City of Santa Barbara
California

PLANNING COMMISSION
STAFF REPORT

REPORT DATE:	April 15, 2010
AGENDA DATE:	April 28, 2010
PROJECT:	*Plan Santa Barbara* Draft General Plan Update and Draft Environmental Impact Report (DEIR)
TO:	Planning Commission
FROM:	Planning Division, (805) 564-5470; www.YouPlanSB.org Bettie Weiss, City Planner John Ledbetter, Principal Planner

I. PUBLIC MEETING PURPOSE

Plan Santa Barbara Draft General Plan elements and a Draft Environmental Impact Report were issued on March 18, 2010 for a public review and comment period to May 17, 2010. The purpose of this next series of meetings (See Next Steps) is to take community input on these documents and for staff to receive initial comments from the Planning Commission based on both the documents and community input.

II. DRAFT *PLAN SANTA BARBARA* DESCRIPTION

A. CHANGES TO *POLICY PREFERENCES REPORT*

Since December 2008, when the City Council directed staff to proceed with the next steps following the *Policy Preferences Report*, a number of recommended policy and map changes have been developed and are now reflected in the draft policy documents released on March 18, 2010. These recommended revisions are a result of either further policy development or additional community and Planning Commission feedback during the intervening period. (Please see **Exhibit A**: *Changes to Policy Preference Report).*

B. DRAFT GENERAL PLAN UPDATE DESCRIPTION HIGHLIGHTS

The *Plan Santa Barbara* General Plan Update proposes new and amended policies to protect and enhance community development values within the City of Santa Barbara over the next 20 years to the year 2030. The Draft documents under review include the following:

Draft General Plan Framework

Part of the City Council's direction for the *PlanSB* process in 2005 was to consolidate the City's environmental policies into a coherent set of General Plan goals and policies. As the public input process

unfolded in 2007, this environmental approach took on greater significance to the point that a sustainability framework was proposed to guide the entire General Plan. A set of sustainability principles was then developed that include established General Plan tenants such as Living within Our Resources and the importance of maintaining Santa Barbara's small town feel.

The proposed General Plan Framework is comprised of an introduction, a framework for organizing policy topics into Elements, and a background and setting for the entire document (which are currently sprinkled throughout various elements). Only the draft *Land Use* and *Housing* Elements are being comprehensively updated at this time. The remaining five elements have been reorganized around a single document format (there are five documents now) and partially updated to reflect the Goals, Polices, and Implementation Actions that emerged from the *PlanSB* process. In addition, formal goals and policies have been established to address the topics of Public Participation and Regionalism.

Draft Land Use Element

The update of Measure E (Charter Section 1508), which managed non-residential growth for the past 20 years through December 2009, was one of three primary *PlanSB* objectives, together with the update of the draft *Land Use* and *Housing* Elements. This update has largely been achieved through the Growth Management goals and policies in the draft *Land Use Element*, and the analysis of the growth scenarios in the draft EIR. The range of square footage analyzed, from 1 million to 2.3 million square feet of non-residential development within the city, was established through the public outreach process.

The production of more affordable housing, as discussed below, continues to be a high priority for the community. In fact, during the *PlanSB* process, the community identified affordable housing as the number one priority for resource allocation above all other types of developments. Santa Barbara does have the zoning capacity to meet the State's required "fair share" regional housing allocation, as identified in the draft *Housing Element*. The draft *Land Use* policies require that the City's resources be closely monitored through the Adaptive Management Program to ensure all development does not out pace available resources.

The four residential growth scenarios analyzed in the Draft EIR, ranging from 2,000 to 4,360 units within the City. (Please see **Exhibit B**: *Residential Build-out Assumptions*.)

The purpose of the Mobility Oriented Development Area (MODA) Principles is to help identify where and how to further encourage affordable housing in a most sustainable manner. Originally, the MODA was conceived as a physical district. However, the location of the MODA boundary became a center of debate during the latter part of 2009. The MODA is no longer proposed as a physical location; rather, the MODA principles simply re-enforce existing land use and circulation patterns that were established in the 1850s, and sound planning practice, to locate higher density housing adjacent to public transportation and within easy walking and biking distance to commercial services, parks and open space.

Not only are these the best places to encourage affordable housing and provide economic benefit for local merchants, but these land use and circulation patterns also encourage more active, healthy lifestyles that can reduce the incidence of obesity, diabetes, and asthma. Additionally, when these principles are combined with Transportation Demand Management measures (i.e. improved transit; improved pedestrian

and bike facilities; reduced parking requirements; and public parking pricing strategies) automobile congestion, regional commuting, and greenhouse gas emissions are all significantly reduced.

The neighborhoods of Santa Barbara provide a high quality of life for residents and are one of the defining characteristics of the City. Little or no change is proposed for the single family and duplex neighborhoods, with the exception of future planning at the neighborhood level. While this phase of the *PlanSB* process has focused on more macro issues such as growth management, community interest in neighborhood planning has bloomed. Several neighborhoods, including the Mesa, Coast Village Road, the West Downtown, and the Upper East, have initiated their own local efforts and are now looking to the City to develop a formal process to incorporate their considerable progress.

Draft General Plan Map

A General Plan map, required by State planning law, identifies designations for the types and densities of land uses. The draft General Plan map changes range from simple to more complex, and include: a more accurate, digitized map; updated land use designation categories and transitions; the correction of inconsistencies between the land use designations on the present General Plan map and the zoning ordinance; the resolution of policy issues stemming from the existing General Plan map; and *PlanSB* policy recommendations.

As noted above, the basic land use patterns are not proposed to be altered but rather re-enforced with more explicit mixed-use designations to better define land use transitions, with modestly higher densities in the center of the city and along select commercial corridor locations.

A clearer definition of land use designations helps to better define land use transitions, particularly with residential uses. The highest density designations are located in the city center and along commercial corridors and densities gradually lessen as one moves out to the multi-family neighborhoods, the single family neighborhoods, and finally to the open spaces of the ocean and mountains. As each of these land uses transition from one use to another, the uses become less intense, the buildings smaller, setbacks wider, and the amount of open space greater – a better-defined system of buffers.

Approximately 6,000 notices were sent to all potentially affected property owners based on the proposed land use and zoning changes to the draft General Plan map. During the Open House on March 18, over 200 citizens attended throughout the daylong event, many of whom had questions relative to their respective parcels and the proposed changes.

Draft Housing Element

State law requires Housing Elements to be updated at least every five years and it is the only element of the General Plan that requires review and certification by the State. Housing Elements are required to identify and analyze existing and projected housing needs for all segments of the community, and identify goals, policies and quantified objectives to meet those needs. The draft *Housing Element* is an update to the previous 2004 Element and contains new and revised policies and implementation actions focused on affordable housing opportunities with emphasis on increased rental and non-subsidized affordable housing units.

The City has a long-standing commitment to the production of affordable housing. Residents of Santa Barbara recognize the need to provide housing for more of our local workers. There is a deep concern that not providing housing for our workforce has and will result in a loss of community diversity and

economic vitality, and lead to increased traffic congestion, air quality impacts and green house gases due to commuters traveling from other jurisdictions to jobs in the City. As such, the draft *Housing Element* includes policies and implementation actions that promote housing opportunities for all segments of the community, including workforce housing.

In response to input from the Planning Commission and the public, the draft *Housing Element* pursues a multi-pronged approach including: 1) new standards for smaller, market-rate units; and 2) the creation and preservation of rental housing for larger families. With the impending expiration of the Redevelopment Agency in 2015, providing non-subsidized affordable housing units will be essential in order to meet the City's affordable housing needs.

III. DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

Under provisions of the California Environmental Quality Act (CEQA), the *Plan Santa Barbara* General Plan Update is subject to environmental review prior to its approval. An Environmental Impact Report (EIR) is an informational document to allow the public and decision-makers to consider the environmental consequences of proposed actions, along with any measures that could feasibly avoid or lessen significant environmental effects.

A Draft Program EIR has been prepared to evaluate potential effects on the physical environment from the proposed *Plan Santa Barbara* policy amendments and forecasted future growth in the City to the year 2030. The Draft *Policy Preferences Report* initiated for environmental review by City Council (January 2009) provided the EIR project description. The analysis assumed development of up to an additional 2,800 residential units, and up to an additional two million square feet of commercial and other non-residential development within the City by 2030.

In general, the DEIR recognizes that additional growth occurring incrementally over the next two decades has the potential for significant impacts cumulatively citywide by 2030. In many instances, existing City policies and proposed *Plan Santa Barbara* policy amendments would reduce these environmental effects. The DEIR also identifies mitigation measures as needed to reduce potentially significant impacts to less than significant levels. Mitigation measures would become additional policies and programs in the General Plan.

A. SUMMARY OF DEIR IMPACT FINDINGS

The DEIR analysis of *Plan Santa Barbara* identifies Class 1 significant impacts associated with traffic congestion and climate change/greenhouse gas generation. Class 2 impacts (less than significant with mitigation) are identified for air quality, biological resources, geological conditions, hazards, heritage resources, hydrology and water quality, noise, open space and visual resources, and solid waste management. Additional Class 3 impacts (less than significant) are also identified for air quality, biological resources, geological conditions, hazards, heritage resources, hydrology and water quality, noise, visual resources, public services, water and wastewater, and transportation.

Additional environmental analysis was provided for energy, global climate change, jobs/housing balance, and socioeconomic effects. (Please see **Exhibit C:** *Summary of Plan Santa Barbara Environmental Impacts and Mitigation.*)

The DEIR also analyzes comparative environmental effects of alternative policy and growth scenarios ("No Project"/Existing Policies, Lower Growth, and Additional Housing alternatives), and considers regional environmental effects and longer-range effects. The Alternatives analysis is discussed further below under Discussion of Key Issues/Growth Management. *(*See also **Exhibit D:** *Summary of Comparative Impacts.)*

B. DRAFT EIR PUBLIC REVIEW AND FINAL EIR CERTIFICATION

The Draft EIR was released for a 60-day public and agency comment period March 18 – May 17, 2010. As noted above, the DEIR utilizes the *Policy Preference Report* as the basis for the Project Description. Since that time, the process has continued to evolve with a number of more detailed refinements to the basic Project Description, which are enumerated in Exhibit A, *Changes to Policy Preference Report.*

Following the end of the DEIR public comment period, a proposed Final EIR will be prepared. Based on direction from City Council and Planning Commission on revisions to the Draft General Plan policies, the proposed Final EIR will be revised to reflect the revised draft project description. The Final EIR will also include written responses to public comments received by May 17, 2010, and any associated revisions to the impact analysis. Upon completion, the proposed Final EIR will be forwarded to the Planning Commission for certification, and on to City Council for their consideration prior taking action on the *Plan Santa Barbara* General Plan update.

