ATTACHMENT L: COUNTY PLANNING COMMISSION ACTION LETTER AND RESOLUTIONS, DATED MAY 1, 2024

County of Santa Barbara
Planning and Development

Lisa Plowman, Director

Jeff Wilson, Assistant Director

Elise Dale, Assistant Director

TO THE HONORABLE BOARD OF SUPERVISORS
COUNTY OF SANTA BARBARA, CALIFORNIA

PLANNING COMMISSION
HEARING OF MAY 1, 2024

RE: Energy Element Amendment – 2030 CAP Update and GHG Thresholds of Significance; 23AGP-00004

Hearing on the request of the County of Santa Barbara Planning and Development Department that the County Planning Commission recommend that the Board of Supervisors adopt a Comprehensive Plan Amendment, Case No. 23GPA-00004, amending Policy 8.3 and Research Action 8.3.1 of the Energy Element of the County Comprehensive Plan, and adopt the proposed amendment to Chapter 11, Greenhouse Gas Emissions, of the *Environmental Thresholds and Guidelines Manual* (County of Santa Barbara, P&D, January 2021) to implement greenhouse gas (GHG) emissions thresholds of significance in compliance with CEQA Guidelines Section 15064.4. (Continued from 03/06/24)

Dear Honorable Members of the Board of Supervisors:

At the Planning Commission hearing of May 1, 2024, Commissioner Parke moved, seconded by Commissioner Bridley and carried by a vote of 5 to 0 to:

1. Recommend that the Board of Supervisors make the required findings for approval (Attachment A of the staff report, dated February 27, 2024), including CEQA findings, for the proposed Comprehensive Plan Energy Element Amendment, Case No. 23GPA-00004.

2. Recommend that the Board of Supervisors find that the proposed Comprehensive Plan Amendment, Case No. 23GPA-0004, is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061(b)(3) (Attachment D of the staff report, dated February 27, 2024).

3. Adopt a resolution (Attachment 1) recommending that the Board of Supervisors approve Case No. 23GPA-00004, to update Policy 8.3 and Research Action 8.3.1 of the Santa Barbara County Comprehensive Plan Energy Element (Attachment 1 of the staff memorandum dated April 23, 2024, Exhibit 1).

4. Recommend that the Board of Supervisors determine that the amendment to the *Environmental Thresholds and Guidelines Manual* (Attachment 2 of the staff memorandum dated April 23, 2024, Exhibit 1) is not a project pursuant to CEQA Guidelines Sections 15060(c)(3), 15378 (b)(5), and 15064.7.

5. Adopt a resolution recommending that the Board of Supervisors amend the *Environmental Thresholds and Guidelines Manual* (Attachment 2) to include new thresholds of significance for determining the significance of impacts from greenhouse gas (GHG) emissions from land use projects and plans under CEQA (Attachment 2 of the staff memorandum dated April 23,2024, Exhibit 1).

Sincerely,

Jeff Wilson
Secretary Planning Commission

cc: Jeff Wilson, Assistant Director
Ben Singer, Planner

Attachments: **Attachment A – Findings**
Attachment 1 – Planning Commission Resolution
Attachment 2- Planning Commission Resolution

JW/dmv

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ATTACHMENT A: FINDINGS OF APPROVAL

1.0 CEQA FINDINGS

The Planning Commission finds and recommends that the Board of Supervisors finds that the Proposed Project is exempt from environmental review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061(b)(3). Please see Attachment D, Notice of Exemption, to the staff report dated February 27, 2024, and incorporated herein by reference, for additional details.

2.0 ADMINISTRATIVE FINDINGS

AMENDMENTS TO THE COMPREHENSIVE PLAN

In compliance with Section 35.104.060 of the County Land Use and Development Code, prior to the approval or conditional approval of an application for an Amendment to the Comprehensive Plan, the review authority shall first make all of the following findings as applicable.

2.1 The request is in the interests of the general community welfare.

The Planning Commission finds and recommends that the Board of Supervisors finds that the proposed Amendment to the Energy Element is in the interests of the general community welfare. The proposed Amendment will update the Energy Element to ensure that it is current with the 2030 Climate Action Plan (CAP). This will allow the County to more effectively contend with the causes and effects of climate change to the benefit of the general community welfare.

2.2 The request is consistent with the Comprehensive Plan, the requirements of the State planning and zoning laws, and this Development Code.

The Planning Commission finds and recommends that the Board of Supervisors finds that the proposed Amendment is consistent with the Comprehensive Plan, the requirements of the State planning and zoning laws, and the Land Use and Development Code (LUDC). The proposed Amendment is consistent with all applicable policies of the County Comprehensive Plan, including the Community Plans. The proposed Amendment will update Policy 8.3 and Research Action 8.3.1 of the Energy Element for consistency with the 2030 CAP. These updates will ensure that the Energy Element is current with the County's latest efforts to increase energy efficiency and combat the causes and effects of climate change.

The proposed Amendment is also consistent with the LUDC and other sections of Chapter 35 of the County Code (Zoning). The proposed Amendment to the Energy Element will update Policy 8.3 and Research Action 8.3.1 to be consistent with the 2030 CAP. These updates will not change any adopted land uses, zoning, or development standards within Chapter 35 of the County Code.

2.3 The request is consistent with good zoning and planning practices.

The Planning Commission finds and recommends that the Board of Supervisors finds that the proposed Amendment is consistent with good zoning and planning practices. The proposed Amendment will update the Energy Element to be consistent and current with other County documents, such as the 2030 CAP. The proposed Amendment does not change any zoning regulations and does not raise environmental or other planning issues.

2.4 If the request is for an amendment to the Comprehensive Plan, then the review authority shall also find that the request is deemed to be in the public interest.

