

**ATTACHMENT K: BOARD OF SUPERVISORS RESOLUTION**

**RESOLUTION OF THE SANTA BARBARA COUNTY BOARD OF SUPERVISORS  
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA**

IN THE MATTER OF ADOPTING )  
AMENDMENTS TO THE SANTA BARBARA )  
COUNTY ENVIRONMENTAL THRESHOLDS )  
AND GUIDELINES MANUAL, CHAPTER 11, )  
GREENHOUSE GAS EMISSIONS, TO ADOPT )  
GREENHOUSE GAS EMISSIONS )  
THRESHOLDS OF SIGNIFICANCE IN )  
COMPLIANCE WITH THE STATE )  
GUIDELINES FOR THE IMPLEMENTATION )  
OF THE CALIFORNIA ENVIRONMENTAL )  
QUALITY ACT )

RESOLUTION NO.: 24- 191

**WHEREAS**, the *Guidelines for the Implementation of the California Environmental Quality Act* (CEQA Guidelines) encourage each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA and the CEQA Guidelines for administering its responsibilities under CEQA (CEQA Guidelines Section 15022); and

**WHEREAS**, the CEQA Guidelines encourage each public agency to develop, publish, and adopt thresholds of significance that the agency uses to determine the significance of environmental effects (CEQA Guidelines Section 15064.7(b); and

**WHEREAS**, on September 12, 1988, the Board of Supervisors adopted the *County of Santa Barbara Guidelines for the Implementation of the California Environmental Quality Act* (County CEQA Guidelines), “to provide the Santa Barbara County (County), other agencies of which the Board of Supervisors is the governing board, applicants, and the public with definitions, procedures, and forms to be used in the implementation of CEQA and to supplement the CEQA Guidelines” (page 1, Article I, Purpose); and

**WHEREAS**, on January 26, 2021, the Board of Supervisors revised and adopted the *Environmental Thresholds and Guidelines Manual*, Chapter 11, Greenhouse Gas Emissions, to establish an interim greenhouse gas (GHG) emissions threshold of significance for non-industrial stationary source projects to be used while final GHG emissions thresholds are developed as part of the 2030 Climate Action Plan; and

**WHEREAS**, the County Community Services Department, Sustainability Division initiated the 2030 Climate Action Plan in July 2020 and expects that the 2030 Climate Action Plan will be adopted in 2024 concurrently with the amendments to the *Environmental Thresholds and Guidelines Manual*, Chapter 11, Greenhouse Gas Emissions. The 2030 Climate Action Plan is a qualified GHG emissions reduction plan in accordance with CEQA Guidelines Section 15183.5, allowing for CEQA tiering for subsequent land use projects and plans; and

Board of Supervisors  
August 27, 2024  
Attachment K - Page 2

**WHEREAS**, the County Community Services Department, Sustainability Division, hired a consultant to develop GHG emissions thresholds of significance, to apply to non-industrial stationary source projects and plans as part of the Board of Supervisors adoption of the 2030 Climate Action Plan; and

**WHEREAS**, the County Community Services Department, Sustainability Division, and Planning and Development Department prepared the 2030 Climate Action Plan Consistency Checklist (Exhibit 2) as a tool to assist in determining if projects and plans are consistent with the 2030 Climate Action Plan; and

**WHEREAS**, updating GHG emissions thresholds of significance will assist the County in achieving the GHG emission reduction targets set by the Board of Supervisors on April 5, 2022, which are to reduce GHG emissions in unincorporated county areas 50 percent by the year 2030, based on 2018 levels, and carbon neutrality by 2045 or sooner, as feasible; and

**WHEREAS**, the County CEQA Guidelines define a process by which County decision makers may amend the *Environmental Thresholds and Guidelines Manual*, which includes one hearing before the County Planning Commission, and transmittal of the Planning Commission's recommendation to the Board of Supervisors; and

**WHEREAS**, the County Planning Commission held duly noticed public hearings on March 6, 2024, and May 1, 2024, at which time County staff explained the proposed amendment and the Commission invited comments from the attendees of the hearing; and

**WHEREAS**, the County Planning Commission, after holding duly noticed public hearings on the above described amendments to the *Environmental Thresholds and Guidelines Manual*, endorses and transmits to the Board of Supervisors said recommended amendments by resolution; and

**WHEREAS**, the proposed amendments are consistent with the policies of the Santa Barbara County Comprehensive Plan (including the Coastal Land Use Plan) and Chapter 35, Zoning, of the Santa Barbara County Code, as described in the County Planning Commission Staff Report dated February 27, 2024; and

**WHEREAS**, the Board of Supervisors now finds that it is in the public interest to recommend that the Board of Supervisors amend and adopt Chapter 11, Greenhouse Gas Emissions, of the *Santa Barbara County Environmental Thresholds and Guidelines Manual* (Exhibit 1) to be consistent with CEQA Guidelines Section 15064.4 and the County's 2030 CAP GHG emissions reduction targets.

**WHEREAS**, the Board of Supervisors held a duly noticed public hearing on August 27, 2024, at which hearing the proposed amendment was explained and comments were invited from attendees of the hearing.

**NOW, THEREFORE, IT IS HEREBY RESOLVED**, that:

1. The above recitations are true and correct.

Board of Supervisors  
August 27, 2024  
Attachment K - Page 3

2. In compliance with the County CEQA Guidelines, Section VI.F.3.b (Process for thresholds amendment and adoption), the Board of Supervisors of the County of Santa Barbara, State of California, following the required noticed public hearing, approves and adopts the amendments to Chapter 11, Greenhouse Gas Emissions, of the *Santa Barbara County Environmental Thresholds and Guidelines Manual* (Exhibit 1).
3. The Chair of the Board of Supervisors is hereby authorized and directed to sign and certify all documents and other materials in accordance with this Resolution.

**PASSED, APPROVED, AND ADOPTED** this 27<sup>th</sup> day of August, 2024 by the following vote:

AYES: Supervisors Williams, Capps and Hartmann

NOES: Supervisors Nelson and Havagnino

ABSENT: None

ABSTENTIONS: None

  
\_\_\_\_\_  
STEVE LAVAGNINO, CHAIR  
BOARD OF SUPERVISORS  
SANTA BARBARA COUNTY

ATTEST:

MONA MIYASATO, COUNTY EXECUTIVE OFFICER  
CLERK OF THE BOARD

By   
\_\_\_\_\_  
DEPUTY CLERK

APPROVED AS TO FORM:

RACHEL VAN MULLEM  
COUNTY COUNSEL

Signed by:  
  
By \_\_\_\_\_  
0AC56B8DE45F483...  
DEPUTY COUNTY COUNSEL

Board of Supervisors  
August 27, 2024  
Attachment K - Page 4

EXHIBITS:

- Exhibit 1. Amended Chapter 11, Greenhouse Gas Emissions, of the *Santa Barbara County Environmental Thresholds and Guidelines Manual*
- Exhibit 2. 2030 Climate Action Plan Consistency Checklist