IV. DISCUSSION OF KEY ISSUES

While to a large degree community agreement has been reached for a number of *PlanSB* components, such as the need to regulate future growth, live within our resources, prioritize affordable housing, encourage smaller units, and neighborhood planning, there remain some important unresolved issues. With the completion of the DEIR, these unresolved issues can be further examined in light of the potential environmental impacts of one course of action or another. The goal at this point of the process is to identify the key policy trade-offs and comparative environmental effects and mitigation measures, as well as any new combination of strategies that will help the community, Planning Commission and Council move toward a greater level of agreement and direction.

A. GROWTH MANAGEMENT

The proposed Growth Management Program will monitor and regulate both residential and non-residential development over the next twenty years based on the availability of resources. An Adaptive Management Program will establish a set of resource related objectives that must be met in order for growth and development to occur. At the time of the General Plan Update adoption, the Council will make a decision on the final non-residential growth limit (net increase in square footage citywide) through the year 2030.

In order to assist with this decision, the DEIR has analyzed four growth scenarios with different residential and non-residential levels of development, and respective assumptions. The **No Project** alternative continues existing policies and historical growth trends for the next 20 years; ***PlanSB*** (the proposed project) is also based on historic growth trends, but amends land use policies to encourage smaller, more strategically located housing; the **Lower Growth** alternative continues many existing policies but with less residential and non-residential development; and

the **Additional Housing** alternative is a more robust approach to improving the Jobs/Housing imbalance through less jobs and more housing.

B. MEASURE E FINDINGS & ADAPTIVE MANAGEMENT PROGRAM

Each of the growth scenarios studied in the DEIR would rely on an Adaptive Management Program to monitor resource capacity and control the use of these resources as necessary to support future growth and development. These resources include natural elements such as water and air quality as well as other resources such as housing, transportation, waste treatment, fire and police services.

Over the past 20 years, non-residential growth was limited by a finding determination that any proposed project would have no significant adverse impact on housing, water or traffic resources. While this program worked well for non-residential growth, a more comprehensive program is needed to monitor and manage both residential and non-residential growth. In addition, such a system will need to be more responsive at a policy level, in order to slow growth as necessary given the particular circumstances such as a drought or fiscal crisis that constrain the City's capacities.

C. RESIDENTIAL DENSITY & UNIT SIZE

The draft *Land Use Element*, the draft *Housing Element,* and the Zoning Ordinance codify the City's policies and standards for residential density. The *PlanSB* General Plan Update direction has been to create a new approach for multiple unit project densities. The current standard is based on a discussion in the existing *Land Use Element* and the Variable Density provisions of the R-3/R-4 zones.

There has been broad community interest in amending the bedroom based standard to one of unit size. Staff developed new ranges of allowed densities for the multi-family zoning districts based on an average unit size of 1,000 square feet and a range very close to what exists today. The current standard is 15-27 units per acre (du/acre) based on bedroom type, and the proposed (Medium High) residential standard is 15-25 du/acre based on unit size.

A new High Density residential standard is also proposed as a range allowing 27-34 du/acre for specific areas of the City where higher intensity development may be appropriate to encourage greater affordability and less dependence on the automobile. In particular, this increased density is proposed as an incentive to target smaller units adjacent to transit and in close walking/biking distance to commercial services. The High Density residential standard is also proposed as a means to help address the Jobs/Housing imbalance, support continued community diversity and economic vitality, and manage traffic, air quality and greenhouse gas generation.

The Additional Housing Alternative studied in the DEIR takes this concept further with a residential density standard of 27-60 du/acre. An economic analysis of the Santa Barbara residential market in 2009 identified densities in the range of 60 du/acre as necessary to encourage the market to produce middle-income units, including approximately 40% of those units with

affordability restrictions. The No Project and Lower Growth Alternatives do not propose a change in residential density standards.

The residential density standards are a critical starting point for the development of affordable housing, but additional policies and programs to encourage affordable housing are also proposed in *PlanSB*, specifically within the draft *Housing Element*. Additional density allowances for rental projects and programs to improve and maintain existing rental housing are proposed.

D. BUILDING SIZE, BULK, SCALE, & HEIGHT

Throughout the *PlanSB* process, people have expressed a desire to preserve the small town character of Santa Barbara. As the city grows and develops over the next 20 years, older structures and parcels with lower value improvements will be proposed for replacement or expansion through a process know as infill and redevelopment. Under current zoning regulations and design review guidelines, buildings tend to be replaced with taller structures and more intense uses.

The Santa Barbara community is divided on the issue of building size. On the one hand, some feel a small town character should be maintained by limiting future growth to one- and two-story buildings. Others believe that three- to four-story buildings will not significantly alter the character of Santa Barbara with adequate design review of size, bulk and scale – particularly, if these buildings can accommodate requisite residential densities for more affordable housing.

The manner in which the proposed Average Density program is structured, average unit sizes are targeted around 1,000 sq ft, which will result in smaller units. However, depending on the densities chosen to accompany this formula, the size of the new buildings in the core areas of the City could vary greatly. Under *PlanSB* densities, the buildings would tend to be smaller, in the two- to three-story range; under the *Lower Growth* alternative the buildings will be even smaller still, in the one- to two- story range; and under the *Additional Housing* scenario, the building will tend to be built as they are today, mostly three-story and some with four-story components.

E. AFFORDABLE HOUSING

During the *PlanSB* process residents were asked to identify the issues that matter most to the community. Providing affordable housing opportunities, especially for the local workforce emerged as a top priority and one that requires creative solutions. The lack of affordable housing was also considered a contributing factor in the loss of community diversity, increased traffic congestion, and other social, economic and environmental issues. Policies and implementation actions in the draft *Housing Element* carry on the City's commitment of retaining and increasing rental units, as well as encouraging the production of non-subsidized affordable housing.

Smaller Market Units

Community concern regarding the construction of large, luxury condominiums unaffordable to the working, middle class has led to the proposed amendments to the existing Variable Density standards. The proposed Average Density program would encourage smaller, market-rate units more affordable to middle class income and workforce households. According to a Feasibility

Study prepared for the City there is strong market support for moderately sized two-bedroom units of 1,000 to 1,300 sq. ft., that allow the flexibility of an extra room to use as a guest room or a home office.

Rental Housing

According to the most recent Census figures, the number of large households (with five or more persons) residing in the City has steadily increased over the years. Approximately 65 percent of large households living in the City are renters. With less than 12 percent of existing rental housing having three or more bedrooms, there is an identified need for large rental units with three or more bedrooms. Several implementation actions are included in the draft *Housing Element* to address the need for large rental units, including a density overlay of up to 50% for rental projects.

Additionally, the loss of older, affordable housing, particularly rental units remains a serious issue for the community. Although State law limits the City's ability to prevent the owners of rental housing from leaving the rental market, the City strives to preserve existing rental housing to the greatest extent possible. Implementation actions are included in the draft *Housing Element* to preserve existing affordable rentals and to promote non-subsidized affordable rental housing, including the ability to re-build existing higher density apartments at their current (non-conforming) density.

Inclusionary Housing

Adopted in 2004, the Inclusionary Housing Ordinance (IHO) is intended to increase the availability of housing for middle and upper middle-income households. However, there continues to be concerns that the IHO requirements hinder, rather than promote the development of additional workforce housing and adds to the size, bulk, and height of projects. Nevertheless, based on the *Policy Preferences Report* direction, to encourage the development of non-subsidized affordable housing, the draft *Housing Element* contains an implementation action that would explore increasing the inclusionary unit requirement from 15 percent to 25 percent in order to provide affordable housing units to moderate and middle-income households.

Secondary Dwelling Units

Secondary dwelling units serve as rental units or affordable units to low and moderate income households. These units are now encouraged in certain single-family neighborhoods of the community outside of the high fire hazard zones. Implementation actions intended to further encourage second units are included in the draft *Housing Element*. These units may not be appropriate in all neighborhoods of the City; therefore, where they are to be allowed will require further study. Nonetheless, second units could significantly contribute to the creation of additional affordable rental housing opportunities for City residents.

F. TARGETED GROWTH

As noted above, there are a number of changes proposed to the existing General Plan map ranging from a digitized-based format to significant policy decisions, as proposed under *PlanSB*. While the reformatting, zoning consistency corrections, and minor policy decisions will greatly enhance

the effectiveness of today's General Plan map, the principal *PlanSB* issue is that of increased residential density at strategic locations.

The proposed split of the existing highest residential density designation of 15 to 27 dwelling units per acre, into two distinct new designations of Medium High (15-25 du/acre) and High (27-34 du/acre) serves two purposes:

1. provide a modest incentive to build smaller, more affordable units in key commercial districts and multi-family neighborhoods that are well served by transit and within easy walking and biking distance to commercial services, and
2. provide a more appropriate land use transition or buffer between the highest density districts and the medium density neighborhoods.

G. TRANSPORTATION PROGRAMS

The central transportation issue facing the City is how to accommodate incremental growth while minimizing or avoiding increased congestion at freeway interchanges and major City roads, such as Upper State Street. The DEIR shows that, although better than the No Project Alternative, the *PlanSB* Alternative as currently proposed will nearly triple the number of significantly impacted intersections in the City.

The traffic model demonstrates that eliminating growth altogether will not eliminate increases in traffic congestion as the trend of less people living and working in the City continues. The analysis shows if people continue to relocate outside the City and drive to work via U.S. Hwy 101, traffic at the freeway interchanges will continue to increase.

The DEIR analysis indicates the most effective measure to combat traffic congestion is to aggressively support Travel Demand Management (TDM) strategies that include parking pricing management in the Downtown, as well as other strategies described. The analysis shows that the aggressive support of TDM strategies analyzed in Additional Housing Alternative could be applied to any of the other scenarios described in the DEIR and significantly reduces congestion impacts accordingly. Additionally, the analysis shows that future development generates the least amount of increased traffic if located within the Downtown core and along major transit corridors north of U.S Hwy 101.

While parking pricing strategies implemented in the Downtown could have the greatest reduction of traffic congestion, implementing such a policy would also have economic ramifications. Therefore, to be successful, parking pricing strategies must be carefully designed to contribute to the economic vitality of the Downtown.

Irrespective of the amount of land use growth, decision makers must determine the appropriate balance between future congestion levels and the aggressiveness of the City's travel demand strategies.

H. ENVIRONMENTAL PROTECTION PROGRAMS

There are a number of existing City policies, regional programs, State and Federal regulations for the protection of environmental resources. The DEIR explains that to a large degree existing policies and *PlanSB* can be found consistent with such regulation and do work to reduce impacts as well as enhance resource protection. Specific DEIR and *PlanSB* topics include: reduction of pollutant emissions, management of land use impacts (such as a buffer along Highway 101), multi-use planning for coastal resources, creek and habitat programs, water quality improvements as well as management and adaptation to climate change concerns.