The Planning Commission finds and recommends that the Board of Supervisors finds that the proposed Amendment is in the public interest. The Energy Element Amendments implement the 2030 Climate Action Plan, which identifies actions to reduce greenhouse gas (GHG) emissions throughout the County in order to meet state-required emission reduction mandates (set via Assembly Bill 32, Senate Bill 32, and Assembly Bill 1279) as well as the County's 50% GHG emissions reduction target. The reduction of GHG emissions improves air quality and lowers certain types of pollutants, both of which benefit the public. The 2030 Climate Action Plan outlines the County's commitment and strategy to reduce GHG emissions, as well as to protect the built environment, public health and welfare, and natural resources from the vulnerabilities caused by changing climate conditions.

ATTACHMENT 1: 23GPA-00004 COUNTY PLANNING COMMISSION RESOLUTION

RESOLUTION OF THE SANTA BARBARA COUNTY PLANNING COMMISSION
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA

IN THE MATTER OF RECOMMENDING TO THE BOARD OF SUPERVISORS THE ADOPTION OF AMENDMENTS TO POLICY 8.3 AND RESEARCH ACTION 8.3.1 OF THE ENERGY ELEMENT OF THE COMPREHENSIVE PLAN	**RESOLUTION NO. 24-05** **CASE NO. 23GPA-00004**

WHEREAS, on December 13th of 1994, the Board of Supervisors adopted the Energy Element of the Santa Barbara County Comprehensive Plan with Resolution No. 94-569, which contains strategies to promote the efficient use of energy; and

WHEREAS, in acknowledgement of the growing and urgent concerns regarding global climate change and the expanding regulatory environment, Board of Supervisors Resolution No. 09-059 adopted the County's Climate Change Guiding Principles supporting county efforts to reduce greenhouse gas emissions; and provided Board of Supervisor's leadership to take immediate, cost-effective and coordinated steps to reduce the County's collective greenhouse gas emissions; and

WHEREAS, Board of Supervisors Resolution No. 09-059 directed County staff to seek funding, including grants and rebates, to offset general fund costs of preparing the County's greenhouse gas emission reduction strategy and implementing programmatic actions that support climate protection; and

WHEREAS, Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, identifies local governments as essential partners in achieving California's goal to reduce greenhouse gas emissions; and

WHEREAS, Senate Bill (SB) 32, the California Global Warming Solutions Act of 2016, and Assembly Bill (AB) 1279, the California Climate Crisis Act, expanded upon GHG emissions reductions targets established by AB 32; and

WHEREAS, in response to "Santa Barbara County Climate Change Principles" (Resolution 09-059), the Board of Supervisors adopted the County of Santa Barbara Energy and Climate Action Plan (ECAP) in May 2015 which established a goal of reducing GHG emissions in the unincorporated county by 15 percent below 2007 levels by 2020 and identified 53 emissions reduction measures to achieve this goal; and

WHEREAS, on December 11, 2018, the Community Services Department, Sustainability Division presented an ECAP Progress Report to the Board of Supervisors, which identified that an increase of GHG emissions in the unincorporated part of Santa Barbara County to 14 percent above 2007 levels as of 2016; and

WHEREAS, in response, the Board directed the Community Services Department, Sustainability Division to develop a 2030 Climate Action Plan (CAP) and set a new GHG emission reduction target of 50% below 1990 levels by 2030; and

WHEREAS, on April 5, 2022, the Board adopted the goal of carbon neutrality by 2045 or sooner, as feasible, and updated the interim 2030 goal from 50% reduction below 2007 levels to 50% net reduction from current (2018) levels; and

WHEREAS, the County of Santa Barbara has a leadership role to play in reducing greenhouse gas emissions and preparing for the impacts of climate change through their regional jurisdiction over policy areas such as air quality, land use planning, transportation, zoning, water conservation, and wastewater and solid waste management; and

WHEREAS, Santa Barbara County has a long tradition of environmental stewardship, specifically in promoting the preservation of agricultural land and open space, an important component of greenhouse gas mitigation. Additionally, the County has already begun to engage in activities to reduce greenhouse gas emissions, such as: municipal fleet electrification, the expansion of solar and battery storage, and partnerships such as the Tri-County Regional Energy Network, Central Coast Community Energy, Santa Barbara County Regional Climate Collaborative, and Electric Drive 805; and

WHEREAS, the County contacted and offered to consult with California Native American tribes in compliance with Government Code Sections §65352.3 and 65352.4 (Senate Bill 18). No tribes contacted the County requesting further consultation; and

WHEREAS, the County Planning Commission held duly noticed public hearings on March 6, 2024, and May 1, 2024, in compliance with Government Code section §65353, at which time County staff explained the proposed amendment and the Commission invited comments from the attendees of the hearing; and

WHEREAS, in compliance with Government Code section §65359, the County Planning Commission recommends the Board of Supervisors determine that the proposed amendment is consistent with the Comprehensive Plan, including the Energy Element, and provides the greatest community welfare without compromising community values, environmental quality, or public health and safety, as specified in the Findings for Approval, Attachment A, of the County Planning Commission staff report dated February 27, 2024, which is incorporated by reference; and

WHEREAS, it is now deemed in the interest of the orderly development of the County and important to the preservation of the health, safety, and general welfare of the residents of said County to amend the Comprehensive Plan's Energy Element, as attached hereto as Exhibit 1 and is incorporated herein by reference.

NOW, THEREFORE, IT IS HEREBY RESOLVED, that:

1. The above recitations are true and correct.

2. In compliance with the provisions set forth in County Code section 2-25.1, the County Planning Commission recommends that the Board of Supervisors, following the required noticed public hearing, approve and adopt the amendment to the Energy Element of the Comprehensive Plan, specified in Exhibit 1 of this resolution.

3. A certified copy of this Resolution shall be transmitted to the County Board of Supervisors.

4. The Chair of this County Planning Commission is hereby authorized and directed to sign and certify all documents, and other materials in accordance with this Resolution to show the aforementioned action by the County Planning Commission.

