

Environmental Scoping Document

County of Santa Barbara 2023-2031 Housing Element Update

Project Website: https://www.countyofsb.org/3177/Housing-Element-Update

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1.0 Purpose

This environmental scoping document describes the proposed *County of Santa Barbara 2023-2031 Housing Element Update* (HEU) (Project). The Housing Element is one of the 13 elements of the Santa Barbara County Comprehensive Plan (Comprehensive Plan). It is based on an assessment of current and projected housing needs and provides an inventory of sites available for residential development. The Housing Element details market, governmental, and physical constraints to housing production. It also identifies goals, policies, and programs to overcome these barriers and encourage residential development.

This environmental scoping document provides a preliminary review of the potential environmental impacts associated with the proposed HEU in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). This scoping document, along with comments received in response to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the proposed HEU, will assist the County of Santa Barbara (County), as the lead agency for the preparation of the EIR, in identifying environmental impacts, mitigation measures, and range of alternatives that must be considered in the EIR.

2.0 Background

Since 1969, California has required that all local governments (i.e., cities and counties) adequately plan to meet the housing needs of everyone in the community. California's local governments meet this requirement by adopting a Housing Element as part of their General Plan. Housing Elements are one of seven mandatory elements and provide policies and programs to ensure the provision of a quantity and diversity of housing types that meet the housing needs over the planning period.

State housing element law (Government Code Section 65588) requires that local governments update their Housing Element regularly on an eight-year cycle. This process starts with the development of the Regional Housing Needs Assessment (RHNA) to determine how much housing and what type of housing is needed at different affordability levels. The California Department of Housing and Community Development (HCD) uses demographic information provided by the California Department of Finance (DOF) to determine housing needs for each regional planning agency, including the Santa Barbara County Association of Governments (SBCAG). Each regional planning agency then uses its demographic figures to refine HCD's allocation and develops a RHNA Plan, which quantifies and geographically locates the need for housing within each local jurisdiction.

The *County of Santa Barbara 2015-2023 Housing Element* contains a number of programs and actions to increase the provision of housing – particularly affordable housing – and strives to address key challenges such as limited available land for housing, high land cost, regulatory barriers and other challenges. However, in February 2023, the housing cycle addressed in the County's 2015-2023 Housing Element will conclude. As a result, the County must prepare and adopt an HEU that complies with State housing element law for the upcoming eight-year cycle from 2023 to 2031. The HEU must be adopted locally no later than February 2023 and certified by HCD. Particular challenges that the HEU will need to address include: very limited available land within the County's designated Urban-Rural Boundary Line, especially on the South Coast; the balance between protecting agricultural and/or open space land and providing adequate housing; further reducing regulatory barriers to providing housing, particularly affordable housing; and assuring that even relatively dense housing (e.g., 20 or more units per acre) is actually

affordable to households of low or moderate income given very high land values and development costs. Such new housing development would also need to be accomplished while avoiding urban sprawl into the County's rural lands which support extensive valuable agricultural and open space resources yet are vulnerable to hazards such as destructive wildfires.

CEQA requires the preparation of an EIR to inform the public and decision-makers of the potential environmental effects of the proposed HEU. According to CEQA Guidelines Section 15151, an EIR should include a "... sufficient degree of analysis, or scope, to provide decision-makers with information that enables them to make a decision which intelligently takes account of environmental consequences."

The EIR for the proposed HEU will evaluate the environmental impacts of anticipated activities resulting from the implementation of the proposed HEU. The environmental analysis will be based on the project description and will set forth mitigation measures to be included as development standards or ministerial permit requirements in order to avoid or substantially reduce significant impacts identified in the environmental analysis.

3.0 Project Description

This section describes the proposed HEU, including the Project Applicant/Lead Agency, project location, project summary, and project adoption and implementation actions.

3.1 Project Applicant / Lead Agency

The County of Santa Barbara is the Lead Agency preparing the EIR with the purpose of informing decision-makers and the public regarding the potential environmental effects related to the proposed HEU in compliance with CEQA.

3.2 Project Location

As described further in Section 3.3, *Project Summary*, the proposed HEU involves planning for residential development in appropriate locations within the unincorporated areas of Santa Barbara County, including the South Coast, Lompoc Valley, Santa Maria Valley, Cuyama Valley, and Santa Ynez Valley.

