource Recovery Project using anaerobic digestion).</u> 2) <del>Develop an</del> <u>Consider expanding</u> ordinance <del>to allow</del> <u>allowing</u> installation of photovoltaic solar systems on agricultural land.

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
IEE 1	Efficient Equipment Incentives	Support legislation for tax credits, grants, loans, and other incentives to assist the public, businesses, and local agencies with the purchase of energy-efficient <u>industrial</u> equipment.	<ol style="list-style-type: none"> <li>1) <del>Support</del> <u>Continue to support</u> the development of state and federal resources such as tax credits, loans, and other incentives for the purchase of energy-efficient <u>industrial</u> equipment.</li> <li>2) Provide outreach and education, <u>particularly via a countywide sustainability website</u>, to large industrial energy users to increase awareness of utility-sponsored incentive and rebate programs specific to large equipment and operations.</li> </ol>
IEE 2	Energy Management Programs	Increase industrial energy <del>user</del> <u>users to</u> participation in energy management programs such as the EnergyStar Benchmarking Program to ensure the efficient use of energy resources and proper operation of equipment and facilities.	<ol style="list-style-type: none"> <li>1) Provide resources, <u>(such as a countywide sustainability website)</u>, educational programs, and incentives for energy management programs to ensure efficient use of energy resources and proper operation of equipment and facilities.</li> </ol>
IEE 3	Efficient Upgrade Incentives	Implement energy efficiency upgrades at industrial facilities through streamlining permit review, providing rebates for audits, and highlighting best practices among similar energy users.	<ol style="list-style-type: none"> <li>1) <del>Establish a streamlined permit review process for completion of</del> <u>Pursue incentives to encourage energy efficiency upgrades at industrial facilities through 2016. After 2016, evaluate. Evaluate</u> program participation <del>in audits</del> and consider a mandatory program if participation falls below 10% of total industrial facilities.</li> <li>2) Develop <u>informational</u> resources for best practices among industrial facilities.</li> </ol>
IEE 4	Efficient Equipment <del>Incentives 2</del>	Increase the use of energy-efficient or EnergyStar-rated equipment at new or renovated industrial facilities.	<ol style="list-style-type: none"> <li>1) Provide education, resources, and assistance, <u>such as via a countywide sustainability website</u>, for the installation of energy-efficient equipment at new or renovated industrial facilities.</li> <li>2) Support or partner with state agencies or nonprofit groups to implement an energy efficiency retrofit program to increase energy efficiency in existing industrial facilities.</li> </ol>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
WR 1	Waste Reduction	Continue to support the programs associated with efficient waste collection and recycling, public school education, and composting.	<ol style="list-style-type: none"> <li>1) <del>Enhance</del><u>Continue to enhance</u> community understanding of resource recovery and waste management programs <u>such as by placing stickers on recycling bins, distributing refrigerator magnets, maintaining a website, and distributing brochures.</u></li> <li>2) Continue the home composting education campaign and the discounted sale of composting bins.</li> <li>3) <del>Establish a program that removes</del><u>Continue to look for opportunities to remove</u> food waste from landfills, <u>such as curbside composting for restaurants.</u></li> <li>4) Continue to implement recycling programs for schools and businesses.</li> <li>5) Support environmentally preferable purchasing programs.</li> <li>6) Support waste reduction regulations such as a plastic bag ban.</li> <li>7) <del>Develop</del><u>Continue to implement</u> an evaluation mechanism to measure waste prevented by <u>preservation, reduction, reuse, and thoughtful consumption and recycling.</u></li> </ol>
WR 2	Increased Recycling Opportunities	Seek additional opportunities for county residents to recycle cardboard, glass, paper, and plastic products.	<ol style="list-style-type: none"> <li>1) <del>All</del><u>Consider amending the zoning ordinance to require all</u> public and private events <u>requiring</u> <del>subject to a discretionary temporary use or special event permit must</del> <u>to</u> implement a waste management plan that meets County approval for providing recycling and composting opportunities at such events.</li> <li>2) Implement <del>at</del><u>the Resource Recovery Project's</u> centralized processing facility for <del>all-waste, or another</del> <u>mechanism for increasing the diversion rate.</u></li> <li>3) Consider addition of new materials to comingled recyclable materials as markets develop.</li> </ol>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
WR 3	Construction and Demolition Waste Recycling	Increase the recycling and reuse of construction waste to reduce energy consumption associated with extracting and manufacturing virgin materials.	<ol style="list-style-type: none"> <li>1) <del>All</del><u>Continue to require all</u> demolition projects requiring a discretionary permit <del>must</del><u>to</u> implement a viable recycling plan that meets County approval and includes provisions to maximize recycling of asphalt, concrete, and equipment, and to minimize disposal of wastes into hazardous waste and solid waste management facilities to the maximum extent feasible.</li> <li>2) <del>Promote</del><u>Continue to promote</u> the reuse of construction waste by educating the public about material reuse facilities and programs.</li> <li>3) <del>Develop</del><u>Maintain and update as needed</u> guidelines for managing construction-generated wastes.</li> <li>4) <del>Require</del><u>Continue to encourage</u> asphalt <del>removed</del><u>removal</u> from roads and paved structures to be recycled to the maximum extent feasible <u>for all projects</u>.</li> <li>5) <del>Require</del><u>Continue to encourage</u> the use of recycled materials in roadway and paved surface construction <u>to the maximum extent feasible for all projects</u>.</li> </ol>
WR 4	Landfill Disposal Reductions	Reduce or minimize GHG emissions from waste materials deposited into landfills.	<ol style="list-style-type: none"> <li>1) <del>Develop best management practices</del><u>Continue to develop and promote programs for waste reduction, reuse, and recycling including backyard composting program, green waste collection and mulch program, and the County's new Food Forward program to reduce commercially generated food waste</u> <del>and utilize new technologies for reducing GHG emissions from active landfills.</del></li> <li>2) <del>Conduct a waste characterization study</del><u>Continue to develop programs and facilities, such as the Resource Recovery Project, that target the diversion and recycling of organic waste, which is the primary cause of methane gas production at landfills.</u></li> </ol>



**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
WR 5	Clean Waste Collection Vehicles	Reduce GHG emissions from waste collection vehicles through the use of alternative fuels.	<ol style="list-style-type: none"> <li>1) <del>Require</del><u>Continue to require</u> the installation of particulate filters on pre-2007 waste collection vehicles to reduce particulate emissions. Older trucks that are not good candidates for retrofit should be phased out of operation.</li> <li>2) <del>Require</del><u>Continue to require</u> alternative-fuel vehicles in all <del>new</del> contracts with waste haulers, <u>per existing waste hauler franchise agreements.</u></li> </ol>
AG 1	Local Food Programs	Increase local food production and distribution.	<ol style="list-style-type: none"> <li>1) <del>Support the development of edible landscapes, neighborhood gardens, and backyard gardening through educational programs.</del></li> <li>2) <del>Provide</del><u>Pursue funding to research and identify education and outreach opportunities for implementing to support and enhance local food programs.</u></li> <li>3) <del>Reduce emissions from the transport of county agriculture related products by encouraging grocers to purchase local food.</del></li> <li>4) <del>Encourage reduced consumption of resource-intensive products.</del></li> </ol>
AG 2	Agricultural Conservation Practices	Promote the use of <del>responsible science-based</del> agricultural practices; <del>such as those established by various Good Agricultural Practice programs, and seek to expand those programs to include science-based soil, fertilizer, water, crop rotation, and fuel management practices.</del>	<ol style="list-style-type: none"> <li>1) <del>Work with</del><u>Research, identify, and pursue funding for organizations such as the University of California Cooperative Extension, UCCE and CRCD that have the capacity to develop and disseminate appropriate voluntary agricultural management practices for the application of pesticides and fertilizers, tillage and contribute to funding voluntary implementation of those practices, cover crops, crop rotation, and other techniques to reduce nitrous oxide emissions, maximize carbon sequestration, and reduce fuel use.</u></li> </ol>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
AG 3	Agriculture Equipment	Work with the <del>APCD</del> <u>SBCAPCD</u> to increase the use of alternatively-fueled equipment in agricultural operations through education, incentives, or revisions to existing regulations.	<ol style="list-style-type: none"> <li>1) Continue to support the <del>APCD's</del><u>SBCAPCD's</u> participation in the Carl Moyer Program to provide rebates for retrofitting or replacing off-road equipment.</li> <li>2) Encourage the use of non-fuel alternatives <del>such as goats</del> for vegetation management.</li> </ol>
AG 4	Energy-Efficient Agriculture Operations	Increase agriculture-related energy conservation through appropriate <del>and practical</del> <u>efficient energy, water, and resource management practices</u> <del>technology</del> .	<ol style="list-style-type: none"> <li>1) <del>Support the voluntary installation of energy efficient irrigation systems and other energy conservation system devices.</del></li> <li>2) <del>Encourage</del> <u>Pursue funding sources and/or provide seed funding for local organizations such as UCCE and CRCD to research and identify opportunities to encourage</u> landowners to participate in voluntary energy conservation programs through the provision of incentives.</li> <li>3) <del>Evaluate potential efficiency improvements in agriculture-related groundwater delivery.</del></li> <li>4) Encourage the State to enact legislation that promotes environmentally sustainable farming practices.</li> <li>5) <del>Encourage participation in self-assessments and certification programs.</del></li> </ol>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
AG 5	Agriculture Irrigation Improvements	Continue to support the programs of the <del>SoH</del> <u>USDA Natural Resource Conservation Service, Resource Conservation Districts, UC Cooperative Extension UCCE/Farm Advisor</u> , utility companies, and others that address efficient irrigation because of their associated energy benefits.	<del>1) Continue to support the smart voluntary installation of energy-efficient irrigation technology education campaign for smart irrigation controllers and rotating sprinkler nozzles.</del> <del>2) Encourage the use of irrigation only between 3 a.m. and two hours after sunrise.</del> <del>3) Encourage the use of irrigation controllers with rain sensors, gravity fed systems, and drip irrigation and other energy conservation system devices.</del> <del>2) Evaluate potential efficiency improvements in agriculture-related groundwater delivery.</del> <del>3) 4) Investigate setting up a funding sources and mechanisms such as grants, mitigation fee program tools, and other options to offset the costs of installing efficient irrigation.</del>
AG 6	Agriculture Protection and Open Space Easements Preservation	Facilitate the increased use of <del>agriculture and open space easements through zoning, dedication of public funds, and mitigation fees</del> <u>policies</u> to protect carbon-sequestering environments and to support local resource-based industries.	<del>1) Review the County Land Use Development Code and Comprehensive Plan for opportunities to strengthen zoning.</del> <del>2) Identify opportunities to support researchSupport development of carbon sequestration in open spaces and agricultural operations.</del> <del>3) Encourage property owners to participate in carbon sequestration programs developed by the State or other entities.</del> <del>2) EstablishSupport development of a GHG credit system.</del> <del>3) Support the County's Agricultural Preserve Program.</del> <del>4) Investigate establishing a mitigation fund for open space easements.</del>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
WE 1	Water Conservation Programs	Decrease energy use associated with the reduced pumping, distribution, heating, and treating of water and wastewater.	<ol style="list-style-type: none"> <li>1) <del>Provide</del>Continue to provide resources for water-efficient plumbing fixture retrofit programs.</li> <li>2) Encourage and assist in the use of water-efficient technologies in the residential, commercial, and industrial sectors.</li> <li>3) Increase coordination and streamline standards or regulations with local water districts that serve unincorporated areas of the county to improve water efficiency.</li> <li>4) Identify per capita water use baselines from water purveyors to determine the need for more indoor and outdoor conservation and rebate programs.</li> <li>5) Encourage water conservation before development of new water resources.</li> </ol>
WE 2	Water-Efficient Building and Landscape Standards	Maximize end-user water efficiency by encouraging the implementation of prescriptive or performance measures included in the California Green Building Code (CALGreen) in all new and existing development.	<ol style="list-style-type: none"> <li>1) <del>Require the installation of water-efficient fixtures and equipment in all new residential, commercial, and industrial development.</del></li> <li>1) <del>Encourage replacement of inefficient plumbing fixtures with more efficient models and require as a condition for issuance of a certificate of final completion and occupancy or final permit approval for building additions and/or alterations.</del></li> <li>3) Encourage the installation of dual plumbing for <del>graywater</del>greywater systems in new and existing buildings.</li> <li>4) 2) Encourage the installation of <del>graywater</del>greywater and rainwater harvesting systems to reduce outdoor potable water use.</li> </ol>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
WE 3	Water-Efficient Landscaping	Increase the use of (per Government Code, Section 65590, Article 10.8) <del>of native,</del> <u>or drought-tolerant</u> landscaping and smart irrigation technologies in new and renovated developments and at public parks and facilities.	<ol style="list-style-type: none"> <li>1) Encourage native <u>or drought-tolerant</u> landscaping and smart irrigation technologies while discouraging hardscape in all new and existing developments.</li> <li>2) Provide <u>informational</u> resources for the water purveyors' incentives for installing native <u>or drought-tolerant</u> landscaping and smart irrigation technologies.</li> <li>3) <del>Require</del> <u>Continue to require</u> a reduction in outdoor water use in new landscapes through compliance with the California Water Conservation in Landscaping Act <del>for properties having landscaped areas between 2,500 and 5,000 square feet.</del></li> <li>4) <del>Increase</del> <u>Facilitate</u> the availability and use of recycled water for use in outdoor landscaping areas, <u>and explore additional markets and opportunities for use of recycled water.</u></li> <li>5) Encourage the installation of turf on no more than 20% of the total site area on parcels 1-acre or less and 20% of landscaped areas on parcels greater than 1 acre.</li> <li>6) Promote the treatment of stormwater runoff on-site through the installation of rain gardens, green roofs, and rain barrels.</li> <li>7) <u>Continue to investigate funding opportunities for water-efficiency improvement projects.</u></li> </ol>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
GO 1	Energy Efficiency and Retrofits, Education, and Financing	<p><u>County facilities shall be retrofitted and designed to improve energy efficiency, particularly where a reasonable return on investment can be realized. Promote energy conservation through educational and competition-based programs and expand efforts to finance energy efficiency projects.</u></p>	<p><u>1) Implement the Energy Action Plan (EAP) with the goal of a 25 percent reduction in electricity use in County facilities by 2020. Aim for a 75 percent reduction by 2035; the increase is in support of the County’s Zero Net Energy Resolution.</u></p> <p><u>2) Audit all County Facilities to identify and prioritize potential energy-efficient improvements.</u></p> <p><u>3) Implement the Benchmarking Policy and use energy usage data to track energy use by building/campus and help prioritize buildings for energy efficient improvements.</u></p> <p><u>4) Use the Utility Manager System (Energy CAP software) to evaluate energy usage per building (select buildings), identify "normal" usage patterns, and take action when anomalies take place.</u></p> <p><u>5) Continue to retrofit governmental facilities with energy efficient equipment and designs including: efficient lighting, dual pane windows, efficient HVAC systems, weatherization, and solar designs.</u></p> <p><u>6) Continue South County Energy Efficiency Partnership training of County Facility Maintenance staff members to become “Certified Building Operators.”</u></p> <p><u>7) Continue to expand efforts to finance greater energy efficiency of County facilities and operations where a reasonable return on investment can be realized.</u></p> <p><u>8) Continue to partner with utility providers to take advantage of rebates or programs funding energy efficiency. Rebates on energy projects shall be reinvested into the utility Internal Service Fund to complete additional energy efficiency projects.</u></p> <p><u>9) Consider pursuing third party Power Purchase Agreements (PPA) as a means to procure “green power” from Renewable Power Generating (RPG) Systems using a collaborative procurement process.</u></p> <p><u>10) Continue to promote energy conservation through education and competition-based programs, such as by:</u></p> <p><u>a. Continuing to investigate opportunities to hold competitions among County departments or facilities to conserve energy. The County is considering holding a competition among the Fire Stations. If that competition is successful, then competitions will be held among other County departments.</u></p> <p><u>b. Continuing to incorporate demonstration and energy conservation education into County facilities improvements such as by providing information on energy generation and greenhouse gas offsets on project web pages.</u></p> <p><u>c. A website will be created to publish the energy consumption characteristics of County facilities and provide information for staff to develop energy consumption reduction strategies.</u></p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
GO 2	Zero Net Energy	<p><u>In 2014, the County Board of Supervisors adopted a Zero Net Energy (ZNE) Resolution as part of the County's Sustainability Progress Report (SPR). All new Santa Barbara County-owned facilities and major renovations beginning design after 2025 must be constructed as ZNE facilities with an interim target for 50 percent of new facilities beginning design after 2020 to be ZNE. Santa Barbara County departments shall also take measures toward achieving ZNE for 50 percent of the square footage of existing County-owned facilities by 2025 and the remaining 50 percent by 2035. This measure is working in conjunction with GO 1.</u></p>	<p><u>1) Improve facilities' energy efficiency: All new energy-consuming equipment installed in County facilities shall be highly efficient.</u></p> <p><u>2) Train staff how to be energy conscious: A website will be created to publish the energy consumption characteristics of County facilities and will provide information for staff to develop energy consumption reduction strategies.</u></p> <p><u>3) Generate renewable energy: The ongoing policy for County-owned facilities shall require new construction, heavily renovated buildings, and buildings undergoing roof replacement to install renewable energy systems and/or install appropriate conduit (electrical and/or plumbing) and supports for viable renewable energy installation.</u></p> <p><u>4) Report on energy usage: Energy reporting software is utilized to track energy use for the County's buildings. The reporting software will interlink the County's existing facilities maintenance software and sub-metering software systems, allowing County staff to make regular improvements to the way County building operations are performed based on real-time data.</u></p>

**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
GO 3	<u>Fuel-Efficient and Alternative Fuel Vehicle Fleet</u>	<u>The County shall purchase fuel-efficient and alternative fuel vehicles for the County fleet, to the maximum extent feasible.</u>	<p><u>1) Aim to increase the number of fuel-efficient and alternative fuel vehicles (i.e. hybrids and electric vehicles) such that 5 percent of the County’s fleet are alternative fuel vehicles by 2020, increasing up to 20 percent by 2035. This assumption assumes that purchases would be for replacement vehicles, rather than additions to the fleet.</u></p> <p><u>2) Continue to facilitate the establishment of fueling and recharging centers for county alternative fuel vehicles.</u></p> <p><u>3) Continue use of re-refined oil in County vehicles and the purchasing of flex-fuel vehicles.</u></p>
GO 4	<u>Commute Trip and Fuel Use Reductions</u>	<u>The County shall continue to make every effort to meet its Transportation Demand Management (TDM) objectives to reach its designated rate of participation specified in the TDM Ordinance, and to reduce fuel use during business activities.</u>	<p><u>1) Aim to reduce fuel use during business activities by 10 percent by 2020 and by 15 percent by 2035 (compared with forecasted levels). For example, continue the County’s ride share program and continue to discourage vehicle idling.</u></p> <p><u>2) Strengthen the County’s telecommuting policy to encourage and support expanded use of telecommuting.</u></p> <p><u>3) Continue to provide incentives under the Commuter Benefit Program, such as by offering pre-tax contributions toward eligible commuting expenses, additional vacation accrual for using alternative commuting methods, and free parking for carpools.</u></p> <p><u>4) Investigate changing County hours of operation to provide greater access to the public (before 8 a.m. and after 5 p.m.) while potentially closing many County services every Friday or every other Friday.</u></p> <p><u>5) Establish and promote the use of a County bicycle fleet that can be used for County business.</u></p> <p><u>6) Continue to install secured bike racks in new and renovated County facilities and, when feasible, continue to provide bicycle lockers and shower facilities.</u></p>



**TABLE 10-6  
REFINED ECAP REDUCTION MEASURES**

#	Measure Title	Measure	Actions for 15% GHG Reduction
GO 5	<u>Environmentally Preferable Procurement</u>	<u>The County shall procure products made from recycled materials to the maximum extent possible and as budget constraints allow. (This measure is supportive and not quantified in terms of GHG reductions).</u>	<ol style="list-style-type: none"> <li><u>1) Develop and implement an environmentally preferable purchasing (EPP) policy to purchase recycled content and toxic-free products for County supplies, equipment, and services. The County's Board of Supervisors has directed the County Purchasing Manager to purchase paper and paper products containing recycled materials and to give preference to the suppliers of recycled paper and paper products, if the bids of these suppliers do not exceed by more than 12 percent of the cost of the lowest bid or price quoted by vendors offering unrecycled paper or paper products. All bidders shall specify the percentage of recycled paper content in the appropriate space provided in the bid. "Recycled paper" means all paper and woodpulp products containing not less than 30 percent of its total weight of secondary and postconsumer waste and with not less than 10 percent of its total weight consisting of postconsumer waste.</u></li> <li><u>2) Continue to implement paperless records management and reduce the amount of paper purchased.</u></li> </ol>
GO 6	<u>Water Efficiency &amp; Conservation</u>	<u>Reduce water use in County facilities by 20 percent over forecasted levels by 2020 following SBX7 (the Water Conservation Act of 2009) and by 20 percent over forecasted levels by 2035</u>	<ol style="list-style-type: none"> <li><u>1) Replace County-maintained turf landscapes (not including park recreational fields or areas) with water-efficient, native landscapes, and demonstration gardens.</u></li> <li><u>2) Continue to retrofit governmental facilities with water-efficient equipment including: water efficient plumbing fixtures, weather tech irrigation controllers, on-demand water heaters, and waterless urinals.</u></li> <li><u>3) Continue to evaluate existing irrigation systems to identify leaks and replace irrigation heads with more efficient fixtures or install drip irrigation if feasible.</u></li> </ol>

**TABLE 10-6**  
**REFINED ECAP REDUCTION MEASURES**

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**APPENDIX A- ENVIRONMENTAL  
SCOPING DOCUMENT FOR THE ENERGY  
AND ACTION PLAN**

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COUNTY OF SANTA BARBARA

Planning and Development

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## Environmental Scoping Document for the Energy and Climate Action Plan

Project Website:

<http://longrange.sbcountyplanning.org/programs/climateactionstrategy/climateaction.php>

Contact:

Heather Allen, Planner  
(805) 884-8082

[hallen@countyofsb.org](mailto:hallen@countyofsb.org)

Long Range Planning Division  
123 E. Anapamu St. • Santa Barbara, CA 93101  
(805) 568-2000

[longrange.sbcountyplanning.org](http://longrange.sbcountyplanning.org)

Facebook: [facebook.com/longrange.sbcounty](https://facebook.com/longrange.sbcounty)

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## 1.0 Purpose

As part of the Environmental Impact Report (EIR) Notice of Preparation (NOP) process, this environmental scoping document describes the draft Energy and Climate Action Plan (ECAP) and provides preliminary review of the project's potential environmental impacts in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.).