PASSED, APPROVED, AND ADOPTED this 1st day of May, 2024 by the following vote:

AYES: Cooney, Bridley, Parke, Reed, Martinez

NOES:

ABSENT:

ABSTENTIONS:

Vincent J. Martinez

VINCENT MARTINEZ, CHAIR
SANTA BARBARA COUNTY
PLANNING COMMISSION

ATTEST:

JEFF WILSON
SECRETARY TO THE COMMISSION

By _____

APPROVED AS TO FORM:

RACHEL VAN MULLEM
COUNTY COUNSEL

By _____
DEPUTY COUNTY COUNSEL

EXHIBIT: 1. Energy Element Amendment (Case No. 23GPA-00004)

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EXHIBIT 1: ENERGY ELEMENT UPDATE (CASE NO. 23GPA-00004)

The following text shows the amendments to the Energy Element resulting from Comprehensive Plan Amendment Case No. 23GPA-00004. Additions are shown in red underlined text and deletions are shown in red strikethrough text. Page references are to the 2015 Energy Element.

SANTA BARBARA COUNTY COMPREHENSIVE PLAN

ENERGY ELEMENT

ADOPTED 1994

REPUBLISHED JUNE 2015

AMENDED JUNE 2024

County of Santa Barbara
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101

GOAL 8: IMPLEMENTATION AND EVALUATION - Assure maximum success of this Element.

POLICY 8.1: IMPLEMENTATION PLAN - The County shall approve and activate the Implementation Plan for this Element and shall evaluate this plan biennially.

Research 8.1.1: The County shall conduct a biennial review with public input to evaluate the progress being made under this element, and a~~n~~ biennial progress report shall be presented before a noticed Board of Supervisors hearing.

POLICY 8.2: ELEMENT EVALUATION - Santa Barbara County shall periodically review and assess the effectiveness of the Element's policies for modifications.

Research 8.2.1: As needed, the County shall report statistics regarding Energy Element policies and programs; the policies shall be reevaluated and adjusted to meet the overall objective of increasing energy efficiency and the use of renewable and other alternative energies.

POLICY 8.3: 2030 ~~E~~CAP IMPLEMENTATION – The County shall implement the 2030 ~~Energy and~~ Climate Action Plan (~~E~~CAP) to reduce greenhouse gas (GHG) emissions from community-wide sources by ~~a minimum of 15~~50% net reduction from the 201807 baseline emissions by 203020.

Research 8.3.1: ~~Established in the ECAP, the~~ The County shall annually monitor progress towards achieving greenhouse gas (GHG) emissions reductions ~~reductions every five years~~ established in the 2030 Climate Action Plan (CAP). ~~Monitoring of the County's~~The 2030 ~~E~~CAP monitoring shall include an update to the GHG emissions from community-wide sources. ~~If~~ The 2030 CAP will be updated as needed if it is determined that the 2030 ~~E~~CAP is not achieving specified levels of GHG emissions reductions~~, the ECAP will be updated as needed~~.

ATTACHMENT 2: COUNTY PLANNING COMMISSION RESOLUTION

RESOLUTION OF THE SANTA BARBARA COUNTY PLANNING COMMISSION
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA

IN THE MATTER OF RECOMMENDING THAT THE BOARD OF SUPERVISORS AMEND THE SANTA BARBARA COUNTY ENVIRONMENTAL THRESHOLDS AND GUIDELINES MANUAL, CHAPTER 11, GREEHOUSE 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 –06**

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

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 a duly noticed public hearings on March 6, 2024, and May 1, 2024, in compliance with Government Code section §65353, at which time County staff explained the proposed amendment and the Commission invited comments from the attendees of the hearing; 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 County Planning Commission 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.

NOW, THEREFORE, IT IS HEREBY RESOLVED, that:

1. The above recitations are true and correct.

2. In compliance with the County CEQA Guidelines, Section F.3.b (Process for thresholds amendment and adoption), the County Planning Commission recommends that the Board of Supervisors of the County of Santa Barbara, State of California, following the required noticed public hearing, approve, and adopt amendments to Chapter 11, Greenhouse Gas Emissions, of the *Santa Barbara County Environmental Thresholds and Guidelines Manual* (Exhibit 1).

3. A certified copy of this Resolution shall be transmitted to the County Board of Supervisors.

4. The Chair of this County Planning Commission is hereby authorized and directed to sign and certify all documents and other materials in accordance with this Resolution to show the aforementioned action by the County Planning Commission.

PASSED, APPROVED, AND ADOPTED this 1st day of May, 2024 by the following vote:

AYES: Cooney, Bridley, Parke, Reed, Martinez

NOES:

ABSENT:

ABSTENTIONS:

VINCENT MARTINEZ, CHAIR
SANTA BARBARA COUNTY
PLANNING COMMISSION

ATTEST:

JEFF WILSON
SECRETARY TO THE COMMISSION

By

APPROVED AS TO FORM:

RACHEL VAN MULLEM
COUNTY COUNSEL

By
DEPUTY COUNTY COUNSEL

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 ~~January 26, 2021~~June 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 ~~screening criteria and~~ thresholds of significance for GHG emissions in this chapter reflect ~~two~~ three primary sources: the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines), ~~and~~ the ~~Governor's Office of Planning and Research's~~California Air Resources Board (~~OPR~~CARB) "~~CEQA and Climate Change Advisory, Discussion Draft~~2022 Scoping Plan for Achieving Carbon Neutrality" (~~OPR~~CARB, ~~2018~~2022), and the County of Santa Barbara 2030 Climate Action Plan (2030 CAP).

This chapter is the result of County efforts in 2015 ~~and~~ through ~~2020~~ 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 ~~State~~ 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 ~~two~~ 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. 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.