3.3 **Project Summary**

In December 2019, SBCAG initiated a process to distribute the 2023-2031 RHNA allocation issued by HCD among the unincorporated areas of the county and the eight incorporated cities (i.e., Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Barbara, Santa Maria, and Solvang). SBCAG formed an ad hoc committee, the RHNA Project Development Team, to advise its staff throughout the RHNA allocation process. The team included planning/community development directors and staff from the County and the incorporated cities. County staff took an active role in the RHNA allocation process throughout 2020. Initial activities included completing SBCAG's RHNA planning factors survey. County staff also attended five RHNA Project Development Team meetings. These meetings focused on seven scenarios and several methodologies for distributing the RHNA allocation. Key factors included vacancy rate, cost burden, and overcrowding.

HCD and SBCAG approved the RHNA Plan in February 2021 and July 2021, respectively. The RHNA Plan specifies the total number of housing units for each of SBCAG's member cities and the unincorporated areas of the County. It divides those units into four income levels – very low, low, moderate, and above moderate. In addition, the RHNA Plan separates Santa Barbara County

TABLE 1 – REGIONAL HOUSING NEEDS ALLOCATION PLAN 2023-2031UNINCORPORATED AREAS OF SANTA BARBARA COUNTY					
Sub-Region	RHNA Allocation	RHNA Allocation by Income Level Very Low Moderate Above Moderate			
South Coast	4,142	809	957	1,051	1,325
North County	1,522	564	243	229	486
Lompoc Valley	521	209	72	54	186
Santa Maria Valley	721	262	118	118	223
Santa Ynez Valley	280	93	53	57	77
Total	5,664	1,373	1,200	1,280	1,811

into two sub-regions, referred to as the South Coast and North County, and allocates the County's RHNA (unincorporated areas of the County) by sub-region.

The RHNA for the *County of Santa Barbara 2015-2023 Housing Element* was 661 units for the unincorporated areas of the County. The County's new RHNA for the 2023-2031 HEU is nearly 10 times larger, totaling 5,664 units. Approximately 47 percent of the region's RHNA allocation resulted from Senate Bill (SB) 828, which added the cost burden and overcrowding adjustment factors to the RHNA process, as well as changed vacancy rate requirements.

The County must demonstrate that the Comprehensive Plan and zoning ordinances provide sufficient opportunities to accommodate its new RHNA. The results of a preliminary suitable sites inventory show that the County faces a significant, countywide shortage of low- and very low-income units. The South Coast also faces a shortfall of moderate- and above moderate-income units. Therefore, the County must consider new policies and programs as well as changes to existing land uses to meet its RHNA.

In order to maintain consistency with the Comprehensive Plan land use and development policy, to the maximum extent practicable, the County will consider accommodating the required RHNA in several housing focus areas within the existing Urban-Rural Boundary Lines in of South Coast and North County areas. Specifically, these housing focus areas could include unincorporated areas within Los Alamos, Lompoc, Santa Maria, Orcutt, Casmalia, Sisquoc, New Cuyama, Cuyama, Santa Ynez, Solvang, Buellton, Los Olivos, Carpinteria, Goleta, Montecito, and Summerland. Consistent with County policy, growth would be focused within existing urban areas and would minimize conversion of agricultural and open space lands, especially outside the Urban-Rural Boundary Line. Additionally, housing focus areas would be served by active transportation infrastructure (e.g., bicycle paths, trails) and urban services to align with local and State-wide goals for sustainable communities. Growth would also avoid designated important resources such as Environmentally Sensitive Habitats (ESH) and significant cultural resources as well as hazardous areas including, but not limited to, floodways, very high fire hazard zones, the Wildland Urban Interface (WUI) wherever possible, and airport approach zones.

3.4 Project Adoption and Implementation Actions

The County Planning Commission will consider and advise the Board regarding the adoption of the proposed HEU. The Board will need to take the following actions in order to implement the project:

- 1. Adopt environmental findings, certify the EIR, and, if needed, adopt a Statement of Overriding Considerations for any unavoidable, significant environmental impacts that will result from the proposed HEU; and
- 2. Adopt the proposed HEU and direct submittal to HCD for review and certification.