The difference between the three alternatives and No Project is really a matter of degree, in terms of the extent of the planning efforts and priority to create new programs and standards. In this regard, policy makers have often directed City programs to be leaders in the area of environmental protection.

I. WATER SUPPLY

Water is a limited resource in the City and State. Historically, water supply has been a constraint to growth in the City and on the South Coast. Existing City policies provide that the City live within its resources, which includes water supply. The City has established a Long Term Water Supply Program, developed diverse water supply sources, and utilizes a high level of monitoring and management of those resources.

The Draft *PlanSB* policies provide that new development would only occur when adequate resources exist to support it (Policies LG 1.2). The California Environmental Quality Act requires that environmental review of water impacts for projects involving substantial water demand be based on a water assessment by the water agency providing services. In preparing the Water Supply section of the Draft EIR for *PlanSB*, Planning staff and the EIR consultant worked with Water Division staff, and the DEIR analysis utilized their extensive expertise, technical data, and commissioned studies.

The Courts have recognized the complexities, uncertainties, and changeable nature of water supplies and water management from year to year. This is addressed in the DEIR by describing these variable conditions, including supply, sources, facilities, and their various constraints and uncertainties. The EIR analysis uses the best available information and judgment from our City technical experts and consultants to identify assumptions for estimated water demand associated with future growth to 2030, and estimated water supplies during "normal" water years and drought years.

The EIR analysis identifies current typical water supply during non-drought years of 17,064 acre-feet per year AFY, including a 10% safety margin (1,706 AFY) and 15,358 AFY available to meet demand. The EIR forecasts that similar supplies could be expected into the future. Although there are uncertainties about various supply sources, the continued diversity of sources and options, and the high level of water supply planning and management provides for the expectation of continued similar supply levels.

Current typical water demand is estimated at 14,000 AFY, with available surplus of 1,358 AFY and 1,706 AFY safety margin. The DEIR identifies citywide water demand in the year 2030 under the *Plan Santa Barbara* policies and growth scenario to be 14,791 AFY, still within the existing supplies and with safety margin and surplus.

The range of future water demand under the DEIR alternative growth scenarios is identified as 14,829 AFY under the "No Project"/Existing Policies, 14,510 AFY under the Lower Growth Alternative, and 14,958 AFY under the Additional Housing Alternative. Each of these water demand estimates is within the current and projected supply estimate, with variations in remaining water for safety margin and surplus. The Desalination plant also remains as a back-up source of additional supply.

The General Plan update process will be followed by a more detailed update of the City Long-Term Water Supply Plan, such as potential for improvements to conservation and supplies, and ongoing monitoring and management of water supply would continue. The General Plan Adaptive Management Program would utilize water supply monitoring and improve tools for relating supply and the development process to ensure that any development is supported by long-term water supply resources.

J. CLIMATE CHANGE

Global climate change refers to substantial changes in climate measures over time, such as average temperature, wind, and storm patterns. Climate changes are believed to result from both natural variability and human activity. Climate changes are anticipated to create effects on the environment associated with water supply and water quality, precipitation levels, flooding, sea level rise, coastal erosion, wildfire activity, biological resources, public health, energy demand, and the economy. The California Climate Adaptation Strategy (2009) identifies measures that can be considered in coastal areas to adapt to climate change effects over time, and the DEIR includes some of these as mitigation measures.

The Intergovernmental Panel on Climate Change (IPCC) determined that the rapid rate of climate changes since the mid 20th century is very likely due to human generated "greenhouse gas" concentrations from fossil fuel combustion and land use changes. Greenhouse gases (GHG) include carbon dioxide, methane, nitrous oxide, and ozone in the atmosphere that absorb radiation from the earth's surface and release it as heat.

The California Global Warming Solutions Act of 2006 (AB 32) recognizes California as a major contributor of greenhouse gas emissions and establishes a goal of reducing statewide GHG emissions to 1990 levels by 2020. SB 375 (2008) created a process by which local governments must work together to prepare a regional plan to achieve the GHG reductions identified in AB 32 through land use development patterns and transportation measures; such a process is now underway with the Santa Barbara County Association of Governments (SBAG).

Senate Bill 97 (2009) amended CEQA to include greenhouse gas effects as part of CEQA analysis, and the Office of Planning and Research adopted CEQA Guidelines amendments in January 2010. The State Attorney General has communicated with the City to emphasize that climate change needs to be addressed as part of General Plan updates and associated EIRs.

Both existing City General Plan policies and the draft *PlanSB* policies contain numerous land use and transportation measures that help to minimize greenhouse gas generation, consistent with the types of measures suggested by the California legislation and regulations. A City Climate Action Plan would be prepared to meet State and regional climate change planning.

The DEIR analysis provides the first baseline calculations of citywide greenhouse gas generation from mobile and stationary energy use that will be needed to meet State mandates for climate change planning. The DEIR presents a reasonable worst-case scenario for GHG emission impacts, which identifies the potential that citywide emissions in 2030 may not meet the State reduction targets.

In addition to existing policies and proposed *PlanSB* policies for energy conservation and reduction of vehicle trips and vehicle miles traveled, the EIR transportation mitigation measures would do the most to further reduce greenhouse gas emissions because they could reduce emissions from existing development as well as the small amount of new development. Additional recommended measures involve tree planting, landfill gas management, retrofitting for energy efficiency, and pursing renewable energy sources.

K. IMPLEMENTATION ISSUES

As a long term planning document, the General Plan policy implementation will take place over many years. A comprehensive work program to prioritize and phase implementation in a logical fashion is necessary. Some decisions need to be made sooner than others for practical reasons such as establishing a factual basis for new standards to be applied during the development review process.

For example, the City's Development Plan Ordinance (SBMC 28.87.300) will need to be revised (the current status is one year into a three year extension on the existing standards for Small Addition, Community Priority, Findings, etc.). The exact nature of the revisions will depend on which growth management program is selected in the *PlanSB* process. Another key measure to implement will be Zoning Map changes associated with the updated General Plan Land Use Map, and as well as the corresponding density standards including the change for the Variable Density Ordinance from bedrooms to unit size. The completion of the grant funded Climate Action Plan will also be a high priority.

Both the *Housing Element* and Mitigation Monitoring Program will also be carefully considered in developing a Draft Implementation Program. The Draft Implementation Program will be considered by the Planning Commission and then by the Council at the time the General Plan is adopted this Fall. Feasibility findings will be important given budget constraints and the involvement of other agencies in some of the programs and mitigations. Further refinement and use of the Adaptive Management Program will be central to the implementation plan.

In past major policy efforts, the use of an Interim Ordinance was determined to be appropriate and may again be used for the first steps in the implementation of *PlanSB*.

V. OVERVIEW OF POLICY OPTIONS AND DECISIONS

Once initial public input has been received on the General Plan Update Policy Documents and the DEIR, the Planning Commission and Council will then provide direction to staff to prepare a set of final policy recommendations. This next step is expected to occur at the joint City Council/Planning Commission meetings of June 22 and 23, 2010. In order to help facilitate the necessary discussion prior to formal direction, staff has prepared **Exhibit E:** *Policy Option Decision Matrix*.

The purpose of the *Policy Option Decision Matrix* is to provide a summary description of the policy options in a format that helps to narrow-down the remaining key issues. All of the Planning Commission members (and eventually the Council members) will be asked to participate in this process by "checking" the desired policy option for each of the Key Issues.

VI. NEXT STEPS

The following public meetings are part of the public review and comment period for the Draft General Plan and DEIR:

- **Wednesday, April 28, 2010** (9:00 a.m.) **Planning Commission**
  Staff presentation highlighting key issues, and public comment hearing on the Draft General Plan and Draft EIR documents
- **Thursday, April 29, 2010** (1:00 p.m.) **Planning Commission**
  If necessary, continued hearing time for additional public comment
- **Thursday, May 6, 2010** (1:00 p.m.) **Planning Commission**
  Continued Planning Commission meeting for Commission discussion and comments on the Draft documents, Commission direction to staff on Final EIR preparation, and Commission recommendations to City Council for preparation of Final General Plan documents
- **Tuesday, June 22, 2010** (6:00 p.m.) and **Wednesday, June 23, 2010** (1:00 p.m.) **City Council/Planning Commission Joint Meeting**
  Discussion and policy direction to staff for preparation of Final General Plan documents (Staff presentation and public comment on June 22nd 6:00 p.m.)

Subsequent Process Steps: Following the end of the Draft General Plan and Draft EIR public review and comment period, proposed Final *Plan Santa Barbara* General Plan documents and a proposed Final EIR (including responses to comments received by May 17, 2010) will be prepared. Subsequent noticed public hearings will be held at the Planning Commission and City Council to consider actions to certify the Final EIR and adopt the Final General Plan documents (anticipated in Fall 2010).

EXHIBITS

A. Changes to Policy Preference Report
B. Residential Build-out Assumptions and Methodology
C. Summary of Environmental Impacts from DEIR Analysis
D. DEIR Summary of Comparative Impacts
E. Policy Options Decision Matrix

Plan Santa Barbara
LIVING WITHIN OUR RESOURCES

CHANGES TO *POLICY PREFERENCES REPORT*

1. Developed an Average Density Program, to replace existing Variable Density Program, based on average unit sizes rather than number of bedrooms. The net result would be to maintain portions of the multi-family districts at approximately the existing density of 15-25 du/acre (Medium High) and increase the multifamily districts closest to the commercial districts, as well as the commercial districts, to 27-34 du/acre (High Density).
2. Reformatted the Goals, Policies and Implementation Actions and distributed to respective elements with reference numbers adjusted accordingly.
3. Redrafted selected policies as implementation actions.
4. Added new implementation actions.
5. Added selected EIR mitigations measures as implementation actions (in italics).
6. Redrafted selected Objectives as Goals.
7. Re-titled *Land Use and Growth Management Element* to simply *Land Use Element.*
8. A *Historic Resources* Element is now recommended as a stand alone element.
9. Relocated Community Design policies from *Historic Resources* to the draft *Land Use Element.*
10. Further developed Floor Area Ratio and Form Based Coding policy direction.
11. Relocated rental incentive policies to the draft *Housing Element.*
12. Developed a draft General Plan (Land Use) map, with attendant format, land use designation, and boundary changes (see Attachment 1, *Principal Change Areas: Proposed Land Use and Zoning Changes*, and Attachment 2, *General Plan Principal Change Areas Map*).
13. Developed a draft Parks and Open Space map.
14. Removed a MODA boundary from the Land Use Map, now the MODA is proposed as a set of principals.
15. Secondary dwelling unit locations part of Housing Element policies.
16. Dropped the "balanced density" concept, which would have down-zoned portions of the multi-family districts and up-zoned others consistent with a MODA boundary.