## 2.0 Background

The EIR for the ECAP will be prepared as a program EIR. CEQA Guidelines Section 15168 defines the purpose of a program EIR. A program EIR is designed to assess a series of actions that can be characterized as one large project that are related either:

1. Geographically;
2. As logical parts in the chain of contemplated actions;
3. In connection with issuance of rules, regulations, plans, or other general criteria to govern a continuing program; or
4. As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

A primary goal of the ECAP is to allow programmatic level review and mitigation of GHG emissions that allows for the streamlining of CEQA review for subsequent development projects. To accomplish this, the ECAP framework is designed to fulfill the requirements identified in CEQA Guidelines Section 15183.5(b).

These requirements are to:

- (A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
- (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- (D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- (E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;
- (F) Be adopted in a public process following environmental review.

This EIR is intended to provide decision-makers and the public with information that enables them to consider the environmental consequences of the proposed action. This EIR identifies significant or potentially significant environmental effects, as well as ways in which those impacts can be reduced to less-than-significant levels, whether through the imposition of mitigation measures or through the

implementation of specific alternatives to the proposed project description that could avoid or substantially lessen potentially significant adverse effects while still achieving the Plan's basic objectives, pursuant to CEQA Guidelines Section 15126.6.

### **3. Project Description**

This section describes the proposed Energy and Climate Action Plan (ECAP), including the project applicant/lead agency, project location, objectives, characteristics, and adoption and implementation.

#### **3.1 Project Applicant/Lead Agency**

The County of Santa Barbara is both the project applicant and the lead agency for the proposed Energy and Climate Action Plan (ECAP).

#### **3.2 Project Overview**

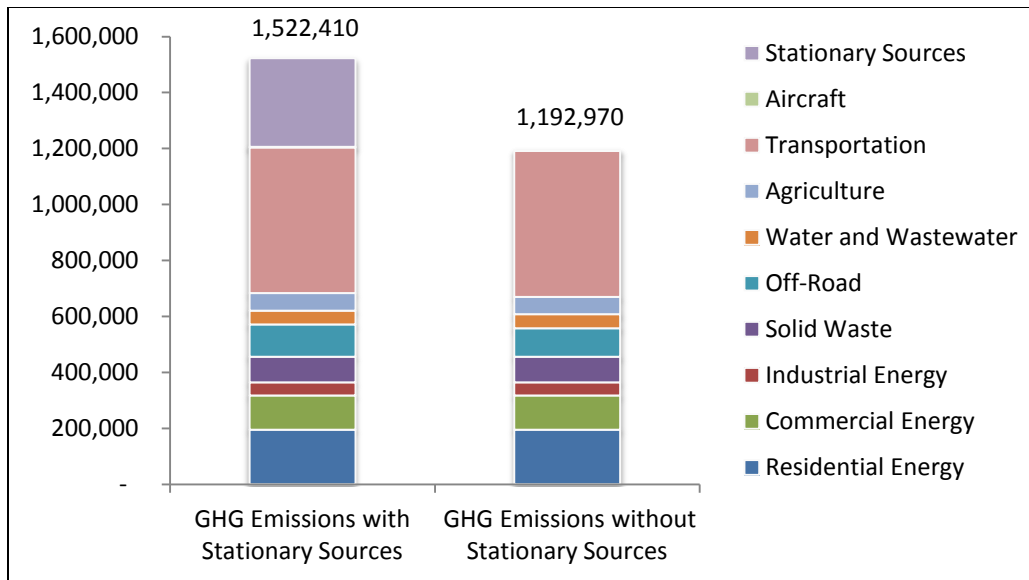
In 2010, the County prepared a 2007 inventory of community-wide GHG emissions for the unincorporated areas of Santa Barbara County. Changes to the regulatory structure since the creation of this initial inventory, including an update to the California Environmental Quality Act (CEQA), prompted the County to re-inventory emissions from community-wide sources. In 2007, emissions from unincorporated county sources totaled 1,522,420 metric tons of carbon dioxide equivalents (MTCO<sub>2</sub>e) in the baseline year 2007. As shown in Table 3-1 and Figure 3-1, the transportation sector is the largest contributor at 34%, producing approximately 521,160 MTCO<sub>2</sub>e.



**Table 3-1.** 2007 Unincorporated Santa Barbara County Emissions (with Stationary Sources)

<b>Sector</b>	<b>GHG Emissions MTCO<sub>2</sub>e</b>
<b>Residential Energy</b>	195,490
<b>Commercial Energy</b>	121,580
<b>Industrial Energy</b>	46,780
<b>Solid Waste</b>	91,920
<b>Off-Road</b>	115,690
<b>Water and Wastewater</b>	49,520
<b>Agriculture</b>	62,110
<b>Transportation</b>	521,160
<b>Stationary Sources</b>	315,890
<b>Aircraft</b>	2,270
<b>TOTAL</b>	1,522,410

Emissions from stationary sources were the next largest contributor, accounting for 21% of total emissions, producing approximately 315,890 MTCO<sub>2</sub>e. Emissions from residential energy use (195,490 MTCO<sub>2</sub>e) account for 13% of total emissions and represent the third largest source of GHG emissions. Commercial energy use (121,580 MTCO<sub>2</sub>e), off-road equipment (115,690 MTCO<sub>2</sub>e), solid waste disposal (91,920 MTCO<sub>2</sub>e), agriculture, industrial energy, water and wastewater, and aircraft operations account for the remainder of unincorporated county emissions in 2007.



**Figure 3-1 – 2007 Unincorporated Santa Barbara County Emissions (with and without Stationary Sources)**

The Energy and Climate Action Plan (ECAP) will identify ways the County of Santa Barbara can reduce greenhouse gas (GHG) emissions and implement energy-saving measures in support of a thriving and sustainable community. This will also assist the County with reducing GHG emissions consistent with Assembly Bill (AB) 32.

**3.3 Project Location**

The ECAP covers the unincorporated areas of Santa Barbara County where the County retains land use permit authority (see Figure 3-2). Thus, the ECAP does not cover state and federal lands and waters within the unincorporated county, including the Los Padres National Forest, Vandenberg Air Force Base, University of California, Santa Barbara, Chumash Reservation and the offshore oil and gas production facilities within the Santa Barbara Channel.

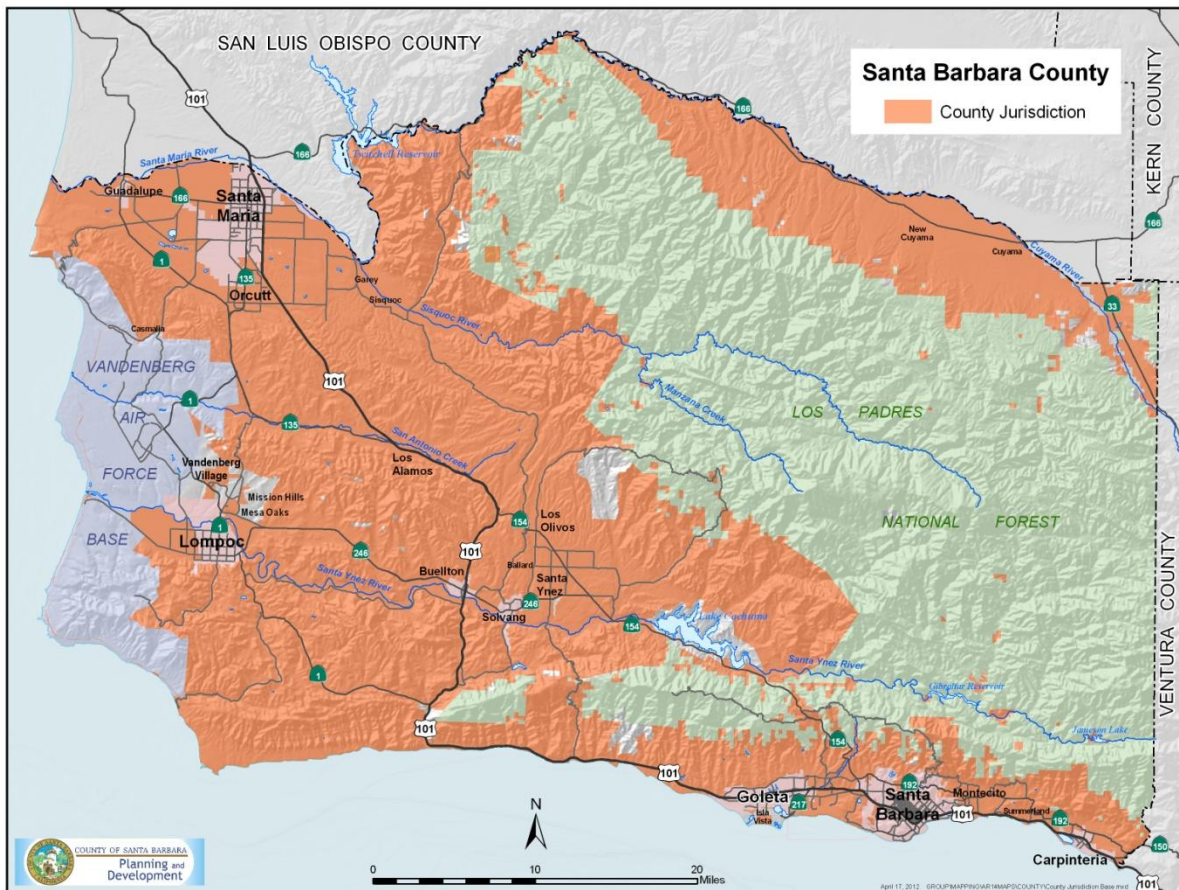


Figure 3-2. County of Santa Barbara Jurisdiction

### 3.4 Project Objectives

Per California Environmental Quality Act (CEQA) Guidelines, local governments may use adopted plans consistent with the CEQA Guidelines to assess the cumulative impacts of projects on climate change, if the adopted plan includes a certified EIR [State CEQA Guidelines, subsection 15124(b)]. The main objectives of the ECAP are to:

- Create a GHG emissions baseline from which to benchmark GHG emissions reductions;
- Reduce the County's GHGs by 15% from baseline emissions by 2020 to be consistent with the reduction target of AB 32;
- Increase the community's resilience to the effects of climate change;
- Provide a policy document with specific implementation measures to be considered as part of the planning process for future development projects;

- Provide a list of specific actions that will reduce GHG emissions, with the highest priority given to actions that provide the greatest reduction in GHG emissions and benefit the community at the least cost;
- Identify energy efficiency goals and targets;
- Create an energy efficiency strategy to meet the County’s energy reduction goals;
- Implement programs to comply with the state of California’s GHG reduction and long-term energy efficiency goals; and
- Establish a qualified reduction plan from which future development within the unincorporated County can tier and, thereby, streamline the environmental analysis necessary under CEQA, as identified in CEQA Guideline Section 15183.5(b).

### 3.5 Project Characteristics

#### 3.5.1 Energy and Climate Action Plan

The proposed ECAP (Appendix A) includes a baseline GHG emissions inventory, a forecast of emissions to 2020 and 2035, a GHG reduction target of 15% below baseline emissions by 2020, a set of emission reduction measures to meet the target, and a methodology for tracking and reporting emissions in the future. These emission reduction measures, combined with the measures identified in the County’s Energy Action Plan for municipal facilities, would collectively provide a decrease in both GHG emissions and energy use in the County. Overall, the proposed ECAP seeks to achieve an overall emissions reduction of 15%, while also allowing for CEQA tiering of future development and promoting Community Choice Aggregation.

The measures proposed in the ECAP are made of a combination of voluntary, phased, and mandatory measures. Phased measures are those that would initially be implemented on a voluntary basis until 2015 (see Table 3-2). At that time, if the participation rate of the measure is below a designated threshold, the measure would be phased into containing mandatory requirements.

**Table 3-2.** Phased Energy Reduction Measures in ECAP

#	Measure Title	ECAP Action + Timeline
BE 4	Energy Scoring and Audits	Encourage all nonresidential properties, even those not covered by AB 1103, to provide buyers or tenants with the previous year’s energy use by documenting use through the EPA’s EnergyStar Portfolio Manager with a 50% participation rate goal by 2015. If a 50% participation rate is not achieved by 2020, the County will consider requiring participation of building owners by 2020.
IEE 3	Efficient Upgrade Incentives	Establish a streamlined permit review process for completion of energy efficiency upgrades at industrial facilities through 2015. After 2015, evaluate program participation in audits and consider a mandatory program if participation falls below 10% of total industrial facilities.

ECAP implementation will assist the State in meeting its GHG reduction goals consistent with AB 32 and energy reduction goals consistent with California's Energy Efficiency Strategic Plan. The ECAP was designed under the premise that the County and the community it represents are uniquely capable of addressing emissions associated with sources under the County's jurisdiction.

#### *3.5.1.1. Land Use Design*

The land use design goal of the ECAP is to maximize the efficient use of local land resources through the implementation of policies and programs that promote the mixed-use and infill development and reduce dependency on automobiles. The distribution of land uses throughout the County influences transportation choices for County residents, employees, and visitors. Where housing, business centers, medical offices, and schools are placed has an impact on transportation choices. Designing communities with well thought out land use patterns can dramatically decrease the amount of vehicle miles travelled and therefore have a direct effect on GHG emissions. The measures presented in this section are designed to affect where jobs and housing are located. These measures complement the measures identified in the Transportation section which are designed to affect how people get from their homes to work and commercial centers every day.

#### *3.5.1.2 Transportation*

The transportation goal of the ECAP is to decrease the use of combustion engine vehicles. Transportation is the largest contributor of GHG emissions in the County. Transportation emissions can be reduced through three basic approaches: 1) producing more fuel efficient vehicles, 2) requiring stricter fuel standards, and 3) by decreasing the number of vehicle miles travelled. The State is working on programs, measures, and standards that accomplish the first two approaches. This section presents measures which seek to accomplish the third approach. The measures are meant to compliment the land use design measure identified in the previous section through the development of a multi-modal transportation system that is convenient and user friendly.

#### *3.5.1.3 Built Environment*

The built environment goal of the ECAP is to foster development and renovations whose location, design, construction, and systems increase energy efficiency. Energy consumption, both gas and electric, by businesses and homes represents a significant source of GHG emissions in the County. Residents use natural gas to heat water and power natural gas appliances. Commercial enterprises also use natural gas for water heating. Electricity powers appliances that have become essential for daily life – from residential appliances to local infrastructure such as street lights. Promoting and achieving more efficient use of energy offers one of the most readily achievable and cost-effective means of GHG reduction. Implementation of energy conservation measures will not reduce GHG emissions but will also reduce household and business costs associated with energy consumption.

These measures target efficiencies in electricity and natural gas use in homes and non-residential uses to reduce emissions. In the County, which is a low growth area, the majority of future GHG emission will come from existing buildings. For this reason, it is critical that energy conservation measures focus on improving the efficiency of existing buildings and ensuring that new construction projects utilize electricity and natural gas as efficiently as possible.

#### 3.5.1.4 *Renewable Energy*

The renewable energy goal of the ECAP is to promote the use of alternative energy for economic and environmental benefits, and facilitate opportunities for businesses that develop or market alternative energy technologies. While energy efficiency in the built environment is the first step to reducing energy consumption and GHG emissions, energy consumption cannot be eliminated. Emissions can be further reduced by generating the energy needed through renewable energy sources. Natural gas can be offset with renewable sources and electricity can be generated by renewable sources of energy that are cost-effective and help contribute to local energy independence. Through this goal, the County can reduce GHG emissions from traditional electricity production and natural gas by promoting the production of renewable energy.

#### 3.5.1.5 *Industrial Energy Efficiency*

The industrial energy efficiency (IEE) goal of the ECAP is to improve the efficiency of industrial sector energy uses and processes. Similar to the measures in the Built Environment section, this area attempts to reduce emissions from the use of natural gas and electricity specific to the industrial sector. Industrial enterprises use natural gas and electricity for water heating, on-site fuel combustion that support industrial and manufacturing processes, and to operate appliances and equipment. The energy used at industrial facilities is unique when compared to the residential and commercial sectors. For this reason, reductions from industrial sources are contained in its own section.

#### 3.5.1.6 *Waste Reduction*

The waste reduction goal of the ECAP is to exceed the State's required diversion rate of 75% by the year 2020. Both the consumption and disposal of resources require energy and emit GHGs. As waste is sent to the landfill, it decomposes and emits methane gas. Improved waste management at the local jurisdiction level and individual level are both necessary parts of a successful reduction strategy. The increased conservation of resources through reusing and recycling materials result in less demand for raw materials and less GHGs generated from future production and transportation of new materials. Additionally, the impact of transporting waste from homes and businesses by waste fleet vehicles can be reduced through increased diversion and cleaner vehicle fleets. This goal seeks to decrease the amount of waste that is being deposited in landfills and to develop energy from the waste which does get sent to the landfill. These measures would be implemented through the Resource Recovery and Waste Management Division of County Public Works.

#### 3.5.1.7 *Agriculture*

The agriculture goal of the ECAP is to facilitate the increased efficiency of agriculture operations. Agriculture is another GHG emissions source to be considered and quantified at local, state, and federal levels. The County recognizes that agriculture is one of its most important resources and critical economic drivers in the County. Integrating agriculture into the County's inventory and GHG reduction strategies allows the County and local agriculturalists to retain a higher degree of local control over how this sector is managed. The inventory of local GHG emissions from agricultural sources follows the best available protocol with the recognition that methodologies and assumptions will change and improve over time. The existing GHG inventory is a valuable foundation, setting the stage for engagement and an

ongoing dialogue about the best methods to identify, measure, and reduce local GHG emissions. These measures provide an opportunity for the County to recognize and support ongoing efforts and to facilitate future activities to the extent practicable.

#### *3.5.1.8 Water Efficiency*

The water efficiency goal of the ECAP is to increase the efficiency of water use to reduce energy consumption associated with various phases of using resources (pumping, distribution, treatment, heating, etc.). The use of water requires energy to pump, treat, distribute, collect, and discharge water as it is used by the community. Conservation of water is an important strategy for both reducing energy-related water use and preparing for times of water shortages. This section analyzes the energy use related to water through new construction and existing development. Implementing water conservation in existing and new development through water efficient features and native drought tolerant landscaping will ensure that communities will help ensure a consistent water supply.

#### *3.5.1.9 Sustainable Communities Strategy*

The Santa Barbara Community of Association of Governments (SBCAG) developed the Sustainable Communities Strategy (SCS) as a component of the Regional Transportation Plan. SCS is the outcome of Senate Bill 375 which requires the Metropolitan Planning Organizations to tie land use planning with transportation planning in order to reduce GHG emissions from passenger vehicles. In October of 2012, the SBCAG Board approved the preferred scenario of Transit-Oriented Development/Infill plus an enhanced transit strategy. SCS was adopted by SBCAG in August of 2013 and accepted by the California Air Resources Board in November 2013. The adopted SCS sets out a plan to meet SBCAG's goal of a zero net increase per capita in GHG emissions from passenger vehicles by 2020. By fully implementing the SCS in the unincorporated county, the County can take credit for reductions achieved through SCS implementation in the ECAP. Such a commitment would involve upzonings of some properties in the County. Rezones of individual parcels would require a separate County Board of Supervisors (BOS) environmental review approval.

#### *3.5.1.10 Community Choice Aggregation*

Community Choice Aggregation (CCA) allows communities to offer procurement service to electric customers within their boundaries. This can include developing and owning electric generating resources, such as County owned utility-scale solar plant, but is not required. The environmental benefit from CCA is driven from the CCA having the ability to procure energy from a portfolio of sources of its choosing allowing it to increase the amount of renewable beyond what the Investor-owned utility offers. Customers within a CCA boundary may "opt-out" and continue to receive electricity from the Investor-owned utility. Other benefits of a CCA include:

- Ability to locally control electric rates
- Ability to know exactly where/how your electricity is created (increase use of renewable energy)
- Ability for communities to develop electric generation projects that increase local employment

The first step for the County of Santa Barbara to implement such a program would be to complete a feasibility study. CCA could be developed as a new program in the County or could also partner with an existing CCA.

### 3.5.2 Comprehensive Plan Amendments

The ECAP would amend the Energy Element of the Comprehensive Plan to include a policy and research action requiring implementation of the ECAP with provisions for monitoring and updating at least every five years. The proposed policy and research action

**POLICY 8.2: ECAP Implementation:** The County shall implement the Energy and Climate Action Plan (ECAP) to reduce greenhouse gas emissions from community-wide sources by a minimum of 15% from the 2007 baseline emissions by 2020.

**Research 7.1.2:** Established in the ECAP, the County shall monitor progress towards achieving GHG reductions every five years. Monitoring of the County's ECAP shall include an update to the greenhouse gas emissions from community-wide sources. If it is determined that the ECAP is not achieving specified levels of greenhouse gas emission reductions, the ECAP will be updated as needed.

## 3.6 Adoption and Implementation

The goals and policies included in the ECAP would be implemented through a variety of mechanisms, including development of County ordinances, permitting requirements for new projects, financing and budgeting, and inter-departmental and inter-governmental coordination. Ordinances would go through a public review process including consideration by the Planning Commission and adopted by the BOS.

Coordination among County departments will be critical for successful implementation of many of the policies proposed in the ECAP. While the ECAP policies and implementation programs would be limited to authorities that can be under the jurisdiction of the County, implementation of some ECAP policies may also require coordination and joint actions with outside agencies and organizations.

### 3.6.1 Required Discretionary Approvals

The following actions will be required:

1. Adoption of the ECAP by the County BOS ,
2. Certification of the EIR for the ECAP by the County BOS, and
3. Adoption of an amendment to the Santa Barbara County Comprehensive Plan Energy Element.
4. Certification of the EIR for the ECAP by the County BOS, and
5. Adoption of an amendment to the Santa Barbara County Comprehensive Plan Energy Element.



## 4.0 Scope of the Environmental Review

### 4.1 Overview

CEQA requires the preparation of an EIR to inform the public and decision-makers of the potential environmental effects of the proposed ECAP. According to CEQA Guidelines Section 15151, an EIR should include a sufficient degree of analysis, or scope, to provide decision-makers with information that enables them to make a decision that takes account of environmental consequences.

### 4.2 Environmental Topics to be Analyzed in the EIR

CEQA Guidelines Section 15060(d) states that an initial study is not required in cases where preparation of an EIR is determined to be clearly required by the lead agency. Accordingly, an Initial Study for the ECAP is not provided herein. However, preliminary review identified the following issue areas for evaluation in the EIR.

#### 4.2.1 Land Use and Development

The EIR analysis will examine the proposed GHG reduction measures and identify their land use and development impacts resulting from more stringent energy-efficiency requirements for new construction and retrofits to existing buildings.

#### 4.2.2 Transportation and Circulation

The draft ECAP includes GHG reduction measures that promote infill development, enhance alternative transportation, completing an integrated bikeway system for Santa Barbara County, and improving pedestrian convenience, comfort, and safety through completing gaps in the existing sidewalk system. Additionally, the ECAP proposes the implementation of the adopted Sustainable Communities Strategy (SCS). The SCS establishes a goal of zero net increase of GHG emissions by passenger vehicles by 2020 through the use of alternative routes and transport options. The ECAP EIR analysis will examine the proposed GHG reduction measures and identify their impacts on transportation and circulation and identify mitigation measures as necessary.