- ~~**Interim**~~ **Thresholds for Non-Industrial Stationary Source Projects**: ~~On~~ In ~~January 26, 2021~~June 2024, the Board adopted ~~interim~~ GHG emissions thresholds of significance for non-industrial stationary source projects (~~interim~~ thresholds). The ~~interim~~ 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.~~2~~ 3 of this chapter describes the ~~interim~~ 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 ~~they are~~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 ~~interim~~ 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." 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, ~~on~~ in December ~~14, 2017~~2022, the California Air Resources Board (CARB) adopted ~~California's 2017 Climate Change Scoping~~

~~Plan~~the 2022 Scoping Plan for Achieving Carbon Neutrality (~~2017~~ 2022 Scoping Plan), the strategy for achieving California's ~~2030 GHG~~goal ~~target~~ of carbon neutrality by 2045 (CARB ~~2017~~2022).

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. ~~In July 2020, the Board affirmed its target to reduce GHG emissions in unincorporated County areas by 50 percent below 2007 levels by 2030.~~ 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 ~~interim~~ thresholds based on the County's 2030 GHG emissions reduction target, which ~~are~~ is in line with the State's GHG emission reduction goals. The County developed the ~~interim~~ project-level threshold**s** 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.~~2~~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 ~~download~~ use the latest web-based version of CalEEMod and view the model's user's guide and technical documentation, go to 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. Section**s** D.2~~.~~ and D.3, below, describe~~s~~

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.

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_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), sulfur hexafluoride (SF6), nitrogen trifluoride (NF3). 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 ($MTCO_2e$/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 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 $MTCO_2e$/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 ~~Energy and~~ Climate Action Plan.

This threshold represents one of several cohesive efforts undertaken by Santa Barbara County to reduce GHG emissions. Those efforts include the ~~Energy and Climate Action Plan (ECAP)~~2030 CAP, which ~~sought~~ seeks to reduce countywide emissions by ~~15~~ 50 percent below the ~~2007~~ 2018 baseline emissions inventory by the year ~~2020~~2030 and carbon neutrality by 2045. The 2030 ~~E~~CAP ~~constituted~~ constitutes a local GHG reduction plan that, pursuant to CEQA Guidelines §15183.5(b), allow~~ed~~ 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 ~~E~~CAP ~~were~~ are intended to complement one another during implementation. ~~As part of the development of the 2030 CAP, which will replace the 2015 ECAP, the County will consider whether updates to the industrial stationary sources thresholds are warranted to achieve consistency with the 2030 CAP.~~

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 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.

~~2~~3. Thresholds for All Other Sources ~~(Interim Thresholds)~~.

a) Applicability.

- The ~~interim~~ 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_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), sulfur hexafluoride (SF_6), nitrogen trifluoride (NF_3). 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 ~~interim~~ 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 ~~interim~~ thresholds when the County is a CEQA responsible agency for a project.
- The ~~interim~~ 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 interim thresholds apply to the emissions from t~~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).
- The ~~interim~~ 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 ~~interim~~ thresholds do not apply to industrial stationary sources.

b) ~~Interim~~ Threshold Development and Methodology.

The County prepared ~~interim~~ 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), ~~and~~ relevant guidance (e.g., ~~OPR 2018~~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. ~~The interim thresholds for land use projects and plans are based on the County's 2030 GHG emissions target (i.e., 50 percent below 2007 levels by 2030). The thresholds framework consists, first, of a numerical threshold (Screening Threshold) and, second, an efficiency threshold (Significance Threshold). The County based the Screening Threshold on the types of land uses that the County permitted over a 10-year period (2010 – 2019). The County set the Screening Threshold at a level that captures the "fair share" of emissions from new development consistent with its 2030 GHG emissions target. The County based the~~

~~Significance Threshold on the targeted level of emissions from new development in 2030 and projected population and employment for the unincorporated county for the same year.~~

~~The County and its consultant, Ascent Environmental, Inc., (Ascent) prepared a memorandum titled "Santa Barbara County Interim Greenhouse Gas Thresholds Justification" (County of Santa Barbara, Planning and Development Department, October 2020). Please see this memorandum for additional information on the methodology that the County and Ascent used to develop the interim thresholds.~~

c) Assessment of Greenhouse Gas Emissions – Overview.

~~The Board adopted a stepped approach to assessing GHG emissions associated with projects and plans (other than for industrial stationary source projects), as shown in Figure 1, "Interim GHG Emissions Threshold Decision Tree for Project Analyses."~~

First, the practitioner will compare anticipated GHG emissions against ~~a~~ the numeric emissions ~~Screening T~~threshold ~~of 300 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year~~based on the project type. The practitioner ~~can~~ shall use ~~either~~ a quantitative approach ~~(~~by calculating project-specific emissions using ~~) or a qualitative approach (by comparing the project size to project screening criteria). If the practitioner selects the quantitative approach, then the practitioner shall use~~ 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.

If a proposed project or plan's estimated GHG emissions ~~meet or~~ exceed the ~~Screening~~ emissions~~T~~ threshold, ~~staff will then compare project emissions to a Significance Threshold (efficiency threshold of 3.8 $MTCO_2e$ per service population, per year). The Significance Threshold is an efficiency threshold based on the project's estimated service population~~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 ~~interim~~ emissions thresholds.

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

Step 1: Determine Threshold Applicability.