## EXHIBIT 1: AMENDMENTS TO THE ENVIRONMENTAL THRESHOLDS AND GUIDELINES MANUAL

*Chapter 11, Greenhouse Gas Emissions, of the Environmental Thresholds and Guidelines Manual is amended to (1) provide a way to tier greenhouse gas emissions analysis off of the 2030 Climate Action Plan, and (2) to provide greenhouse gas emissions thresholds for non-industrial stationary source projects, as follows below. Additions are shown in red underlined text and deletions are shown in red strikethrough text. Except as provided herein, the Environmental Thresholds and Guidelines Manual shall remain unchanged and in full force and effect.*

### 11. GREENHOUSE GAS EMISSIONS (Approved by the Board of Supervisors May, 2015. Revised August 2024)

---

#### A. Introduction.

This chapter sets forth the procedure for determining the significance of impacts from greenhouse gas (GHG) emissions under CEQA. It describes how to interpret and apply the two GHG emissions threshold questions (i.e., “a” and “b”) contained in the County’s Initial Study Template, Section 4.3b, Air Quality – Greenhouse Gas Emissions. The thresholds of significance for GHG emissions in this chapter reflect three primary sources: the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines), the California Air Resources Board (CARB) “2022 Scoping Plan for Achieving Carbon Neutrality” (CARB, 2022), and the County of Santa Barbara 2030 Climate Action Plan (2030 CAP).

This chapter is the result of County efforts in 2015 through 2024 to develop GHG emission significance thresholds for land use projects and plans and a qualified GHG emissions reduction plan. The GHG emission thresholds comply with CEQA Guidelines Section 15064.4, Determining the Significance of Impacts from Greenhouse Gas Emissions. The 2030 CAP complies with CEQA Guidelines Section 15183.5(b)(1) as a qualified GHG emission reduction plan for projects with buildout years through 2030. The County adopted the following thresholds that are described further in this chapter, below:

- **Industrial Stationary Source Threshold:** On May 19, 2015, the Board of Supervisors (Board) adopted a numerical threshold of significance for GHG emissions from industrial stationary source facilities. The numerical threshold applies to oil and gas production and surface mining projects, but may also apply to other industrial stationary sources of GHG emissions within the unincorporated County areas. Section D.1 of this chapter describes the industrial stationary source threshold and its application to discretionary projects.
- **Consistency with the 2030 CAP:** Pursuant to CEQA Guidelines Section 15183.5, project-specific environmental documents can tier from, or incorporate by reference, the existing programmatic review in a qualified GHG emissions reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project’s consistency with the GHG emissions reduction strategy included in the qualified GHG emissions reduction plan. The 2030 Climate Action Plan Consistency Checklist (checklist) is a tool to determine if non-exempt discretionary land use project and plans, which do not contain industrial stationary sources of GHG emissions, are consistent with the 2030 CAP.

## **Greenhouse Gas Emissions**

---

Projects and plans deemed consistent with the 2030 CAP can tier GHG emissions analysis from the CAP Programmatic Environmental Impact Report (PEIR). Section D.2 of this chapter describes the checklist and its application to non-industrial stationary source projects.

- **Thresholds for Non-Industrial Stationary Source Projects:** In August 2024, the Board adopted GHG emissions thresholds of significance for non-industrial stationary source projects (thresholds). The thresholds apply to non-exempt discretionary land use projects and plans that do not contain industrial stationary sources of GHG emissions and cannot be found consistent with the 2030 CAP through the checklist. Section D.3 of this chapter describes the thresholds and their application to non-industrial stationary source projects.

### **B. Background on CEQA Guidelines and Thresholds of Significance.**

#### **1. CEQA Guidelines.**

Climate change under CEQA differs from most other types of impacts in that it is examined as a cumulative impact that results not from an individual project's GHG emissions, but rather from GHG emissions emitted on a global scale for many decades and from many different sources. Therefore, analysis of a project's GHG emissions under CEQA focuses solely on the incremental contribution of estimated project emissions to climate change. The CEQA Guidelines address GHG emissions as a cumulative impact given that climate change is a global phenomenon (CEQA Guidelines Section 15064.4.(b)). As the California Supreme Court explained, "because of the global scale of climate change, any one project's contribution is unlikely to be significant by itself" (*Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 512.). A project's significant GHG impacts must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact (CEQA Guidelines Sections 15064.4.(b) and 15183.5). Therefore, GHG emissions impacts should be considered in a broader, cumulative context. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions (CEQA Guidelines, Section 15064.4.(b)). The GHG emissions thresholds are designed to identify (1) a cumulatively considerable contribution to an existing adverse condition, and (2) a cumulatively significant impact in combination with other projects causing related impacts.

A CEQA lead agency may determine that a project's incremental contribution to an existing cumulatively significant issue, such as climate change, is not significant based on supporting facts and analysis (CEQA Guidelines Section 15130, Discussion of Cumulative Impacts, Subsection (a)(2)). The CEQA Guidelines direct that a project's contribution to a significant cumulative impact will be rendered insignificant if the project is required to implement or fund its fair share of a mitigation measure designed to alleviate the cumulative impact (CEQA Guidelines Section 15130(a)(3)). The lead agency must provide substantial evidence in the environmental document to demonstrate that mitigation required of a project represents the project's "fair-share" contribution towards alleviating the cumulative impact.

Consistent with CEQA Guidelines Section 15064.7, Thresholds of Significance, the County developed and adopted thresholds of significance for determining the significance of a project's GHG emissions. CEQA Guidelines Section 15064.7(a) states, "[a] threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect."

## **Greenhouse Gas Emissions**

---

Projects that comply with an applicable threshold will normally have an insignificant effect on the environment. Projects that exceed or otherwise do not comply with an applicable threshold may have a significant effect on the environment and, as a result, may require project modifications or mitigation measures to avoid or reduce those effects to insignificant levels. The following thresholds reflect this general guidance as well as the specific guidance set forth in CEQA Guidelines Section 15064.4 regarding the significance of impacts from GHG emissions.

Specifically, CEQA Guidelines Section 15064.4 states that lead agencies shall make a good faith effort to estimate or describe a project's GHG emissions. The section further states that in determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes.

Per CEQA Guidelines Section 15064.4, County staff should consider the following factors, among others, when determining the significance of impacts from GHG emissions on the environment: (1) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (e.g., CEQA Guidelines Section 15183.5, Tiering and Streamlining the Analysis of Greenhouse Gas Emissions, Subsection (b)). The CEQA Guidelines also clarify that the County has the discretion to select a model or methodology that it considers most appropriate for estimating GHG emissions, but that it must "support its selection of a model or methodology with substantial evidence" and "explain the limitations of the particular model or methodology selected for use."

### **2. County and State GHG Emissions Goals.**

The State has codified progressive GHG emissions reduction goals considering the evolving scientific data surrounding climate change. Executive Order S-3-05, Executive Order B-30-15, and Assembly Bill (AB) 32 (codified in California Health and Safety Code, Part 1, Chapter 2, Section 38501) established GHG emission reduction goals for the year 2020. To further those goals, the California legislature adopted Senate Bill (SB) 375 in 2008 to develop regional GHG emission reduction targets for passenger vehicles and SB 32 in 2016 to establish a statewide goal of reducing GHG emissions to 40 percent below 1990 levels by 2030 (codified in the California Health and Safety Code, Division 25.5, Part 4, Section 38566). SB 32 is an extension of the State's original climate change goal under AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. Further, SB 32 is a benchmark reduction goal for the State's pathway to 80 percent below 1990 levels of GHG emissions by 2050, as directed by Executive Order S-3-05. In 2022, the California legislature adopted AB 1279, which codified the State's commitment to achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. Agencies and project proponents must do their fair share to reduce local GHG emissions, which may be evaluated during the environmental review process, to meet these goals. In addition, in December 2022, the California Air Resources Board (CARB) adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan), the strategy for achieving California's goal of carbon neutrality by 2045 (CARB 2022).