EXHIBIT A

Plan Santa Barbara
LIVING WITHIN OUR RESOURCES

Principal Change Areas:
Proposed Land Use Designation and Zoning Changes

1. **Mission, Highway 101, De La Vina and Santa Barbara**
   LU Designations:
   - Commercial High Density
   - Office High Density

2. **Alamar and State Area**
   LU Designations:
   - Commercial High Density
   - High density Residential (consistent with R-4 zone)

3. **101 Freeway, Chapala, and Mission**
   LU Designations:
   - Commercial High Density
   - High Density Residential

4a. **Upper State Street Northside**
   LU Designations:
   - Commercial Medium High Density
   - Medium High Residential (consistent with R-O zone)
   - Office Medium (consistent with R-O zone off Verde Vista)

   Zoning:
   - Average Density not allowed in C-P (only 12 du/acre); maintain as neighborhood serving w/mixed use. Rezoning of CP not part of *PlanSB.*
   - Calle Real and Pesetas Lane rezone R-2 parcel to R-O.

4b. **Upper State Southside**
   LU Designations:
   - Commercial High
   - Commercial Medium High (consistent with C-P zone; single family bordering De La Vina; car dealership parcels)

5. **Cottage Hospital Area**
   LU Designation:
   - Office Medium Density (from Institutional)

6. **Garden between Carrillo and Victoria Area**
   LU Designations:
   - Commercial Medium High (C-2 zone, consistent with surrounding Medium High Residential).
   - Office High along west side of Garden and surrounding R-O zone (consistent with surrounding Commercial and Residential High Density).

ATTACHMENT 1

7. **Milpas Corridor**
   LU Designations:
   - Commercial High (from Industrial) along Westside of Milpas
   - Medium Density Residential (from Commercial, consistent with R-2 zone) between east side of Milpas Street and Alisos Street.

8. **Coast Village Road**
   LU Designation:
   - Commercial Medium High

9. **Saint Francis Hospital Area**
   LU Designation:
   - Medium High Density Residential (from Institutional, consistent with surrounding residential uses)

   Zoning:
   - C-O to R-3

10. **Anacapa/Chapala/101/Ortega Streets**
    LU Designation:
    - Commercial High (from Industrial, consistent with existing uses)

    Zoning:
    - C-M to C-2

11. **Alan Road/Vista Del Mar Drive**
    LU Designation:
    - Low Density Residential Maximum 3 du/acre (from Residential, 1 Unit Per Acre)

12. **Industrial Area**
    LU Designation:
    - Commercial Industrial/Medium High Density (from Industrial, consistent with C-M zone)

13. **Oceano Drive and Loma Alta Area**
    LU Designation:
    - Medium High Density (consistent with existing residential densities)

    Zoning:
    - From R-2/SD-3 to R-3/SD-3

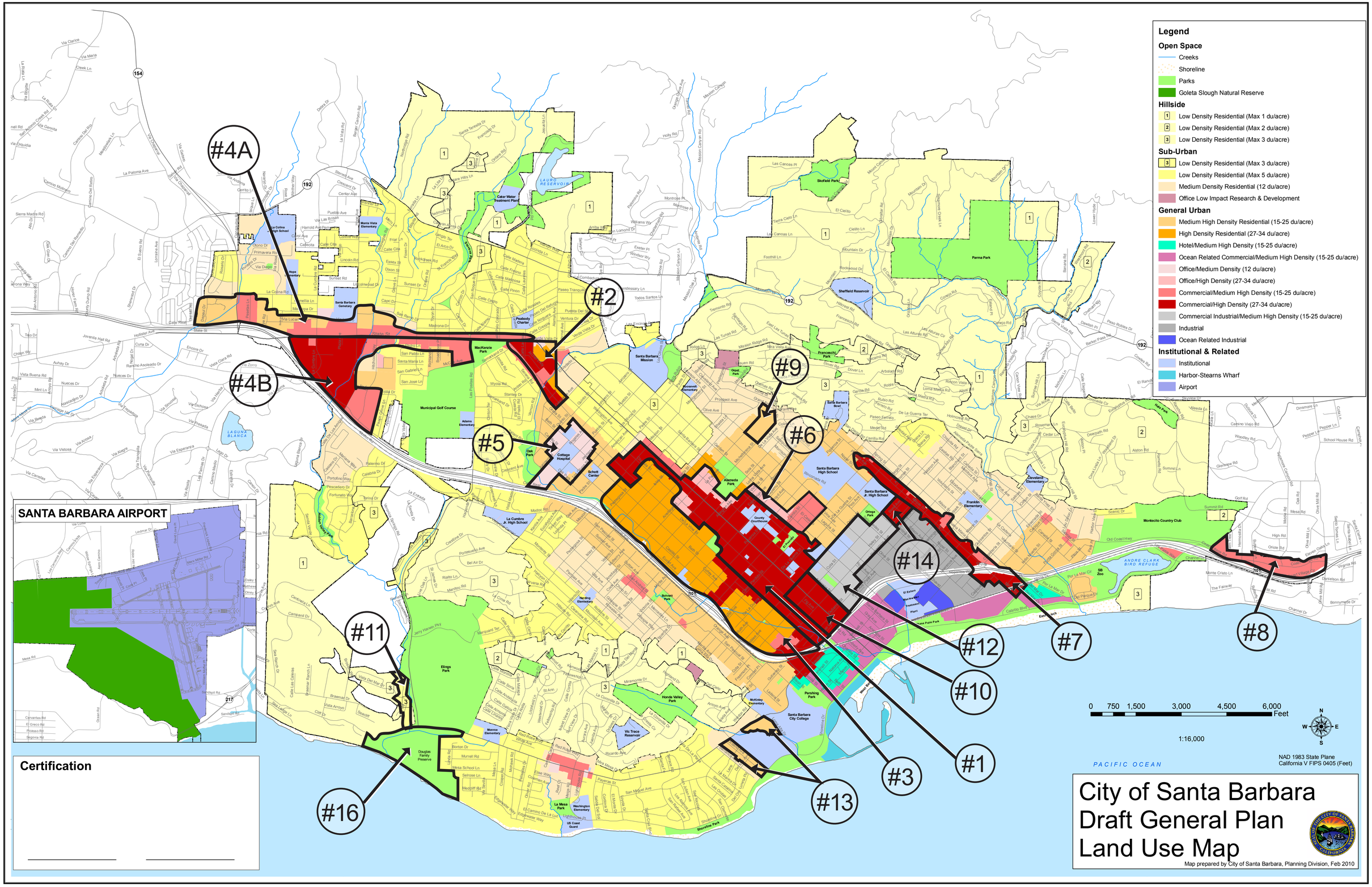
14. **Reddick/Bond/Milpas/Quarantina**
    LU Designation:
    - Commercial High Density (from Industrial, consistent with existing C-2 zone and existing uses)

15. **Coastal Zone Where Residential allowed**
    LU Designation:
    - Medium High Density Residential (consistent with existing densities; no increase over historic density allowances except for #13 area above).

16. **Douglas Family Preserve**
    LU Designation:
    - Open Space Parks (from 3 du/acre)

17. **Other Locations**
    Various minor "clean-up" changes to resolve conflicting zones or land use designations boundaries by parcel are also proposed; please see proposed General Plan map.

Principal Change Areas



City of Santa Barbara
Planning Division

Memorandum

DATE: April 14, 2010

TO: John Ledbetter, Principal Planner

FROM: Adam Nares, Planning Technician II

SUBJECT: Residential Build-out Assumptions and Methodology

The purpose of this memo is to show the evolution of how residential build-out has been calculated during the *PlanSB* process.

During the 1980s the Santa Barbara residential build-out capacity was estimated to be 40,005 units. In 2008, the California Department of Finance estimated the City had approximately 38,000 units on the ground. The estimate of 40,005 unit capacity was calculated prior to GIS parcel based technology and did not fully estimate residential build-out in Commercial zones. Throughout the *PlanSB* process, calculations have been made to estimate the build-out in the City for a variety of purposes. The following documents the different purposes, assumptions and methodology followed in: the *Development Trends Report*, the draft Environmental Impact Report (EIR), and the draft *Housing Element*.

Development Trends Report

One of the first calculations in the *PlanSB* process was the Commercial Zones Residential Build-out Analysis in the *Development Trends Report* (March 2008). See Attachment 1 for more details. This analysis estimated that commercial zones have a capacity of 5,865 additional residential units.

Draft EIR – "Extended Range"

For the different growth scenarios, the draft EIR analyzed the build-out of residential units throughout the City. Aside from the 20-year future g rowth alternative, the draft EIR also analyzed the long term "Extended Range" alternative. The amount of future residential growth in the City under the "Extended Range" alternative is 8,000 units. This is based on 2,000 units remaining from the 40,005 unit City build-out number, and the approximately 6,000 potential units in the City non-residential zones per the *Development Trends Report*. The majority of the units were assumed to develop within the core of the City.

Proposed Densities and General Plan Map

During the draft EIR process and *Policy Preferences* discussions, new densities were proposed to encourage development of smaller units in the City's core. It would change the current Variable Density standard, an average of 20 units per acre, into two separate density standards. The High Residential Density of 27-34 units per acre is proposed closer to the inner core, and the Medium

High Residential Density of 15-25 units per acre is proposed just outside of the core. The proposed General Plan Land Use Element also proposes changes to some areas from current zoning to the new densities. See Proposed General Plan Map

Housing Element

The Housing Element is required by the State to demonstrate the residential potential per zoning and environmental constraints for each parcel. The new proposed densities (see above) were used for this analysis and a new citywide build-out number was calculated to be 9,099 units. See attachment 2 for more details on the assumptions and methodology used. Key assumptions for this analysis assume that the High Residential Density areas would develop at an average residential density of 30 units per acre and the Medium High Density areas would develop at an average residential density of 20 units per acre.

Proposed General Plan Map without High Density

For comparison purposes the overall build-out was calculated again by replacing the High Density 30 units per acre average with the Medium High 20 units per acre average. This analysis used the same parcels after environmental constraints and the proposed General Plan Map as the Housing Element Analysis. Using this analysis, the net new unit build-out was calculated to be 7,455 units.