#### 4.2.3 Aesthetics and Visual Resources

The draft ECAP includes measures that increase the use of alternative energy technology in appropriate new and existing development, encourages the use of solar water heaters, and adopting a policy or program to offer alternative energy incentives. Energy-generating facilities may be installed on rooftops, parking lots, or other areas suitable for energy generation. The ECAP EIR will assess the proposed GHG reduction measures for potential impacts to important visual and scenic resources and identify mitigation measures as necessary.

#### 4.2.4 Agricultural Resources

The EIR will assess whether the proposed ECAP is consistent with existing agricultural preservation policies and programs or has the potential to result in potentially significant adverse effects upon any unique or other farmland of State or Local Importance. The EIR will also assess whether the ECAP will cause potential impacts to agricultural resources, including potential conversion of agricultural land to non-agricultural uses or result in land use conflicts that impact agricultural production. The ECAP EIR will recommend mitigation of any significant impacts, where necessary.

#### 4.2.5 Biological Resources

The ECAP could lead to the development of large-scale renewable energy facilities, such as wind farms and solar fields, on vacant open space areas that may currently be used by wildlife as habitat, cause off site impacts to plants, wildlife and habitat and contribute to the cumulative loss of sensitive habitats or habitat fragmentation. The ECAP EIR will analyze the potential for anticipated development to result in direct and cumulative impacts to wildlife and plant habitat. The ECAP EIR will identify mitigation measures where necessary to reduce or eliminate impacts to these resources.

#### 4.2.6 Noise

The proposed ECAP promotes development of light commuter rail connections between employment and residential centers. This may be a cause of noise disturbance. Mitigation measures will be identified for locations where noise levels may cause exposure levels that exceed regulatory standards.

#### 4.2.7 Air Quality

The proposed ECAP includes GHG reduction measures that promotes development light commuter rail connections and large-scale renewable energy facilities. This may cause short-term construction related and potential cumulative impacts to air quality and GHG emissions related to the development and project-related vehicle trips. The issue of Global Climate Change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable such that it constitutes a significant cumulative impact. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (CEQA Guidelines, Section 15355).

The ECAP EIR will evaluate the GHG emissions associated with the proposed land uses, assess measures related to the reduction of GHG emissions and identify the need for mitigation measures where necessary. The ECAP EIR will also analyze anticipated cumulative air quality impacts and assess consistency with the policies and measures in the Air Quality Supplement of the Comprehensive Plan, and the Clean Air Plan (CAP).

#### 4.2.8 Cumulative Impacts

Pursuant to CEQA Guidelines Section 15130, the ECAP EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. A cumulative impact consists of an impact that is created as a result of the combination of the proposed project together with other projects causing related impacts. The ECAP EIR will assess the potential cumulative impacts in each environmental topical section.

### 4.3 Alternatives Analysis

The ECAP EIR will describe a range of reasonable alternatives to the proposed project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, as required by CEQA Guidelines Section 15126.6. The alternatives discussion in the EIR will include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. The ECAP EIR will programmatically describe the major characteristics and significant environmental effects of each alternative. The ECAP EIR analysis will also include a brief discussion of each alternative considered, but rejected from further analysis in the EIR, if any, as suggested by CEQA Guidelines Section 15126.6.

### 4.4 Other CEQA Required Discussions

The ECAP EIR will include a section that addresses other issues for which CEQA Guidelines Section 15126 requires analysis beyond the environmental topical areas described above. In this section, the EIR will analyze the additional possible impacts of the proposed ECAP including growth inducement, significant irreversible environmental changes, and secondary/indirect impacts.

### 4.5 Policy Consistency Analysis

The ECAP contains measures that must be consistent with the County of Santa Barbara Comprehensive Plan. The EIR will include an evaluation of the ECAP's consistency with relevant plans and policies including the County of Santa Barbara Comprehensive Plan, including but not limited to the Land Use Element and the Coastal Land Use Plan.

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## Appendix A

### County of Santa Barbara Draft Energy and Climate Action Plan

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COUNTY OF SANTA BARBARA

Draft Energy and Climate  
Action Plan

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Appendix 1 – GHG Reduction Measures and Implementing Actions



## Santa Barbara County Greenhouse Gas Emissions Inventory

### Purpose and Scope

In 2007, the County of Santa Barbara (County) completed a Greenhouse Gas (GHG) emissions inventory for the unincorporated County using 2007 as the base year. The inventory acts as a foundation for the County's Energy and Climate Action Plan (ECAP) by informing the County and community of the sources of GHG emissions, and thus the opportunities for GHG reductions. The inventory focuses on community-wide emissions in the unincorporated Santa Barbara County only and provides a baseline against which future progress can be measured. Thus, the inventory excludes incorporated cities, the University of California, the Chumash reservation, and State and federal lands including Los Padres National Forest, Vandenberg Air Force Base, and offshore oil and gas production facilities. The inventory consists of emissions from six primary GHGs that were identified in Assembly Bill 32 (AB 32). The gases are all expressed in terms of carbon dioxide equivalent (CO<sub>2</sub>e) and are as follows:

- |                                      |   |
|--------------------------------------|---|
| 1) Carbon Dioxide (CO <sub>2</sub> ) | 4) Hydrofluorocarbon (HFCs)               |
| 2) Methane (CH <sub>4</sub> )        | 5) Perfluorocarbon (PFCs)                 |
| 3) Nitrous Oxide (N <sub>2</sub> O)  | 6) Sulfur Hexafluoride (SF <sub>6</sub> ) |

In 2010, the County updated the 2007 inventory as a result of changes to the regulatory structure since the creation of the initial inventory, including an update to the California Environmental Quality Act (CEQA) Guidelines. Senate Bill 97, adopted in 2007 by the State of California, directed the Governor's Office of Planning and Research to amend the CEQA Guidelines to address GHG emissions. The revised CEQA Guidelines became effective on March 18, 2010. Per CEQA Guidelines Section 15183.5, local governments may use adopted plans consistent with the CEQA Guidelines to assess the cumulative impacts of projects on climate change, if the adopted plan includes a certified environmental impact report (EIR). In order to benefit from the streamlining provisions of the CEQA Guidelines Section 15183.5, a plan for the reduction of GHG emissions must accomplish the following:

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
- Be adopted in a public process following environmental review.

To create a Qualified GHG Reduction Strategy in compliance with the CEQA Guidelines, the County hired a consultant to peer review and update the existing baseline GHG inventory. The updated baseline inventory used methodologies recommended by the California Air Resources Board (CARB), ICLEI-Local

Governments for Sustainability, and industry best practices. The inventory analyzes the following emissions sources:

- Energy – Residential, commercial, and industrial electricity and natural gas consumed in the unincorporated county.
- Transportation – Vehicle miles traveled (VMT) to, from, or within the unincorporated county.
- Waste – Methane emissions from waste sent to landfills from the community.
- Stationary Sources – Direct emissions from industrial, commercial, and office processes that are permitted by the County of Santa Barbara.
- Off-road – Emissions from agricultural, construction, lawn and garden, and other industrial equipment/vehicles.
- Agriculture – Emissions from livestock and from fertilizer application.
- Aircraft – Emissions from operations at the Santa Ynez Airport in unincorporated Santa Barbara County.
- Water and Wastewater – The energy required to extract, filter, move, and treat the water consumed and/or treated in the county.

A major change in the updated inventory is that stationary sources have been removed. The primary reason for this change is that the ECAP will address community GHG emissions and measures to reduce those emissions. Stationary sources are unique and will require special attention and collaboration with the Santa Barbara County Air Pollution Control District (APCD).

### **2007 Inventory Summary**

Emissions from unincorporated county sources totaled 1,192,970 metric tons of carbon dioxide equivalents (MTCO<sub>2</sub>e) in the baseline year 2007 as follows:

- Transportation (521,160 MTCO<sub>2</sub>e)
- Residential energy use (195,490 MTCO<sub>2</sub>e)
- Commercial energy use (121,580 MTCO<sub>2</sub>e)
- Off-road equipment (102,140 MTCO<sub>2</sub>e)
- Solid waste disposal (91,920 MTCO<sub>2</sub>e)
- Agriculture (62,110 MTCO<sub>2</sub>e)
- Water and wastewater (49,520 MTCO<sub>2</sub>e)
- Industrial energy (46,780 MTCO<sub>2</sub>e)
- Aircraft operations (2,270 MTCO<sub>2</sub>e)

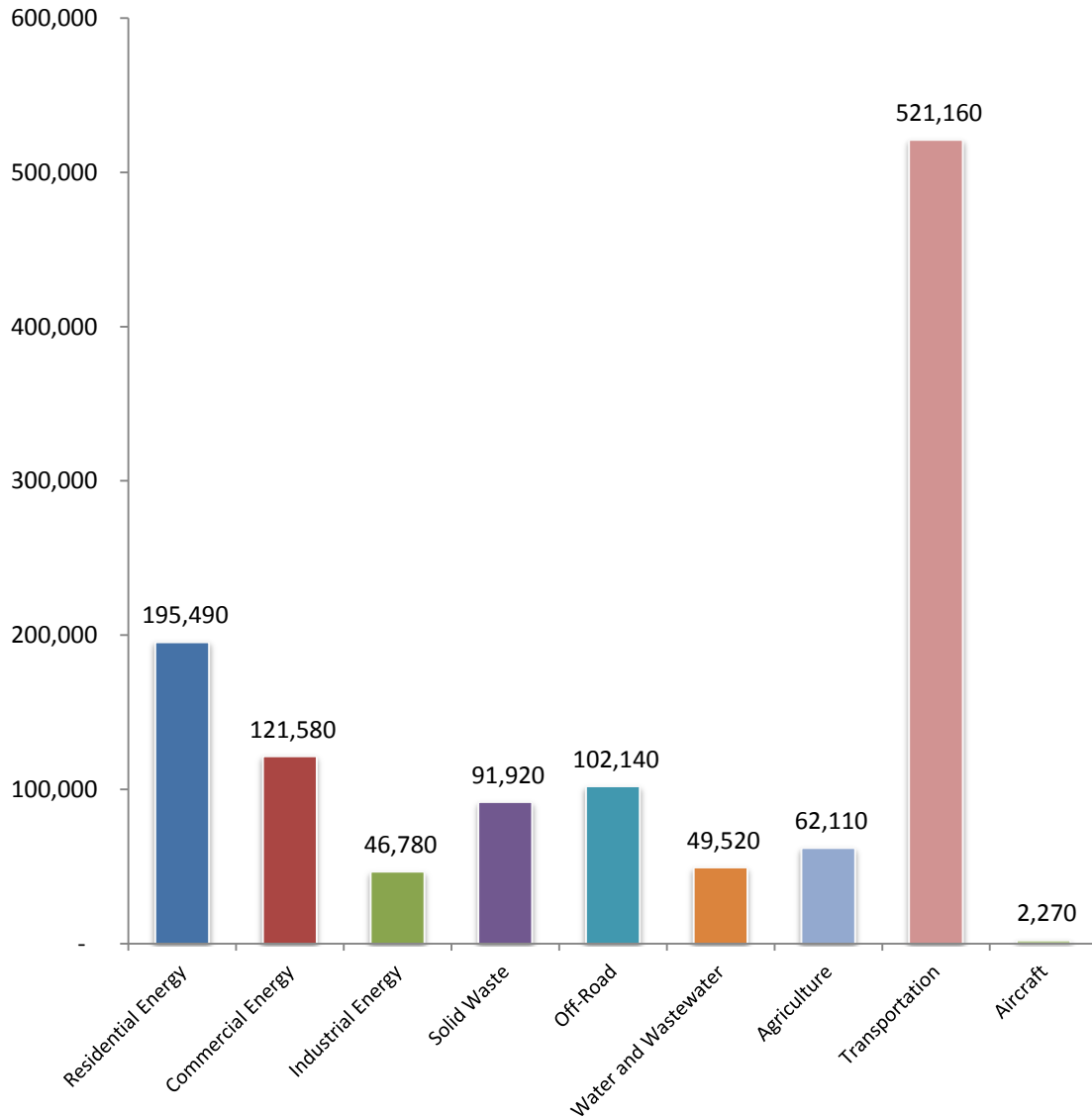
**Table 1** identifies the sector and subsectors of GHG emissions from activities within the county in 2007, and identifies the county's relative degree of influence to affect GHG emissions. Relative degree of influence is determined by identifying whether the county has jurisdictional, financial, permitting, or operational control to implement policies or programs to reduce a particular GHG emissions source.

**Figure 1** represents unincorporated Santa Barbara County GHG emissions by sector. As both **Table 1** and **Figure 1** illustrate, transportation is the largest source of emissions.

**Table 1– 2007 Unincorporated Santa Barbara County GHG Emissions by Sector**

Sector	Subsector	Activity	Unit	MTCO <sub>2</sub> e	County Degree of Influence
<b>Transportation</b>	On-Road transportation from trips beginning or ending in the unincorporated county	1,075,523,400	Annual VMT	521,160	High
<b>Residential Energy</b>	Residential Electricity	293,717,600	kWh	85,610	High
	Residential Natural Gas	20,656,900	Therms	109,890	High
<b>Commercial Energy</b>	Commercial Electricity	143,946,300	kWh	41,950	High
	Commercial Natural Gas	14,968,300	Therms	79,630	High
<b>Off-Road</b>	Agricultural Equipment	6,878,600	gallons	67,500	Medium
	Construction and Mining Equipment	2,882,600	gallons	28,560	Medium
	Industrial Equipment	309,800	gallons	2,490	Medium
	Lawn & Garden Equipment	373,700	gallons	2,560	Medium
	Light Commercial Equipment	130,400	gallons	1,030	Medium
<b>Solid Waste</b>	Landfilled Waste	115,390	tons	90,440	High
	Alternative Daily Cover	2,380	tons	1,480	High
<b>Agriculture</b>	Fertilizer Emissions	116,400	Acres of Crops	34,080	Medium
	Livestock Emissions	26,200	Livestock	28,030	Low
<b>Water and Wastewater</b>	Electricity used by water systems	85,710	Million Gallons	42,680	Medium
	Wastewater Emissions	2,577	Million Gallons	1,550	Medium
	Septic Tanks	8,749	Septic Tanks	5,280	Medium
<b>Industrial Energy</b>	Industrial Electricity	114,952,900	kWh	33,500	Medium
	Industrial Natural Gas	2,498,600	Therms	13,290	Medium
<b>Aircraft</b>	Landings and takeoffs from Santa Ynez Airport	71	Daily Flights	2,270	Low

**Figure 1 – 2007 Unincorporated Santa Barbara County GHG Emissions by Sector**



### **GHG Emissions Not Included In County Inventory**

While there are other sources of emissions occurring within Santa Barbara County, the sources identified below in **Table 2** and **Figure 2** are excluded from the County’s baseline GHG emissions inventory for one or more of the following reasons:

- **Lack of jurisdictional control**—There are areas of the unincorporated county in which the County lacks jurisdictional control or permitting authority to influence GHG emissions-generating activities. Examples include Vandenberg Air Force Base, Chumash Casino, Forest Service Land, the University of California at Santa Barbara, and the Santa Barbara Channel.
- **Limited ability to influence or reduce GHG emissions**—In cases where the County is limited in its ability to influence the emissions-generating activity, the County has excluded the source from the

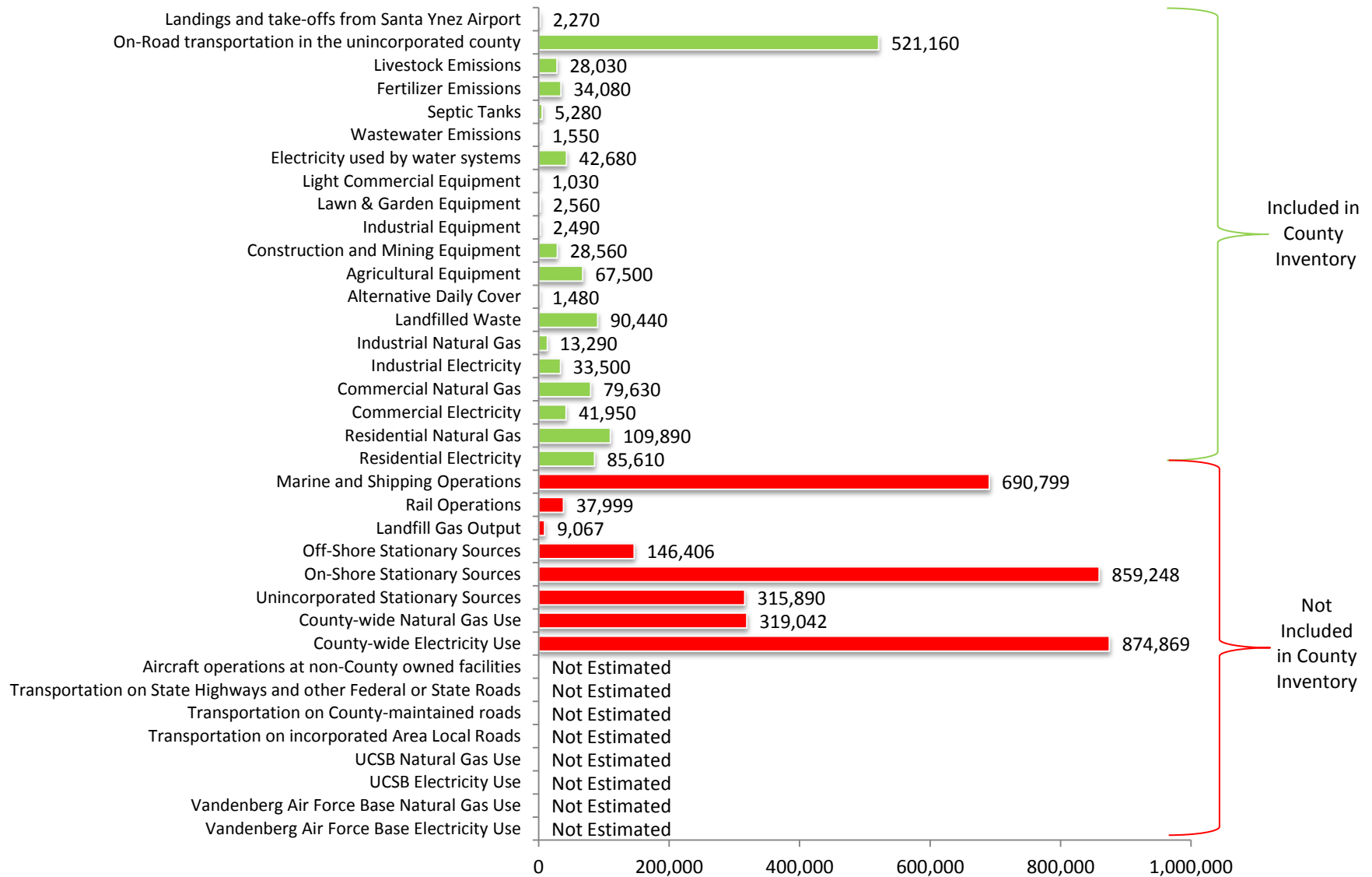
GHG inventory. Examples of such sources include large stationary facilities that are permitted by the APCD, state and federal regulatory agencies, and vehicle and rail travel that does not stop in the county, but uses fuel and generates GHG emissions while in the county.

- **GHG emissions are considered biogenic in nature**—Biogenic sources of GHG emissions would occur with or without human intervention, and therefore cannot be managed or influenced by the County. An example of a biogenic emissions source would be the naturally occurring oil and gas seeps in the Santa Barbara Channel.
- **Lack of methodology to estimate GHG emissions**—In cases where the activity data needed to determine GHG emissions are not reasonably available or methods to estimate activity data have not yet been developed, the activity has been excluded from the GHG inventory. An example of an emissions source that lacks clear methodology or cannot be reasonably estimated includes community use and consumption of products, often called a lifecycle analysis.

**Table 2 – GHG Emissions Sources Excluded from the County GHG Inventory**

Sector	Subsector	Activity	Unit	MTCO <sub>2e</sub>	County Degree of Influence	
<b>Energy Use</b>	County-wide Electricity Use (Incorporated areas)		3,242,000,000	kWh	874,869	Low
	County-wide Natural Gas Use (Incorporated areas)		130,756,020	Therms	319,042	Low
	Vandenberg Air Force Base Electricity Use		Not Available		Not Estimated	Low
	Vandenberg Air Force Base Natural Gas Use		Not Available		Not Estimated	Low
	UCSB Electricity Use		69,217,570	kWh	Not Estimated	Low
	UCSB Natural Gas Use		2,426,111	Therms	Not Estimated	Low
<b>Stationary Sources</b>	Unincorporated Stationary Sources		Not Available		315,890	Low
	On-Shore Stationary Sources		Not Available		859,248	Low
	Off-Shore Stationary Sources		Not Available		146,406	Low
<b>Solid Waste</b>	Landfill Gas Output		Not Available		9,067	Medium
<b>Off-Road</b>	Rail Operations		Not Available		37,999	Low
	Marine and Shipping Operations		Not Available		690,799	Low
<b>Transportation</b>	Transportation on incorporated Area Local Roads		285,843,800	VMT	Not Estimated	Low
	Transportation on County-maintained roads not originating or terminating in the County		309,849,200	VMT	Not Estimated	Low
	Transportation on State Highways and other Federal or State Roads		271,480,800	VMT	Not Estimated	Low
<b>Aircraft</b>	Aircraft operations at non-County owned facilities		Not Available		Not Estimated	Low

**Figure 2 – Comparison of GHG Emissions Sources Included and Excluded from the County GHG Inventory**



## **GHG Emissions by Sector Activity**

### **TRANSPORTATION**

On-road transportation generates GHG emissions from the combustion of gasoline and diesel fuel by vehicles operating on roads within Santa Barbara County. Consistent with the majority of California, travel by on-road motorized vehicles constitutes the greatest percentage of GHG emissions in the unincorporated county. Three types of vehicle trips were tracked:

- 1) Internal-Internal: Vehicle trips that remained in the unincorporated county;
- 2) Internal-External and External-Internal: Vehicle trips that have an ending or a beginning in the unincorporated and another within an incorporated city or outside of Santa Barbara County; and
- 3) External-External: Vehicle trips with neither end of the trip beginning or ending in the unincorporated county. This trip type is excluded from the inventory.

### **RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL ENERGY**

Energy use includes natural gas and electricity consumption. Electricity is provided to residential, commercial, and industrial customers in Santa Barbara County by Pacific Gas & Electric Company in the North County and by Southern California Edison on the South Coast. Residential, commercial, and industrial natural gas usage is provided to Santa Barbara County by the Southern California Gas Company.

### **OFF-ROAD EQUIPMENT**

Gasoline and diesel fuel are used to power off-road equipment in Santa Barbara County. Off-road equipment incorporated in this inventory includes agricultural, construction and mining, lawn and garden, and light commercial equipment.

### **SOLID WASTE**

Solid waste emissions include waste generated by residential, commercial, and industrial uses in the unincorporated county that are disposed of at Tajiguas Landfill, a managed landfill in Santa Barbara County.