As described in Section D.~~2~~3.a. above, the ~~interim~~ 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 ~~interim~~ 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 ~~interim~~ 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 Numeric Screening Threshold.~~

~~Step 2 uses the terms "screening criteria" and "Screening Threshold." "Screening criteria" refer to a set of metrics (e.g., square footage of single-family homes) based on compliance with the Screening Threshold. "Screening Threshold" refers to a specific numeric value. Both terms refer to levels that, if exceeded, require projects or plans to further evaluate their GHG emissions in comparison to the Significance Threshold.~~

~~The Board adopted a numeric Screening Threshold of 300 $MTCO_2e$/year for non-industrial stationary source projects and plans.~~

~~The recommended Screening Threshold results in approximately 15 percent of all applicable future projects, and 87 percent of all applicable future land use emissions, being subject to the Significance Threshold. Approximately 85 percent of future projects will fall below the Screening Threshold and, therefore, will not require further analysis.~~

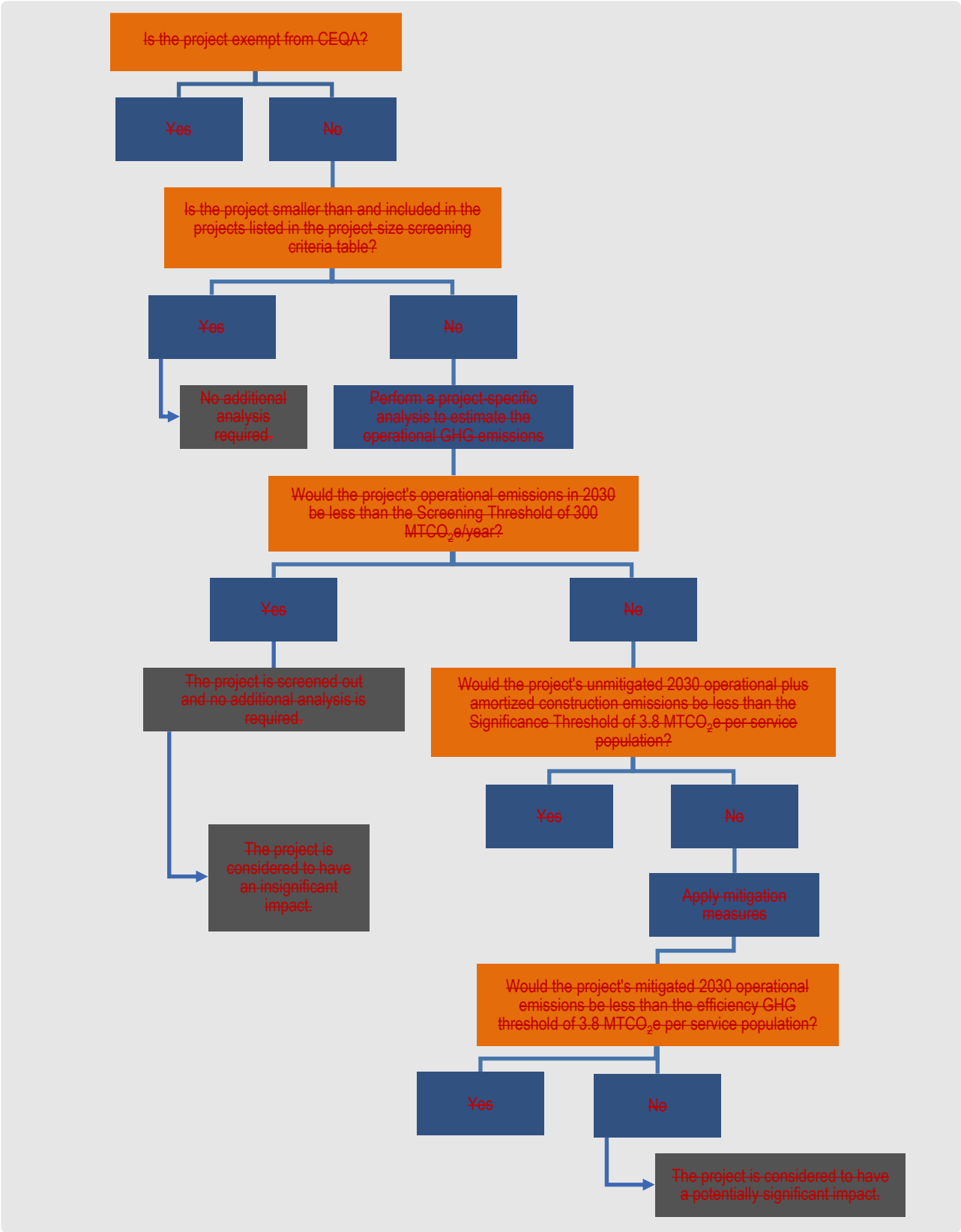

Figure 1. Interim GHG Emissions Threshold Decision Tree for Project Analyses.

The County will strictly apply the 300 $MTCO_2e$/year threshold as a screening threshold. The Screening Threshold is not a threshold of significance for projects that meet or exceed the threshold. In other words, projects that meet or exceed this emissions level may not propose mitigation measures to reduce emissions below 300 $MTCO_2e$/year; instead, County staff shall compare those projects against the proposed Significance Threshold.

Staff can apply the Screening Threshold either: (1) qualitatively, by comparing the project's land use and size to screening criteria that correspond to the numeric threshold, or (2) quantitatively, by comparing project- or plan-specific emissions directly to the numeric Screening Threshold. This section discusses both methods below.

Qualitative Approach

Lead agencies may adopt screening criteria to streamline project review for environmental impacts. Screening criteria identify classes of projects based on land use, size, and other factors that would have an insignificant impact. Agencies presume a project that meets any of the screening criteria, absent substantial evidence to the contrary, have an insignificant impact and will not require further impact analysis.

Based on the historical permit research and the recommended Screening Threshold of 300 $MTCO_2e$/year, the Board adopted a "Size-Based Project Screening Criteria Table" (Table 1). Table 1 lists types and sizes of projects that will typically emit less than 300 $MTCO_2e$/year, by the year 2030. The screening criteria represent the maximum project size at which a project is likely to emit 300 or fewer $MTCO_2e$ per year.