## **Greenhouse Gas Emissions**

---

The County has prepared the 2030 CAP, consistent with CEQA Guidelines Section 15183.5, which establishes GHG emission reduction goals of 50 percent below 2018 levels by 2030 and carbon neutrality by 2045. This target is in line with the State's goal of reducing statewide emissions by 40 percent below 1990 levels by 2030.

The County developed the thresholds based on the County's 2030 GHG emissions reduction target, which is in line with the State's GHG emission reduction goals. The County developed the project-level thresholds by determining the portion of the County's 2030 GHG target emissions level that may be attributed to new development. For additional details, please see Section D.3.

### **3. Estimating Project-Level GHG Emissions.**

For applicable land use projects and plans, the County recommends that CEQA practitioners use the California Emissions Estimator Model (CalEEMod) to estimate operational and construction GHG emissions from projects. CalEEMod, developed for the California Air Pollution Officers Association (CAPCOA) in collaboration with the California Air Districts, estimates project emissions based on the types of proposed land uses, sizes, location within the state, and approximate start dates of construction and operations. It allows users to input project-specific details, such as construction schedules and land use types, but also provides default assumptions based on the available project inputs, where specific projects details are not yet known (e.g., construction phasing, construction equipment, energy use during operations, vehicle emission factors). To use the latest web-based version of CalEEMod and view the model's user's guide and technical documentation, go to [www.caleemod.com](http://www.caleemod.com). Additionally, the Santa Barbara County Air Pollution Control District (SBCAPCD) provides guidance and additional information on using CalEEMod at <https://www.ourair.org/environmental-review-guidelines/>.

### **C. Initial Study Guidance.**

As discussed above, CEQA Guidelines Appendix G, Section VIII, contains two questions to help assess a project's potential impacts from GHG emissions. The County uses these same questions in its Initial Study template, which include the following:

*VIII. Greenhouse Gas Emissions: Would the project:*

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Sections D and E, below, describe each threshold question in further detail.

### **D. Initial Study Question "a" – GHG Emissions That May Have a Significant Impact.**

Section D.1, below, describes the process County staff shall use to answer Initial Study question "a" for industrial stationary sources of GHG emissions. Sections D.2 and D.3, below, describe the process County staff shall use to answer Initial Study question "a" for land use projects and plans and all other sources of GHG emissions.

## Greenhouse Gas Emissions

---

### 1. Threshold for Industrial Stationary Sources.

#### a) Applicability.

- The threshold applies to the following greenhouse gases, per the California Health and Safety Code §38505(g), and any other gas that the California Air Resources Board recognizes as a greenhouse gas in the future: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), sulfur hexafluoride (SF<sub>6</sub>), nitrogen trifluoride (NF<sub>3</sub>). The County recognizes that environmental documents will primarily focus on the first three chemicals, because the latter four are unlikely candidates to be associated with projects subject to this threshold.
- The threshold applies to industrial stationary sources subject to discretionary approvals by the County, where the County is the CEQA lead agency. The County shall request other CEQA lead agencies and NEPA lead agencies to use this threshold, where the County is a CEQA responsible agency for a project.
- The threshold applies to both direct and indirect emissions of greenhouse gases, where protocols to support calculation of such emissions are available.
  - Direct emissions encompass the project's complete operations, including GHG emitted from a location within California from all stationary and mobile sources, involved in the operation, including off-road equipment, as well as removal of trees and other vegetation.
  - Indirect emissions encompass GHG that are emitted to:
    - Provide the project with electricity, including generation and transmission;
    - Supply the project with water, including water treatment; and
    - Transport and treat solid and liquid waste produced from the project's operations and water to the project's operations and the emissions to transport and process solid.
- Construction-related emissions are to be accounted for in the year that they occur.
- The threshold does not apply to GHG that are emitted throughout the life cycle of products that a project may produce or consume, except as identified above as a project's indirect emissions.
- The threshold does not apply to residential or commercial development.

#### b) Quantification of Greenhouse Gas Emissions.

- The environmental document shall first quantify and disclose a project's GHG emissions by individual GHG and then convert the project's emissions to metric tons of carbon dioxide equivalent per year (MTCO<sub>2</sub>e/year), based on the global warming potential of each gas.
- Renewable energy projects, such as solar and wind projects, may be credited for GHG emissions that would otherwise be emitted by natural gas-fueled electrical generation, based on consistency with California GHG reduction strategies to

## Greenhouse Gas Emissions

---

increase statewide reliance on renewable energy. The Environmental Protection Agency's [Greenhouse Gas Equivalencies Calculator](#) may be a helpful starting point to understand potential GHG emission credits.

*c) Numeric Bright-Line Threshold.*

All industrial stationary-source projects shall be subject to a numeric, bright-line threshold of 1,000 MTCO<sub>2</sub>e/year to determine if GHG emissions constitute a significant cumulative impact. Annual GHG emissions that are equivalent to or exceed the threshold are determined to have a significant cumulative impact on global climate change unless mitigated. For the purpose of addressing the potential for unmitigated incremental growth, the combined GHG emissions from one or more previous discretionary permit project approvals after adoption of this threshold will be considered in the environmental review of all subsequent discretionary permit applications that, as determined by the County, constitute separate parts or phases of the previously approved projects, including but not limited to:

- Any series of oil and gas production projects under common ownership or control, including related processing and transport operations that are located within the same State-designated oil field, or represent an expansion of any State-designated oil field.
- Any series of surface mining projects under common ownership or control, including related processing and transport operations, that are located within the same individually designated Surface Mining and Reclamation Act (SMARA) operation, or represent an expansion of any individually designated SMARA operation.

*d) Mitigation.*

Projects found to result in a significant cumulative impact would be required to reduce their GHG emissions to the applicable threshold, where feasible, through onsite reductions and/or offsite reduction programs approved by the County.

*e) Periodic Revisions.*

The Director of Planning and Development shall re-examine this threshold as needed to ensure its consistency with evolving GHG reduction progress, plans, targets, and regulations. As necessary, the Director will recommend amendments and updates to the Board for consideration.

*f) Relation to County Climate Action Plan.*

This threshold represents one of several cohesive efforts undertaken by Santa Barbara County to reduce GHG emissions. Those efforts include the 2030 CAP, which seeks to reduce countywide emissions by 50 percent below the 2018 baseline emissions inventory by the year 2030 and carbon neutrality by 2045. The 2030 CAP constitutes a local GHG reduction plan that, pursuant to CEQA Guidelines §15183.5(b), allows a CEQA lead agency to determine whether a future project's incremental contribution to the cumulative effect of climate is significant or not, based upon compliance with requirements of the reduction plan.

This threshold and the CAP are intended to complement one another during implementation.