### **AGRICULTURE**

The agriculture sector includes an analysis of the GHG emissions occurring from fertilizer application on crops, and from livestock which produce methane through digestive processes. In 2007, the unincorporated county's agricultural economy included 116,400 acres of cultivated cropland and 26,200 livestock animals. Crops in Santa Barbara County include vegetables, berries, fruit, row crops, and wine grapes. Livestock populations in Santa Barbara County include dairy cattle, grazing cattle, sheep, goats, horses, llamas, and alpacas.



## WATER AND WASTEWATER

This inventory includes two types of water-related emissions: (1) direct process emissions, which include methane generated from septic systems and wastewater treatment plants; and (2) emissions from the electricity and natural gas used to extract, process, treat, and deliver water and wastewater to, from, and within Santa Barbara County.

In 2007, the unincorporated county used approximately 86 billion gallons of water, 90% of which was used for agricultural purposes and extracted through private groundwater wells. Wastewater treatment plants throughout the county also utilize energy to treat approximately 2.6 billion gallons of wastewater generated by uses in the unincorporated county. There are approximately 8,750 septic systems in unincorporated Santa Barbara County, which are used to treat wastewater from private properties that are not connected to sewer and wastewater treatment systems.

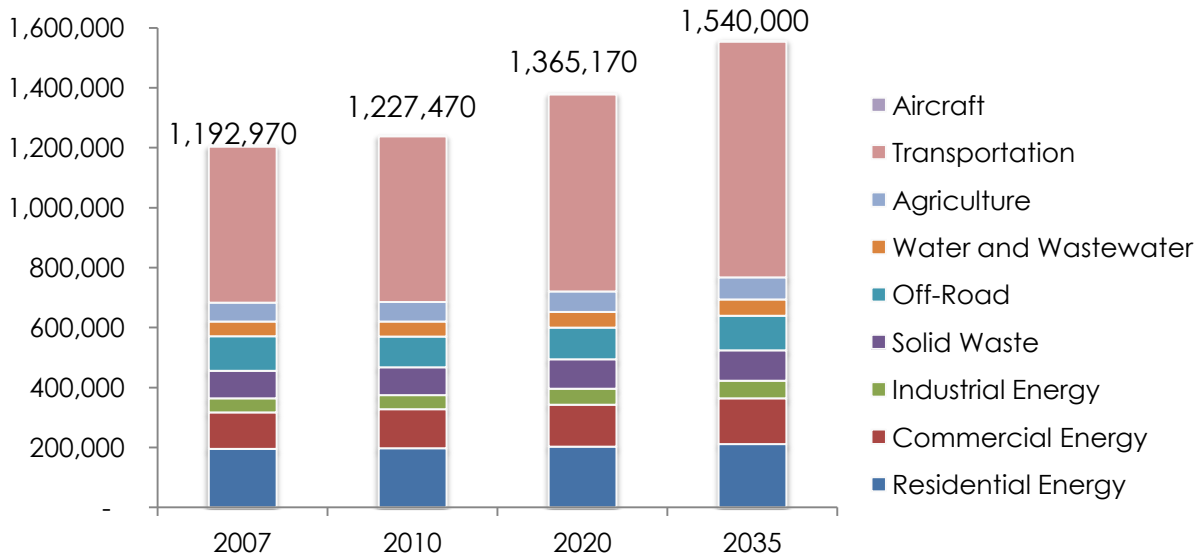
## AIRCRAFT

Aircraft emissions include the fuel used during landings and take-offs at the Santa Ynez Airport. While there are six airports in Santa Barbara County (Santa Barbara, Santa Maria, Santa Ynez, Lompoc, new Cuyama, and Vandenberg), only the Santa Ynez airport is operated by Santa Barbara County. The airport averages approximately 70 operations per day, all of which are civil flights using piston or jet aircrafts.

## Santa Barbara County Greenhouse Gas Emissions Forecast

After conducting the 2007 baseline GHG emissions inventory, the County prepared a GHG emissions forecast for key target years. A GHG emissions forecast demonstrates the anticipated future conditions in comparison to the 2007 baseline year. As the County implements GHG reduction measures, it will be possible to compare actual emissions to projected emissions to track reduction progress. The community-wide GHG emissions have been forecast to the year 2020 for consistency with state legislation (AB 32). For consistency with other County and regional planning efforts such as the SCS, a second emissions forecast year of 2035 is included as well. The basis for all growth scenarios is a “business-as-usual” (BAU) projection. The BAU projection forecasts emissions to reflect the County’s growth projections without regulatory or technical intervention to reduce GHG emissions. The BAU projection is then used as a starting point for the County to determine the level of emissions reductions needed to reach a reduction target. In order to complete a BAU forecast for unincorporated Santa Barbara County, a clear picture of the county’s anticipated growth in population, housing, and jobs is important. The growth estimates used in the forecast came from the Santa Barbara County Association of Government’s Regional Growth Forecast (2007) and have incorporated 2010 Census Data, when available. The population, housing, and job forecast indicators are applied to the 2007 GHG emissions inventory to determine a BAU growth scenario. Emissions are forecasted under this scenario by utilizing projections that indicate growth in each sector. A BAU projection is an estimate of how emissions would grow if there are no regulatory or technical interventions to reduce GHG emission as the County population and employment grows. Under the BAU scenario, community-wide emissions will grow by approximately 14% by the year 2020 and by approximately 29% by 2035 (refer to **Figure 3.**)

**Figure 3 – 2007–2035 Business-As-Usual GHG Emissions (MTCO<sub>2</sub>e)**



### Adjusted Business-As-Usual Forecast

State-led or state-induced reduction strategies included in the AB 32 Scoping Plan are factored into the adjusted 2020 and 2035 emissions forecast. Strategies include all state actions that are approved, programmed, and/or adopted and require no additional local action. Incorporating these strategies into the forecast and reduction assessment to create an adjusted business-as-usual (ABAU) forecast provides a more accurate picture of future growth in emissions. This methodology also provides a more accurate assessment of the responsibility of local governments once state measures to reduce GHG emissions have been implemented. State programs that are still uncertain are not included in the ABAU forecast. One example is the State’s Cap and Trade program. Although Cap and Trade has begun to be implemented, the market mechanisms employed by facilities to meet the cap-and-trade requirements have not yet been studied at the depth necessary to identify an achievable local GHG reduction to Santa Barbara County’s stationary sources. Additionally, since stationary sources are excluded from the inventory (Figure 2) it would not be appropriate to take credit for reductions in that sector.

A brief description of each of these state-led or state-induced reduction strategies, along with the methodology used to incorporate the strategy into the adjusted emission forecast, is presented below. The overall effect of these strategies is also summarized below in **Table 3**.

**Table 3 – GHG Reduction Impact of State Policies on Santa Barbara County (MTCO<sub>2</sub>e)**

	2010	2020	2035
<b>Renewable Portfolio Standard</b>	830	23,850	41,800
<b>Pavley (Clean Car Standard)</b>	0	97,550	17,3850
<b>Low Carbon Fuel Standard</b>	0	40,300	44,160
<b>Title 24 Standards</b>	310	2,030	6,790
<b>California Solar Initiative</b>	130	260	230
<b>TOTAL</b>	1,270	163,990	266,830

## RENEWABLE PORTFOLIO STANDARD

California's Renewable Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country, mandating that 33% of electricity delivered in California be generated by renewable sources such as solar, wind, and geothermal by 2020. The California RPS was first codified in 2002 by Senate Bill 1078 (requiring a 20% renewable electricity mix by 2010) and further strengthened in April 2011 with the adoption of Senate Bill 2 (requiring a 33% renewable electricity mix by 2020). Based on California Public Utilities Commission progress reports and identified barriers to achieving the RPS targets, this analysis assumes a more conservative forecast of a 28% renewable mix by 2020 and a 35% renewable energy mix by 2035 for both PG&E and SCE.

## PAVLEY STANDARD

Signed into law in 2002, Assembly Bill 1493 requires car manufacturers to reduce GHG emissions from new passenger cars and light trucks beginning in 2011. CARB adopted regulations in 2004, which took effect in 2009 with the release of a waiver from the US Environmental Protection Agency (EPA) granting California the right to implement the bill. CARB anticipates that the Pavley standards will reduce GHG emissions from new California passenger vehicles by about 22% in 2012 and about 30% in 2016, all while improving fuel efficiency and reducing motorists' costs.

## LOW CARBON FUEL STANDARD

Because transportation is the largest single source of greenhouse gas emissions in California, the State is taking an integrated approach to reducing emissions from this sector. Beyond improving vehicle efficiency standards and lowering vehicle miles traveled, the State is proposing to reduce the carbon intensity of transportation fuels consumed in California. To reduce the carbon intensity of transportation fuels, CARB is developing a Low Carbon Fuel Standard (LCFS). The LCFS will reduce the carbon intensity of California's transportation fuels by at least 10% by 2020 as called for by Governor Schwarzenegger in Executive Order S-01-07. The LCFS will also incorporate compliance mechanisms that provide flexibility to fuel providers in how they meet the requirements to reduce greenhouse gas emissions.

In late 2011, a Federal District Court Judge ruled that California's LCFS violates the dormant commerce clause by discriminating against out of state ethanol products and that CARB failed to identify alternative methods for achieving greenhouse gas reductions. CARB appealed the decision to the Federal Ninth Circuit Court of Appeals (Ninth Circuit) and then moved to stay the injunction pending resolution of the appeal. In April 2012, the Ninth Circuit granted CARB's motion for a stay of the injunction while it continues to consider CARB's appeal of the lower court's decision. The County's ECAP includes LCFS related GHG emission reductions; however, if the Ninth Circuit rules against CARB, then the County will need to reevaluate the measures included in the ECAP.

## TITLE 24 STANDARDS

Title 24 of the California Code of Regulations mandates how each new home and business is built in California. It includes requirements for the structural, plumbing, electrical, and mechanical systems of buildings, and for fire and life safety, energy conservation, green design, and accessibility in and around buildings. The 2010 triennial edition of Title 24 pertains to all occupancies that applied for a building permit on or after January 1, 2011, and remains in effect until the effective date of the 2013 triennial edition. The two parts of Title 24 that most directly apply to a GHG emissions forecast are: Part 6, the California Energy Code; and Part 11, the California Green Building Standards Code or CALGreen Code. These two parts or codes require direct savings of electricity, natural gas, and water for every new home or business built in California. Title 24 is a statewide standard applied at the local level by local agencies through project review. The most recent update to Title 24 Part 6, the California Energy Code, went into effect on January 1, 2010, for both residential and nonresidential new construction. Part 6 also includes requirements for lighting and insulation upgrades to nonresidential buildings undergoing a major retrofit.

## CALIFORNIA SOLAR INITIATIVE

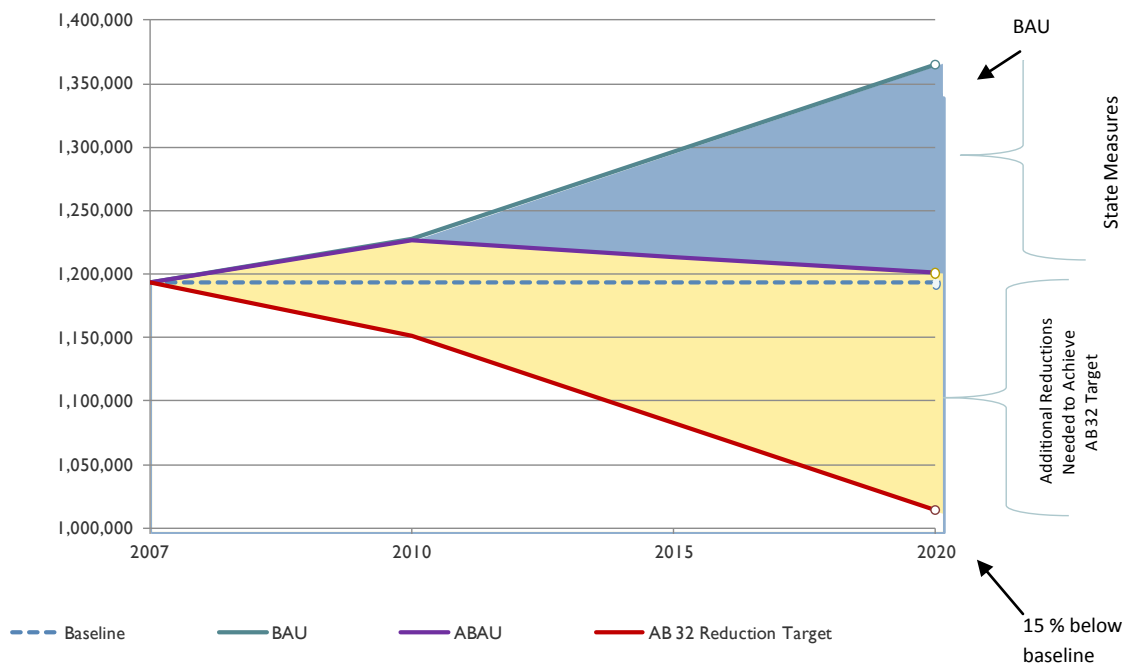
The California Solar Initiative (CSI) was authorized in 2006 under Senate Bill 1. CSI allows the California Public Utilities Commission (CPUC) to provide incentives to install solar technology on existing residential, commercial, nonprofit, and governmental buildings if they are customers of the state's investor-owned utilities (IOUs): Pacific Gas & Electric, San Diego Gas & Electric, or Southern California Edison.

The CSI program has a budget of \$2.167 billion to expend by 2016 with a goal to reach 1,940 megawatts (MW) of installed power through solar facilities throughout the state by that year. The CSI program has several components including the Research and Development, Single-family Affordable Solar Housing, Multifamily Affordable Solar Housing, and Solar Water Heating Pilot programs, each of which provides incentives to further the development and installation of new solar technology on California's buildings.

### **Adjusted Business-As-Usual Forecast Summary**

As shown in **Figure 4**, state policies and programs will reduce GHG emissions by approximately 12% below the BAU forecast by 2020. **Figure 4** demonstrates the gap that will need to be closed between the ABAU forecast and a proposed GHG reduction target of 15% below baseline emissions by 2020. This reduction target is based on the recommendation to local governments in the AB 32 Scoping Plan to "move toward establishing similar goals for community emissions that parallel the State commitment to reduce greenhouse gas emissions by approximately 15% from current levels by 2020." If adopted, the County would be responsible for reducing the remaining emissions amounting to 186,900 MTCO<sub>2</sub>e by 2020. The County's ECAP is intended to identify regulatory and incentive based policies to close that gap and meet the GHG reduction target.

**Figure 4 – Comparison of Business-As-Usual and Adjusted Business-As-Usual Emissions (MTCO<sub>2</sub>e), 2007–2020**



## Proposed Emission Reduction Measures

### Introduction

The ECAP would implement a menu of emissions reduction measures across many sectors to achieve community-wide GHG emission reductions. These emission reduction measures, combined with the measures identified in the County’s Energy Action Plan for municipal facilities, would collectively provide a reduction in both GHG emissions and energy use in the County. The actions will assist the State in meeting its GHG reduction and energy use goals.

Emission reduction measures proposed for the ECAP are organized by topic area and include:

- Land Use Design
- Transportation
- Built Environment
- Renewable Energy
- Industrial Energy Efficiency
- Waste Reduction
- Agriculture
- Water Efficiency

Additionally, two large measures are each given their own category:

- Sustainability Communities Strategy
- Community Choice Aggregation.

Each topic area includes a goal for that topic. The reduction measures that follow the goal are designed to reach that goal and achieve an overall reduction in community-wide GHG emissions. Each reduction measure includes the measure language and the supporting actions that would implement the measure. When sufficient information is available, emissions reduction measures have been quantified to indicate the contribution that a measure will have to the overall GHG reductions. This approach meets the minimum criteria for a Qualified GHG Reduction Plan and would allow the County to use the ECAP for programmatic CEQA tiering of future development. To accomplish this, the ECAP framework is designed to fulfill the requirements identified in CEQA Guidelines Section 15183.5(b).

### **ECAP 15% GHG Reduction Target**

Overall, the ECAP seeks to achieve an overall emission reduction of 15% below the baseline. Voluntary reduction measures alone cannot achieve a 15% GHG emission reduction. Because of this, the ECAP includes a mix of voluntary, phased, and mandatory emissions reduction measures (Appendix 1). Mandatory measures include:

- BE 2 – Energy Efficient Renovations
- BE 4 – Energy Scoring and Audits
- BE 8 – Energy Efficiency and Green Building Standards
- RE 1 – Alternative Energy Development
- RE 2 – Solar Water Heaters

Phased measures include: IEE 3 – Energy Upgrade Incentive, and the Sustainable Communities Strategy (SCS).

Implementation of SCS would likely require rezones and a general plan amendment to comply with the infill development approach proposed by the Santa Barbara County Association of Governments (SBCAG). Rezones of individual parcels would require board approval.

The following section provides an overview of the quantification for each approach by measure. A full list of the emission reduction measures and their implementing actions is provided in Attachment A.

### **Summary of GHG Reduction Measures by Topic**

#### **SUSTAINABLE COMMUNITIES STRATEGY**

SBCAG is in the process of completing the Sustainable Communities Strategy (SCS). In October of 2012, the SBCAG Board adopted the preferred scenario of Transit-Oriented Development/Infill plus an enhanced transit strategy. SBCAG staff is currently completing the SCS with this scenario and is expected to move forward for adoption in summer of 2013. By fully implementing the SCS in the unincorporated county, the County can take credit for reductions achieved through SCS implementation in the climate action plan. Such a commitment would involve upzonings of some properties along the

Hollister Avenue corridor in the Goleta Planning Area. Upzonings of individual parcels would require separate Board approval.

#### COMMUNITY CHOICE AGGREGATION

CCA allows communities to offer procurement service to electric customers within their boundaries. This can include developing and owning electric generating resources, such as county owned utility-scale solar plant, but is not required. The environmental benefit from CCA is driven from the CCA having the ability to procure energy from a portfolio of sources of its choosing allowing it to increase the amount of renewable beyond what the Investor-owned utility offers. Customers within a CCA boundary may “opt-out” and continue to receive electricity from the Investor-owned utility. Other benefits of a CCA include:

- Ability to locally control electric rates.
- Ability to know exactly where/how your electricity is created (increase use of renewable energy).
- Ability for communities to develop electric generation projects that increase local employment.

The City of Santa Barbara included Community Choice Aggregation in its CAP and General Plan Update. They propose to complete a feasibility study to include a cost benefit analysis of the measure. The feasibility study being completed is contingent upon other agencies partnering with them on the effort such as the County of Santa Barbara or the County of Ventura. The first step for Santa Barbara County to implement such a program would be to complete a feasibility study. CCA could be developed as a new program in the County or could also partner with an existing CCA.

Other communities in California have developed or are pursuing CCA's including Marin County, Sonoma County, Kings County, and the City and County of San Francisco.

#### LAND USE DESIGN

*Goal: Maximize the efficient use of local land resources through the implementation of policies and programs that promote mixed-use and infill development and reduce dependency on automobiles.*

The distribution of land uses throughout the county influences transportation choices for county residents, employees, and visitors. Where housing, business centers, shopping centers, medical offices, and schools are placed has an impact on transportation choices. Designing communities with well thought out land use patterns can dramatically decrease the amount of vehicle miles travelled and therefore have a direct effect on GHG emissions. The measures presented in this section are designed to affect where jobs and housing are located. These measures complement the measures identified in the Transportation section which are designed to affect how people get from their homes to work and commercial centers every day.

#### TRANSPORTATION

*Goal: Decrease the use of combustion engine vehicles.*

Transportation is the largest contributor of GHG emissions in the county. Transportation emissions can be reduced through three basic approaches: 1) producing more fuel efficient vehicles 2) requiring stricter fuel standards, and 3) by decreasing the number of vehicle miles travelled. The State is working on programs, measures, and standards that accomplish the first two approaches. This section presents measures which seek to accomplish the third approach. The measures are meant to compliment the land use design measure identified in the previous section through the development of a multi-modal transportation system that is convenient and user friendly.

#### BUILT ENVIRONMENT

*Goal: Foster development and renovations whose location, design, construction, and systems increase energy efficiency.*

Energy consumption, both gas and electric, by businesses and homes represents a significant source of GHG emissions in the County. Residents use natural gas to heat water and power natural gas appliances. Commercial enterprises also use natural gas for water heating. Electricity powers appliances that have become essential for daily life - from residential appliances to local infrastructure such as street lights. Promoting and achieving more efficient use of energy offers one of the most readily achievable and cost effective means of GHG reduction. Implementation of energy conservation measures will not only reduce GHG emissions but will also reduce household and business costs associated with energy consumption.

These measures target efficiencies in electricity and natural gas use in homes and non-residential uses to reduce emissions. In Santa Barbara County, which is a low growth area, the majority of future GHG emissions will come from existing buildings. For this reason it is critical that energy conservation measures focus on improving the efficiency of existing buildings and ensuring that new construction projects utilize electricity and natural gas as efficiently as possible.

#### RENEWABLE ENERGY

*Goal: Promote the use of alternative energy for economic and environmental benefits, and facilitate opportunities for businesses that develop or market alternative energy technologies.*

While energy efficiency in the built environment is the first step to reducing energy consumption and GHG emissions, energy consumption cannot be eliminated. Emissions can be further reduced by generating the energy needed through renewable energy sources. Natural gas can be offset with renewable sources and electricity can be generated by renewable sources of energy that are cost-effective and help contribute to local energy independence. Through this goal, the County can reduce greenhouse gas emissions from traditional electricity production and natural gas by promoting the production of renewable energy.

#### INDUSTRIAL ENERGY EFFICIENCY

*Goal: Improve the efficiency of industrial sector energy uses and processes.*



Similar to the measures in the Built Environment, this area attempts to reduce emissions from the use of natural gas and electricity specific to the industrial sector. Industrial enterprises use natural gas and electricity for water heating, on-site fuel combustion that support industrial and manufacturing processes, and to operate appliances and equipment. The energy used at industrial facilities is unique when compared to the residential and commercial sectors. For this reason, reductions from industrial sources are contained in its own section.

#### WASTE REDUCTION

*Goal: Exceed the State's required diversion rate of 75% by 2020.*

Both the consumption and disposal of resources require energy and emit greenhouse gases. As waste is sent to the landfill, it decomposes and emits methane gas. Improved waste management at the local jurisdiction level and individual level are both necessary parts of a successful reduction strategy. The increased conservation of resources through reusing and recycling materials result in less demand for raw materials and less GHG generated from future production and transportation of new materials. Additionally, the impact of transporting waste from homes and businesses by waste fleet vehicles can be reduced through increased diversion and cleaner vehicle fleets. This goal seeks to decrease the amount of waste that is being deposited in landfills and to develop energy from the waste which does get landfilled. These measures would be implemented through the Resource Recovery and Waste Management Division of County Public Works.