Table 1 reflects the average annual operational emissions typical of the land use types listed in the table, based on default modeling conducted in CalEEMod for new land uses operating in Santa Barbara County. CalEEMod accounts for typical operational emissions (e.g., energy use, mobile, waste, and water).

Staff or applicants with proposed projects that are smaller than these size-based criteria can qualitatively discuss anticipated GHG emissions during CEQA review of a project and do not need to quantify GHG emissions.

Plans that may include projects listed in Table 1 can also use the screening criteria. However, if plans include any land uses other than those shown in Table 1, the applicant must use the quantitative 300 $MTCO_2e$/year screening threshold process described below.

A single-component project (e.g., residence, office, or store) only needs to meet one of the screening criteria. However, each component of a multiple-component project (e.g., residential/retail mixed-use development) must either meet at least one applicable screening criterion that relates to each specific land use (shown in Table 1).

The County presumes a project that is smaller than the size-based screening criteria, absent substantial evidence to the contrary, will have an insignificant impact and will not require further impact analysis.

Table 1. Size-Based Project Screening Criteria

Project Type	Size-Based Screening Criteria
Single-Family Housing [1]	62,000 sf [2]
Multi-Family Housing [3]	55,000 sf [2]
Commercial Space [4]	26,000 sf
Regional Shopping Center	12,000 sf
General Office Building	28,000 sf

Notes: sf = square feet.

[1] Single-family housing developments are defined as single-family detached homes on individual lots.

[2] Residential square footage refers to all inhabited square footage on the lot, including any on-site accessory dwelling units (ADUs). Do not include accessory structures (as defined in the County's development codes). Measure residential square footage as the "gross floor area" per the County's development codes. Refer to pages 93-94 regarding ADUs.

[3] Multi-family housing developments are defined as low-rise multi-family housing complexes, modeled as "Apartments-Low Rise" in CalEEMod.

[4] Commercial space is modeled as "Office Park" in CalEEMod.

Source: Analysis conducted by Ascent Environmental in 2020.

Projects that do not meet the screening criteria in Table 1 for the following reasons must quantify GHG emissions for comparison with the Screening Threshold:

- Project types or land uses not listed in Table 1.
- Projects that meet or exceed the size-based screening criteria.
- Projects that meet one or more of the land use categories in Table 1, but has additional emissions sources that are not typical of the listed project type (e.g., schools, hotels).
- Projects that meet one or more of the land use categories in Table 1, but have GHG emissions sources that are not included in the emissions included in CalEEMod for the project type (e.g., commercial space with boilers).

Quantitative Approach

The quantitative approach involves the use of CalEEMod or another applicable GHG modeling program to model GHG emissions from the proposed project or plan. CalEEMod is the most typically used model for estimating project-level GHG emissions of land use projects. Refer to Section B.3. of this chapter for information on how to obtain and use CalEEMod. Contact the Santa Barbara County Air Pollution Control District for recommendations on how to calculate emissions for project land uses or types that are not included in CalEEMod.

Staff will compare the quantified GHG emissions against the 300 $MTCO_2e$/year Screening Threshold. If the estimated GHG emissions are less than the Screening

~~Threshold, staff can conclude that project would have an insignificant environmental impact, and the project would require no further analysis.~~

~~The 300 $MTCO_2e$/year threshold must be strictly applied as a screening threshold. It is not intended to be a threshold of significance. In other words, projects that meet or exceed this emissions level may not propose mitigation measures to reduce emissions below 300 $MTCO_2e$/year.~~

~~The County considers projects or plans with annual GHG emissions less than this numeric Screening Threshold to have an insignificant cumulative impact on global climate change. As discussed above, GHG-related impacts are analyzed as cumulative impacts given that climate change is a global phenomenon. A screening threshold of 300 $MTCO_2e$/year captures an adequate amount of emissions from new development so as to not interfere with the County's 2030 GHG emissions reduction target as described above. Projects exceeding the screening threshold are required to further analyze and, if necessary, mitigate their emissions to achieve reductions consistent with the County's goals. Thus, the screening threshold ensures that emissions from new development projects consistent with the threshold would not result in a cumulatively considerable contribution to a significant cumulative impact related to GHG emissions.~~

~~If substantial evidence shows that a project has unique characteristics that warrant adjustments to the screening threshold approach, the preparer of the environmental document may do so, provided the document sets forth substantial evidence to support/explain the adjustments.~~

~~If a project's or plan's estimated GHG emissions meet or exceed the Screening Threshold, staff must analyze the GHG efficiency against the Significance Threshold for potential significant environmental impacts. If the project's estimated GHG emissions (measured in $MTCO_2e$/year) meet or exceed the Screening Threshold, then proceed to Step 3, Apply the Efficiency-Based Significance Threshold, below.~~

~~Projects that meet or exceed the Screening Threshold must compare their GHG emissions against the Significance Threshold for potential significant environmental impacts, as described in Step 3 below.~~

Step ~~3~~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 ~~meet or exceed the Screening Threshold~~cannot be tiered off the 2030 CAP PEIR, as described in Section D.2 of this chapter, will apply the ~~recommended~~ efficiency-based Significance Threshold listed in Table 1 depending on the project or plan type~~ of 3.8 $MTCO_2e$ per service population, per year~~. Table 1 provides GHG significance thresholds for residential, non-residential, and mixed-use project types~~Service population is the total number of residents and/or jobs anticipated to be generated by the project. The County based the Significance Threshold on the 2030 GHG emissions reduction target and demographics projections (i.e., population and employment) for the same year~~. 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

Project Type	GHG Significance Threshold
Residential. 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_2e per resident
Non-residential. All commercial uses (including office and retail uses), all lodging uses, all public and quasi-public uses, 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 & 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.	2.63 MT CO_2e per employee
Mixed-use. A combination of at least one residential and at least one non-residential land use specified above.	2.67 MT CO_2e per service person[1]

Notes: MT CO_2e = metric tons of carbon dioxide equivalents.