4.0 Scope of the Environmental Review

4.1 Overview

CEQA requires the preparation of an EIR to inform the public and decision-makers of the project's potential environmental effects. This includes any potential environmental effects resulting from the allowance of the supplemental uses described in the project description. According to CEQA Guidelines Section 15151, "...[a]n EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences."

4.2 Environmental Topics to be Analyzed in the EIR

CEQA Guidelines Section 15060(d) states that an Initial Study is not required in cases where preparation of an EIR is determined to be clearly required by the Lead Agency. Accordingly, an Initial Study for the proposed HEU is not provided herein. However, preliminary review of the proposed HEU identified the following issue areas for evaluation in the EIR. Additional issues beyond those that are set forth below may also be addressed to the EIR, based on the comments received in response to the NOP for the EIR and Draft EIR that will be prepared for the proposed HEU.

4.2.1 Agricultural Resources

The County supports over 500,000 acres of productive agricultural land, including extensive areas of grazing land and cultivated agriculture such as row crops, strawberries, and broccoli in the Santa Maria Valley, vineyards in the Santa Ynez Valley, and orchards, truck crops, and cannabis along the South Coast. The County's agricultural lands are concentrated within the rural areas, but include important pockets of urban agricultural land, particularly in the Eastern Goleta Valley and Santa Ynez Valley. Agriculture is a key component of the County's economy, providing tens of thousands of jobs and attracting tourists to visit the County's famed wineries. County goals prioritize agricultural preservation and protection from urban development and adverse influences. The EIR analysis will consider direct, indirect, and cumulative impacts on agricultural resources, including the potential for direct conversion of agricultural lands (e.g., within or immediately adjacent to urban areas), potential for conflicts with agricultural operations and loss of agricultural viability. The analysis will also consider the relationship between Williamson Act contracts and agricultural resource policies, including the *County of Santa Barbara Uniform Rules for Agricultural Preserves and Farmland Security Zones*.

4.2.2 Air Quality and Greenhouse Gas Emissions

The EIR will document the existing climatic and air quality conditions in Santa Barbara County, relevant Santa Barbara County Air Pollution Control District (SBCAPCD), State, and federal regulatory standards and thresholds, and attainment/nonattainment pollutants for the South Central Coast Air Basin (Basin). The EIR will provide an up-to-date description of the current regulatory setting regarding greenhouse gas (GHG) emissions and climate change and assess consistency with Assembly Bill (AB) 32, Senate Bill (SB) 32, SB 375, State Attorney General, Office of Planning

and Research and Climate Action Team recommendations, the County's Comprehensive Plan and Climate Change Vulnerability Assessment, and other recent State and federal regulations and standards. The EIR will provide programmatic information on net new vehicle trip generation estimates provided in the Technical Transportation Study (Section 4.2.13, *Transportation*), the potential effects of active transportation (e.g., cycling, walking) on emissions reduction, and available programmatic information on stationary source emissions. Based on available data, the EIR will present programmatic criteria pollutant and GHG emissions calculations to inform the impact analysis using the latest edition of CalEEMod. The EIR will quantify direct (e.g., increased traffic and construction equipment) and indirect (e.g., electrical power generation) emissions for temporary construction and ongoing operational emissions. GHG emissions will be calculated individually and collectively as carbon dioxide equivalent (CO₂e) from construction activities and operational emissions. The EIR will also assess the consistency of the proposed HEU with regulations and policies, including the Comprehensive Plan and the Air Quality Attainment Plan as well as the Climate Action Plan and other applicable GHG policies.

4.2.3 Biological Resources

The County supports a wide range of habitats, including oak (*Quercus* spp.) and riparian woodlands, chaparral and coastal sage scrub, vernal pools, native grasslands, and coastal wetlands that support dozens of special status species. These include special status wildlife species such as the California tiger salamander (*Ambystoma californiense*), southern steelhead (*Oncorhynchus mykiss*), and arroyo toad (*Anaxyrus californicus*), along with rare plants such as the Gaviota tarplant (*Deinandra increscens* ssp. *villosa*). Although these resources tend to be most intact in the rural areas, urban communities can also support intact habitat areas and sensitive species. This includes riparian and oak woodlands in the Eastern Goleta Valley, Santa Ynez Valley, and Orcutt and Burton Mesa chaparral in the Lompoc Valley. The biological resource analysis will assess the potential for growth to impact sensitive biological resources based on desktop research using tools such as the California Natural Diversity Data Base (CNDDB), National Wetlands Inventory (NWI) maps, habitat maps (e.g., ESH maps in Coastal Zone), or other data from adopted general and community plans, as well as regional plans or State and federal data.