### 2. 2030 Climate Action Plan Consistency Checklist.

#### a) Applicability.

- The checklist may apply to all non-exempt projects and plans, other than industrial stationary source projects, subject to discretionary approvals by the County, where the County is the CEQA lead agency. Applicability of the checklist shall be determined through completion of the checklist. If it is determined that project does not satisfy all the criteria of the checklist, that project shall use the thresholds described in Section D.3 of this chapter to determine if it will have a significant impact related to GHG emissions.
- The checklist does not apply to industrial stationary sources.

#### b) Checklist Development and Methodology.

As discussed in Sections A and B of this chapter, the 2030 CAP is a qualified GHG emission reduction plan consistent with CEQA Guidelines Section 15183.5. The 2030 CAP includes measures that are applicable to existing developments and municipal government operations, as well as mandatory measures to be applied to future development for public and private projects and plans. These measures are required to be implemented on a project-by-project and plan-by-plan basis to ensure that the specified emissions targets identified in the 2030 CAP are achieved, and the 2030 CAP PEIR determined that with implementation of these measures there would not be an impact to GHG emissions. The checklist contains questions that determine if a project or plan is consistent with the measures included in the 2030 CAP, and that therefore the analysis of GHG emissions for that project or plan can be tiered off of the 2030 CAP PEIR consistent with CEQA Guidelines Section 15183.5.

#### c) Checklist Usage.

The checklist is a tool to assist in determining if a project or plan is consistent with the 2030 CAP. It includes questions that the project or plan applicant must answer which reflect the GHG emission reduction measures in the 2030 CAP. The answers provided by the project or plan applicant, as well as the explanations for the provided answers, determine whether the project or plan is consistent with the 2030 CAP. If the provided answers demonstrate consistency with the 2030 CAP, the GHG emission impact analysis shall be tiered off of the 2030 CAP PEIR. A project or plan that is consistent with all applicable measures of the 2030 CAP would result in less-than-significant GHG emissions and would not result in a cumulatively considerable impact related to GHG emissions and climate change. In this case, the analysis of a project or plan's GHG emissions should include a qualitative summary of the project or plan's consistency with applicable measures of the 2030 CAP and an explanation with substantial evidence of why any measures described in the checklist do not apply.

If the provided answers and explanations do not demonstrate consistency with the 2030 CAP (i.e., the project or plan is not complying with the 2030 CAP measures) the project or plan

## Greenhouse Gas Emissions

---

cannot be tiered off of the 2030 CAP PEIR, and it must be reviewed subject to the quantitative thresholds described in Section D.3 of this chapter.

### *d) Revisions to the Checklist*

The County will update the 2030 CAP Consistency Checklist as necessary to maintain consistency with the 2030 CAP, the County Comprehensive Plan, and state law. Any changes made to the 2030 CAP Consistency Checklist shall be approved by the Director of the Planning and Development Department. The action of the Director to approve or deny a change to the 2030 CAP Consistency Checklist is final and not subject to appeal.

### **3. Thresholds for All Other Sources.**

#### *a) Applicability.*

- The thresholds apply to the following GHGs, per the California Health and Safety Code § 38505(g), and any other gas that the California Air Resources Board recognizes as a greenhouse gas in the future, including but not limited to: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), sulfur hexafluoride (SF<sub>6</sub>), nitrogen trifluoride (NF<sub>3</sub>). The County recognizes that environmental documents will primarily focus on the first three chemicals because the latter four are unlikely candidates to be associated with projects subject to this threshold.
- The thresholds apply to all non-exempt projects and plans, other than industrial stationary source projects, subject to discretionary approvals by the County, where the County is the CEQA lead agency, and that cannot be tiered off of the 2030 CAP PEIR due to inconsistency with the 2030 CAP. The County shall request other CEQA lead agencies and NEPA lead agencies to use the thresholds when the County is a CEQA responsible agency for a project.
- The thresholds apply to both direct and indirect emissions of GHGs, where protocols to support the calculation of such emissions are available.
  - Direct emissions encompass the project's complete operations, including GHGs emitted from all on-site (e.g., natural gas combustion in appliances) and mobile sources, involved in the operation, including off-road equipment, as well as the removal of trees and other vegetation.
  - Indirect emissions encompass GHGs that are emitted to:
    - Provide the project with electricity, including generation and transmission; and
    - Supply the project with water, including water treatment;
    - The (1) transportation and treatment of solid and liquid waste produced from the project's operations and water for the project's operations, and (2) transportation and processing of solid waste.
- Construction-related emissions are to be amortized across the lifetime of the project (i.e., dividing total construction emissions by the number of years the project is expected to be operated).

## Greenhouse Gas Emissions

---

- The thresholds do not apply to GHGs that are emitted throughout the life cycle of products that a project may produce or consume, except as identified above as a project's indirect emissions.
- The thresholds do not apply to industrial stationary sources.

### ***b) Threshold Development and Methodology.***

The County prepared thresholds for land use projects and plans and all other non-industrial stationary sources in accordance with the CEQA Guidelines (e.g., Sections 15183.5 and 15064.4), recent case law (e.g., *Center for Biological Diversity v. California Department of Fish and Wildlife*), state law (e.g., AB 32 and SB 32), relevant guidance (e.g., CARB 2022) and the 2030 CAP.

The quantitative thresholds were developed using the unincorporated County's GHG emissions inventory and associated forecast for the year 2030 and are therefore, specific to the County of Santa Barbara. The thresholds are directly tied to the population and employment growth anticipated by SBCAG, and in alignment with the Santa Barbara County General Plan as well as to the County-specific GHG emission reduction measures that the County has proposed to reduce total and per capita emissions. In addition, the magnitude of local GHG emission reduction achieved by State legislation/policies (i.e., vehicle fuel efficiency standards, the Renewable Portfolio Standard [RPS], and Title 24) was estimated based on County-specific growth and vehicle miles travelled (VMT) forecasts.

The quantitative thresholds are separated into three categories – residential, non-residential, and mixed-use – which are intended to apply to the three main types of development projects in County of Santa Barbara. These thresholds were calculated by disaggregating the County's business-as-usual GHG emissions forecasts for residential and non-residential development. The emissions reduction specific to residential and non-residential development achieved by State legislation/policies and the 2030 CAP were then subtracted from the business-as-usual forecast to determine "caps" of emissions for new residential and new non-residential development for year 2030. These emissions "caps" were then divided by the numbers of residents and employees forecast for the year 2030 to determine efficiency thresholds for residential and non-residential projects, respectively. For mixed-use development, the residential and non-residential emissions "caps" were summed, then divided by the service population forecast for 2030 to determine an efficiency threshold for mixed-use projects.

### ***c) Assessment of Greenhouse Gas Emissions – Overview.***

First, the practitioner will compare anticipated GHG emissions against the numeric emissions threshold based on the project type. The practitioner shall use a quantitative approach by calculating project-specific emissions using CalEEMod or another applicable GHG modeling program to estimate the proposed project's GHG emissions.

If a proposed project or plan's estimated GHG emissions do not exceed the applicable emissions threshold, then it is considered consistent with the 2030 CAP, which sets the acceptable countywide GHG emissions levels. In this scenario, the project or plan's GHG emissions impacts (both project- and cumulative-level) related to GHG emissions and climate change would be less than significant.