#### AGRICULTURE

*Goal: Facilitate the increased efficiency of agriculture operations.*

Agriculture is another GHG emissions source to be considered and quantified at local, state, and federal levels. The County recognizes that agriculture is one of its most important resources and critical economic drivers in the County. Integrating agriculture into the County's inventory and GHG reduction strategies allows the County and local agriculturalists to retain a higher degree of local control over how this sector is managed. The inventory of local GHG emissions from agricultural sources follows the best available protocol with the recognition that methodologies and assumptions will change and improve over time. The existing GHG inventory is a valuable foundation, setting the stage for engagement and an ongoing dialogue about the best methods to identify, measure, and reduce local GHG emissions. These measures provide an opportunity for the County to recognize and support ongoing efforts and to facilitate future activities to the extent practicable.

#### WATER EFFICIENCY

*Goal: Increase the efficiency of water use to reduce energy consumption associated with various phases of using resources (pumping, distribution, treatment, heating, etc.).*

The use of water requires energy to pump, treat, distribute, collect, and discharge water as it is used by the community. Conservation of water is an important strategy for both reducing energy-related water

use and preparing for times of water shortages. This section analyzes the energy use related to water through new construction and existing development. Implementing water conservation in existing and new development through water efficient features and native drought tolerant landscaping will ensure that communities will help ensure a consistent water supply.

**Table 4 – Summary of GHG Reduction Measures**

Measure #	Measure Title	15% Target
		2020 GHG Reductions (MTCO <sub>2</sub> e)
<b>Local Reductions Needed to Achieve Target</b>		<b>186,900</b>
CCA	Community Choice Aggregation	-56,610
SCS	Sustainable Communities Strategy	-32,410
LUD 1	Infill development	-460
LUD 2	Transit-Oriented Development	-1,240
LUD 3	Affordable Housing	-780
T 1	Car Sharing and Ride Sharing	-5,770
T 2	Commuter Incentives	-3,460
T 3	Alternative-Fuel Vehicles and Incentives	-1,850
T 4	Alternative Transportation	-1,330
T 5	Integrated Bikeway System	-1,720
T 6	Pedestrian Improvements	-2,020
T 7	Vehicle Idling	-6,590
T 8	Traffic Signal Synchronization	Supportive Measure <sup>1</sup>
T 9	Commuter Rail Connections	-2,030
BE 1	Energy Efficiency Education and Outreach	-2,860
BE 2	Energy-Efficient Renovations	-24,300
BE 3	Green Business Participation	-1,800
BE 4	Energy Scoring and Audits	-16,790
BE 5	Community Forestry	-520
BE 6	Smart Grid Technology	-2,640
BE 7	Lawn and Garden Equipment	-50
BE 8	Energy Efficiency and Green Building Standards	-2,000
BE 9	Efficient Building Design	Supportive Measure
BE 10	Construction Equipment Operations	-990
BE 11	Energy Code Training	Supportive Measure
RE 1	Alternative Energy Development	-2,420
RE 2	Solar Water Heaters	-1,410
RE 3	Alternative Energy Incentives	-1,170
RE 4	Utility-Scale Renewable Energy Projects	-8,360
IEE 1	Efficient Equipment Incentives	-1,450
IEE 2	Energy Management Programs	-250

<sup>1</sup> A supportive measure is a measure which contributes to overall reductions but is not quantifiable.

Measure #	Measure Title	15% Target
		2020 GHG Reductions (MTCO <sub>2</sub> e)
<b>Local Reductions Needed to Achieve Target</b>		<b>186,900</b>
IEE 3	Efficient Upgrade Incentives	-6,180
IEE 4	Efficient Equipment Incentives 2	-960
WR 1	Waste Reduction	-19,020
WR 2	Increased Recycling Opportunities	-16,360
WR 3	Construction and Demolition Waste Recycling	-10,330
WR 4	Landfill Disposal Reductions	-680
WR 5	Clean Waste Collection Vehicles	-730
AG 1	Local Food Programs	Supportive Measure
AG 2	Agricultural Conservation Practices	Supportive Measure
AG 3	Agriculture Equipment	-4,140
AG 4	Energy Efficient Agriculture Operations	Supportive Measure
AG 5	Agriculture Irrigation Improvements	-1,430
AG 6	Agriculture and Open Space Easements	Supportive Measure
WE 1	Water Conservation Programs	-230
WE 2	Water-Efficient Building and Landscape Standards	-20
WE 3	Water-Efficient Landscaping	-210
<b>Total Local Reductions</b>		<b>-186,960</b>
<b>Percent Total Reductions (State and Local)</b>		<b>15.0%</b>
<b>Additional Reductions Needed</b>		<b>-60</b>

## Public Participation

To develop the ECAP, County staff engaged the public through community education about climate action planning and related implications for land use policy in Santa Barbara County. Public outreach included a community visioning workshop, participation in the Santa Barbara Earth Day Festival, four facilitated stakeholder meetings, and an online survey. The overall strategy was designed to ensure that balanced, transparent, and effective communication occurred through an inclusive community-wide outreach and engagement campaign.

### *Public Engagement Goals*

- Educate the community about the purpose of the ECAP and clearly describe the process, impacts, and benefits of project implementation.
- Educate key target audiences and stakeholders about the importance of daily lifestyle choices and community-wide efforts to achieve ECAP goals.
- Provide opportunities for community members to give input into the ECAP development.
- Provide community members and other key stakeholders with a clear understanding of their important role in the planning process.

### *Key Findings*

Several key viewpoints emerged during the public engagement process:

- The citizens of Santa Barbara County feel strongly about climate change planning. Some have already taken steps to improve the energy efficiency of their homes and are enthusiastic about the ECAP. Some are supportively skeptical and want to know more details about how the ECAP measures will affect them. Others are apprehensive about the very idea of an ECAP. Regardless of individual positions, this outreach program has indicated that people want to be involved in the process to help shape the future of their community.
- Throughout the process, actions that the County itself might take to reduce GHG emissions, such as improved bicycle and transit infrastructure, gathered more support than individual actions. Those in the building industry especially found it hard to support measures that could impact viability of new construction and wanted to make sure they were not being asked to take on more than a fair share of the GHG reduction mandates.
- Nearly everyone agreed that improvements can be made to the county's transportation system.
- Among those who provided input and feedback, opinions about an incentive-based approach to implementation of the ECAP, versus a required-mandatory approach to implementation, varied by the specific subject matter the measure addressed. Generally speaking, environmental non-profit organizations supported of the mandatory measures which provide for greater reductions with greater certainty. The industry and business organizations generally preferred a completely voluntary approach to most measures included in the ECAP.
- Some elements of the draft measures are seen as barriers to economic growth and that is viewed as unwise in an already depressed economy, and unfair if the impact is to homeowners, homebuyers, and new development projects.
- Participants seemed more willing to support County-driven GHG measures, such as the improvement of bike networks.

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#	Measure Title	Measure	Actions for 15% GHG Reduction
CCA	Community Choice Aggregation	Increase the amount of renewable energy used to a minimum of 50% by 2020 through community choice aggregation program or other renewable energy procurement programs.	See "Measure" box.
SCS	Sustainable Communities Strategy	Support SBCAG's Implementation of the 2040 Regional Transportation Plan and Sustainable Communities Strategy to reduce per capita GHG emissions from transportation.	See "Measure" box.
LUD 1	Infill development	Promote infill development.	<ol style="list-style-type: none"> <li>1) Support strategies for sustainable new development by adopting principles and policies which encourage and expedite the permitting of mixed-use, infill, and transit-oriented development, with jobs and housing co-located together where feasible or in close proximity (walking/biking distance) to transit facilities.</li> <li>2) Review the Comprehensive Plan to determine the extent to which it promotes GHG emissions reductions. Recommend amendments to improve policies and implementation measures to promote GHG emissions reductions.</li> <li>3) Integrate complete streets policies and projects into updates of the Land Use Element and Circulation Element and into new and existing Community Plans.</li> <li>4) Promote the use of ground-floor or street-oriented space in commercial and mixed-use centers for retail, food service, financial institutions, and other high-volume commercial uses.</li> <li>5) Encourage new residential development to be within walking distance (1/2 mile or less) of public activity centers such as schools, libraries, parks, and community centers.</li> <li>6) Retrofit existing, older neighborhoods to improve connectivity, redesign circulation, and create walkable streets.</li> <li>7) Establish a program where energy efficient mixed-use, infill, and transit-oriented development projects can trade GHG credits.</li> </ol>

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#	Measure Title	Measure	Actions for 15% GHG Reduction
LUD 2	Transit-Oriented Development	Coordinate office, commercial, industrial, and high-density residential developments with mass transit service and existing or proposed bikeways.	1) Encourage employers to provide funding for reliable mass transit. 2) Coordinate new, proposed, and existing commuter rail, mass transit service and bikeways so that alternative transportation modes complement one another. 3) Expand existing bike network around existing development as proposed in the Bicycle Master Plan.
LUD 3	Affordable Housing	Work to increase workforce and affordable housing in Santa Barbara County.	1) Continue to provide programs, incentives, and regulations for affordable housing through the County's affordable housing requirements and inclusionary housing program.
T 1	Car Sharing and Ride Sharing	Create new, additional, or improve existing, car-sharing and ride-sharing programs.	1) Work with Traffic Solutions to expand North County Santa Barbara car pool/van pool programs and increase bus line options. 2) Explore expanding car-share options in Santa Barbara County with Traffic Solutions and the Community Environmental Council. 3) Work to effective implement the CalVans program in Santa Barbara County. 4) Support SBCAG's Park and Ride Program.
T 2	Commuter Incentives	Work cooperatively with major local employers to offer incentives and services which decrease single occupancy automobile commuting.	1) Encourage and support employers, especially small and middle-sized employers to voluntarily prepare and implement a Transportation Demand Management program for their employees. 2) Provide TDM program education and community briefings annually and/or semi-annually.



<b>Measure</b>			
<b>#</b>	<b>Title</b>	<b>Measure</b>	<b>Actions for 15% GHG Reduction</b>
T 3	Alternative-Fuel Vehicles and Incentives	Increase the use of alternative-fuel vehicles, and plan for the development of alternative fuel infrastructure.	1) Require pre-wiring for electric vehicle charging stations in new developments. 2) Support the efforts of Plug-in Santa Barbara to plan for and deploy electric vehicle infrastructure in Santa Barbara County. 3) Revise parking requirements for public and new commercial developments to include designated stalls for low-emitting, fuel-efficient vehicles and carpool/vanpool vehicles for a minimum of 8% of total parking capacity and to pre-wire stalls for future electric vehicle charging stations for 2% of total parking capacity. 4) Ensure that alternative-fuel stations and support facilities are allowed uses in land use designations which currently allow gas and service stations. 5) Identify alternative-fuel projects to seek funding through Measure A.
T 4	Alternative Transportation	Enhance alternative transportation.	1) Promote the efforts of the Santa Barbara Car Free program. 2) Require reduced-fare or free transit passes to residents or employees as mitigation of significant traffic impacts for projects. 3) Require projects to include mass transit improvements, such as bus stops, pull-outs, and shelters, or funding to assist in the installation of mass transit improvements as mitigation for significant impacts. 4) Continue to identify alternative transportation projects for funding under Measure A. 5) Expand transit opportunities in northern Santa Barbara County and in agricultural communities. 6) Encourage bus service providers in the County to expand express services and to purchase alternatively fueled and accordion buses. 7) Work with the Chamber of Commerce to encourage alternative transportation opportunities within the tourism industry. 8) Work with Traffic Solutions to establish a bike-sharing program.

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#	Measure Title	Measure	Actions for 15% GHG Reduction
T 5	Integrated Bikeway System	Complete an integrated bikeway system, linking residences with commercial centers, work locations, schools, parks, and mass transit facilities to be a high priority for promoting the use of the bicycle as a primary mode of transportation.	1) Fully implement the Santa Barbara County Bike Plan. 2) Support educational programs for safe and lawful biking. 3) Install signage to promote safe biking and discourage actions such as biking on sidewalks 4) Expand the existing bicycle network, especially in North County. 5) Add more Class I and II bike lanes.
T 6	Pedestrian Improvements	Improve pedestrian convenience, comfort, and safety.	1) Update the countywide design guidelines to create maximum connectivity between neighborhoods, streets, and projects for pedestrian and bicycle travel. 2) Work with COAST to support the expansion of Safe Routes to School programs to all elementary and middle schools within the county, and assess potential roadway improvements for increased safety within school zones. 3) Amend applicable ordinances to direct new development to construct paths that connect land uses and other non-motorized routes and safe road crossings at major intersections. 4) Facilitate pedestrian needs, and provide and ensure well-lit, safe, well-connected, accessible walkways and sidewalks to commercial nodes, schools, and recreation to increase the walkability of communities in the county. 5) Continue to complete gaps in the existing sidewalk system and improve pedestrian crossings. 6) Support enforcement of vehicles yielding for pedestrians in crosswalks.
T 7	Vehicle Idling	Reduce vehicle idling through enforcement and education targeted toward commercial vehicle operators, school parents, and government employees.	1) Support enforcement and education to reduce vehicle idling.

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#	Measure Title	Measure	Actions for 15% GHG Reduction
T 8	Traffic Signal Synchronization	Implement traffic signal synchronization technologies or traffic calming measures to reduce idling emissions.	1) Work to install video signal detection for cyclists and off-peak traffic light prompts for cyclist, pedestrians, and cars on minor connectors.
T 9	Commuter Rail Connections	Develop commuter rail connections between employment centers.	1) Continue to work with Union Pacific to reach agreement on track sharing. 2) Work with Traffic Solutions to provide jitney services from station to final destination. 3) Provide amenities at rail connection stations.
BE 1	Energy Efficiency Education and Outreach	Increase public energy conservation and awareness. Provide information and education to the general public, businesses, and organizations on the importance of energy conservation and available programs, products, and incentives regarding energy efficiency and alternatives. Promote existing low-income energy conservation and weatherization programs, and coordinate with local utility providers and nonprofit corporations to develop additional energy efficiency programs.	1) Work with public utilities, private businesses, organizations, and governmental agencies to develop guidelines on energy-efficient designs. These guidelines should be disseminated as early in the planning process as possible (e.g., include the guidelines with all initial permit applications, disseminate at the permit zoning counter and at pre-application meetings). 2) Work with public utilities, educational facilities, County departments, City departments, and others that have existing outreach programs to disseminate materials about energy conservation and programs available to the general public. 3) Work with public utilities, private businesses, organizations, and governmental agencies to develop outreach programs designed to inform the general public about the cost and benefits of energy efficiency, including technical options, funding, and incentive programs. 4) Establish public outreach (elementary school component, public workshops, etc.) and employee education mechanisms to teach about energy efficiency and other climate-related initiatives. 5) Continue to encourage and promote utility provider energy conservation programs for residential, commercial, industrial, agricultural, and governmental buildings. 6) Encourage the development of green building and weatherization training programs. 7) Encourage builders to make all new construction solar-ready and to inform their clients about the option to install both solar water heating and photovoltaics. 8) Support programs like the Community Action Commission of Santa Barbara County, which provide free energy services to low-income households, including weatherization, furnace repair, and water heater replacement.

County of Santa Barbara  
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<b>Measure</b>			
<b>#</b>	<b>Title</b>	<b>Measure</b>	<b>Actions for 15% GHG Reduction</b>
BE 2	Energy-Efficient Renovations	Incentivize homeowners and commercial and industrial building owners to Improve the energy efficiency of existing buildings upon renovation or alteration. Support and provide resources for tax credits, grants, loans, and other incentives to assist the public, businesses, and local agencies with the purchase of energy-efficient equipment.	<ol style="list-style-type: none"> <li>1) Require all alterations or additions comply with current minimum CalGreen standards as they apply to new construction.</li> <li>2) Require energy audits for all building permits valued greater than \$10,000, and offer expedited building permit plan check for implementing audit recommendations, and consider providing a rebate for completing the audit or a waiver of building permit fees if upgrades were completed.</li> <li>3) Provide energy audit information on different residential building types in each community. These pilot audits would provide general information about efficient retrofits in different building types without requiring each building to complete an audit</li> <li>4) Investigate incentivizing energy-efficient retrofits through direct financial incentives such as property tax rebates or subsidies.</li> <li>5) Encourage participation in the County's emPowerSBC Program and Energy Upgrade California</li> <li>6) Maintain a website with resources for tax credits, grants, loans, and other incentives for the purchase of energy-efficient equipment</li> <li>7) Pursue the participation in an established program or development of a County program, such as commercial PACE, to incentivize energy efficiency upgrades in commercial and multifamily buildings.</li> </ol>
BE 3	Green Business Participation	Increase Encourage participation in the Santa Barbara County Green Business Program.	<ol style="list-style-type: none"> <li>1) Highlight the efforts of businesses participating in the Santa Barbara County Green Business Program.</li> <li>2) Provide information about the Santa Barbara County Green Business Program when new business licenses are received by the County Treasurer/Tax Collector.</li> <li>3) Support the Green Business Program through additional funding and dedicated staff time.</li> </ol>

#	Measure Title	Measure	Actions for 15% GHG Reduction
BE 4	Energy Scoring and Audits	<p>Improve the energy efficiency of buildings Provide information from programs like the Department of Energy's Home Energy Scores to be provided at the time of sale for all residential buildings, and encourage all disclose energy use history when nonresidential buildings are being leased or sold.</p>	<p>1) Require residential property owners to complete or comply with a specified set of energy efficiency upgrades to their home at the time of building sale or within one year from the close of escrow including:</p> <ul style="list-style-type: none"> <li>•Toilets -- 1.6 gal/flush, or flow reduction devices</li> <li>•Showerheads -- 2.0 gal./minute flow rate.</li> <li>•Faucet aerators -- 2.75 gal./minute flow rate for kitchens and bathrooms.</li> <li>•Water heater blankets -- Insulation wrap of R-12 value</li> </ul> <p>•Hot &amp; Cold Water Piping -- Insulate the first two feet from the heater to R-3 value •Hot Water Piping in Pumped, Re-circulating Heating Systems -- Insulate all pipes to R-3 value</p> <ul style="list-style-type: none"> <li>•Exterior Door Weatherstripping -- Permanently affix weather stripping, and door sweeps or door shoes;</li> <li>•Furnace duct work -- Seal duct joints add insulation wrap to R-3 value</li> <li>•Fireplace chimneys -- Must have dampers, doors or closures</li> <li>•Ceiling insulation -- Insulate to R-30 value or greater</li> </ul> <p>•Common Area Lighting (multi-unit buildings) -- Replace incandescent bulbs with compact fluorescent lamps (CFL) of at least 25 lumens.</p> <p>2) Encourage all nonresidential properties, even those not covered by AB 1103, to provide buyers or tenants with the previous year's energy use by documenting use through the EPA's EnergyStar Portfolio Manager with a 50% participation rate goal by 2015. If a 50% participation rate is not achieved by 2020, the County will consider requiring participation of building owners by 2020.</p> <p>3) Provide resources for individuals to self auditing their homes or businesses energy efficiency.</p>

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 Attachment 1

<b>Measure</b>			
<b>#</b>	<b>Title</b>	<b>Measure</b>	<b>Actions for 15% GHG Reduction</b>
BE 5	Community Forestry	Maintain and expand the native tree population to enhance the cooling benefits.	1) Consider developing a shade tree program that provides free native trees to residents and businesses for planting adjacent to buildings to reduce building heat gain.  2) Require landscape plans to include shade trees in parking lots and street trees, where appropriate.  3) Assess existing trees on a proposed project site to determine compatibility with landscaping, shading, and solar access goals, and protect existing trees to the maximum extent feasible.  4) Develop a comprehensive community tree program for planting and maintaining native trees on County-maintained roads, medians, and public parking lots.  5) Continue tree replacement and mitigation requirements when removing trees with new development.  6) Continue to require the protection of native trees on land with proposed development.  7) Form partnerships with local advocacy and community groups to fund the planting and maintenance of native street trees.
BE 6	Smart Grid Technology	Support the local utility providers' implementation of smart grid technology in new and existing residential and nonresidential properties.	See "Measure" box.
BE 7	Lawn and Garden Equipment	Increase the use of electric or alternative-fuel lawn and garden equipment through the development of an exchange or rebate program.	See "Measure" box.

#	Measure Title	Measure	Actions for 15% GHG Reduction
BE 8	Energy Efficiency and Green Building Standards	<p>Establish mechanisms and incentives to encourage builders, architects, developers, consultants, and property owners to implement energy efficiency and green building practices in new and existing developments to exceed the California Green and Building Code (Title 24) standards. Consider adoption and implementation of a green building program, with a voluntary component, for all new and existing development with a voluntary reach code.</p>	<ol style="list-style-type: none"> <li>1) Continue to use the Innovative Buildings Review Committee, designated by the County Building Official, to incentivize green building practices. The committee shall function on a voluntary basis and comprise professionals with specific expertise in energy-efficient building, including the gas and electric utilities, architects, and energy specialists. Its membership shall be approved by the County Building Official.</li> <li>2) Develop and apply permit streamlining for solar energy systems.</li> <li>3) Develop a green building program that requires applicants to develop projects to achieve CALGreen’s Tier 1 standard and encourages achievement of Tier 2 standards and utilizes the existing Innovative Buildings Review Committee.</li> <li>4) Encourage the installation of energy-efficient materials and equipment which substantially exceed the requirements of Title 24 for all new and existing development.</li> <li>5) Provide incentives like expedited building permit plan check and energy plan check fee reductions to development projects that achieve CALGreen’s Tier 2 standard or beyond. Investigate providing additional incentives for implementing environmental efficiency and green building practices.</li> <li>6) Provide homeowners and commercial building owners with information on cost/benefit analysis for energy-efficient measures and available audit and rebate programs. The information would be disseminated early in the planning process</li> <li>7) Encourage energy-efficient upgrades on all development projects.</li> <li>8) Encourage the use of post-consumer recycled content and/or certified sustainable production in building materials.</li> <li>9) Encourage building design, materials production, and construction practices that minimize waste.</li> <li>10) Provide resources and incentives to residents and businesses on carbon-reduction actions in existing buildings, including energy efficiency, renewable energy, choice of materials, and building reuse.</li> </ol>

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Measure		Measure	
#	Title	Measure	Actions for 15% GHG Reduction
BE 9	Efficient Building Design	Assist architects, builders, and others in using state-of-the-art energy technology, design, and spatial orientation for more efficient buildings. Encourage Increase the use of passive, solar design and day lighting in existing and new structures.	See "Measure" box.
BE 10	Construction Equipment Operations	Require the use of Implement best management practices for construction equipment operation. Examples of BMPs include reduced equipment idling, use of alternative fuels or electrification of equipment, or proper maintenance and labeling of equipment.	See "Measure" box.
BE 11	Energy Code Training	Maintain and strengthen the existing training of Planning and Development, Building & Safety Division personnel to remain proficient and consistent in reviewing plans for compliance with the energy code.	See "Measure" box.