PLANSB KEY ASSUMPTIONS AND NET NEW UNITS PER ANALYSIS

Analysis	Key Assumptions	Commercial Zone Net New Units	Citywide Net New Units
Development Trends Report	• For Commercial Zones Only • Low valued lots were identified • Used Current zoning standards • 20 Units/Acre average for variable Density	5,865	N/A
EIR Extended Range	• Used Development Trends Report Sites for Commercial Zones • Added in Residential Zones • Used current zoning standards • Citywide Analysis	6,000	8,000
Housing Element	• Used Development Trends Report Sites for Commercial Zones • Removed sites with Environmental Constraints • Used proposed General Plan Map • Used new Densities developed during PlanSB process • 30 Units/Acre for High Density Areas • 20 Units/Acre for Medium High Density Areas • Citywide Analysis		9,099
Proposed General Plan Map without High Density	• Used Development Trends Report Sites for Commercial Zones • Removed sites with Environmental Constraints • Used proposed General Plan Map • Used new 20 Units/Acre Average for all High and Medium High Areas • Citywide Analysis		7,455

Attachments:

1. **Development Trends Report Exhibit 10 - Commercial Zones Residential Build-Out Analysis**
2. **Housing Element – Suitable Opportunity Sites**

Commercial Zones Residential Buildout Analysis
March 2008 - DRAFT

Steps taken to Identify the Potential Build-out Parcels

1. All non-residentially zoned Parcels were identified in a database.

2. Non-residentially Zoned Parcels that do not allow residential use (e.g. M-1, OM-1, HRC-1, portions of HRC-2 and C-X overlay zone) were removed from the build-out database.

3. The improvement value per square foot for each property was calculated using the County Assessor's improvement valuation for the parcel. (Assessor's Improvement Value divided by the lot size.)

4. Identified parcels without Assessed Land and Improvement Value and categorized these as Public Land, including parks. These parcels were removed from the build-out database.

5. Parcels with historic buildings (Landmarks or Structures of Merit) were identified and removed from the build-out database.

6. To determine which non-residential zoned parcels were more likely than others to redevelop with residential uses, low improvement value per square foot of lot area was chosen as the method.

   A list of 30 Pending Residential Projects on Commercial Zoned was analyzed. Of the 30 currently pending projects, 23 parcels (70%) had an improvement to area value of $20/sf or less. This included five projects on vacant parcels, several projects comprised of multiple small parcels, the Sandman Inn project and the La Sumida project. There were also three projects (10%) that were over $100/sf. Two of these were on small parcels of less than 2,000 square feet in size. The other was on an 8,500 sf parcel. The highest value/square foot of these three parcels was $227.00/sf. The average improvement/area value of the 30 pending projects came to $26.7/sf. It should be noted that the Circuit City project was somewhat above the average at $33.00/sf as was the Radio Square project at $40.40/sf. The $26.7/sf per lot area average figure was chosen for use in identifying non-residential zoned parcels with potential for development or redevelopment.

   Note: Several years ago, a commercial real estate broker was contacted and asked his opinion on the property values that were most likely to be sold for development. He indicated that $100.00/sf improvement to area value was a good number. After mapping parcels with values of $100.00/sf or less it was determined that the number encompassed too many of the commercially zoned parcels. For this reason, the Pending Projects were analyzed instead. The

Pending Projects represent the actual development trend and do not rely on personal opinions.

7. Parcels with an improvement value over $26.7 per square foot of lot area were labeled "High Value" as they were determined to be less likely to sell or redevelop. These parcels were removed from the build-out database.

8. The "Potential Build-Out Parcels" are shown in Blue on the map and do not include those parcels identified above as either High Value, Public Lands, Historic Buildings or not allowing residential development.

9. The Potential Build-Out Parcels were separated into three categories: Allows Variable Density, Standard R-3 Build-Out, and 5000 and less square foot area. The build-out analysis determined the number of residential units that could be built on each parcel.

<u>Potential Methodology to Calculate Total Number of Units that could be built on buildout parcels identified above (using designated parcels of $26.7/square foot or less per lot area)</u>

A. Calculation 1. (Two-bedroom unit average assumption)

    1. Calculated build-out on all parcels less than 5000 square feet to allow one unit.
    2. Calculated Variable Density parcel build-out at 20 units per acre. (This number is consistent with the average historical trend of 18.4 units/acre as described in Calculation 3 below.
    3. Calculated Standard R-3 parcel build-out at 12 units per acre
    4. The sum of the build-out units using these assumptions is **5,865** units.

B. Calculation 2 (Based on Historic Building Trend, 1990 - 2007)

    1. Summed the acreage of all Potential Build-Out Parcels (340.6 Acres)
    2. Analyzed the Historic Data for build-out of residential units in commercial zones counting all units on the parcel. It was determined that the Historic Trend was18.4 units/acre.
    3. The 18.4 units/acre was applied to the 340.6 acres to determine potential build-out.
    4. The sum of the build-out units using these assumptions is **6,267** units.
    5. The Historic Data included affordable housing, density bonus, inclusionary and mixed use projects.

Suitable Opportunity Sites

Following the analysis of residential projects in the pipeline, the City assessed the commercial and multi-family zones for opportunity sites or those parcels determined to be feasible and desirable for residential redevelopment within this planning period. Given the market and development trends illustrated by the pipeline projects, residential development in commercial zones is on the rise. This is consistent with the goals and policies established in the City's Land Use and Circulation Elements as well as the historical pattern of development targeting higher density development in the Downtown area near jobs, transit and recreation / cultural activities.

Unlike many other cities in the State of California, the City of Santa Barbara has a long established practice of allowing and encouraging residential development in commercial zones. Residential development is allowed throughout the City, except in the relatively small industrial area of the City (less than 1 percent of the total land area) and in portions of the City's Coastal Zone as dictated by Coastal Act land use priorities.

Residential development is allowed in most commercial zones at densities ranging from 27-34 du/acre. These densities are intended to encourage small, more affordable units to promote affordable housing opportunities for the community, particularly the City's local workforce. The smaller the average size unit, the greater the density allowance, up to a maximum 34 du/ac in most commercial zones. Likewise, in the R-3/R-4 multi-family zones, densities ranging from 15-25 du/acre are permitted based on average unit size. This approach is designed to discourage the proliferation of large, luxurious and costly units, while concentrating densities in the most sustainable locations (i.e., near transit, access to commercial services, access to parks and open space, etc.).

Residential Development Potential in Commercial Zones

Suitable Opportunity Sites in Commercial Zones

An inventory of vacant and underdeveloped parcels in commercial zones was undertaken to identify their build-out potential. The analysis used the City's GIS land use database and the County Assessors land use codes. Aerial photography and site inspections were also used to verify the status of certain parcels. The following steps were taken and assumptions made to calculate the residential development potential in commercial zones:

- All non-residentially zoned parcels were identified in the database.
- Non-residentially zoned parcels that do not allow residential use (e.g. M-1, OM-1, HRC-1, portions of HRC-2 and C-X overlay zone) were removed from the database.
- The improvement value per square foot for each property was calculated using the County Assessor's improvement valuation for the parcel (Assessor's Improvement Value divided by the lot size).
- Public land, including parks were removed from the database.
- Parcels with historic buildings (Landmarks or Structures of Merit) were removed from the database.
- Parcels with significant environmental constraints associated with biological resources, floodplain, and creeks were removed from the database.

- Low improvement value per square foot of lot area was used to determine which non-residential zoned parcels were more likely than others to redevelop with residential uses, (generally $27/square foot of lot area or less). The low improvement value per square foot was based on the analysis of 30 pending residential projects in commercial zones with the average improvement/area value of $26.7/square foot.
- Commercially zoned parcels identified in the inventory fall under two land use designations, Medium High Density Residential (MHDR) and High Density Residential (HDR). The MHDR designation allows 15-25 du/acre and the HDR designation allows 27-34 du/acre depending on the average unit size of the residential development.
- To assess a realistic development potential for the commercial parcels designated MHDR (15-25 du/acre), a 20 du/acre build-out potential was assumed.
- To assess a realistic development potential for the commercial parcels designated HDR (25-34 du/acre), a 30 du/acre build-out potential was assumed.
- Development potential on these opportunity sites assumed that all existing improvements on the property would be removed and redeveloped at their full residential potential.

The suitable sites inventory identified 1009 opportunity sites with residential development potential in commercial zones. Based on the above steps and assumptions there is the potential to produce approximately 6,329 additional residential units on these parcels.

Residential Development Potential in Multi-Family Zones

Suitable Opportunity Sites in Multi-Family Zones

As stated above, the highest residential densities are allowed in the City's commercial and multi-family zones. Vacant and underdeveloped R-3 and R-4 sites were identified using the GIS land use database and County Assessor's land use codes. Aerial photography and site inspections were also used as needed.

Historically, the City has encouraged the redevelopment of aging housing stock to more intense multi-family apartment or condominium development as allowed by the zone. The Zoning Ordinance states that the R-3 and R-4 zone is intended to be "...residential district of high density in which the principal use of land is for multiple-family dwellings..."

A recent trend has been to demolish aging housing stock and to replace it with multi-family development, typically condominiums. In some cases, this has been supported by the neighborhood as appropriate recycling and improvement of the housing stock. In other cases, concerns have been raised about the loss of historic resources or housing that was "affordable" by virtue of its aging conditions.

The City's General Plan Conservation Element provides policy context and direction for protection of cultural and historic resources in our built environment as well as visual resource protection in our hillside and open space areas. With respect to historic resources, the City existing policies and Master Environmental Assessment (MEA) provide guidance to protect resources. Further, the City has responded by initiating historic surveys. The City recently completed two architectural and historic resource survey areas, including the Lower Riviera neighborhood. The City has also adopted a demolition control ordinance to preserve historically significant architecture.

The following steps were taken and assumptions made to identified opportunity sites and calculate the residential potential in Multi-Family zones (R-3/R-4 zones):

- Vacant parcels 3,000 square feet or more were included in the inventory.
- Underdeveloped parcels are those larger than 4,900 square feet with an existing single family residence. For the purposes of this development potential / zoning capacity inventory, no further research was made into the condition, quality or historic nature of the existing residence. It was assumed that one existing unit on a lot in a multi-family zone was "underdeveloped." It should be noted that this exercise is not unlike the analysis nonprofit and for profit developers, realtors or other development professionals undertake to identify prospective projects.
- Parcels with significant environmental constraints associated with biological resources, floodplain, and creeks were removed from the database.
- R-3/R-4 zoned parcels identified in the inventory fall under two land use designations, Medium High Density Residential (MHDR) and High Density Residential (HDR). The MHDR designation allows 15-25 du/acre and the HDR designation allows 27-34 du/acre depending on the average unit size of the residential development.
- To assess a realistic development potential for the R-3/R-4 parcels designated MHDR (15-25 du/acre), a 20 du/acre build-out potential was assumed. For the parcels designated HDR (25-34 du/acre) a realistic development potential of 30 du/acre was assumed.

The suitable sites inventory identified 789 opportunity sites with residential development potential in multi-family zones. Based on the above steps and assumptions, there is the potential to produce approximately 1,507 additional residential units on these parcels.