## Greenhouse Gas Emissions

---

If a proposed project or plan's estimated GHG emissions exceed the emissions threshold, mitigation measures must be identified, and respective GHG emissions reduction calculation included within the respective CEQA review document in order to reduce project or plan GHG emissions to at or below the applicable emissions threshold.

Subsection d) below provides a step-by-step approach to describing or quantifying GHG emissions from a project or plan and applying the emissions thresholds.

***d) Step-by-Step Method to Assess Significance of GHG Emissions.***

**Step 1: Determine Threshold Applicability.**

As described in Section D.3.a. above, the thresholds apply to non-exempt discretionary projects under CEQA; specifically, land use development projects (residential and non-residential), as well as land use plans (e.g., specific plans, community plans, or master plans). The thresholds do not apply to industrial stationary sources of GHG emissions. The thresholds also do not apply to any project or plan that can be tiered off the 2030 CAP PEIR as described in Section D.2 above. The thresholds apply to the sum of a project's annual operational and amortized construction emissions (over the lifetime of the project, if known, or a default lifetime of 30 years).

**Step 2: Apply the Efficiency-Based Significance Threshold.**

The Board adopted an "efficiency" type of threshold to assess the significance of GHG emissions from a land use project or plan. An efficiency threshold identifies a per-capita level of GHG emissions from new development that supports statewide reduction planning efforts (Association of Environmental Professionals 2016).

Projects that cannot be tiered off the 2030 CAP PEIR, as described in Section D.2 of this chapter, will apply the efficiency-based Significance Threshold listed in Table 1 depending on the project or plan type. Table 1 provides GHG significance thresholds for residential, non-residential, and mixed-use project types. To compare the estimated project or plan GHG emissions to the applicable threshold, the total estimated GHG emissions calculated using CalEEMod or another applicable GHG modeling program should be divided by the total number of residents, jobs, or service persons created by the project or plan. This per capita estimate will then be compared to the applicable threshold from Table 1 based on the project type.

**Table 1: GHG Significance Thresholds by Project Type**

<b>Project Type</b>	<b>GHG Significance Threshold</b>
<b>Residential.</b> Single-family dwellings, multi-family dwellings, accessory dwelling units, boarding house, caretaker quarters, fraternities and sororities, high-occupancy residential uses, continuing care communities, mobile-home parks, or any combination of these uses.	2.68 MT CO <sub>2</sub> e per resident
<b>Non-residential.</b> All commercial uses (including office and retail uses), all lodging uses, all public and quasi-public uses,	2.63 MT CO <sub>2</sub> e per employee

## Greenhouse Gas Emissions

---

<p>elderly and long-term care, hospice in-patient facilities, family day cares, residential care facilities, supportive and/or transitional housing, sports and entertainment assembly facilities, all industry, manufacturing &amp; processing, and wholesaling uses that are not subject to Santa Barbara County Air Pollution Control District (APCD) stationary source permitting or the State cap-and-trade program, or any combination of these uses.</p>	
<p><b>Mixed-use.</b> A combination of at least one residential and at least one non-residential land use specified above.</p>	<p>2.67 MT CO<sub>2</sub>e per service person<sup>1</sup></p>

Notes: MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalents.

<sup>1</sup> Service person means resident of the residential land use or employee of the non-residential land use.

For the purpose of applying the threshold, resident shall mean full-time resident, employee shall mean full-time employee equivalent (i.e., multiple part-time employees may be equivalent to a full-time employee), and service person shall mean a resident or an employee. For example, a hotel project should divide the total annual emissions anticipated to occur in its first year of full operation by the total number of full-time employees and full-time residents (if any) to calculate the GHG emissions efficiency. Visitors and guests should not be counted toward this project's service population, because they are residents of other locations. Similarly, an elementary school project, while it serves many students, would account for the full-time equivalent staff, but would not include students in its service population, unless they are living on campus.

The Significance Threshold shall apply the sum of the amortized construction emissions (i.e., dividing total construction emissions across all construction years by the number of years the project would operate or a default project lifespan of 30 years) and the estimated annual operational emissions. For estimating construction emissions, CalEEMod generates a default construction schedule and equipment list based on the plan/project-specific information, including land use, project size, location, and construction timeline. In general, if specific applicant-provided information is unknown, the default construction equipment list and phase lengths are the most appropriate inputs. However, if more detailed site-specific equipment and phase information (i.e., data from the project applicant) is available, the model's default values can (and should) be overridden.

Operational emissions should be calculated to include all of the following as applicable to the project or plan:

1. Area Source Emissions: GHG emissions generated by the use of landscaping equipment, hearths, woodstoves, etc., which emit GHGs associated with the equipment's fuel combustion.

## Greenhouse Gas Emissions

---

2. Energy Use Emissions: GHG emissions generated by combustion of natural gas for cooking, space and water heating, and decorative uses and off-site during the generation of electricity from fossil fuels in power plants.
3. Mobile Source Emissions: GHG emissions generated by vehicle trips associated with the proposed project or plan. If available, project or plan-specific trip generation rates or VMT data should be input in CalEEMod.
4. Water and Wastewater Emissions: GHG emissions generated indirectly by the amount of water used and the amount of wastewater generated.
5. Solid Waste Emissions: GHG emissions generated by the transportation of waste, anaerobic decomposition in landfills, and incineration. To calculate the GHG emissions generated by solid waste disposal, the total volume of solid waste is calculated using waste disposal rates identified by CalRecycle. Practitioners should contact the County's Community Development Department to obtain the County's most recent solid rate diversion rate to be included in the calculation of solid waste GHG emissions

Projects with GHG emissions less than the Significance Threshold would normally result in an insignificant impact and, therefore, would not require further analyses or studies. Nonetheless, CEQA Guidelines Section 15064(b)(2) states, "Compliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant." The analyst must consider any substantial evidence as appropriate to the proposed project or plan.

Projects with GHG emissions above the Significance Threshold would normally result in a significant impact and, therefore, would require further analyses and studies, and, if necessary, project modifications or mitigation measures as discussed in Step 3, Apply Mitigation Measures.

### *Specific Project Considerations*

This subsection describes how to assess potential impacts from specific instances where analysts need to consider unique project circumstances.

#### *1. Projects or Plans That Do Not Meet the Efficiency-based Requirements or Definitions.*

The thresholds of significance are for general use and should apply to most discretionary projects subject to environmental review that are not industrial stationary source projects. However, the thresholds may not be appropriate for unique projects. In such cases, CEQA Guidelines Section 15064.7(b) allows the County to use other thresholds "... on a case-by-case basis as provided in Section 15064(b)(2)." When using thresholds on a case-by-case basis, the practitioner must: (1) set forth substantial evidence in the administrative record for the project, to justify the use of different thresholds; and (2) explain how non-compliance or compliance with these thresholds means that a project would result in significant or insignificant impacts, respectively.

Regarding projects that may not fit within the definitions used in the development of the thresholds and may require a project-specific analysis, the practitioner shall determine which threshold to use based on the project's specific attributes. The efficiency-based Significance Threshold may not apply to specific attributes of a

unique or uncommon project or plan type. For example, projects that have a low service population due to limited employment, may have other users that are not included in the definition of service population (e.g., schools, hotels, and community centers) that should be considered in the evaluation of impacts. Additionally, projects that do not include new permanent development (e.g., temporary uses and facilities) may not create a new service population. In such a case, the practitioner can consider using a numeric screening threshold specific to the proposed project; however, the County shall make the determination on a case-by-case basis using substantial evidence set forth in the administrative record for the project.