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#	Measure Title	Measure	Actions for 15% GHG Reduction
RE 1	Alternative Energy Development	Increase the use of alternative energy technology in appropriate new and existing development.	1) Support the establishment of federal and state funds to provide low-interest loans for alternative energy technology.  2) Expand emPowerSBC to allow for funding of multi-family housing and alternative energy packages.  3) Where appropriate and feasible, remove impediments (e.g., prolonged review due to a proposal including a new or different technology) to the utilization of alternative energy technologies that are cost-effective and contribute to improved environmental conditions.  4) Reconsider Commercial PACE programs to finance energy efficiency and renewable energy improvements.  5) Encourage the use of anaerobic digesters in agriculture.  6) Identify policies and practices to attract businesses that develop or market alternative energy technologies.  7) Require new buildings to install renewable energy systems or be built "renewable energy ready" as follows: - Single family residential projects, multi-family projects under 4 units, and commercial projects less than 10,000 square feet must be built in a manner that future photovoltaic installation could be installed. - Multifamily residential projects greater than 4 units, and commercial projects larger than 10,000 square feet must provide at least 1 kW of renewable energy per 1,000 square feet.
RE 2	Solar Water Heaters	Encourage the replacement of existing water heaters with solar water heaters.	1) Require new residential development and encourage existing development to participate in Promote the State's CSI-Thermal program which provides rebates to utility customers who install solar thermal systems to replace water-heating systems powered by electricity or natural gas.
RE 3	Alternative Energy Incentives	Adopt a policy or program that offers incentives (such as streamlined permitting, permit waivers, or fee waivers) to encourage a switch in electricity generation from fossil fuels to renewable sources through small-scale renewable electricity generation.	See "Measure" box.

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#	Measure Title	Measure	Actions for 15% GHG Reduction
RE 4	Utility-Scale Renewable Energy Projects	Promote the use of clean alternative energy production by encouraging development of utility-scale renewable electrical generation facilities.	See "Measure" box.
IEE 1	Efficient Equipment Incentives	Support legislation for tax credits, grants, loans, and other incentives to assist the public, businesses, and local agencies with the purchase of energy-efficient equipment.	See "Measure" box.
IEE 2	Energy Management Programs	Encourage Increase industrial energy users to participation in energy management programs such as the EnergyStar Benchmarking Program to ensure the efficient use of energy resources and proper operation of equipment and facilities.	See "Measure" box.
IEE 3	Efficient Upgrade Incentives	Incentivize the completion of Implement energy efficiency upgrades at industrial facilities through streamlining permit review, providing rebates for audits, and highlighting best practices among similar energy users.	<p>1) Establish a streamlined permit review process for completion of energy efficiency upgrades at industrial facilities through 2015. After 2015, evaluate program participation in audits and consider a mandatory program if participation falls below 10% of total industrial facilities.</p> <p>2) Develop resources for best practices among industrial facilities.</p>
IEE 4	Efficient Equipment Incentives 2	Increase the use of energy efficiency or EnergyStar rated equipment at new or renovated industrial facilities.	See "Measure" box.

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#	Measure Title	Measure	Actions for 15% GHG Reduction
WR 1	Waste Reduction	Continue to support the programs associated with efficient waste collection and recycling, public school education, and composting.	See "Measure" box.
WR 2	Increased Recycling Opportunities	Seek additional opportunities for county residents to recycle cardboard, glass, paper, and plastic products.	See "Measure" box.
WR 3	Construction and Demolition Waste Recycling	Increase the recycling and reuse of construction waste to reduce energy consumption associated with extracting and manufacturing virgin materials.	See "Measure" box.
WR 4	Landfill Disposal Reductions	Reduce or minimize GHG emissions from waste materials deposited into landfills.	See "Measure" box.
WR 5	Clean Waste Collection Vehicles	Require waste haulers on contract with the County to use clean, Reduce GHG emissions from waste collection vehicles through the use of alternative fuels for waste collection vehicles.	See "Measure" box.
AG 1	Local Food Programs	Increase local food production and distribution.	See "Measure" box.
AG 2	Agricultural Conservation Practices	Promote the use of science based agricultural conservation practices, such as those established by various Good Agricultural Practice programs, and seek to expand those programs to include soil,	See "Measure" box.

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Measure			
#	Title	Measure	Actions for 15% GHG Reduction
		fertilizer, water, crop rotation, and fuel management practices.	
AG 3	Agriculture Equipment	Work with the APCD to increase the use of alternatively fueled equipment in agricultural operations through education, incentives, or revisions to existing regulations.	See "Measure" box.
AG 4	Energy Efficient Agriculture Operations	Increase agriculture-related energy conservation through appropriate and practical efficient energy, water, and resource management practices.	See "Measure" box.
AG 5	Agriculture Irrigation Improvements	Continue to support the programs of the Soil Conservation Service, Resource Conservation Districts, UC Cooperative Extension/Farm Advisor, utility companies, and others that address efficient irrigation because of their associated energy benefits.	See "Measure" box.
AG 6	Agriculture and Open Space Easements	Facilitate the increased use of agriculture and open space easements through zoning, dedication of public funds, and mitigation fees to protect carbon-sequestering environments and to support local-resource-based industries.	See "Measure" box.

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<b>Measure</b>			
<b>#</b>	<b>Title</b>	<b>Measure</b>	<b>Actions for 15% GHG Reduction</b>
WE 1	Water Conservation Programs	Encourage water purveyors and water customers to continue their efforts to install more efficient options to Decrease energy use associated with reduced pumping, distribution, heating, and treating of water and wastewater.	See "Measure" box.
WE 2	Water-Efficient Building and Landscape Standards	Maximize end-user water efficiency by encouraging the implementation of prescriptive or performance measures included in the California Green Building Code in all new and existing development.	See "Measure" box.
WE 3	Water-Efficient Landscaping	Increase the use of (per Government Code, Section 65590, Article 10.8) native, drought-tolerant landscaping and smart irrigation technologies in new and renovated developments and at public parks and facilities.	See "Measure" box.



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**APPENDIX B- NOTICE OF PREPARATION  
AND COMMENTS RECEIVED**

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## APPENDIX B. NOTICE OF PREPARATION AND COMMENTS RECEIVED

The County of Santa Barbara published a Notice of Preparation (NOP) for the proposed Energy and Climate Action Plan (ECAP; proposed project) on February 12, 2014, which initiated a 30-day response period. This appendix provides the NOP, the written correspondence received in response to the NOP, and responses to comments.

### NOP RESPONSE LETTERS

The table below lists the persons, organizations, and public agencies that provided responses to the NOP. The written letters and memoranda received in response to the NOP are presented in their entirety at the end of this appendix.

**TABLE B-1  
RESPONSES TO THE NOP**

Agency, Organization, and/or Person	Date of Letter
Native American Heritage Commission	February 18, 2014
Neighborhood Defense League of California	March 3, 2014 March 11, 2014
Santa Barbara Association of Realtors	March 3, 2014
Community Environmental Council, Santa Barbara Bicycle Coalition, and Coalition for Sustainable Transportation (joint)	March 12, 2014
City of Santa Barbara	March 13, 2014
California Department of Fish and Wildlife	March 13, 2014
Santa Barbara County Air Pollution Control District	March 14, 2014

### RESPONSES TO NOP COMMENT LETTERS

Responses to the letters and memoranda submitted on the NOP are presented below.

#### NATIVE AMERICAN HERITAGE COMMISSION

In their NOP response letter, the Native American Heritage Commission (NAHC) provided recommendations for consideration of Native American resources. These recommendations are duly noted and were considered in the preparation of the analysis of archaeological resources and human remains in Section 3.0, subsection 3.1.2, of this EIR.

#### NEIGHBORHOOD DEFENSE LEAGUE OF CALIFORNIA

In their NOP response memorandum and letter, the Neighborhood Defense League of California (NDLC) expressed their recommendation for ECAP Option 3 rather than Option 4; provided recommendations regarding the ECAP and certain greenhouse gas (GHG) reduction measures; provided two periodical articles; and offered commentary on the following EIR review topics: land use and development, bikes, public transportation and pedestrians, aesthetics and visual resources, agriculture, biological resources, noise, and air quality. The NDLC's comments, opinions, and recommendations are duly noted and were considered in the preparation of this EIR. Specifically, the NDLC's comments on land use and development were considered in Section 3.1, Land Use; comments on bikes, public transportation, and pedestrians were considered in Section 3.2, Transportation and Circulation; comments on aesthetics and visual

## **APPENDIX B. NOTICE OF PREPARATION AND COMMENTS RECEIVED**

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resources were considered in Section 3.3, Aesthetics and Visual Resources; comments on agriculture were considered in Section 3.4, Agricultural Resources; comments on biological resources were considered in Section 3.5, Biological Resources; comments on noise were considered in Section 3.6, Noise; and comments on air quality were considered in Section 3.7, Air Quality.

### **SANTA BARBARA ASSOCIATION OF REALTORS**

In their NOP response letter, the Santa Barbara Association of Realtors expressed their opinions regarding the ECAP, including their opposition to GHG reduction measure BE4 Energy Scoring and Audits. These comments are duly noted and were considered in the analysis of project alternatives in Section 5.0 of the EIR.

### **COMMUNITY ENVIRONMENTAL COUNCIL, SANTA BARBARA BICYCLE COALITION, AND COALITION FOR SUSTAINABLE TRANSPORTATION**

In their NOP response letter, the Community Environmental Council, Santa Barbara Bicycle Coalition, and Coalition for Sustainable Transportation jointly requested clarifications regarding the ECAP and provided suggestions for the ECAP, including suggestions for GHG reduction measures. These comments are duly noted.

### **CITY OF SANTA BARBARA**

In response to the NOP, the City of Santa Barbara provided suggestions for the ECAP and for the contents of the EIR, including suggestions for alternatives. These comments are duly noted and were considered in the preparation of the EIR. See Section 5.0 of the EIR for an analysis of project alternatives and Section 6.0, subsection 6.3, of the EIR for an analysis of energy-related impacts.

### **CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE**

In response to the NOP, the California Department of Fish and Wildlife (CDFW) provided recommendations for consideration of impacts on biological resources. These recommendations are duly noted and were considered in the preparation of the analysis of biological resources in Section 3.5 of this EIR.

### **SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT**

In response to the NOP, the Santa Barbara County Air Pollution Control District (APCD) provided recommendations for consideration of air quality impacts. These recommendations are duly noted and were considered in the preparation of the analysis of air quality in Section 3.7 of this EIR.

### **NOP AND RESPONSE LETTERS**

The project's NOP and response letters are presented on the following pages.



# County of Santa Barbara Planning and Development

Glenn S. Russell, Ph.D., Director  
Dianne Black, Assistant Director

## NOTICE OF PREPARATION

**DATE:** February 12, 2014

**TO:** State Clearinghouse  
1400 Tenth Street  
Sacramento, CA 95814

**FROM:** County of Santa Barbara  
Planning and Development Department  
Long Range Planning Division  
123 E. Anapamu Street  
Santa Barbara, CA 93101-2058  
(805) 568-3380

**SUBJECT:** Notice of Preparation and Scoping of a Program Environmental Impact Report

**PROJECT NAME:** Energy and Climate Action Plan Environmental Impact Report

**PROJECT CASE NO.:** 14GPA-00000-00003

**PROJECT LOCATION:** The Energy and Climate Action Plan (ECAP) covers the unincorporated areas of Santa Barbara County where the County of Santa Barbara retains land use permit authority. The ECAP therefore excludes incorporated cities, the University of California, the Chumash Reservation, and State and federal lands including Los Padres National Forest, Vandenberg Air Force Base, and offshore oil and gas production facilities.

**LEAD AGENCY:** The County of Santa Barbara is the lead agency preparing the Program Environmental Impact Report (EIR) with the purpose of informing decision-makers and the public regarding the potential environmental effects related to the ECAP in compliance with the California Environmental Quality Act (Public Resources Code §21000 et seq.). The EIR will consider the potential effects of the project on the environmental areas identified while developing the ECAP and during the scoping period.

**PROJECT DESCRIPTION:** The proposed ECAP includes a 2007 baseline inventory of community-wide GHG emissions, a forecast of emissions to the years 2020 and 2035, a GHG reduction target of 15% below baseline emissions by 2020, a set of emission reduction measures to meet the target, and a methodology for tracking and reporting emissions in the future. The ECAP would implement a suite of emissions reduction measures across many sectors to achieve community-wide GHG emission reductions and energy-saving measures in support of a thriving, well-balanced, and sustainable community. The emission reduction measures proposed in the ECAP are made of a combination of voluntary, phased, and mandatory measures. Phased measures are those which would initially be implemented on a voluntary basis until a designated

check-in year. At that time, if the participation rate of the measure is below a designated threshold, the measure would be phased into containing mandatory requirements. These emission reduction measures, combined with the measures identified in the County's Energy Action Plan for municipal facilities, would collectively provide a decrease in both GHG emissions and energy use in the County. The actions will assist the State in meeting its GHG reduction goals consistent with AB 32 and energy reduction goals consistent with California's Energy Efficiency Strategic Plan.

The project description, location, and potential environmental effects are included in the attached *Environmental Scoping Document for the Energy and Climate Action Plan* and may be downloaded from the Planning and Development Department, Long Range Planning Division webpage at:

<http://longrange.sbcountyplanning.org/programs/climateactionstrategy/climateaction.php>

**PUBLIC ENVIRONMENTAL SCOPING HEARING:** The Planning and Development Department will hold an environmental scoping meeting at the County Planning Commission Hearing Room on Monday, March 3, 2014 at 6:00 p.m. The purpose of the meeting is to receive comments on the scope and content of the environmental issues to be addressed in the EIR. The County Planning Commission Hearing Room 17 is located at 123 East Anapamu Street, Santa Barbara.

**PUBLIC AND AGENCY COMMENTS:** We need to know the views of you or your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

Your response must be received no later than March 14, 2014. Please send your comments and the name of a contact person in your agency to Heather Allen, Associate Planner, at the address listed above. Due to the time limits mandated by State law, your response must be received at the earliest possible date but not later than 30 days after receipt of this notice.

Date: February 10, 2014  
Planner: Heather Allen  
Division: Long Range Planning  
Telephone: (805) 884-8082  
Email: hallen@countyofsb.org

cc: Clerk of the Board (please post for 30 days)  
Encl: Location map  
Scoping Document

G:\GROUP\COMP\Comp Plan Elements\Legislation\AB 32\CAS\CAP\Environmental Review\Scoping

**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Boulevard, Suite 100  
West Sacramento, CA 95691  
(916) 373-3715  
Fax (916) 373-5471  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
Ds\_nahc@pacbell.net  
e-mail: ds\_nahc@pacbell.net



February 18, 2014

Ms. Heather Allen, Associate Planner

**County of Santa Barbara Planning & Building  
Long Range Planning Division**

123 East Anapamu Street  
Santa Barbara, CA 93101-2058

RE: SCH#2014021021 CEQA Notice of Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **Energy and Climate Action Plan Environmental Impact Report (14GPA-00000-00003) Project;** located in unincorporated area County-wide where Santa Barbara County, California has land use jurisdiction

Dear Ms. Allen:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

If there is federal jurisdiction of this project due to funding or regulatory provisions; then the following may apply: the National Environmental Policy Act (NEPA 42 U.S.C 4321-43351) and Section 106 of the National Historic Preservation Act (16 U.S.C 470 *et seq.*) and 36 CFR Part 800.14(b) require consultation with culturally affiliated Native American tribes to determine if the proposed project may have an adverse impact on cultural resources

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PLANNING & DEVELOPMENT

We suggest that this (additional archaeological activity) be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. Any information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People...with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding 'environmental justice.' Also, applicable to state agencies is Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

  
Dave Singleton  
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts  
Santa Barbara County California  
February 18, 2014**

Ernestine DeSoto, Tribal Elder  
1311 Salinas Place # 5 Chumash  
Santa Barbara CA 93103  
805-636-3963

Patrick Tumamait  
992 El Camino Corto Chumash  
Ojai , CA 93023  
(805) 640-0481  
(805) 216-1253 Cell

Beverly Salazar Folkes  
1931 Shadybrook Drive Chumash  
Thousand Oaks, CA 91362 Tataviam  
folkes9@msn.com Ferrnandeño  
805 492-7255  
(805) 558-1154 - cell  
folkes9@msn.com

San Luis Obispo County Chumash Council  
Chief Mark Steven Vigil  
1030 Ritchie Road Chumash  
Grover Beach CA 93433  
(805) 481-2461  
(805) 474-4729 - Fax

Santa Ynez Band of Mission Indians  
Vincent Armenta, Chairperson  
P.O. Box 517 Chumash  
Santa Ynez , CA 93460  
varmenta@santaynezchumash.  
(805) 688-7997  
(805) 686-9578 Fax

John Ruiz  
1826 Stanwood Drive Chumash  
Santa Barbara CA 93103  
(805) 965-8983

Barbareno/Ventureno Band of Mission Indians  
Julie Lynn Tumamait-Stennslie, Chair  
365 North Poli Ave Chumash  
Ojai , CA 93023  
jtumamait@hotmail.com  
(805) 646-6214

Gilbert M. Unzueta Jr.  
571 Citation Way Chumash  
Thousand Oaks, CA 91320  
uhuffle@aol.com  
(805) 375-7229

**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.**

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**Native American Contacts  
Santa Barbara County California  
February 18, 2014**

Owl Clan  
Qun-tan Shup  
48825 Sapaque Road  
Bradley , CA 93426  
mupaka@gmail.com  
(805) 472-9536 phone/fax  
(805) 835-2382 - CELL

Chumash

Coastal Band of the Chumash Nation  
Michael Cordero, Chairperson  
P.O. Box 4464  
Santa Barbara CA 93140  
CbcnTRIBALCHAIR@gmail.com

Chumash

Stephen William Miller  
189 Cartagena  
Camarillo , CA 93010  
(805) 484-2439

Chumash

Charles S. Parra  
P.O. Box 6612  
Oxnard , CA 93031  
(805) 340-3134 (Cell)  
(805) 488-0481 (Home)

Chumash

Santa Ynez Tribal Elders Council  
Adelina Alva-Padilla, Chair Woman  
P.O. Box 365  
Santa Ynez , CA 93460  
elders@santaynezchumash.org  
(805) 688-8446  
(805) 693-1768 FAX

Chumash

Santa Ynez Band of Mission Indians  
Tribal Admin/Counsel Sam Cohen  
P.O. Box 517  
Santa Ynez , CA 93460  
info@santaynezchumash.org  
(805) 688-7997  
(805) 686-9578 Fax

Chumash

Randy Guzman - Folkes  
4676 Walnut Avenue  
Simi Valley , CA 93063  
ndnRandy@yahoo.com  
(805) 905-1675 - cell  
(805) 520-5915-FAX

Chumash  
Fernandeño  
Tataviam  
Shoshone Paiute  
Yaqui

Carol A. Pulido  
165 Mountainview Street  
Oak View , CA 93022  
805-649-2743 (Home)

Chumash

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**Native American Contacts  
Santa Barbara County California  
February 18, 2014**

Melissa M. Parra-Hernandez  
119 North Balsam Street Chumash  
Oxnard , CA 93030  
envyy36@yahoo.com  
805-983-7964  
(805) 248-8463 cell

Barbareno/Ventureno Band of Mission Indians  
Raudel Joe Banuelos, Jr.  
331 Mira Flores Court Chumash  
Camarillo , CA 93012  
805-987-5314

Frank Arredondo  
PO Box 161 Chumash  
Santa Barbara CA 93102  
ksen\_sku\_mu@yahoo.com

Coastal Band of the Chumash Nation  
Janet Darlene Garcia  
P.O. Box 4464 Chumash  
Santa Barbara CA 93140  
805-689-9528

Santa Ynez Tribal Elders Council  
Freddie Romero, Cultural Preservation ConsInt  
P.O. Box 365 Chumash  
Santa Ynez , CA 93460  
805-688-7997, Ext 37  
freddyromero1959@yahoo.  
com

Coastal Band of the Chumash Nation  
Crystal Baker  
P.O. Box 723 Chumash  
Atascadero , CA 93423  
805-466-8406

Barbareno/Ventureno Band of Mission Indians  
Kathleen Pappo  
2762 Vista Mesa Drive Chumash  
Rancho Pales Verdes CA 90275  
310-831-5295

Barbareño Chumash  
Ms. Regina Unzueta  
125 West Carrillo Street Chumash  
Santa Barbara CA 93101  
805 570-9530  
reginaUnzueta@gmail.com

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Santa Barbara County California  
February 18, 2014**

PeuYoKo Perez  
11465 Nardo Street  
Ventura , CA 93004  
grndowl4U@yahoo.com  
805-231-0229 cell

Chumash

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**MEMO FROM:**  
**Neighborhood Defense League of California**  
**1482 East Valley Road, Suite 252**  
**Santa Barbara CA 93108**

**RECEIVED**

**TO:**  
**Heather Allen**  
**Planning and Development Department**  
**123 East Anapamu Street**  
**Santa Barbara CA 93101**

MAR 03 2014  
S.B. COUNTY  
PLANNING & DEVELOPMENT

**RE:**  
**Energy and Climate Action – Environmental Scoping Meeting**  
**March 3, 2014**

**The NDLC Board of Directors ECAP Sub Committee**

**The following comments are directed at the March 3 Scoping Meeting and will be followed by a comprehensive statement prior to the March 14 deadline:**

**Staff should recommend that the Board of Supervisors vote to drop from mandatory Option 4 to non-mandatory Option 3 in the matrix choices for implementation of ECAP.**

- 1. All other governmental agencies contacted are voluntary**
- 2. City of Santa Barbara only has one-half page of suggestions for private home adaption to climate change, as compared to draconian, mandatory Option 4 in County directed matrix**
- 3. Revisit and make sure what County is asking private citizens to do is reasonable and cost-effective and *voluntary***
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- 5. Incentivize all and reward outstanding compliance efforts/publicize**
- 6. Execute CAP using existing staff**
- 7. Have Utility companies continue their Energy inspection service**
- 8. Teach by example, as the City of Santa Barbara has done, repair and outfit existing County properties as you would wish private citizens to do. Elevate retrofitting and repair in the County budget.**
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- 10. *Above all*, return to the R-4 “mild climate” designation as rated by the California Energy Commission. Design ECAP compatible with R-4.**



**Neighborhood  
Defense League  
of California**

*(formerly Homeowners Defense Fund)*

1482 East Valley Road, Suite 252  
Santa Barbara, CA 93108  
fax: 805-969-0297

*Accommodating growth  
While preserving the character  
Of our neighborhoods*

Board of Directions  
.....