[1] 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. ~~The County uses the Bay Area Air Quality Management District's (BAAQMD) definition of service population, where service population equals the sum of the number of residents and jobs anticipated to be generated by a project (BAAQMD 2017). The County interprets this definition of service population as the sum of full-time employees and full-time residents of a project. Therefore, projects or plans, regardless of type, should also use this definition in quantifying their GHG emissions efficiency.~~ 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.
2. Energy Use Emissions: GHG emissions generated by combustion of natural gas for cooking, space and water hearing, 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 43, Apply Mitigation Measures.

Specific Project Considerations

This subsection describes how to assess potential impacts from ~~two~~ 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 ~~interim~~ 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 ~~interim~~ thresholds may not be appropriate for unique projects. In such cases, CEQA Guidelines Section 15064.7(~~c~~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~~In such a case, the practitioner can consider using the numeric screening threshold of 300 MTCO$_2$e/year as a threshold of significance~~; 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:

- 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, 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 ~~4~~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). ~~Ascent prepared a list of potential GHG emission mitigation measures to aid County staff and CEQA practitioners. The list of potential mitigation measures will provide options for different types of land use projects. P&D staff will make the list available to the public. The list will be an informational resource, to be updated as needed during the 2030 CAP process.~~

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 ~~recommended by Santa Barbara County Air Pollution Control District (SBAPCD) (SBAPCD 2020)~~:

- 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 County has developed a list of recommended mitigation measures for projects exceeding the thresholds of significance. This list is available to applicants upon request and will include resources to help the applicant calculate the effectiveness of the mitigation measure(s).~~ The applicant may also apply applicable mitigation measures recommended by the SBCAPCD, available at www.ourair.org/ghgmitigation-sbc.

~~***e) Revisions and Relation to County Climate Action Plan.***~~

~~The County will update the interim GHG emissions thresholds with revised GHG emissions thresholds after it completes the 2030 CAP. Until the County releases and adopts the updated GHG emissions thresholds, the County shall apply the interim GHG emissions thresholds. The County developed the interim thresholds based on the County's 2030 GHG emission reduction target to reduce the county's emissions to 50 percent below 2007 levels by 2030, which are in line with State GHG reduction goals. By ensuring that new development will not exceed its fair share of emissions by 2030, the thresholds help the County meet its 2030 GHG emissions target.~~

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 ~~adopted the ECAP in 2015~~ as the County's GHG emission reduction plan. The County ~~has been implementing~~will implement the 2030 ~~E~~CAP ~~since 2016 but is not projected to meet the plan's 2020 GHG emission reduction goals, according to the 2016 GHG Emissions Inventory Update and Forecast~~ and the ~~2017 ECAP Progress Report. The final ECAP progress report will be released in 2021, using data through 2020.~~, 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 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

~~Until the 2030 CAP is adopted, the County considered projects or plans that have emissions below interim thresholds to be consistent with County GHG emission reduction plans. The interim thresholds are part of the County's GHG emissions reduction strategy and were i~~ informed by the County's 2030 emissions reduction target. The GHG emissions ~~interim~~ thresholds provide a pathway for projects and plans to show compliance with County goals.

State GHG Reduction Plans, Policies, and Regulations

The ~~Board's~~ 2030 CAP GHG emission reduction goal (50 percent reduction from ~~2007~~ 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 ~~2017~~2022) describes the State's strategy for achieving California's 2030 GHG emission reduction target. The ~~2017~~ 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 $MTCO_2e$ per capita by 2030, and no more than two $MTCO_2e$ 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 ~~interim~~ GHG emission efficiency threshold is considerably lower than the State's 2030 per capita target. Therefore, analysts can apply the County's ~~interim~~ threshold with confidence that it aids the State in achieving its target, as well.

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EXHIBIT 2: 2030 CLIMATE ACTION PLAN CONSISTENCY CHECKLIST

County of Santa Barbara

CLIMATE ACTION PLAN CONSISTENCY CHECKLIST for Future Development[1]

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 mandatory measures to be applied to future development for public and private projects and plans. Mandatory GHG reduction measures that are applicable to future development 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, applicability, 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. Implementation of these measures would ensure that future development is

[1] Future development refers to any project or plan that is subject to discretionary review and triggers environmental review pursuant to CEQA.

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.

APPLICATION COMPLETENESS REQUIREMENTS

The CEQA GHG Checklist will be a completeness 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 CEQA GHG Checklist will be included in the respective project or plan conditions of approval.

GENERAL PROJECT INFORMATION

Contact Information:	
Project or Plan Name:	
Address:	
Applicant Name and Co.:	
Contact Phone:	**Contact Email:**
Was a consultant retained to complete this checklist? Yes☐ No☐ If Yes, complete the following:	
Consultant Name: _____ Company Name: _____	Contact Phone: _____ Contact Email: _____
Project Information	
What is the size of the project site or plan area (acres)? **Gross: _____** **Net: _____**	
Identify all applicable proposed land uses: ☐ Residential (indicate # of single-family and multi-family dwelling units): _____ ☐ Commercial (indicate total square footage, gross and net): _____ ☐ Other (describe): _____	
Project description. This description should be consistent with the project description that will be used for the CEQA document. The description may be attached to the GHG Checklist if there are space constraints. _____ _____ _____ _____ _____ _____ _____ _____ _____	

COMPLIANCE CHECKLIST TABLE

Section 1: COMPREHENSIVE PLAN AND ORDINANCE CONSISTENCY			
Regulation	**Requirements**	**Project/Plan Compliance[2]**	**Required Explanation [3]**
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☐ No☐ N/A☐	_____ _____ _____ _____ _____
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☐ No☐ N/A☐	_____ _____ _____ _____ _____ _____

[2] 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.