4.2.4 Cultural and Tribal Cultural Resources

Santa Barbara County supports a rich assemblage of cultural resources, including hundreds of known prehistoric archaeological sites, historic structures and districts, a high potential for unknown subsurface prehistoric and historic resources, as well as potential tribal cultural resources. The cultural resources analysis will be based on desktop research using tools such as the County's database and maps of cultural resources, local and state agency lists of historic structures, or other data from local and regional plans or state and federal data. Based on the policies and programs of the proposed HEU, receipt of comments on the NOP, consultation performed under AB 52 and SB 18, and input from the County and key stakeholders, the EIR will identify programmatic impacts on both pre-historic and historic resources, as well as tribal cultural resources.

4.2.5 Energy

Southern California Edison (SCE) and Pacific Gas and Electric (PG&E) provide electricity to the county and Southern California Gas Company (SoCal Gas) provides natural gas. The CEQA Guidelines require that EIRs include a discussion of the potential energy impacts of proposed projects, with emphasis on avoiding or reducing inefficient, wasteful, and unnecessary

consumption of energy. To assess energy issues related to the proposed HEU, the EIR will investigate the energy availability and demand associated with housing development, including energy diversity and options for alternative energy sources. The EIR will review and compile information from existing plans and studies and describe existing energy infrastructure and services and any shortfalls or inadequacies in existing infrastructure or services. The EIR will quantify the energy demands associated with the proposed HEU, including estimates of electricity, natural gas, and fuel. The EIR will estimate energy demands for envisioned housing projects using consumption factors from the California Energy Commission's (CEC's) California End-Use Survey and outputs from CalEEMod (Section 4.2.3, *Air Quality and GHG Emissions*). The analysis will determine whether the proposed HEU would have impacts from a wasteful, inefficient, or unnecessary consumption of energy resources.

4.2.6 Hydrology and Water Quality

The County supports three river or large stream systems, including the Santa Ynez River, Santa Maria River, and San Antonio Creek, along with hundreds of perennial and intermittent creeks and both coastal and inland wetlands. Many of the smaller creeks flow though the County's urban areas such as Atascadero and Maria Ygnacia Creeks in the Eastern Goleta Valley, Zanja de Cota and Alamo Pintado Creek in the Santa Ynez Valley and Orcutt Creek in Orcutt. These rivers and creeks present flood hazards in low-lying rural areas, as well as provide important aquatic habitats that are dependent upon clean water to support associated wildlife and other beneficial uses. Flooding in urbanized areas is generally controlled through devices and management provided by the County Flood Control and Water Conservation District (Flood Control). The EIR will identify potential impacts associated with hydrology, including both flooding and water quality impacts. Groundwater supplies and quality will also be addressed. The will contain relevant flooding and water quality and supply information and/or links to agency websites. The Hydrology and Water Quality analysis will be based on desktop research using tools such as Federal Emergency Management Agency (FEMA) floodplain maps, County Flood Control data, County Project Clean Water information, and other readily available databases and maps, including State and federal data.

4.2.7 Land Use and Planning

Land use and development are governed by a range of County plans and policies, including the 1980 Land Use Element and community plans, the amended 1980 Circulation Element, the 2015-2023 Housing Element, and a range of County and State regulations and ordinances. Land use conflicts that can arise in the County relate primarily to agriculture, recreation, noise, odors, dust, light and glare, transportation associated with vehicle miles traveled (VMT), level of service (LOS)/congestion, safety, and accessibility. In particular, potential conversion of agricultural land to provide much needed housing may raise land use policy considerations as the County's inventory or urban land is limited. The EIR will programmatically address potential policy consistency issues regarding land use compatibility, resource preservation, road geometrics and safety, and other land use issues of possible community concern while acknowledging the Comprehensive Plan's priority for open space, agriculture, and rural character. The land use planning analysis will assess related impacts and consistency with adopted policies. Results of the Technical Transportation Study (Section 4.2.11, *Transportation*) will be incorporated as needed into this policy consistency analysis.