**Judith Ishkanian**  
*President*

**Sally Jordan**  
*Vice President*

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**James Westby**  
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**Gary Earle, Emeritus**

**Roy Gaskin, Emeritus**

**Rob Lowe, Emeritus**

RECEIVED

MAR 11 2014

S.B. COUNTY  
PLANNING & DEVELOPMENT

March 11, 2014

**Heather Allen**  
c/o Planning and Development Department  
123 East Anapamu Street  
Santa Barbara CA 93101

CC: Jeff Hunt

Dear Heather:

Enclosed is a hard copy of the NDLC commentary on the ECAP Scoping Document. There is the March 3 statement, which is a product of our NDLC ECAP sub-committee. It is a good overview. There is an essay style commentary on ECAP pages 1 - 4 and then an itemized conversational response to the categories, pps 5 -23. I wrote that in the form of a casual conversation, making points and counter-points along the way. At the end I enclose two recent articles from Investor's Business Daily that indicate the rising voices of concern about the extreme ideas that undergird some of the regulations presented in the document.

NDLC shares the mission of County Planning and Development, as is expressed in our motto, "Accommodating growth while preserving the character of our neighborhoods." As with P & D, we do not oppose growth, but advocate zoning and rational planning. We do not support the various movements in fashion today that demand we all return to the pre-industrial era, or the original "state of nature." Let us be wise in navigating this document for the sake of the county government and all its citizens.

Sincerely,

*Judith Ishkanian*  
Judith Ishkanian, President  
Neighborhood Defense League

# NOTICE OF PREPARATION

## of an Environmental Impact Report for the Energy and Climate Action Plan

Planning & Development Department is the lead agency for preparation of a program Environmental Impact Report for the County of Santa Barbara Energy and Climate Action Plan (ECAP). A first step in the EIR process is for the lead agency to prepare and distribute a Notice of Preparation to provide notice that an EIR is being prepared, and to solicit guidance from Responsible Agencies, Trustee Agencies, and other public agencies on the scope and content of the environmental information to be included in the EIR. A Notice of Preparation (NOP) was issued on February 12, 2014 for a 30-day comment period ending March 12, 2014.

### Environmental Scoping Meeting

Planning and Development will conduct an Environmental Scoping Meeting on March 3, 2014 to provide an additional opportunity for the public to comment on the scope and content of the environmental issues to be addressed in the EIR. The Environmental Scoping Period and hearing schedule is listed below. All interested parties are invited to attend.

### Energy and Climate Action – Environmental Scoping Meeting

**March 3, 2014 (6:00 pm)**

Planning Commission Hearing Room 17  
123 E. Anapamu Street, Santa Barbara

**All comments must be received by**  
**5:00 p.m. March 14, 2014**

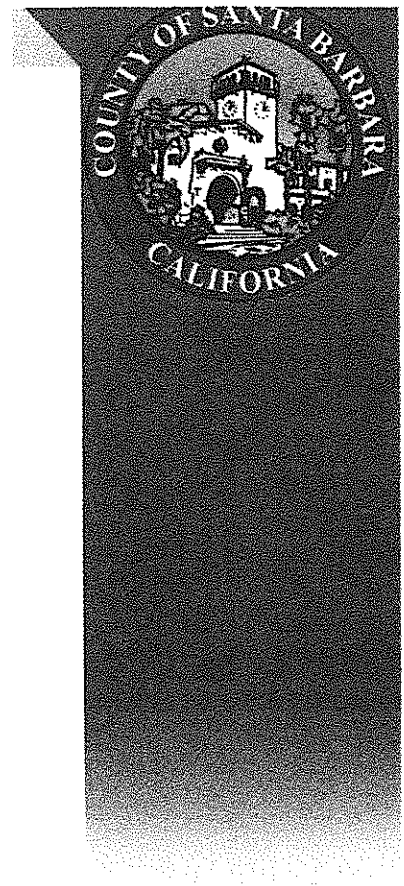
A project description and potential environmental issues to be addressed in the Draft EIR are detailed in the *Environmental Scoping Document for the Energy and Climate Action Plan* and may be downloaded from the Long Range Planning Division webpage at:

<http://longrange.sbcountyplanning.org/programs/climateactionstrategy/climateaction.php>

The document may also be reviewed at the County Planning and Development Department Offices located at 123 East Anapamu Street, Santa Barbara or 624 W. Foster Road, Santa Maria, CA 93455.

### How to comment:

Written comments can be sent to: Heather Allen, Planning and Development Department, 123 East Anapamu Street, Santa Barbara, CA, 93101, or you may email comments to [hallen@countyofsb.org](mailto:hallen@countyofsb.org).



### contact

Heather Allen  
123 E. Anapamu Street  
Santa Barbara CA 93101

Phone: 805-884-8082  
E-mail: [hallen@countyofsb.org](mailto:hallen@countyofsb.org)  
Web: <http://longrange.sbcountyplanning.org/>  
Facebook: [facebook.com/longrange.sbcounty](https://www.facebook.com/longrange.sbcounty)

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**Staff should recommend that the Board of Supervisors vote to drop from mandatory Option 4 to non-mandatory Option 3 in the matrix choices for implementation of ECAP.**

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**Neighborhood Defense League of California  
Commentary on Santa Barbara County  
Energy and Climate Change Scoping Document**

**Due: March 14, 2014**

**Pages 1 -4: Response to introductory Comments**

**The NDLC General comments of March 3, 2014 stand as a good introduction to the general comments that follow. The NDLC Sub Committee on ECAP contributed to the Scoping Plan meeting of March 3. The comments that follow are entirely the work of Judith Ishkanian, President, NDLC. They reflect the tenor of the Scoping Plan Sub-committees opinions, comparative studies with the City of Santa Barbara Final Climate Plan, and nine years of study of Climate politics since AB 32 was passed in the California State Legislature in 2006. The implications incipient in 2006 are gradually becoming a reality on the ground and involve, logistics, demographics and a level of public involvement of which the public is unaware.**

**The goal of NDLC is to continue to give a fresh perspective to the Planning and Development Department that will enable the planners to frame an adaptable set of rules within the framework of the law.**

**If the staff, or the public can persuade the Board of Supervisors to drop its mandatory choice of "Option 4" in the draft matrix, that obliges it to enact mandatory ordinances for the public to follow, in favor on a voluntary "Option 3" then the following commentary is moot. However, considering the politics of the day it seems unlikely that a less Draconian approach will prevail.**

**Thank you for amending the earlier version of the ECAP Scoping Plan. Two items stand out and deserve attention: 1. The omission of R 19 wall insulation requirement at point of sale; 2. The almost complete erase of Agricultural requirements, in favor of local control of Agriculture interests.**

**The exception to the Agriculture edit is the startling insertion of ICLEI requirements in other parts of the document that, again, hobble the cattle industry. ICLEI as not part of the original Scoping Plan, but since then, three of the five Supervisors have signed the "ICLEI Pledge," which was not part of the California laws that invited the response to Climate Change. ICLEI should be dropped for sake of consistency, and, perhaps legality.**

**Finally, A comparative approach to the California AB 32 between the City of Santa Barbara and the County of Santa Barbara reveals a very different approach about how to enact the law. Whereas the City of Santa Barbara produced an in-house document wherein each Department submitted a report on what it had already accomplished toward the desired goal of AB 32, the**

**County of Santa Barbara commissioned an outside contractor firm for a triple digit sum to produce a template into which the County of Santa Barbara was to fit. Whereas the City of Santa Barbara directed most of its efforts toward adapting its own City policy and actions toward the desired goal, the County of Santa Barbara concentrated on public compliance to the County directives. (This could well be the result of the impersonal nature of the outside contractor). Whereas the City of Santa Barbara had a great deal to say about the theories driving all the CAP efforts, the County document was more concerned with compliance with the law than justifying it.**

**In sum, option 3 would render the County approach more compatible with the city approach. Inconsistencies should be reconciled, and most certainly in favor of our own staff edits, rather than outside organizations.**

**Judith Ishkanian, President  
Neighborhood Defense League of California**



## Rolling Commentary of Scoping Plan

**Pps. 1 – 4 : (Matter of Fact introduction in compliance with the law)**

**p. 5 “Physician, heal thyself.” Begin with County property as an example to others. Inventory existing County “stationary sources” and upgrade to green. Is it cost effective and compliant? Only then, apply what you have demonstrated to private residences and commercial stationary sources.**

**p. 6. Unincorporated jurisdiction of County is close to, or less than half, the land in the County. Los Padres National Forest is a huge component of land and one forest fire can ruin the atmosphere for years... not to mention Vandenberg AFB: one rocket can do the same. (These two entities do not have mandated CAP Plans.)**

**p. 7. Winning suggestion on this page is to incorporate best idea into future planning principles. Also, 15% by 2020 is unrealistic and bad in that it is mandatory when all other plans are voluntary. So should be the SBC plan. Santa Barbara City projects to 2030 for many proposals affecting the public, but the city is already practicing on itself, to wit: narrower roads, bicycle lanes, green public buildings, etc.**

**p. 8. B-4 – Energy Scoring with EPA Energy Star, 50% by 2015: Good Luck**

**p. 8 – p. 15 1 EE3 General Comments re: Efficient Upgrade Incentives**

**p. 9. Transportation – (Here is the Bicycle Lobby wish list).**

**Reality: Internal Combustion engine will dominate in near to near/far future horizon.**

**Good idea: Safe for drivers, “multi-modal” idea – good, can be practiced**

**Natural Gas: Is used here anyway in CA (more than back east). Electricity has to be produced by coal or natural gas.**

**p. 10. Thank you for saying that “energy consumption cannot be eliminated.” Advice: Seek alternatives while NOT demonizing petroleum-based products. Also, “traditional electricity production” – yes, the Federal Government is outlawing coal-fired plants that generate electricity. This is energy suicide. As with Quixote, the eco-left is “tilting at windmills” seeing villains in harmless servants to humanity. [This may seem blasphemous, but I have been reading about the “de-growth” movement that has already had 4 international meetings, that wishes to return to the pre-industrial 18<sup>th</sup> century, not to mention “Wilding” that wants to eliminate humans altogether. This is the nihilist, neo-romanticism that often follows bursts of human advancement (late Middle Ages, Early 19<sup>th</sup> century, late 1880’s)**

**\*Check with the Audubon Society over the raptor and migrating bird deaths. New Mexico has sounded the alarm about mass bat deaths from wind turbines as bats feed on insects. When we are regulating insecticides, such natural pest control allies should be considered.**

**Waste Reduction: Why not utilize methane gas? Landfill methane – my husband advocated this 30+ years ago. Begin with your own facilities.**

**Agriculture – This is a BIG improvement from the first matrix. Ag is more realistic in this iteration. HAT-TIP to local control by local agriculturalists over how to manage AG is very much appreciated.**

**p.11 Water efficiency – (Hey, there is no water. Improve supply to Cachuma [political] and Gibraltar [bond issue for dredging?] storage systems. )**

**Sustainability Community Strategy:**

**Vague... hmmm.**

**“Stack and Pack” High Density programs, as described by SB 375 will not be well received – especially when by a mandated directive. Metro-singles like funk zone living and, also, “Snow Birds”, and this is fine, but the idea is not user-friendly for families of any economic status. Also, it goes against the sustainability idea of family gardens, chickens, etc. – I suppose they are thinking of garden collectives for stack and pack people. That would fit the ideology.**

**Sustainability is a term that is used in the “De-Growth” movement and also ICLEI, and so am wondering how much of these ideas come from those sources.**

**Community Choice Aggregation: Yay! Here is a winner idea that should be explored. Marin County has begun to implement his idea for independent community Utility management, and we have a CEO from Marin. This portends a strategy to get off the grid for community safety, independence and reliability.**

**Hydrogen fuel cell energy is supplying many huge Silicon companies with independent energy source and two companies were working on product for individual homes. Bloom Box still does, and Clear Edge, we just learned, found it not cost effective and so is dropping single residence product for the CCA's that are cropping up all over. (we have more information on this if you wish)**

**p. 12 (2020 is unrealistic for most of your goals. It would be better to match SB City's 2030 goals line for line)**

### **3.6. Adoption and Implementation**

**Oh oh: Now the nasty reality of the "Option 4" comes in.  
County Ordinances – No!;  
Permitting Requirements – No!**

#### **p. 13 EIR Review Topics**

##### **4.1 Land Use and Development**

- a) No Water, no new hook-ups**
- b) No new Building permits**
- a) & b) Of course, there go new property tax income for the County**
- c) County sells all unused out of code Buildings and put proceeds in Trust for public works improvement and AGW reduction incentives and citizen prizes**

##### **4.2.2. Bikes, Public Transportation and Pedestrians**

**Eliminating huge busses and going with 12 seat busses and electric trolley cars on wheels could improve public transportation. – get rid of behemoths. (but then, how much control does County have over the Metropolitan Transit Authority? Is it an SBCAG jurisdiction?)**

##### **4.2.3. Aesthetics and Visual Resources**

**So, do you think wind turbines are aesthetically pleasing? (beauty in the eye of the beholder)**

##### **4.2.4. Agriculture**

**Glad that you wish to preserve agriculture. It is appropriately agree to accommodate the local AG community. (much appreciated) thank you for removing regulations on cattle industry)**

##### **4.2.5. Biological Resources**

**All are endangered by large-scale renewable energy facilities!  
Wind Turbines proven to kill birds, including endangers  
s Golden and Bald Eagles. Wind farms utilize the SAME wind currents that migrating birds use. Kleiner, Perkins, Caufield and Gore recently received a permit for one of their wind turbine clients to kill 52 or 54 (forgot which) California Golden Eagles per year. (Now I have read that there are many such wavers) ("all are equal, but some are more equal than others")  
Solar Farm, five miles square in Mojave Desert gives off 1,000 degree heat and is frying whole flocks of migrating birds in flight.  
The intense heat surrounding solar farm is killing endangered desert tortoise**

**Both Wind Farms and solar farms subsidized by Federal government.**

#### **4.2.6. Noise**

**ECAP solutions silent killers – not noisy,  
Residents living near wind turbine farms report an annoying perpetual hum,  
according to a recent UK report.**

#### **4.2.7 Air Quality.**

**Re: Alternative Transportation solutions – note: What are the chances that  
Union Pacific will change its mind and share its rails with Santa Barbara  
County?**

**p. 15**

#### **4.3. Alternative Analysis**

**Thank you for considering alternatives to untested theories. Test and verify  
all ideas, and look for existing examples, pro and con.**

**4.5 – ECAP must be consistent with SBC Comprehensive Plan, Coastal  
Commission, and so on.**

**SBC GGEI:**

#### **p.3. Two items of interest**

##### **1. “The County hired a Consultant to peer review...”**

**Question: Was this the same Consultant Group hired to do the public  
participation matrix, and then re-hired to finish the job for another sum of \$\$  
by the Board of Supervisors?**

**Comment: The consultant team hired is the reason the County report has more  
of a “cookie cutter” approach than the SB City plan, but is more detailed and  
clinical and less ideological than the S.B. City plan**

**2. NO ICLEI! Should not be inserted for methodology or anything else. It  
is a major conflict of interest since one of our County Supervisors is the Vice  
President of ICLEI North America, and three of our Supervisors are signatories  
of the “ICLEI Pledge.” This inclusion means the “pledge” is not just theoretical,  
but is influencing policy out of the view of the public. C of I invites potential  
litigation.**

#### **p. 4 List of “Methodology” Inventory**

**differs from your P & D amendments to Agriculture that was so appreciated.  
The Agriculture in the ICLEI list has “Emissions from Livestock and Fertilizer**

Application.” This is a formulation often advanced in ICLEI/De-Growth circles that, sadly, has dangerous implications and contradicts the other goal advanced by this study: sustainability. Animal husbandry and commercial agriculture are obviously in the crosshairs of advocates of local food production.

Thank you for amending the matrix in this regard. The ICLEI add-on should be eliminated for the sake of consistency.

p. 5. Eek! (ICLEI, again) Get rid of this.

The use of nitrates and Ag fertilizer regulations is monitored by the Water Quality Control Board. Let it continue to do its job.

Stop emphasizing energy use by residential and commercial users. Teach by example. Where is the list of government energy use? (ICLEI, again)

p. 6. The graph on this page shows the fool’s errand of trying to make the most rural segment of the human occupied County the leader in the crusade against AGW.

p.7. Why not consider biogenic sources of GHG? (drill it out!)

p. 9. See? UCSB, Vandenberg AFB, etc., “not estimated.” (one blast-off can ruin your whole chart!) UCSB has 23,000+ students, 9,000 staff, and houses most in high -density old buildings for a high concentration of humans. Should this not be included in any estimate?

**GH Emissions by Sector Activity**

p. 10 go to CCA and reduce dependence on Utility providers – great idea!

**Agriculture:** Here is ICLEI, again! It is its template inserted here. First you say to grow local food, then ICLEI attacks growing berries and row crops (direct attack of Santa Maria, North County agriculture)

So far, ICLEI appears to be anti-human, anti-livestock and anti-commerce. It is troubling to deal with State laws and ICLEI policy at the same time.

p. 11 Key Term: “If there are no regulatory or technical interventions to reduce GHG...as the county population and employment grows...”

Comment: Since government bureaucracy is the biggest employer in the County, does it not follow that to reduce bureaucracy would be to reduce GHG? (“Physician, heal thyself”)

p. 12. It is good that you are tossing the ball back to the State and AB32 from whence this adventure began. You are correct to state that the state must stabilize its implementation strategy before local governments can plan effectively. (This is the reason the County should extend its time frame, drop to Option 3, or less, and fall into line with the City of Santa Barbara.

p. 13.

1. Good point here: Good that you point out in polite terms, that California stands alone in its GHG Standards policy AB32, and the orders for Utility Companies to provide service and comply with regulations is built in to their current business model. (that is why CCA is a good idea – if developed)
2. The Pavely Standard: No politician, especially an ideologue, should be allowed to run amok on CARB Standards or anything related to it. It negatively affects business, freedom of choice, family budgets, poor people; it is a Yuppie dream and not practical. (who should tell her?)
3. Pretty soon they will not be selling new cars in California because car companies won't want to tool up factories to make special cars for one state. (Tesla tried, but is moving to Texas by the end of 2014)

p. 14. Title 24

It should be repealed. Overall: Only incentives will work. Lead by example, not by mandates and regulations.

p. 15. Ah ha! Here is the same emission list as ICLEI

But, P & D is standing up for itself. It offers two measures "have been given in each category" 1) Sustainability Communities Strategy and, 2) CAA. I agree.

p.16. However, if you cannot reach the goal of 15% by 2020 (which you cannot) then, drop back to a realistic level.

What upzonings? No, let the Cities upzone. We are rural, by S.B. City's own CAP definition. Is Hollister taking the hit? Have you asked the people living there? Well, there is a logic, according to SB 375. Light Industry is coming back (since its inception in the 1960's) and so housing and transportation would complete the picture.

p.17. Community Choice Aggregation

1. This wins the Smart prize. I volunteer to help with a feasibility study. Yes, for Marin.

**2. Mixed use – We have mixed results here. Mixed use is inherently anti zoning. Many citizens and homeowner associations in County are pro zoning. Family life is compatible with zoning laws, no matter the economic status. Let the Urban areas experiment with mixed use. (This is a de- growth idea) Also, developers may profit from private residences in upper stories of business buildings.**

**Transportation: Is your goal to decrease the use of internal combustion vehicle? Why not begin by relocating 4,000+ County employees to nearby mixed-use housing and see how it goes? If it works, all government employees could be relocated near their work. (How is that for an impractical idea?)**

**Seriously, don't take these ideas to the larger public.**

**p. 18. Alternative energy is subsidized, and is more expensive and less effective because it is aimed at reaching an ideological goal rather than a practical goal..**

**p. 19. Here we are, again, discussing the same categories, but this time, it fits the amended matrix. Thank you. You are putting up a valiant fight against the forced insertion of ICLEI into your work.**

**p. 20. Why interfere with water purification and distribution systems or wastewater systems. By their very nature these are the original environmentalists who have produced the "1<sup>st</sup> world" civilization we have been privileged to enjoy. ("Respect thy parent")**

**p. 21. Summary of GHG Reduction Measures**

- 1. Look at how huge the CCA would be!**
- 2. This looks like a math project meant to look good for the State officials.**
- 3. (Don't worry, I won't tell. Love the vehicle idling)**

**p. 23. Public Participation**

**Friends, this is where 'the rubber hits the road.'" For the love of God, Get the Sups to drop to Option 3!**

# A Nightmare For Europe's Green Dream

**Energy Policy:** The media aren't paying much attention, but in recent weeks Europe has decided to run, not walk, as fast as it can away from the economic menace of green energy.

That's right, the same Europeans who used to chastise us for not signing the Kyoto climate change treaty, not passing a carbon tax and dooming the planet to catastrophic global warming.

In Brussels last month, European leaders agreed to scrap per-nation caps on carbon emissions. The EU countries — France, Germany, Italy and Spain — had promised a 40% reduction in emissions by 2030 (and 80% by 2050!). Now those caps won't apply to individual nations.

Brussels calls this new policy "flexibility." Right. More like "never mind," and here's why: The new German economic minister, Sigmar Gabriel, says green energy mandates have become such an albatross around the neck of industry that they could lead to a "deindustrialization" of Germany.

Chancellor Angela Merkel said earlier this year that overreliance on renewable energy could cause "a problem in terms of energy supply" — and she's always described herself as a green politician and a champion of these programs.

But green dreams have collided with cold economic reality. Green programs aren't creating green jobs but green unemployment at intolerable double-digit rates. The quip in economically exhausted Europe these days is that before we save the planet, we have to save ourselves.

Now European leaders are admitting quietly that they want to get into the game of fracking and other new drilling technologies that have caused an explosion of oil and gas production in the U.S.

According to energy expert Daniel Yergin, if Europe wants to remain competitive, these nations must tap the fountain of abundant and cheap shale gas and

oil. He recently wrote that European leaders now realize a major factor behind the economic woes in euro-land is that electric power costs are "two to three times more expensive" than in the U.S.

Consider the price of natural gas in the U.S. vs. other nations in the chart below. U.S. prices are about three to four times lower and in states like Ohio, Michigan and Pennsylvania, and this is causing a renaissance in manufacturing. German engineering and manufacturing

firms are looking to relocate to the U.S. where power costs are lower.

What's amazing about this story is that so few American politicians get it. President Obama talked in his State of the Union speech about doubling renewable energy output over the coming years. Mr. President,

## The Frack Advantage

Natural gas prices in Europe far exceed North America's

Per million BTU in December

1. Japan	\$16.75
2. Germany	11.03
3. United Kingdom	9.46
4. United States	3.50
5. Canada	2.27

Source: Energy Information Administration, 2013

these are exactly the goals the Europeans are abandoning. Why chase the losers?

Why not try a different approach to energy policy? Get rid of all taxpayer subsidies for energy — oil, gas, wind and solar power, biofuels, electric-battery-operated cars and others — and create a true level playing field where every energy source competes on efficiency and cost rather than political/corporate favoritism?

The answer is that the green lobby knows it can't possibly compete on a level playing field. Not with natural gas at \$4 and 150 years' worth of this power source in Appalachia's Marcellus shale basin and more out West.

The Europeans made nearly a \$100 billion wrong bet on renewable energy, and their economies and citizens have taken a big hit. Now they've awakened to their mistakes. The shame in Washington is still slumbering.