Residential Development Potential in the Duplex Zone

The City next assessed the City's R-2 duplex zone for development opportunities. The City's R-2 zone is a Medium Density residential district (12 du/acre). The principal use of the land is for two-family dwellings.

Suitable Opportunity Sites in the R-2 Zone

Vacant and underdeveloped parcels in the R-2 zone were identified using the City's GIS land use database and the County Assessor's land use codes. The following steps were taken and assumptions made to identified opportunity sites and calculate the residential potential in R-2 zones. Identifying opportunity sites in the R-2 zones utilized a two-step process:

- Vacant R-2 parcels were identified for the inventory. Some parcels were removed from the land inventory due to their small size. Other parcels had their development potential reduced to 20 percent due to steep slopes.
- All underdeveloped parcels greater than 4,900 square feet with only one single family residence currently on site were included in the inventory. This step included parcels between 5,000 – 6,000 square feet that were recently made eligible for duplex development.

A total of 916 opportunity sites were identified and are dispersed throughout the R-2 zoned areas in the City. The development potential on underdeveloped opportunity sites in the R-2 zone is approximately 1,043 units.

Residential Development Potential in the Single Family Zones

The City's single family zones include the following categories:

A-1	One acre minimum lot size
A-2	25,000 square feet minimum lot size
E-1	15,000 square feet minimum lot size
E-2	10,000 square feet minimum lot size
E-3	7,500 square feet minimum lot size
R-1	6,000 square feet minimum lot size

The corresponding General Plan designations for these zoning categories include residential densities ranging from 1- 5 units per acre. The General Plan also identifies many of these areas to include open space, major hillsides and visual resources. In the steeper hillside areas, the General Plan envisions significantly lower densities, as low as one dwelling unit for every 10 or more acres. Approximately 50 percent of the City's single family zones are in the High Fire District.

While vacant undeveloped land is believed to be easier to develop than infill development in the City of Santa Barbara, the majority of vacant land remaining is located in the single family zones. These vacant parcels are typically located in the hillsides and face significant development constraints such as steep slopes, proximity to creeks, poor soil conditions, and limited or expensive access to City water and sewer services.

Given the City's focus and emphasis on infill and multi-family residential development in and around the City's commercial core, the City looked at an inventory of vacant land zoned for single family residential development as the last step and least likely to develop further.

Vacant parcels in the City's residential zones were identified using the GIS land use database and County Assessor's land use codes. Aerial photography and site inspections were also used to verify the status of certain parcels. As mentioned above, significant site constraints may exist on many of these lots rendering the development potential to be limited and difficult at best. Further, the City has policies in place regarding hillside protection, conservation of open space, avoiding development in high fire areas and limiting development on steep slopes.

To develop a more realistic estimate of the development potential on single family lots for the Housing Element planning period, the City looked closer at parcel size and City's slope density requirements. The City's slope density requirements mandate that any parcel with an average slope of over 10 percent provide increased lot area requirements based on the zone. In single family zones, parcels with slopes of 30 percent or greater must provide three times the standard minimum lot size requirements. This is often difficult to achieve especially in the steeper areas and higher reaches of the City's foothills. Further, development of these constrained hilly sites often encounter geologic, biologic or other environmental constraints that often requires extra care, caution and special studies in the development and design phases.

Therefore, for the purposes of this RHNA analysis, it was assumed that only 20 percent of the entire parcel with slopes over 30 percent had realistic development potential within the 2010 Housing Element planning period. Approximately 121 vacant and underdeveloped sites in single family zones were identified for the inventory. The estimated development potential on these sites is 220 units.

It should be noted that the City has a Secondary Dwelling Unit Ordinance that requires all new second ("granny") units be rented to relatives or low or moderate-income households. This along with development standards that are highly protective of single family neighborhoods and a prohibition against second units in high fire areas (approximately 50 percent of the City's single family zones) have resulted in very few secondary dwelling units being applied for or built. To date, the City has permitted only fifteen units. For the purposes of meeting the City's RHNA, it is not realistic to think that a substantial increase in secondary dwelling units will occur even with the passage of new state legislation streamlining the permit process. It is not the process but the development standards and affordability requirements that make significant building of second units in single family zones unlikely.

Suitable Sites Inventory Summary

Table 52 provides a summary of the City's vacant land and opportunity sites analysis by project status and by zone district type. Appendix F of the Housing Element provides a parcel-by-parcel listing of the vacant land inventory and opportunity sites by zone.

Table 52: Summary of Opportunity Sites Development Potential
City of Santa Barbara

Category	Opportunity Sites # Parcels	Total # Units	Cumulative Total # Units	% RHNA
Commercial Zones	1,009	6,329	6,329	144%
R-3 / R-4 Multi-Family Zones	789	1,507	7,836	179%
R-2 Duplex	916	1,043	8,879	202%
Single Family Zones	121	220	9,099	207%
RHNA = 4,388 Units				

Source: City of Santa Barbara 2009

Table 52 above demonstrates that the City has the land and zoning capacity to meet the regional housing needs allocation for this planning period. However, given land costs, construction costs and other market conditions, simply providing higher density zoning may not result in housing affordable to very low and low-income households in Santa Barbara. The City's experience is that it requires community partnerships and public subsidies to provide housing available to very low, low and even moderate income households. Over the past 20 years, the City has been very successful in providing and leveraging funds, developing partnerships, identifying and acting on land banking opportunities. Unfortunately, as identified in the nongovernmental constraints section, construction costs can be prohibitive.

Plan Santa Barbara General Plan Update
SUMMARY OF ENVIRONMENTAL IMPACTS FROM DEIR ANALYSIS

The Draft EIR analysis identified the following environmental impacts associated with additional development to the year 2030 under draft *Plan Santa Barbara* General Plan policy amendments. Required mitigation measures are identified to reduce potentially significant impacts. Recommended measures are also identified to further address potential impacts.

Significant Impacts (Class I) *(Citywide in 2030)*	**Required Mitigation Measures**
Transportation Increased peak-hour traffic congestion	MM T-1 –Roadway and signal improvements MM T-2 – Measures to reduce peak-hour vehicle trips and increase use of alternative travel modes through modified parking requirements and pricing and transportation demand management measures.
Global Climate Change Increased greenhouse gases emissions from transportation fuel and buildings	MM T-2 -Reduce vehicle trips and miles traveled and associated greenhouse gas generation *(Recommended measures RM C-1 policies for carbon sequestration though tree planting/ revegetation; RM C-2 work with regional partners toward methane capture/ fuel cell development at Tajiguas and former Las Positas landfills; RM C-3 continue programs to retrofit municipal systems with energy efficient equipment; RM C-4 policies for additional renewable energy sources for City operations including wind turbines and solar facilities, and monitor ocean power projects; and RM C-5 additional policy to establish goal of 30 MW new solar energy in City by 2030.)*
Less Than Significant Impacts with Mitigation (Class 2) *(Citywide in 2030)*	**Required Mitigation Measures**
Air Quality Potential health risks to residential uses along Highway from diesel particulate emissions	MM AQ-1 – Interim 250-foot setback from Highway 101 for new residential uses until State regulations are implemented and risks reduced; install additional vegetation along Highway 101.
Biological Resources Gradual loss of upland and creek/riparian habitats and species.	MM B-1 – Further protect key upland habitat/ corridors MM B-2 – Creek channel naturalization; drainage restoration; riparian habitat restoration; creek setback standard. *(Recommended measures RM B-1 oak woodland protection and RM B-2 riparian woodland protection*
Geological Conditions Sea cliff retreat	MM G-1 – Updated bluff retreat review guidelines; shoreline management plan *(Recommended measure RM G-1 to update Coastal Plan language.)*

Class 2 Less than Significant Impacts with Mitigation (continued)	**Required Mitigation**
Hazards Adequacy of household hazardous materials collection facility capacity	MM Hz-2 – Agency coordination to establish additional collection facility capacity
Heritage Resources Effects of development on historic resources	MM Hr-1a – Protect historic resources during adjacent construction activities MM Hr-1b – Modified density and design policies for landmark and historic districts
Hydrology and Water Quality Increased flood hazards from climate change sea level rise (longer range impact to 2050)	MM Hydr-1a – Adaptive management for sea level rise
Noise Increased roadway noise levels along Highway 101 affecting existing residential uses	MM N-1 – Periodically monitor freeway noise levels along Highway 101. If traffic noise expands the 65 dBA contour along the freeway corridor, implement measures to reduce effects (e.g., structure retrofits, barriers, vegetation)
Open Space/Visual Resources Gradual loss of important open space areas	MM V-1 – Protect key open space areas; establish additional funding mechanisms; coordinate management with citizen groups, owners, educational institutions. V-2 – Coordinate on regional open space
Public Utilities/ Solid Waste Management Adequacy of long-term solid waste management facility capacity	MM PU–1a –Coordinate with agencies to establish additional long-term waste management capacity. MM PU-1.b – Increase diversion of solid waste from landfill disposal through programs to increase waste reduction, recycling, and reuse.
Less Than Significant Impacts (Class 3) *(Citywide in 2030)*	**Recommended Measures to Further Reduce Impacts**
Air Quality	
Projected population/emissions are consistent with adopted County Clean Air Plan	*RM AQ-1 – Programs to support electric vehicles and low-emission vehicles and equipment*
Short-term emissions during construction	*No additional measures beyond existing City policies and proposed Plan Santa Barbara measures*
Residential development location within the commercial core - impacts from mixed use	*No additional measures*
Biological Resources	
Development impact on creek water quality	*RM B-2 – Riparian habitat protection, and RM Hydr-1 for flood hazards further address water quality*
Impacts of future development on coastal habitats and species	*RM B-3 Coastal habitat restoration*
Impacts of development on urban forest and individual specimen trees	*RM B-4 urban tree protection*
Geological Conditions	
Seismic hazards ((fault rupture, groundshaking, liquefaction, tsunami)	*No additional measures identified*