2. *Accessory Dwelling Units as Part of a Proposed Subdivision or Discretionary Housing Project.*

CEQA Guidelines Section 15268, Ministerial Projects, subsection (a), states that ministerial projects are exempt from the requirements of CEQA. However, CEQA Guidelines Section 15268(d) states, “Where a project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.”

Government Code Section 65852.2(a)(3) requires jurisdictions to consider and approve a proposed ADU or a junior accessory dwelling unit [JADU] ministerially without discretionary review. Therefore, ADUs and JADUs not associated with a subdivision or other discretionary project are exempt from CEQA and the GHG analysis and thresholds in this chapter. In contrast, ADUs and JADUs that are part of a larger discretionary project are subject to CEQA. In these cases, the County will analyze the ADUs’ and JADUs’ potential environmental impacts in the environmental document for the discretionary project.

If a discretionary housing project with ADUs as part of the project description exceeds the efficiency-based Significance Threshold, staff must seek additional guidance when applying or requiring mitigation measures. Mitigation measures must be applied to the primary residential use (e.g., single-family or multi-family dwelling units) only. ADU legislation limits the restrictions that can be imposed on ADUs, therefore, mitigation such as adding parking or requiring additional design standards would not be allowed by statute. Depending on the impact, it may need to be classified as significant and unmitigatable based on state law and the County must adopt a statement of overriding consideration.

The *Environmental Thresholds and Guidelines Manual* amendment provides step-by-step approaches for two specific instances:

(a) *ADUs as Part of a Discretionary Housing Project*

If ADUs are proposed as part of a discretionary project, and the proposed number and size (square footage) of the ADUs are contained in the project description, then staff must include the ADUs when applying the Screening Threshold. Table 1 provides direction on how to include ADUs when applying the size-based project screening criteria. Specifically, staff must:

## **Greenhouse Gas Emissions**

---

- Select the appropriate project type (single-family housing or multi-family housing),
- Include the total square footage of any ADUs in the total size of the proposed project, and
- Measure residential square footage as the “gross floor area” per the County’s development codes.

### *(b) ADUs as Part of a Proposed Residential Subdivision*

If a proposed discretionary project does not include proposed housing development concurrently, then the County may make the following assumptions regarding future development of ADUs on the newly formed residential parcels for purposes of environmental review:

- Assume that 25 percent of the future residential parcels will contain ADUs.
- Assume that the average ADU will be 800 square feet in size.
- Assume that any future JADUs will be conversions of existing development, so there will be no additional square footage allotted to JADUs.

P&D staff based the above assumptions on (1) residential subdivisions permitted within the past 10 years in the unincorporated county areas that had subsequent ADU development, and (2) ADU/JADU permit applications since adoption of county and state ordinances allowing for ADUs/JADUs. P&D staff will recommend that the above approach regarding ADUs/JADUs be adjusted if the County experiences a dramatic change in actual ADU/JADU development in the future.

### *3. Comprehensive Plan Land Use Designation Amendments*

For a project or plan that would result in a change in the project site or plan area Comprehensive Plan land use designation, emissions anticipated for the existing land use designation must be calculated in conjunction with emissions for the proposed project or plan to demonstrate whether the project or plan would be more or less GHG-intensive than the development anticipated for the existing land use designation. In this case, GHG emissions should be reported for both the existing and proposed scenarios.

Emissions anticipated for the existing land use designation and the proposed land use designation should be calculated using the methods described in Section D.3.d of this Chapter. Any emissions reduction credits applied to the proposed project or plan that are related to State legislation/policies (e.g., vehicle standards, Title 24, etc.) or the project or plan location (e.g., proximity to transit, destination accessibility, etc.) should be applied to the existing and proposed scenarios. Emission reduction credits that are specific to the proposed project or plan (e.g., use of recycled water, increased density, installation of energy- or water-efficient appliances, etc.) should only be included for the proposed scenario. In addition,

## Greenhouse Gas Emissions

---

care should be taken to identify any emission reduction credits that might be specific to the existing land use designation and not applicable to the proposed project or plan.

### Step 3: Apply Mitigation Measures.

Projects and plans that meet or exceed the Significance Threshold require the implementation of feasible project modifications or mitigation measures. The modifications or mitigation avoid or reduce GHG emissions impacts to an insignificant level (i.e., below the applicable threshold of significance).

Lead agencies should tailor mitigation measures to a project's characteristics and potential impacts. Mitigation measures should be prioritized to select on-site and then local mitigation options first, then allow for regional or state-wide mitigation measures if on-site and local options are exhausted. The project's administrative record must provide substantial evidence to support any conclusions regarding whether the mitigation measures would reduce the impacts to an insignificant level or whether the impacts would remain significant and unavoidable. If the project will rely on programmatic mitigation measures, the administrative record for the project must set forth substantial evidence to explain how participation in the program will mitigate project-generated GHG emissions.

Mitigation measures may not always reduce a project's GHG emissions impacts to an insignificant level. In such cases, CEQA Guidelines Section 15093 requires decision-makers to make a statement of overriding considerations in order to approve the project or plan.

The County recommends that applicants proposing mitigation measures follow the additional criteria below:

- Proposed mitigation measures shall also have established funding mechanisms and be fully implementable.
- Because the proposed threshold relates to GHG emissions, the proposed mitigation measures should target actions that maximize the reduction of GHGs rather than other air pollutants. For example, a mitigation measure that promotes use of low-emissions diesel generators will most effectively reduce emissions of particulate matter and nitrogen oxides; GHG emissions would only be reduced if the equipment was also designed to be more fuel-efficient.
- Proposed mitigation measures should go beyond existing regulatory requirements.

The applicant may also apply applicable mitigation measures recommended by the SBCAPCD, available at [www.ourair.org/ghgmitigation-sbc](http://www.ourair.org/ghgmitigation-sbc).

### **E. Initial Study Question "b".**

Section 4.3.b (*Air Quality – Greenhouse Gas Emissions*) of the Initial Study Proto asks if the proposed project would “conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases[.]”

#### *County GHG Emission Reduction Plans, Policies, and Regulations*

The Board adopted the 2030 CAP in 2024 as the County's GHG emission reduction plan. The County will implement the 2030 CAP, including all measures and actions included in the 2030 CAP, in an effort to achieve the goal of a 50 percent reduction from 2018 levels by 2030, and the

## **Greenhouse Gas Emissions**

---

long-term aspirational goal of carbon neutrality by 2045. The GHG emissions thresholds are part of the 2030 CAP GHG emissions reduction strategy, and are informed by the County's 2030 emissions reduction target. The GHG emissions thresholds provide a pathway for projects and plans to show compliance with County goals.