[3] 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[2]**	**Required Explanation[3]**
Clean Energy			
County 2030 Climate Action Plan (Measure CE-1)	2. **All Project Types - Building Electrification.** 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?	Yes☐ No☐ N/A☐	_____ _____ _____ _____ _____ _____
County 2030 Climate Action Plan (Measure CE-1)	3. **All Project Types** - **Carbon Free Electricity.** 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&E) both distribute power from Central Coast Community Energy.	Yes☐ No☐ N/A☐	_____ _____ _____ _____ _____ _____

Section 2: 2030 CLIMATE ACTION PLAN MEASURES CONSISTENCY			
Regulation	**Requirements**	**Project/Plan Compliance[2]**	**Required Explanation[3]**
County 2030 Climate Action Plan (Measure TR-1) & County Municipal Code (Article XVII. - Expedited Permitting Procedures for Electric Vehicle Charging Station Review)	4. **All Project Types - EV Charging Infrastructure.** 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.	Yes☐ No☐ N/A☐	_____ _____ _____ _____ _____ _____
County 2030 Climate Action Plan (Measure TR-3)	5. **All Project Types - Off-Road Equipment Electrification.** 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?	Yes☐ No☐ N/A☐	_____ _____ _____ _____ _____ _____

Section 2: 2030 CLIMATE ACTION PLAN MEASURES CONSISTENCY			
Regulation	**Requirements**	**Project/Plan Compliance[2]**	**Required Explanation[3]**
Housing & Transportation			
County 2030 Climate Action Plan (Measure TR-2) & County Environmental Thresholds and Guidelines Manual	6. **All Project Types- Reduce VMT**. 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: a. meeting the screening criteria for Vehicle Miles Traveled (VMT) to not require further analysis; or b. resulting in a reduction in VMT?	Yes☐ No☐ N/A☐	_____ _____ _____ _____ _____ _____
County 2030 Climate Action Plan (Measure TR-2)	7. **Large Employers - Transportation Demand Management (TDM)**. 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?	Yes☐ No☐ N/A☐	_____ _____ _____ _____ _____ _____

Section 2: 2030 CLIMATE ACTION PLAN MEASURES CONSISTENCY			
Regulation	**Requirements**	**Project/Plan Compliance[2]**	**Required Explanation[3]**
Waste, Water, and Wastewater			
County 2030 Climate Action Plan (Measure W-1 and W-2)	8. **All Project Types - Residential & Commercial Landfill Diversion Rate Goal.** 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 https://lessismore.org/organics/.	Yes☐ No☐ N/A☐	_____ _____ _____ _____ _____ _____ _____
County 2030 Climate Action Plan (Measure W-2)	9. **All Project Types - Residential & Commercial Organics Recycling Requirement.** 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 https://lessismore.org/organics/.	Yes☐ No☐ N/A☐	_____ _____ _____ _____ _____ _____ _____

COUNTY OF SANTA BARBARA
PLANNING AND DEVELOPMENT

MEMORANDUM

TO: County Planning Commission

FROM: Alex Tuttle, Deputy Director, Long Range Planning Division

STAFF CONTACT: Ben Singer, Planner, (805) 934-6587, bsinger@countyofsb.org

DATE: April 23, 2024

HEARING DATE: May 1, 2024

RE: Energy Element Amendment and Greenhouse Gas Emissions Thresholds of Significance Amendment, Case No. 23GPA-00004

The County Planning Commission previously heard the Energy Element Amendment and Greenhouse Gas Thresholds of Significance Amendment at the March 6, 2024, hearing. At that hearing, the project was continued to the April 10, 2024, hearing to allow additional time for the Planning Commission to consider the project materials. The April 10, 2024, hearing was subsequently cancelled, and the project was rescheduled for the May 1, 2024, Planning Commission hearing.

The proposed Planning Commission Resolutions (Attachments 1 and 2) have been updated to reflect the corrected hearing dates. No other changes have been made to the project materials.

Recommended Actions

Your Commission's motion should include the following:

1. Recommend that the Board of Supervisors make the required findings for approval (Attachment A of the staff report, dated February 27, 2024), including CEQA findings, for the proposed Comprehensive Plan Energy Element Amendment, Case No. 23GPA-00004.

2. Recommend that the Board of Supervisors find that the proposed Comprehensive Plan Amendment, Case No. 23GPA-0004, is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061(b)(3) (Attachment D of the staff report, dated February 27, 2024).

3. Adopt a resolution (Attachment 1) recommending that the Board of Supervisors approve Case No. 23GPA-00004, to update Policy 8.3 and Research Action 8.3.1 of the Santa Barbara County Comprehensive Plan Energy Element (Attachment 1, Exhibit 1).

4. Recommend that the Board of Supervisors determine that the amendment to the *Environmental Thresholds and Guidelines Manual* (Attachment 2, Exhibit 1) is not a project pursuant to CEQA Guidelines Sections 15060(c)(3), 15378 (b)(5), and 15064.7.

5. Adopt a resolution recommending that the Board of Supervisors amend the *Environmental Thresholds and Guidelines Manual* (Attachment 2) to include new thresholds of significance for determining the significance of impacts from greenhouse gas (GHG) emissions from land use projects and plans under CEQA (Attachment 2, Exhibit 1).

Refer back to staff if the County Planning Commission takes other than the recommended action for appropriate findings and conditions.

Attachments:

1. Planning Commission Resolution Recommending Approval of Energy Element Amendment
   - Exhibit 1. Energy Element Amendment (Case No. 23GPA-00004)
2. Planning Commission Resolution Recommending Approval of GHG Emissions Thresholds
   - Exhibit 1. Amended Chapter 11, Greenhouse Gas Emissions, of the *Environmental Thresholds and Guidelines Manual*
   - Exhibit 2. 2030 CAP Consistency Checklist

Cc**:** Case File (to Planner)
Hearing Support

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