Class 3 Less than Significant Impacts (cont.)	Recommended Measures
Geological Conditions (cont.)	
Geologic and soil instability (slope failure, expansive soils, erosion, radon).	*No additional measures identified*
Hazards	
Accident risks associated with aircraft, transportation corridors, electromagnetic fields (EMF)	*Recommended measure RM Hz-1 to continue EMF prudent avoidance policy for development near transmission lines and monitor scientific study*
Hazardous materials associated with contaminated sites and commercial/ industrial facilities	*RM Hz-2 vapor barrier study for development near sites with past contamination*
Wildland fires, emergency response and adequacy of roads and water systems.	*RM Hz-3 water system improvements and private water supplies for fire fighting*
Heritage Resources	
Development effects on archaeological resources	*No additional measures identified*
Development effects on paleontological resources	*No additional measures identified*
Hydrology and Water Quality	
Development effects associated with flood hazards and storm water run-off effects	*No additional measures identified*
Effects on creek and groundwater quality	*Recommended measures RM Hydr-1 considerations for establishing creek setbacks*
Effects on coastal and marine water quality	*RM Hydr-2 measures to improve water quality at area beaches, including pharmaceutical waste education and collection, restoration measures for channels and habitat; and watershed action plans*
Noise	
Increased airport noise impacts	*No additional measures identified*
Noise guideline change	*No additional measures identified*
Noise effects from mixed use development	*Recommended measure RM N-1 to require more detailed noise assessments for propose special, conditional, and institutional uses that may create nuisance noise affecting residential neighborhoods.*
Construction noise effects	*No additional measures identified*
Open Space and Visual Resources	
Effects of development on gradual loss of important scenic views of waterfront, hillsides, and in commercial core areas	*Recommended measure RM V-1 additional policies for protection of scenic views*
Gradual change to community visual character	*RM V-2 additional policies for protecting community character pertaining to design standards, design overlays, building size, bulk, and scale, form-based codes, development monitoring, and preserving community character*
Lighting and glare effects	*RV V-3 policies on open space night sky*

Class 3 Less than Significant Impacts (cont.)	Recommended Measures
Public Services	
Police services	*No additional measures identified*
Fire protection services	*No additional measures identified*
Parks and recreation services	*Recommended measure RM PS-1 additional policies for provision of parks*
School services	*RM PS-2 additional policies language on schools as part of Sustainable Neighborhood Plans*
Public Utilities	
Water supply	*Recommended measure RM PU-1 measures for consideration as part of updating long-term water supply program*
Wastewater	*No additional measures identified*
Power and communications utilities	*No additional measures identified*
Transportation	
Reduced per capita vehicle commute trips from PlanSB policies and MMs (Class 4 beneficial impact)	*RM SE-2 policies to promote businesses that serve lower income and ethnic minority populations*
ADDITIONAL ENVIRONMENTAL ANALYSIS	
Energy	
Transportation fuel consumption	*Recommended measure RM E-1 fuel reduction objective and gas tax for reduction of trip generation and reduced fuel consumption*
Energy consumption in buildings	*RME-2 building green, solar, lighting, and heating measures, and community energy program to promote energy conservation*
Global Climate Change	
Greenhouse gas emissions from buildings	*Recommended measures identified under Climate Change and Energy items abov*
Jobs/Housing Balance	
Job growth and housing availability	*Recommended measures RM P-1 additional policies addressing growth monitoring, growth pacing; job creation, regional coordination on affordable housing, City affordable housing locations, student/faculty housing, and incentives for affordable housing pertaining to streamlining of permitting process, and pursuing legislation to extend redevelopment funding*
Socioeconomic Issues	
Environmental hazards	*Recommended measures RM SE-1 interior noise reduction home improvement program*
Economic development and housing availability	*RM SE-2 policies to promote businesses that serve lower income and ethnic minority populations.*
Community resources and public services	*RM SE-2 policies to promote businesses that serve lower income and ethnic minority populations*
Participation in community planning	*No additional measures identified*

Table 22.2: Summary of Comparative Impacts

Project *Plan Santa Barbara*	No Project Existing Policies Alternative	Lower Growth Alternative	Additional Housing Alternative
Air Quality: Population growth would be consistent with the adopted Clean Air Plan, a less than significant impact. Exposure of residents of new residential development within 500 feet of U.S. Hwy 101 to potentially harmful emissions would be a potentially significant impact. Mitigation would include implementation of vigorous trip reduction measures to slow traffic growth, restrictions on new development within 500 feet of U.S Hwy 101 for 5 years until new State regulations implemented and installation of trees and soundwalls would reduce this to less than significant (Class 2).	**Air Quality:** Incrementally greater construction and operational emissions than under *Plan Santa Barbara.* Population growth would continue to be consistent with the adopted Clean Air Plan resulting in a less than significant impact. Similar to *Plan Santa Barbara,* a potentially significant impact would result from the siting of residential development within 500 feet of U.S. Hwy 101. Reduction of this impact would require similar mitigation measures as for *Plan Santa Barbara.*	**Air Quality:** Incrementally lower construction and operational emissions than under *Plan Santa Barbara.* Population growth would continue to be consistent with the adopted Clean Air Plan resulting in a less than significant impact. Similar to *Plan Santa Barbara,* a potentially significant impact would result from the siting of residential development within 500 feet of U.S. Hwy 101. Reduction of this impact would require similar mitigation measures as for *Plan Santa Barbara.*	**Air Quality:** Somewhat greater construction emissions as compared to *Plan Santa Barbara,* but substantially lower operational emissions. Population growth would continue to be consistent with the adopted Clean Air Plan resulting in a less than significant impact. Similar to *Plan Santa Barbara,* a potentially significant impact would result from the siting of residential development within 500 feet of U.S. Hwy 101. Reduction of this impact would require similar mitigation measures as for *Plan Santa Barbara.*
Biological Resources: Potentially significant impacts of growth to upland, coastal and riparian habitats/wetlands: loss/fragmentation of coastal sage scrub, oak woodlands, grasslands, chaparral and riparian communities and supported species, particularly in the foothills, Las Positas Valley and other open areas. Increased noise and light, changes in water quantity or quality and increased sedimentation, pollutant inputs and water quality degradation could also impact habitats and species. Existing Federal, State, and City biological protection regulations would lessen impacts as would proposed *Plan Santa Barbara* policies to protect open space, improve habitat protection and enhance restore creeks.	**Biological Resources:** Development could incrementally increase in the Las Positas Valley and foothills, causing potentially greater impacts than *Plan Santa Barbara* to upland habitat and could also degrade creeks, coastal habitats and affect special status species. Existing Federal, State, and City biological protection regulations would lessen impacts as would proposed *Plan Santa Barbara* policies to protect open space, improve habitat protection and enhance restore creeks.	**Biological Resources:** Lower levels of growth could reduce impacts to biological resources. However, less emphasis in-fill development could force development outward to less developed lands and incrementally increase in the Las Positas Valley and foothills, causing potentially greater impacts than *Plan Santa Barbara* to upland habitat and could also degrade creeks, coastal habitats and affect special status species. Existing Federal, State, and City biological protection regulations would lessen impacts as would proposed *Plan Santa Barbara* policies to protect open space, improve habitat protection and enhance restore creeks.	**Biological Resources:** Increased densities Downtown could impact specimen trees. Pressure to develop additional housing could force development outward to less developed lands and incrementally increase in the Las Positas Valley and foothills, causing potentially greater impacts than *Plan Santa Barbara* to upland habitat and could also degrade creeks, coastal habitats and affect special status species. Impacts to outlying habitats could be somewhat greater than anticipated under *Plan Santa Barbara* policies. Existing Federal, State, and City biological protection regulations would lessen impacts as would proposed *Plan Santa Barbara* policies to protect open space, improve habitat protection and enhance restore creeks.

Table 22.2: Summary of Comparative Impacts (Continued)

Project *Plan Santa Barbara*	No Project Existing Policies Alternative	Lower Growth Alternative	Additional Housing Alternative
With mitigation measures to identify and protect larger important contiguous habitats, implement, creek restoration programs, increase extent of natural channels and woodlands, increase creek setbacks (Class 2). Impacts to the other resources (e.g. coastal bluff habitats and specimen trees) would be less than significant (Class 3).			
Geological Conditions: Impacts to new development from most geological hazards (e.g., earthquakes, constrained soils, landslides) would be less than significant with existing and proposed policies (Class 3). Structures near the coastal bluff edge could be damaged or destruction the ext 20 years due to bluff erosion; secondary impacts could result from construction of shoreline armoring to protect existing structures. Mitigation measures to update Seismic Safety and Safety Element bluff retreat policies and preparation of a Shoreline Management Plan element of the proposed Climate Action Plan would be mitigate potential impact (Class 2).	**Geological Conditions:** Similar to *Plan Santa Barbara*, impacts to new development from most geological hazards would be less than significant. Incrementally increased development in the Las Positas Valley or foothills could be exposed to potential landslides/erosion hazards, but would be addressed by existing policies. Coastal development would be exposed to bluff erosion and lack of an Adaptive Management Program and Climate Action Plan could increase impacts and secondary pressure for coastal armoring. Reduction of bluff retreat impacts would require similar mitigation measures as for *Plan Santa Barbara*.	**Geological Conditions:** Impacts to new development from most geological hazards would be less than significant; lower population growth would expose fewer future residents to such hazards. Incremental increases in housing development in the Las Positas Valley or foothills could slightly increase erosion and landslide hazards potential compared to *Plan Santa Barbara*, but would be reduced to less than significant through application of existing policies. Reduction of bluff retreat impacts would require similar mitigation measures as for *Plan Santa Barbara*.	**Geological Conditions:** Impacts to new development from most geological hazards would be less than significant; higher population growth would expose substantially more future residents to such hazards. Intensified housing construction in the Las Positas Valley or foothills could increase the potential for landslides and erosion could increase, but would be mitigated by existing policies. Reduction of bluff retreat impacts would require similar mitigation measures as for *Plan Santa Barbara*.
Hazards: Hazards associated with accident risks from aircraft, transportation corridors and high-voltage transmission lines would be less than significant with existing policies and programs (Class 3). Potential exposure to hazardous materials from mixing of commercial/industrial and residential development would be reduced to less than significant by existing regulations and	**Hazards:** Potential transportation related accident risk hazards would be similar to *Plan Santa Barbara*. Potential increases in illicit disposal of hazardous waste would be expected to be less than significant, similar to *Plan Santa Barbara*. Incrementally greater development in High Fire Hazard Area foothills would be exposed to wildfire hazards; impacts	**Hazards:** Potential transportation related accident risk hazards would be slightly lower than *Plan Santa Barbara*. Impacts of mixing of commercial/industrial and residential development would be lower than *Plan Santa Barbara*. Impacts of illicit disposal of household hazardous wastes to landfill and/or illegal dumping would be lower than	**Hazards:** Potential transportation related accident risk hazards would be somewhat greater than *Plan Santa Barbara* due to higher population. Impacts of mixing of commercial/industrial and residential development would be substantially greeter than under *Plan Santa Barbara*, but existing regulations would reduce to less than significant.