### *State GHG Reduction Plans, Policies, and Regulations*

The 2030 CAP GHG emission reduction goal (50 percent reduction from 2018 levels by the year 2030) is consistent with the State's direction under Senate Bill 32 as codified in the California Health and Safety Code, Division 25.5, Part 4, Section 38566 (40 percent reduction below 1990 levels by 2030). CARB's 2017 Scoping Plan and 2022 update (CARB, 2017 and 2022) describes the State's strategy for achieving California's 2030 GHG emission reduction target. The Scoping Plan does not prescribe or require specific actions by local government agencies; rather, the Scoping Plan provides guidance to local agencies and CARB supports programs that assist local agencies. Local government efforts to reduce emissions within their jurisdiction are critical to achieving the State's long term GHG goals, and can also provide important co-benefits, such as improved air quality, local economic benefits, more sustainable communities, and an improved quality of life.

CARB recommends statewide targets of no more than six MTCO<sub>2e</sub> per capita by 2030, and no more than two MTCO<sub>2e</sub> per capita by 2050. The statewide per capita targets account for all emissions sectors in the State, statewide population forecasts, and the statewide reductions necessary to achieve the 2030 statewide target under SB 32 and the longer term State emissions reduction goal of 80 percent below 1990 levels by 2050. This limit represents California's and these other governments' recognition of their "fair share" to reduce GHG emissions to the scientifically based levels to limit global warming below two degrees Celsius.

CARB recommends that local governments evaluate and adopt robust and quantitative locally-appropriate goals that align with the statewide per capita targets and the State's sustainable development objectives and develop plans to achieve the local goals.

The County's GHG emission efficiency threshold is considerably lower than the State's 2030 per capita target. Therefore, analysts can apply the County's threshold with confidence that it aids the State in achieving its target, as well.

## **REFERENCES**

Association of Environmental Professionals (AEP). 2016. "Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California, Final White Paper." 18 October. Available at [https://califaep.org/docs/AEP-2016\\_Final\\_White\\_Paper.pdf](https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf).

Bay Area Air Quality Management District. 2017. California Environmental Quality Act Air Quality Guidelines. Available at: [https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en).

California Air Resources Board (CARB). 2017. "California's 2017 Climate Change Scoping Plan." November. Available at: [https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping\\_plan\\_2017.pdf?utm\\_medium=email&utm\\_source=govdelivery](https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf?utm_medium=email&utm_source=govdelivery).

## **Greenhouse Gas Emissions**

---

California Air Resources Board (CARB). 2022. “2022 Scoping Plan for Achieving Carbon Neutrality.” December. Available at: <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>.

County of Santa Barbara. 2024. 2030 Climate Action Plan. Available at: <https://www.countyofsb.org/1217/2030-Climate-Action-Plan>.

California Natural Resources Agency. 2018. “Guidelines for Implementation of the California Environmental Quality Act.” 2018. December. Available at: [https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2018\\_CEQA\\_FINAL\\_TEXT\\_122818.pdf](https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf).

Governor’s Office of Planning and Research (OPR). 2018. “CEQA and Climate Change Advisory, Discussion Draft.” December. Available at: [http://opr.ca.gov/docs/20181228-Discussion\\_Draft\\_Climate\\_Change\\_Advisory.pdf](http://opr.ca.gov/docs/20181228-Discussion_Draft_Climate_Change_Advisory.pdf).

## EXHIBIT 2: 2030 CLIMATE ACTION PLAN CONSISTENCY CHECKLIST

# County of Santa Barbara

## CLIMATE ACTION PLAN CONSISTENCY CHECKLIST for Future Development<sup>1</sup>

The County of Santa Barbara 2030 Climate Action Plan establishes 2030 and 2045 greenhouse gas (GHG) emissions targets and provides measures to establish a trajectory towards achieving those targets. The 2030 Climate Action Plan includes specific measures to achieve a GHG emissions target of 50 percent below 2018 levels by 2030. This is consistent with and exceeds California's goal of reducing GHG emissions to 40 percent below 1990 levels (per Senate Bill 32) by 2030 and provides substantial progress towards achieving the State GHG reduction goal of carbon neutrality (per Executive Order B-55-18) by 2045. The County Board of Supervisors, County staff, and community will continue to develop an approach to meet the State 2045 goal of carbon neutrality.

Over the years, the County has implemented many environmental programs. The 2030 Climate Action Plan establishes the continuation of some programs, expansion of other programs, and implementation of new programs to reduce GHG emissions.

Per the 2030 Climate Action Plan, the Santa Barbara County GHG Emissions Inventory will be updated at least every three years. In addition, the CAP will be updated every five to seven years with annual reviews of progress on implementation of specific Santa Barbara County measures and with respect to meeting emissions reduction targets.

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15183.5, a lead agency may determine that a project's or plan's incremental contribution to a cumulative effect is not cumulatively considerable if it complies with the requirements in a previously adopted plan or mitigation program under specified circumstances. In order for the 2030 Climate Action Plan to be considered a qualified GHG reduction strategy and provide for CEQA streamlining of GHG analysis for future development, the 2030 Climate Action Plan must identify those measures that are applicable to future development projects. The 2030 Climate Action Plan includes measures that are applicable to existing developments, municipal government operations, as well as measures to be applied to future development for public and private projects and plans. GHG reduction measures that are applicable to future development to be able to rely on the streamlined GHG analysis are summarized in the following CEQA GHG Emissions Compliance Checklist (referred to herein as the CEQA GHG Checklist). This CEQA GHG Checklist identifies applicable regulations, requirements, and monitoring and reporting required by those regulations. The purpose of the CEQA GHG Checklist is to assist with determining project or plan consistency with the 2030 Climate Action Plan and provide a streamlined review process for proposed future development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA.

This CEQA GHG Checklist contains measures that are required to be implemented on a Project-by-Project and Plan-by-Plan basis to be able to rely on the streamlined GHG analysis. Implementation of these

---

<sup>1</sup> Future development refers to any project or plan that is subject to discretionary review and triggers environmental review pursuant to CEQA.

measures would ensure that future development is consistent with 2030 Climate Action Plan assumptions and that the County is making progress toward achieving the identified GHG reduction targets. Projects or plans that are consistent with the 2030 Climate Action Plan as determined through the use of this CEQA GHG Checklist may rely on the programmatic 2030 Climate Action Plan Environmental Impact Report (EIR) GHG emissions analysis for the respective project- and cumulative-level GHG emissions impacts analysis. Inconsistency with any of the applicable measures in this CEQA GHG Checklist would make a Plan/Project inconsistent with the overall CEQA GHG Checklist. **Projects and plans that are identified as not consistent with the 2030 Climate Action Plan through the use of this CEQA GHG Checklist must prepare a project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions compared to the County GHG emissions thresholds outlined in the CEQA GHG Emissions Thresholds and Guidance Document (2024) and incorporation of the 2030 Climate Action Plan measures in this CEQA GHG Checklist to the extent feasible.**

Cumulative GHG emissions associated with construction from a land use development project are generally orders of magnitude lower than the operational emissions from a project because construction emissions are generally short in duration compared to the project's overall lifetime, and thus can be assessed qualitatively as part of related CEQA GHG emissions analysis. However, some projects may have long construction periods or entail large quantities of cut and fill that could result in construction-related GHG emissions that may be considered significant. Thus, the County retains the discretion on a project-by-project basis to consider whether a project's construction-related GHG emissions could be cumulatively considerable and require more detailed quantitative CEQA GHG emissions analysis and respective mitigation.