4.2.8 Noise

Unincorporated communities in the County generate a range of noises, including ambient transportation noise to construction noise, but generally maintain an acceptable noise environment (i.e., below 65 A-weighted decibels [dBA] outdoors; below 45 dBA indoors). In contrast, the County's rural area is generally quiet, though agricultural operations generate noise from sources including equipment, employment, and visitors. The EIR will analyze noise based on desktop research using tools such as the Comprehensive Plan and community plans, recent EIRs, the Airport Land Use Compatibility Plan, available California Department of Transportation (Caltrans) data, and adopted noise standards. The EIR will programmatically identify noise and groundborne vibration impacts associated with construction activities to compare against noise standards. Changes in roadway noise levels and groundborne vibration levels will be calculated using previously modeled vehicle operations and associated noise levels, adjusted using average daily trip (ADT) volumes for the Existing Baseline (2022), Future (2032) With Project, and Future (2032) No Project Scenarios.

4.2.9 Population and Housing

The County is geographically diverse with over 450,000 residents living in different cities and unincorporated communities that range dramatically from suburban communities such as Orcutt and Eastern Goleta Valley to smaller rural towns such as Sisquoc, Los Olivos, and Los Alamos. According to U.S. Census Bureau data the majority of County residents live in urban areas with approximately 309,226 (68.7 percent) of County residents living in the eight incorporated cities and 140,858 (31.3 percent) residing in unincorporated communities and rural areas. The County's population is projected to increase through 2050 by 13.2 percent, a total increase of approximately 45,875 residents. This growth will drive housing demand, including the total units and affordability ranges targeted for the proposed HEU. The EIR will evaluate the population and housing in the State and the County to disclose what effect the proposed HEU would have on growth projections.

4.2.10 Public Services and Recreation

Public services provided by the County include fire protection, sheriff services, libraries, and parks, which provide recreation resources for residents and visitors. Over time, housing created through the implementation of the proposed HEU would substantially increase the demand for public services. The EIR will estimate increases in demand for fire protection, sheriff services, schools, parks, and libraries from substantial population increase associated with the proposed HEU in different communities. The EIR will summarize the status of existing public services provided in the County, and any ongoing fiscal or facility issues associated with the provision of such services. These will include sheriff services, fire protection, parks, libraries, and schools, with special attention to: fire response services and equipment to adequately serve increased densities; enrollment status of schools that would serve new populations; and assessment of parkland acreages to determine the adequacy of park ratios. For example, the County is currently preparing a countywide Recreation Master Plan on a similar timeline to the proposed HEU and new housing could generate substantial demand for recreation, with coordination between these two planning efforts offering opportunities to address such demand. The EIR will identify increases in demand for public services for both cumulative growth and potential housing development. This analysis will include personal communications with public service providers to understand the potential impacts of the proposed HEU on their facilities, operations, and service ratios.

4.2.11 Transportation

The County supports a diverse transportation network, including regional freeways such as U.S. 101, State Highways (State Route 1, 154, and 246), and local roads in both urban and rural areas of the county. Public transit service, pedestrian, and bicycle facilities are present in virtually all communities in the County, although these become much less prevalent in the more rural lands. Many roads have incomplete or no pedestrian and bicycle facilities and lack safe links within urban communities. New housing throughout the County would create new vehicular trip generation, VMT, possible safety hazards associated with increased traffic and pedestrian or bicycle use, and limited increases in demand for active transportation linking these new facilities to the communities. However, new housing on the South Coast offers the potential to partially address long distance commuting to the South Coast from Ventura and the North County associated with a major jobs-housing imbalance, with some possible benefits to VMT reduction.