(Interim  
Business  
Daily)

Business  
2/15/14

180  
2/6/14



# Back To Poverty

**Extremism:** What could be next in the environmentalists' catalog of crazy ideas to save the planet? Did someone say a return to 18th Century living? Whoever did would be right.

**T**hey call it "de-growth," but it would be better described as "insanity." The advocates of this plan want to literally "de-grow" the economy back to what they believe is a "sustainable" level.

"There's no such thing as sustainable growth, not in a country like the U.S.," Worldwatch senior fellow Erik Assadourian told Sierra Magazine. "We have to de-grow our economy, which is obviously not a popular stance to take in a culture that celebrates growth in all forms."

Someone should tell Mr. Assadourian there's a good reason why his stance is not a popular: People don't want to be poor and live shorter, unhealthier lives.

In Assadourian's vision, we'd all earn "a livable wage and could each work a 20-hour week." That way, he says, "we'd have time to choose more sustainable options that are also better for ourselves."

The Sierra Club suggests that "maybe we'd even like" Assadourian's way of life. We suggest otherwise.

If everyone is working 20 hours a week for a livable wage, who will have the incentive to develop breakthrough drugs and medical devices? Who will build the next generation of jetliners that fly businesspeople and tourists around the world to great economic benefit?

Who's going to make safer cars, faster computers and smarter phones that make life easier? From where will the technological advancements that make modern life what it is — and what it will be — come?

Sustainability or sustainable growth are simply weasel words for describing economic regression. That is, shrinkage. No matter how Assadourian and others sugar-coat their terms, the reality is their ideas would take our developed economy back a century — or more.

Don't think Assadourian is a lone crackpot.

De-growth is an organized movement with a following. It has an academic association — Research & Degrowth — that promotes "the fair and ecological downscaling of production and consumption."

And in September, Leipzig, Germany, will host the International Conference on Degrowth for Ecological Sustainability and Social Equity. It won't be the first meeting of these fanatical minds. It will be the *fourth*.

De-growth advocates are free to hold their opinions and air their views. But why would we all have to surrender to their ideas? Most of us don't want to give up what economic progress has brought.

180

3/6/14

Business  
Perspective



March 3, 2014

Heather Allen  
County of Santa Barbara  
Planning and Development Department  
Long Range Planning Division  
123 E. Anapamu Street  
Santa Barbara, CA 93101-2058

Dear Ms. Allen:

The Santa Barbara Association of REALTORS® (SBAOR) would like to take this opportunity to comment on the Environmental Scoping Document for the Energy and Climate Action Plan. SBAOR is proud to have been an active stakeholder in this process since its inception and is pleased with many of the countywide measures that are based upon encouragement and voluntary actions. However, while reviewing the Environmental Scoping Document for the Energy and Climate Action Plan, we were disappointed with one measure placed in the Environmental Scoping Document for the Energy and Climate Action Plan for study.

As mentioned above, SBAOR is pleased with education and encouragement of energy efficiency, but we cannot support BE 4 – Energy Scoring and Audits which has mandates that burden property owners. Having any type of time of sale communitywide measures unfairly burden home sale transactions. To place the burden of the whole community on only homebuyers and sellers is inequitable. These types of mandates are highly inefficient in getting all members of the community to comply with new standards. While some homes are sold every few years, many others remain with the same owner for many years, or even decades. Therefore, if new standards are important enough to be mandated by law, then the implementation of those standards should be applied to all homes in the community. These mandates also add complications to sales transactions. Another step only delays the escrow process and adds more stress to the homebuyer and seller. The cost of retrofitting or of an inspection can cause the home sales price to increase drastically, leaving the potential homebuyer with an added expense, and possibly, the inability to purchase a home. Government mandates should be implemented, overseen, administered and applied evenly to the entire community. They should not target home sellers and home buyers.

Organized real estate supports reducing greenhouse gas emissions (GHG) and we encourage property owners to obtain an energy audit during the transaction and we promote the benefits of green building and/or wise energy use through our marketing efforts. What organized real estate does not support are mandates done at the time of sale. As mentioned above, SBAOR has been an active stakeholder in this process, believe that GHG reduction is important, and as such **we request that you remove the time of sale provision from this document.**

Sincerely,

Ed Fuller  
President



March 12th, 2014

Heather Allen

County of Santa Barbara, Long Range Planning  
123 E. Anapamu St.  
Santa Barbara, CA 93101

**RE: Scoping of EIR for the Energy and Climate Action Plan**

Dear Ms. Allen,

The Community Environmental Council, Santa Barbara Bicycle Coalition, and the Coalition for Sustainable Transportation have followed the County's Climate Action planning process over the last few years and support development and implementation of the Climate Action Plan. We continue to urge the County to adopt a Plan that will reduce GHG emissions by greater than 15% by 2020. Santa Barbara County is a low growth region of California, and by choosing bare minimum 15% reductions, we shirk our responsibility as other, higher growth regions of California have greater reductions to achieve. We also ask the County to release the background report that was used to calculate the emission reductions for various measures, as the City of Santa Barbara did in their adopted Climate Action Plan. Additionally, there are various speculative or unpredictable measures that may not reach their full potential as described in the Plan. The EIR should address this scenario with an alternative plan for reaching the County's goal.

Specific items that should be changed or expanded on in the EIR are as follows:

1. Transportation GHG Emissions, pg. 10 – How are Internal-External and External-Internal trips calculated and how are the resulting GHGs assigned to the County or other jurisdiction?
2. Sustainable Communities Strategy, pg. 16 – SCS is the second largest measure in the ECAP, with 32,410 MTCO<sub>2e</sub>, or 17% of the total reductions needed by 2020. We have followed the SCS process closely and would like to see the background calculations for

this large number. As the County grows very slowly, this number seems very high to achieve in the next six years from new development.

3. Community Choice Aggregation, pg. 17 – CCA is the largest measure in the ECAP, with 56,610 MTCO<sub>2</sub>e, or 30% of the total reductions needed by 2020. As there is a long lead time to develop CCA, we ask for this item to be fast tracked and for the County to make completing an implementation study to be the number one priority in the ECAP. If CCA is found to not be feasible or if the implementation process drags out past 2020, the County needs a back-up plan on how to achieve these 56,610 MTCO<sub>2</sub>e by other measures.
1. T-2, Commuter Incentives, Attachment 1, pg. 2 - Commuter incentives should be obligatory for any County business that is enacting transportation impacts that require mitigation, as opposed to a purely voluntary effort. This is a policy the City of Goleta has enacted.
2. T-3, Alternative Fuel Vehicles and Incentives, pg. 3 – This measure should be modified to add the following actions: Continue building public electric vehicle charging stations. Switch to electric vehicles in the County fleet where cost effective and possible.
3. T-4, Enhance Alternative Transportation, pg. 3 – The language choice is out of date and we suggest changing “Alternative transportation” to “Active transportation and transit” and change “Enhance alternative transportation” to “Improve accessibility to active transportation and transit”.
4. T-5, Bike Improvements, pg. 4 - We support the measure language of item T-5, Integrated Bikeway System, however the action points are imprecise and redundant. We suggest replacing them with:
  - 1) Fully implement the Santa Barbara County Bike Plan.
  - 2) Support educational programs for safe, effective, and lawful bicycling.
  - 3) Upgrade existing wayfinding signage and install new signage where needed, in coordination with regional partners.
  - 4) Connect missing segments of our bicycle routes, increasing physical safety of cyclists.

5) Coordinate addition of secure bicycle parking with transit agencies and overall increase bicycle parking supply.

5. T-6, Pedestrian Improvements, pg. 4 - We support the following changes 2) Change to: "Work with COAST to support Safe Routes to School programs at all schools within the county..."

3) "Safe road crossings at ~~major intersections~~." (Any crossing can be a problem.)

4) "...provide and ensure well-lit, well connected, accessible walkways, sidewalks and crosswalks."

6. T-7, Vehicle Idling, pg. 4 - As one of the larger measures in the ECAP, this policy should be strengthened by adding the addition of a no idling program for all County vehicles, including Sheriff vehicles.

7. RE 1, Alternative Energy Development, pg. 11 - Under item 3, removing impediments to the utilization of alternative energy sources, the County should have a goal for permit fast tracking and turn around and also convene a group to ensure consistency across various jurisdictions in the Santa Barbara County.

Please contact Michael Chiacos at [mchiacos@cecmail.org](mailto:mchiacos@cecmail.org) or 805-963-0583, ext. 110 for any questions regarding these comments. We look forward to reviewing the County's Energy and Climate Action Plan and EIR and assisting in implementation of various measures.


Sincerely,



Dave Davis  
CEO/Executive Director, CEC



Mark Bradley  
President, COAST



Ed France  
Executive Director, SBBike



# City of Santa Barbara

## Community Development Department

[www.ci.santa-barbara.ca.us](http://www.ci.santa-barbara.ca.us)

March 13, 2014

Heather Allen, Associate Planner  
123 East Anapamu Street  
Santa Barbara, CA 93101

Via electronic mail to [hallen@countyofsb.org](mailto:hallen@countyofsb.org)

#### Director's Office

Tel: 805.564.5502

Fax: 805.564.5506

Subject: Comments on County ECAP and EIR Scope

Ms. Allen:

#### Building & Safety

Tel: 805.564.5485

Fax: 805.564.5476

Thank you for the opportunity to comment on the Draft County of Santa Barbara Energy and Climate Action Plan (ECAP) and EIR scope of analysis.

#### Draft Plan

#### Housing &

#### Redevelopment

Tel: 805.564.5461

Fax: 805.564.5477

The City applauds the County for this important energy and climate planning effort, and supports the many energy, land use/ building, transportation, waste management, and water conservation measures proposed in the plan. These measures would benefit energy conservation and efficiency, reduction of greenhouse gas emissions, and quality of life in our County and region.

#### Planning

Tel: 805.564.5470

Fax: 805.897.1904

As has been discussed in various staff communications over the past years, as well as in the context of developing the regional Sustainable Communities Strategy, at sustainability and climate conferences, etc., the City looks forward to further coordination and collaboration efforts between the County and City to implement plan measures and to most efficiently monitor and update climate plans.

630 Garden Street

PO Box 1990

Santa Barbara, CA

93102-1990

The description of the Sustainable Communities Strategy (p. 16) should be updated to reflect its current status.

It would be helpful for the Plan to reference appendix materials providing emissions calculations that are summarized in the plan tables (e.g., Table 4), and to indicate their location for access.

#### EIR Scope of Analysis

State CEQA Guidelines Appendix F requires EIRs to include specified energy analysis applicable to the project. Information from the ECAP should be summarized in the EIR to address this requirement.

The scope of analysis does not outline the intended approach for alternatives analysis. It is suggested that the analysis include the "business as usual scenario" as the no project alternative, and consider analyzing the other reduction goal options identified in the earlier Phase 1 Climate Action Study.

Please contact me or Barbara Shelton with any questions on this matter (805.564.5470; [jledbetter@santabarbaraca.gov](mailto:jledbetter@santabarbaraca.gov); [bshelton@santabarbaraca.gov](mailto:bshelton@santabarbaraca.gov)).

*John Ledbetter*

John Ledbetter, AICP  
Principal Planner

cc. Mayor Helene Schneider  
Paul Casey, Assistant City Manager  
Bettie Weiss, Acting Director and City Planner, Community Development Department



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



March 13, 2014

Heather Allen  
County of Santa Barbara, Long Range Planning Division  
123 E. Anapamu St.  
Santa Barbara, CA 93101  
hallen@countyofsb.org

**Subject: Notice of Preparation of a Draft Environmental Impact Report for the Energy and Climate Action Plan Project, Santa Barbara County, SCH #2014021021**

Dear Ms. Allen:

The California Department of Fish and Wildlife (Department) appreciates this opportunity to comment on the above-referenced Project, relative to impacts to biological resources.

The proposed Energy and Climate Action Plan (Plan) would cover the unincorporated areas of Santa Barbara County (County) where the County retains land use permit authority and would include a 2007 baseline inventory of greenhouse gas (GHG) emission, a forecast of emissions, a forecast of emissions to the years 2020 and 2035, a GHG reduction target of 15% below baseline emissions by 2020, a set of emission reduction measures to meet the target, and a methodology for tracking and reporting emissions in the future. The Plan could lead to the development of large-scale renewable energy facilities on open space areas that may currently be used as wildlife habitats, cause off-site impacts to wildlife, and contribute to the cumulative loss of sensitive wildlife habitats.

The Department is California's trustee agency for fish and wildlife resources, holding these resources in trust for the People of the State pursuant to various provisions of the California Fish and Game Code. (Fish & G. Code, §§ 711.7, subd. (a), 1802.) The Department submits these comments in that capacity under the California Environmental Quality Act (CEQA). (See generally Pub. Resources Code, §§ 21070; 21080.4.) Given its related permitting authority under the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, the Department also submits these comments possibly as a responsible agency for the Project under CEQA. (*Id.*, § 21069.)

The California Wildlife Action Plan, a Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) intensive agriculture; 5) excessive livestock grazing; and 6) recreational pressures. The Department looks forward to working with the County to minimize impacts to fish and wildlife resources with a focus on these stressors.

To enable Department staff to adequately review and comment on the proposed Project we recommend the following information, where applicable, be included in the Draft Environmental Impact Report (DEIR):

- 1) A complete, recent assessment of flora and fauna within the Plan's proposed development areas, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.
  - a) A thorough recent assessment of rare plants and rare natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities ([http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/Protocols\\_for\\_Surveying\\_and\\_Evaluating\\_Impacts.pdf](http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/Protocols_for_Surveying_and_Evaluating_Impacts.pdf))).
  - b) A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.
  - c) Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, § 15380).
  - d) The Department's Biogeographic Data Branch in Sacramento should be contacted at (916) 322-2493 ([www.dfg.ca.gov/biogeodata](http://www.dfg.ca.gov/biogeodata)) to obtain current information on any previously reported sensitive species and habitats. Environmentally Sensitive Habitat Areas (ESHAs) or any areas that are considered sensitive by the local jurisdiction located in or adjacent to the Plan area must be addressed.
- 2) A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.
  - a) CEQA Guidelines, § 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
  - b) Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife linkage/movement areas, including access to undisturbed habitat in adjacent areas, should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic and outdoor artificial night lighting.



- c) A cumulative effects analysis should be developed as described under CEQA Guidelines, § 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
  - d) Impacts to migratory wildlife affected by the Plan should be fully evaluated. This can include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.
  - e) Impacts to all habitats from County required Fuel Modification Zones (FMZ) should be fully evaluated. Areas slated as mitigation for loss of habitat shall not occur within the FMZ.
  - f) Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 3) An EIR shall describe feasible measures which could minimize significant adverse impacts (CEQA Guidelines §15126.4(a)(1)). Compensation for unavoidable impacts through acquisition and protection of suitable habitat should be considered.
- a) The Department considers Special Status Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts. Lists of California Natural Communities may be viewed and downloaded online by visiting the Department's website at [http://www.dfg.ca.gov/biogeodata/vegcamp/natural\\_comm\\_list.asp](http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_list.asp). The List of California Vegetation Alliances may be viewed and downloaded at [http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/NaturalCommunitiesList\\_Oct07.pdf](http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/NaturalCommunitiesList_Oct07.pdf).
  - b) The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.

- 4) A range of alternatives should be analyzed to ensure that alternatives to the proposed Project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.
- 5) An Incidental Take Permit (ITP) from the Department may be required if the Project, Project construction, or any Project-related activity during the life of the Project will result in "take" as defined by the Fish and Game Code of any species protected by CESA (Fish & G. Code, §§86, 2080, 2081, subd. (b), (c)). Early consultation with Department regarding potential permitting obligations under CESA with respect to the Project is encouraged (Cal. Code Regs., tit. 14, § 783.2, subd. (b)). It is imperative with these potential permitting obligations that the DEIR include a thorough and robust analysis of the potentially significant impacts to endangered, rare, and threatened species, and their habitats, that may occur as a result of the proposed Project. For any such potentially significant impacts the County should also analyze and describe specific, potentially feasible mitigation measures to avoid or substantially lessen any such impacts as required by CEQA and, if an ITP is necessary, as required by the relevant permitting criteria prescribed by Fish and Game Code section 2081, subdivisions (b) and (c). The failure to include this analysis in the DEIR could preclude the Department from relying on the County's analysis to issue an ITP without the Department first conducting its own, separate lead agency subsequent or supplemental analysis for the Project. (See, e.g., Cal. Code Regs., tit. 14, § 15096, subd. (f); Pub.Resources Code, § 21166). For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
- 6) The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations.

The Department also has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. To facilitate our issuance of the agreement when CEQA applies, the Department as a responsible agency under CEQA may consider the DEIR. To minimize additional requirements by the Department under CEQA the DEIR should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

Heather Allen  
County of Santa Barbara, Long Range Planning Division  
March 13, 2014  
Page 5 of 5

The Department suggests a pre-project or early consultation planning meeting for all projects. To make an appointment, please call Martin Potter, Senior Environmental Scientist (Specialist) at (805) 640-3677. Thank you for this opportunity to provide comment.

Sincerely,



Betty Courtney  
Environmental Program Manager I  
South Coast Region

ec: Mr. Martin Potter, CDFW, Ojai  
Ms. Natasha Lohmus, CDFW, Santa Barbara  
Mr. Eric Weiss, CDFW, San Diego  
Ms. Mary Meyer, CDFW, Ojai  
Mr. Ali Aghili, CDFW, Los Alamitos  
Scott Morgan, State Clearinghouse, Sacramento





**Santa Barbara County  
Air Pollution Control District**

March 14, 2014

Heather Allen  
Long Range Planning  
County of Santa Barbara  
123 E. Anapamu Street  
Santa Barbara, CA 93101

**Re: APCD Response to Notice of Preparation of a Program Environmental Impact Report for Energy and Climate Action Plan, 14GPA-00000-00003**

Dear Ms. Allen:

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the County of Santa Barbara's Energy and Climate Action Plan (ECAP). The County of Santa Barbara proposes to adopt an ECAP that includes a 2007 baseline inventory of community-wide GHG emissions, a forecast of emissions to the years 2020 and 2035, a GHG reduction target of 15% below baseline emissions by 2020, a set of emission reduction measures to meet the target, and a methodology for tracking and reporting emissions in the future. The emission reduction measures in the ECAP are made of a combination of voluntary, phased, and mandatory measures.

APCD staff reviewed the Scoping Document and NOP of a Draft EIR, and concurs that air quality impacts should be addressed in the EIR. APCD's guidance document, entitled *Scope and Content of Air Quality Sections in Environmental Documents* (updated December, 2011), is available online at [www.sbcapcd.org/apcd/landuse.htm](http://www.sbcapcd.org/apcd/landuse.htm). This document should be referenced for general guidance in assessing air quality impacts in the Draft EIR.

The EIR should evaluate any potential adverse air quality impacts that could occur from all phases of the project including the following potential impacts:

1. **Attainment Status and Consistency with the APCD Clean Air Plan (CAP).** The APCD has posted the most up-to-date attainment status for the County on the APCD website [www.sbcapcd.org/sbc/attainment.htm](http://www.sbcapcd.org/sbc/attainment.htm) and the most recent Clean Air Plan is available at [www.sbcapcd.org/cap.htm](http://www.sbcapcd.org/cap.htm). The website should be consulted for the most up-to-date air quality information prior to the release of the Public Draft EIR. The 2010 CAP used the 2007 regional growth factors for land use and population projections provided by the Santa Barbara County Association of Governments (SBCAG), along with on-road emissions forecasts provided by the California Air Resources Board (ARB) as a basis for vehicle emissions forecasting. The EIR should examine whether the proposed project will be consistent with the growth assumptions in the 2010 CAP.
2. **Land Use Conflicts Related to Air Pollutant Emissions.** The EIR should examine whether any components of the proposed project will result in air quality impacts to sensitive land uses such

Louis D. Van Mullem, Jr. • Air Pollution Control Officer

as residential, childcare facilities, schools, or senior living communities. Examples of this type of impact include odors from restaurants, dust, or toxic air contaminants such as diesel particulate emissions from trucks.

3. **Increase in Emissions from Proposed Project.** The EIR should present significance thresholds for ozone precursor emissions (reactive organic compounds [ROC], and oxides of nitrogen [NO<sub>x</sub>]) and particulate matter and determine whether the proposed project will produce emissions in excess of the thresholds. APCD's *Scope and Content* document contains the APCD Board-adopted criteria for evaluating the significance of adverse air quality impacts for APCD projects. In the absence of locally-adopted thresholds, APCD recommends that these thresholds be used to determine significance of air quality impacts.
4. **Construction Impacts.** If construction activities will occur as a result of project implementation, the EIR should discuss the potential air quality impacts associated with those activities. APCD's *Scope and Content* document, Section 6, presents recommended mitigation measures for fugitive dust and equipment exhaust emissions associated with construction projects. Construction mitigation measures should be enforced as conditions of approval for the project. The EIR should include a Mitigation Monitoring and Reporting Plan that explicitly states the required mitigations and establishes a mechanism for enforcement.
5. **Asbestos Reporting Requirements.** If the project will involve any demolition or renovation of existing structures, the EIR should discuss notification and reporting requirements pursuant to APCD Rule 1001 – National Emission Standards for Hazardous Air Pollutants (NESHAP) – Asbestos.

APCD offers the following comments on the Draft Energy and Climate Action Plan provided with the Environmental Scoping Document:

1. **Draft Energy and Climate Action Plan, Table 1 – 2007 Unincorporated Santa Barbara County GHG Emissions by Sector, Page 5:** For the Off-Road sector, the unit is listed as gallons but the fuel type is not listed. Please consider clarifying the fuel type.
2. **Draft Energy and Climate Action Plan, Adjusted Business-As-Usual Forecast, Page 13:** The last paragraph on this page discusses a 2012 Ninth Circuit court case involving the ARB. This paragraph should be updated with recent events related to this case. On September 18, 2013, the Ninth Circuit upheld the Low Carbon Fuel Standard (LCFS) in the case of *Rocky Mountain Farmers Union v. Corey*, 730 F.3d 1070 (2013), see <http://www.gpo.gov/fdsys/pkg/USCOURTS-ca9-12-15135/pdf/USCOURTS-ca9-12-15135-0.pdf> for the case brief.
3. **Draft Energy and Climate Action Plan, Summary of GHG Reduction Measures by Topic, Page 16:** The last paragraph on this page discusses SBCAG's anticipated adoption of its Regional Transportation Plan-Sustainable Communities Strategy (RTP-SCS). This paragraph should be updated with recent events. The SBCAG Board adopted the 2040 RTP-SCS and certified the EIR on August 15, 2013. For more information visit <http://www.sbcag.org/planning/2040RTP.html>.

We hope you find our comments useful. We look forward to reviewing the Draft EIR. Please contact me at 961-8890 or by e-mail at [cvw@sbcapcd.org](mailto:cvw@sbcapcd.org) if you have questions.

Sincerely,



Carly Wilburton  
Air Quality Specialist  
Technology and Environmental Assessment Division

cc: Project File  
TEA Chron File