This CEQA GHG Checklist may be periodically updated to incorporate new GHG reduction techniques, to comply with later amendments to the CAP, or to reflect changes in other sustainability-focused local, State, or federal laws, regulations, ordinances, and programs. At a minimum, this CEQA GHG Checklist will be updated as needed to be consistent with 2030 Climate Action Plan timing.

#### **PROJECT APPLICATION REQUIREMENTS**

Completion of the CEQA GHG Checklist will be a requirement once it is determined if the project/plan is subject to CEQA review. The CEQA GHG Checklist is designed to assist the applicant in identifying the minimum 2030 Climate Action Plan and other applicable sustainability-focused requirements specific to a proposed project or plan. However, it may be necessary to supplement the completed CEQA GHG Checklist with supporting materials, calculations, or certifications to demonstrate compliance with 2030 Climate Action Plan and other applicable sustainability-focused requirements. If the minimum 2030 Climate Action Plan and other applicable sustainability-focused requirements are not already clearly committed to as part of the CEQA project description, the completed measure in the CEQA GHG Checklist will be included in the respective project or plan conditions of approval.



**COMPLIANCE CHECKLIST TABLE**

Section 1: COMPREHENSIVE PLAN AND ORDINANCE CONSISTENCY			
Regulation	Requirements	Project/Plan Compliance <sup>2</sup>	Required Explanation <sup>3</sup>
Comprehensive Plan	1a. Does the Project/Plan include a Comprehensive Plan, Zoning Map, or Ordinance Amendment? If “No”, proceed to Section 2 – CAP Strategies Consistency. If “Yes”, proceed to question 1b.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
Comprehensive Plan	1b. Does the Comprehensive Plan, Zoning Map, or Ordinance Amendment result in an equivalent or less GHG-intensive project when compared to the existing designation? Rezones involving increases in density (e.g., residential density) are an increase in GHG intensity. Rezones between non-density based zones (e.g., commercial zones) may be equivalent, but will depend on the proposed development.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

<sup>2</sup> A Project/Plan that answers “No” to any question 1.b through 9 is determined inconsistent with the CAP and must prepare a Project/Plan-specific analysis of GHG emissions compared to the GHG emissions thresholds.

<sup>3</sup> Every question included in this checklist is required to be answered with explanation of either: 1) how it will be achieved, 2) why it will not be achieved, or 3) why it is not applicable.

**Section 2: 2030 CLIMATE ACTION PLAN MEASURES CONSISTENCY**

Regulation	Requirements	Project/Plan Compliance <sup>2</sup>	Required Explanation <sup>3</sup>
<b>Clean Energy</b>			
<p>County 2030 Climate Action Plan (Measure CE-1)</p>	<p><b>2. All Project Types - Building Electrification.</b> Will the Project/Plan (whether all new construction, remodel, or combination thereof) comply with 2030 Climate Action Plan Action CE-1.1 and be all-electric with no natural gas hookup?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<p>County 2030 Climate Action Plan (Measure CE-1)</p>	<p><b>3. All Project Types - Carbon Free Electricity.</b> Will the Project/Plan (whether all new construction, remodel, or combination thereof) retain Central Coast Community Energy as the energy provider or otherwise utilize 100% carbon free electricity? Southern California Edison (SCE) and Pacific Gas and Electric (PG&amp;E) both distribute power from Central Coast Community Energy.</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

**Section 2: 2030 CLIMATE ACTION PLAN MEASURES CONSISTENCY**

Regulation	Requirements	Project/Plan Compliance <sup>2</sup>	Required Explanation <sup>3</sup>
<p>County 2030 Climate Action Plan (Measure TR-1) &amp; County Municipal Code (Article XVII. - Expedited Permitting Procedures for Electric Vehicle Charging Station Review)</p>	<p><b>4. All Project Types - EV Charging Infrastructure.</b> Will the Project/Plan (whether all new construction, remodel, or combination thereof) meet or exceed the requirements of the California Green Building Standards Code, Title 24, Part 11, (CALGreen) Tier II for EV charging infrastructure? New single-family or two-family dwellings are not required to include EV charging infrastructure. Multi-family dwellings (more than three dwellings) and non-residential project must include EV charging infrastructure based on the project size.</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<p>County 2030 Climate Action Plan (Measure TR-3)</p>	<p><b>5. All Project Types - Off-Road Equipment Electrification.</b> Will the Project/Plan (whether all new construction, remodel, or combination thereof) commit to the use of electrified off-road landscaping equipment (e.g., mowers, chippers, tractors) for ongoing operations and maintenance?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

**Section 2: 2030 CLIMATE ACTION PLAN MEASURES CONSISTENCY**

Regulation	Requirements	Project/Plan Compliance <sup>2</sup>	Required Explanation <sup>3</sup>
<b>Housing &amp; Transportation</b>			
<p>County 2030 Climate Action Plan (Measure TR-2) &amp; County Environmental Thresholds and Guidelines Manual</p>	<p><b>6. All Project Types- Reduce VMT.</b> Will the Project/Plan demonstrate consistency with the County's Thresholds of Significance for Transportation Impacts in the County Environmental Thresholds and Guidelines Manual by either:</p> <p>a. meeting the screening criteria for Vehicle Miles Traveled (VMT) to not require further analysis; or</p> <p>b. resulting in a reduction in VMT?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<p>County 2030 Climate Action Plan (Measure TR-2)</p>	<p><b>7. Large Employers - Transportation Demand Management (TDM).</b> If the Project/Plan will have 50 or more employees, will the Project/Plan (whether all new construction, remodel, or combination thereof) provide a commuter benefit program for employees with measures (such as subsidies for employees that bike, walk, or carpool, telework policy, and/or provide free transit passes for all employees) and achieve a 50-80% telework participation rate by eligible employees able to work remotely consistent with Connected 2050 RTP/SCS?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

**Section 2: 2030 CLIMATE ACTION PLAN MEASURES CONSISTENCY**

Regulation	Requirements	Project/Plan Compliance <sup>2</sup>	Required Explanation <sup>3</sup>
<b>Waste, Water, and Wastewater</b>			
<p align="center">County 2030 Climate Action Plan (Measure W-1 and W-2)</p>	<p><b>8. All Project Types - Residential &amp; Commercial Landfill Diversion Rate Goal.</b> Will the Project/Plan (whether all new construction, remodel, or combination thereof) meet current legislation and 2030 Climate Action Plan goals to properly sort and collect recyclables and organic waste, as applicable, to reduce communitywide landfilled organics 80% by 2030 and 100% by 2045 by providing dedicated space for organic waste and/or recycling receptacles? To find out your specific requirements based on project type and geographic area, please visit <a href="https://lessismore.org/organics/">https://lessismore.org/organics/</a>.</p>	<p align="center">Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<p align="center">County 2030 Climate Action Plan (Measure W-2)</p>	<p><b>9. All Project Types - Residential &amp; Commercial Organics Recycling Requirement.</b> Will the Project/Plan (whether all new construction, remodel, or combination thereof) meet SB 1383 legislation requirements by posting education signage, as applicable, and sorting and collecting organic waste, as applicable, to achieve 0.08 tons per capita compost procurement requirements for the unincorporated County? To find out your specific requirements based on project type and geographic area, please visit <a href="https://lessismore.org/organics/">https://lessismore.org/organics/</a>.</p>	<p align="center">Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>