To address potential transportation impacts, the EIR will assemble existing data related to transportation facilities in the County, as well as a comprehensive assessment of applicable circulation plans, policies, ordinances, and programs, including regional plans (e.g., Regional Transportation Improvement Plan, bicycle master plans, long range transit plans), the County's Circulation Element and community plans, and capital improvements plans. The EIR will include a policy consistency analysis for the proposed HEU relative to applicable circulation plans and policies (Section 4.2.7, *Land Use and Planning*), as well as a programmatic evaluation of potential VMT impacts, geometric hazards, and evacuation/emergency access in the rural agricultural areas potentially affected by the proposed HEU. A Technical Transportation Study will be prepared to guide the EIR's VMT analysis and to refine potential mitigations that could help to reduce the potential for significant transportation impacts. The study will analyze VMT based on the methodologies and transportation impact thresholds contained in the *Santa Barbara County Environmental Thresholds and Guidelines Manual*. The new travel demand forecasting model developed by SBCAG as part of the Connected 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) will be used for the VMT analysis.

4.2.12 Utilities and Water Supply

The County's unincorporated communities are served by water, wastewater treatment, and solid waste management systems typically through a range of special districts and sometimes private water companies. The County's domestic water is supplied from groundwater withdrawal, storm runoff collected in reservoir systems (e.g., Lake Cachuma), the State Water Project, and recycled water. Water suppliers include the Santa Barbara County Water Agency, Carpinteria Valley Water District, Goleta Water District, Montecito Water District, Golden State Water Company, La Cumbre Mutual Water Company, and others. Sanitation districts providing wastewater management and treatment include the Carpinteria Sanitary District, Goleta Sanitary District, Laguna County Sanitation District, Montecito Sanitary District, and Summerland Sanitary District. Marborg Industries provides solid waste hauling services to Tajiguas Landfill on the Gaviota Coast.

To assess utility issues associated with the proposed HEU, the EIR will review and compile information from existing plans and studies, including any recently updated documents such as Urban Water Management Plans, Water Supply and Reliability Plans, Water Supply Assessments, Water Supply Management Reports, Water Conservation Strategic Plans, Water Shortage Contingency Plans, and Groundwater Sustainability Plans. The EIR will incorporate current data about water availability, sewer capacity, and the condition of existing infrastructure. The EIR will describe existing utility infrastructure and service capacity in the County with attention to key housing focus areas and potentially suitable sites. The EIR will estimate the net change in water consumption, wastewater generation, and solid waste management demand to serve housing development based on available duty/demand factors and coordination with County staff.

A Water Supply Assessment (WSA) will be prepared for the proposed HEU consistent with SB 610. The WSA will analyze water demand generated by the potential additional units and assess available supplies, including the anticipated change to all local water sources (i.e., groundwater and recycled water). The WSA will assess the consistency of the proposed HEU with County goals for water self-sufficiency. The WSA will identify potential impacts associated any shortfalls or inadequacies in existing infrastructure or services (e.g., increased groundwater overdraft), particularly the adequacy of existing water and sewer lines and treatment/pumping facilities serving the County.

4.2.13 Wildfire

The County supports large areas that are exposed to high wildland fire hazards, particularly in the "chaparral urban interface" or wildland urban interface (WUI) between wildland vegetation and adjacent urban development. The Santa Ynez Mountains and other wildland areas are subject to dry conditions during fire season, seasonal 40 to 50 mile per hour winds, and high temperatures of over 90 degrees that contribute to a much higher threat of wildfire year round. As such, much of the County is located within an area designated as subject to high fire hazards – Very High Fire Hazard Severity Zone by CALFIRE. In particular, the Eastern Goleta Valley, Santa Barbara, and Montecito WUIs have experienced repeated wildfires sometimes burning deep into the urban areas and destroying hundreds of homes. The proposed HEU could introduce housing in vulnerable areas such as the WUI and increase housing densities in some places that could create new vulnerable populations. The proposed HEU would increase residential uses that may require defensible space and other fire resiliency techniques. The EIR will identify wildfire impacts, including the increased potential for ignition if any. As previously described this analysis will include personal communications with public service providers to understand the potential impacts of the proposed HEU on their facilities, operations, and service rations.

4.2.14 Aesthetics and Visual Resources

Santa Barbara County supports a wide range of aesthetic and visual resources, including scenic highways (e.g., State Routes 1 and 154 and a portion of U.S. Highway 101), scenic natural resources such as the Santa Ynez Mountains, oak woodlands, historic buildings, and areas with panoramic ocean views. The EIR will assess the potential impacts on scenic resources associated with the proposed HEU. This discussion will include a characterization of the existing physical setting; identification of potential impacts upon the character of scenic areas, gateways, relevant aspects of the built environment, public open spaces, and recognized landmarks; evaluation of consistency with routes in the County designated for protection under California's Scenic Highway Program; and a description of cumulative effects to public vistas and scenic routes.

4.2.15 Geology and Soils

The County includes multiple types of geological hazards, including dozens of on- and offshore faults that can cause fault rupture or ground shaking, steep slopes with potential for rockfall and landslides, and soil constraints such as expansion, contraction, or collapse. The EIR will assess the

potential for impacts based on desktop research using tools such as the County's Seismic Safety Element, Alquist-Priolo Fault Maps, Dibblee Geologic Maps, Natural Resource Conservation Service Soils maps, and other readily available geologic databases and maps, including state and federal data. The EIR will describe the existing regulations that address geotechnical impacts such as the California Building Code (CBC).

4.2.16 Hazards and Hazardous Materials

The County has a wide range of potential hazards, including contaminated soils from past uses, older buildings with potential asbestos, lead-based paint, and mold, and transportation hazards such as heavy rail and airport operations. The hazards and hazardous materials analysis will be based on desktop research using tools such as hazardous materials databases (e.g., Envirostor, Envirofacts, County Fire Department records), Department of Toxic Substance Control (DTSC) database, past EIRs, etc. The EIR will describe the existing regulations that address existing contaminated sites as well as procedures for addressing previously unknown contaminants during any ground disturbance.

4.2.17 Cumulative Impacts

CEQA Guidelines Section 15355 defines "cumulative impacts" as follows:

"Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- *(a) The individual effects may be changes resulting from a single project or a number of separate projects.*
- (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

The EIR will assess the significant cumulative impacts to which the proposed HEU may make a "cumulatively considerable" contribution (CEQA Guidelines Section 15130).

4.3 Alternatives Analysis

While the RHNA provides the County with a housing allocation, the County is responsible for determining how to meet the RHNA. A comprehensive analysis of alternatives may be useful in disclosing potential changes in housing density, housing focus areas, suitable sites, and/or programs and policies to assess changes in impacts related to density, layout, community character, utilities and service systems, public services, and regional VMT. The alternatives analysis may be used to discuss the differences in the feasibility of obtaining community benefits under differing approaches to accommodate the County's RHNA.

The EIR will describe a reasonable range of alternatives that would feasibly attain most of the basic objectives of the proposed HEU but would avoid or substantially reduce any of the significant effects of the project, as required by CEQA Guidelines Section 15126.6. For example, the alternatives may consider the trade-offs between density, building height, and the reduction of impacts to agricultural resources or urban sprawl into rural areas. The alternatives discussion in the EIR will include sufficient information about each alternative to allow meaningful evaluation,

analysis, and comparison. The EIR will programmatically describe the major characteristics and significant environmental effects of each alternative.

The alternatives analysis will meet the requirements of CEQA Guidelines Section 15126.6, which governs the type and range of alternatives that should be considered, and factors that affect the feasibility of such alternatives (e.g., economic viability, site suitability, availability of infrastructure). The alternatives analysis is linked to and supported by the identified project objectives. The EIR will provide a: reasonable range of alternatives for consideration, including different approaches to housing development in an alternative location(s); and brief description of alternatives considered yet discarded from further evaluation (CEQA Guidelines Section 15126.6).

In accordance with the requirements of CEQA the EIR will include an analysis of the No Project Alternative. In the context of a project involving the potential adoption of a land use plan or longrange plan such as the proposed HEU, the No Project Alternative will consider foreseeable development that could reasonably be expected to occur under existing adopted plans and policies. While not consistent with the County's obligations under State housing law and the State mandate to plan for and accommodate the RHNA allocation issued by SBCAG, the No Project Alternative will consider the environmental impacts if the proposed HEU is not adopted by the County.

4.4 Other CEQA Required Discussions

Consistent with CEQA Guidelines Section 15126 this section of the EIR will summarize significant unavoidable environmental effects and describe the reasons that the proposed HEU is being proposed notwithstanding any significant unavoidable impacts. Additionally, this section will describe significant irreversible environmental changes and growth inducing impacts. Effects found not to be significant also will be summarized and likely will include topical areas such as forestry, mineral resources, and others that are determined not to be affected by the implementation of the proposed HEU.

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