Table 22.2: Summary of Comparative Impacts (Continued)

Project *Plan Santa Barbara*	No Project Existing Policies Alternative	Lower Growth Alternative	Additional Housing Alternative
procedures (Class 3), Increased illicit disposal of household hazardous wastes to landfill and/or illegal dumping could be reduced to less than significant through development of an additional household hazardous waste facility (Class 2). Existing and proposed fire prevention and response policies would reduce imapcts of limited potential growth in High Fire Hazard Areas from wildland fires to less than signficant (Class 3).	would remain similar to, or slightly more severe than under *Plan Santa Barbara.*	*Plan Santa Barbara.* Incremental increases in development in High Fire Hazard Area foothills could expose more residents to wildfire hazards; impacts would be similar or somewhat more severe than under *Plan Santa Barbara.*	Increased development in High Fire Hazard Area foothills could expose more residents to wildfire hazards; impacts would be more severe than under *Plan Santa Barbara,* but existing regulations would reduce to less than significant.
Heritage Resources: Impacts of new development on subsurface archaeological remains would be less than significant with existing and proposed policies that ensure protection of such resources (Class 3). Development of large new multiple story buildings in El Pueblo Viejo and Brinkerhoff Avenue Landmark Districts and other areas could alter historic character of area and damage or destroy structures, creating potentially impacts to heritage resources, including landmark districts and historic structures. Existing policies and those proposed in *Plan Santa Barbara* to protect heritage resources and preserve historic buildings would substantially reduce, but not eliminate impacts. Adoption of new form-based codes and the use of density and design controls (e.g., floor-to-area ratios) to restrict development size and scale in sensitive areas and open space and visual resource mitigation for community character would reduce this impact to less	**Heritage Resources:** Potential impacts to subsurface archaeological remains would be similar to *Plan Santa Barbara.* Without *Plan Santa Barbara*'s improved design and heritage resource policies, impacts to historic structures and districts would be more severe than under *Plan Santa Barbara.* Mitigation measures similar to *Plan Santa Barbara* improved design policies and proposed new mitigation measures reduce to less than significant.	**Heritage Resources:** Potential impacts to subsurface archaeological remains would be somewhat less than under *Plan Santa Barbara.* Reductions in the amount of development in historic districts combined with lower maximum building heights and densities would decrease impacts to historic structures and districts. Mitigation measures similar to *Plan Santa Barbara* improved design policies and proposed new mitigation measures reduce to less than significant.	**Heritage Resources:** Potential impacts to subsurface archaeological remains would be somewhat greater than under *Plan Santa Barbara,* but would be reduced to less than significant by existing policies. Substantial increases in the amount of development and the number of new multiple story buildings in historic districts would make impacts to historic structures and districts more severe. Application of *Plan Santa Barbara* improved design policies and proposed new mitigation measures would reduce to less than significant.

Table 22.2: Summary of Comparative Impacts (Continued)

Project *Plan Santa Barbara*	No Project Existing Policies Alternative	Lower Growth Alternative	Additional Housing Alternative
than significant (Class 2).			
Hydrology and Water Quality: Impacts of new development in floodplains and adjacent to creeks would be less than significant with existing measures and proposed policies to update floodplain maps and increase creek setbacks (Class 3). Potential impacts to surface and groundwater quality from future development would be less than significant with existing regulations, policies, and programs, and proposed *Plan Santa Barbara* measures (Class 3). Incremental increases in treated wastewater discharge would not impact the quality of offshore waters with existing regulations and proposed *Plan Santa Barbara* policies (Class 3). Potential impacts to ocean water quality from increases in runoff and pollutants from new development would be less than significant with application of existing City policies and regulation combined with *Plan Santa Barbara* programs to protect water quality (Class 3).	**Hydrology and Water Quality:** Potential impacts of new development in floodplains would be similar to, but slightly more severe than *Plan Santa Barbara,* due to the absence of new policies. Potential impacts to surface, groundwater and ocean water quality from future development would be similar to, but slightly more sever than *Plan Santa Barbara,* due to the absence of new policies. Incremental increases in treated wastewater discharge would result in impacts similar to *Plan Santa Barbara.* Incrementally more development in the Las Positas Valley and foothills could potentially result in greater sediment input into the Arroyo Burro, Cieneguitas, and Atascadero creeks watersheds, which would be mitigated by existing policies.	**Hydrology and Water Quality:** Potential impacts of new development in floodplains and next to creeks would be similar to but slightly less severe than *Plan Santa Barbara,* due to less development. Potential impacts to surface, groundwater and ocean water quality from future development would be less than *Plan Santa Barbara,* due to less development. Incremental increases in treated wastewater discharge would be less than *Plan Santa Barbara,* with similar impacts. Incrementally more development in the Las Positas Valley and foothills could potentially result in greater sediment input into the Arroyo Burro, Cieneguitas, and Atascadero creeks watersheds, which would be mitigated by existing and proposed policies.	**Hydrology and Water Quality:** Potential impacts of new development in floodplains and next to creeks would be similar to but more severe than *Plan Santa Barbara,* due to substantially higher levels of development; existing and proposed policies would mitigate any increase in impacts. Potential impacts to surface, groundwater and ocean water quality from future development would incrementally greater than under *Plan Santa Barbara,* due to substantially more development existing and proposed policies would mitigate any increase in impacts. Incremental increases in treated wastewater discharge would be greater than *Plan Santa Barbara,* with similar impacts. Increased development in outlying areas such the Las Positas Valley and foothills could result in greater sediment input into the Arroyo Burro, Cieneguitas, and Atascadero creeks watersheds, which would be mitigated by existing and proposed policies.
Noise: Incremental increases in roadway traffic noise of 60, 65 dBA or greater by the year 2030 would adversely affect existing residences. These gradual changes in noise levels would be imperceptible, but could exceed interior noise standards and would be potentially significant. Vehicle trip reduction mitigation measures to reduce traffic volumes, installation of soundwalls and retrofit of affected older structures would reduce this impact to less than significant (Class 2)	**Noise:** Impacts from increases in roadway noise would be similar to but slightly more severe than under *Plan Santa Barbara.* Existing exterior noise standards would remain unchanged and no impact would occur. Construction noise impacts would be similar to *Plan Santa Barbara.* Noise impacts of mixing residential and commercial uses and entertainment district noise issues would be similar to	**Noise** Impacts from increases in roadway noise would be similar to but slightly less severe than under *Plan Santa Barbara* due to lower traffic volumes. Existing exterior noise standards would remain unchanged and no impact would occur. Construction noise impacts would be slightly less than under *Plan Santa Barbara.* Noise impacts of mixing residential and commercial uses and entertainment	**Noise:** Impacts from increases in roadway noise would be substantially lower than under *Plan Santa Barbara* due dramatically lower traffic volumes. Impacts from amending exterior noise standards would be similar to *Plan Santa Barbara.* Construction noise impacts would be incrementally greater than under *Plan Santa Barbara* due to increased residential construction activity. Noise impacts of mixing residential and

Table 22.2: Summary of Comparative Impacts (Continued)

Project *Plan Santa Barbara*	No Project Existing Policies Alternative	Lower Growth Alternative	Additional Housing Alternative
Proposed amendments to residential noise guideline to permit 65 dBA CNEL in exterior spaces would not adversely affect interior noise levels and provide acceptable outdoor noise environment (Class 3). Construction noise would be reduced to less than significant by existing policies (Class 3) Increased residential uses near commercial uses and/or hotel uses within the entertainment district would be exposed to nuisance noise (Class 3). Periodic special events or the siting of new non-residential facilities in neighborhoods could create nuisance level peak noise that would not exceed standards; City's existing CUP process and Noise Ordinance would minimize nuisance noise (Class 3).	*Plan Santa Barbara.* Special event or siting of non residential uses in neighborhood noise impacts would be similar to *Plan Santa Barbara.*	district noise issues would be less than under *Plan Santa Barbara.* Special event or siting of non residential uses in neighborhood noise impacts would be similar to *Plan Santa Barbara.*	commercial uses and entertainment district noise issues would be greater than under *Plan Santa Barbara,* but mitigated by existing policies. Special event or siting of non residential uses in neighborhood noise impacts would be similar to *Plan Santa Barbara.*
Open Space and Visual Resources: Potentially significant impacts of growth: loss/fragmentation of open space (e.g., foothills, Las Positas Valley); gradual change in downtown character; potential obstruction of hillside/mountain scenic views. Impacts are lessened with proposed *Plan Santa Barbara* policies to protect open space, improve building design, maintain community character, and preserve key views. With mitigation measures to protect important contiguous open space and stronger provisions for area-specific guidance on building design with form-based codes and floor area ratios, impacts to open space, community character, and scenic views would be less than	**Open Space and Visual Resources:** Potentially significant effects from growth on loss/fragmentation of open space (e.g., foothills, Las Positas Valley). Fewer policy protections result in larger buildings, and substantially greater changes in downtown character, and greater obstruction of scenic views of the ridges and hillsides. Existing policies do not mitigate impacts. Potentially significant open space, community character, and view impacts, greater than under *Plan Santa Barbara.* Impacts to open space, community character, and views could be reduced to less than significant levels by application of *Plan Santa Barbara* policies and mitigation measures.	**Open Space and Visual Resources:** Potentially significant impacts of growth to loss/fragmentation of open space (e.g., foothills/Las Positas Valley). Without policies directing growth to core, could be pressure to develop more outlying areas to meet housing demand. Policies with stronger height limits and design policies result in less change in downtown character and more limited obstruction of scenic views of the ridges and hillsides. Potentially significant open space impacts, similar to *Plan Santa Barbara.* Less than significant impacts to community character and views, less than *Plan Santa Barbara.* Open space impacts could be reduced	**Open Space and Visual Resources:** Potentially significant impacts to loss/fragmentation of open space in foothills/Las Positas Valley. More development in outlying areas to meet housing demand. Greater changes in downtown character and obstruction of scenic views of the ridges and hillsides. Potentially significant impacts to open space and community character, similar to *Plan Santa Barbara.* Potentially significant impacts to views, greater than *Plan Santa Barbara.* Impacts to open space, community character, and views could be reduced to less than significant levels by application of *Plan Santa Barbara* and mitigation measures.

Table 22.2: Summary of Comparative Impacts (Continued)

Project *Plan Santa Barbara*	No Project Existing Policies Alternative	Lower Growth Alternative	Additional Housing Alternative
significant (Class 2).		to less than significant level with *Plan Santa Barbara* policies and mitigation measures.	
Public Services: Increased population could incrementally increase demand for police and fire protection services. Existing City policies and proposed *Plan Santa Barbara* objectives would address (Class 3). Population growth would increase demand for parks, Waterfront and recreation services; existing City programs and proposed policies to create park and open space standards and new parks would reduce impacts to less than significant (Class 3). Increased school enrollment growth would be less than significant as excess school capacity is available and existing and proposed policies would address demand (Class 3).	**Public Services:** Impacts from increased demand for police and fire services would be similar to *Plan Santa Barbara.* Impacts from increased demand for parks, Waterfront and recreational services would be similar to *Plan Santa Barbara.* Impacts from increased school enrollment growth would be similar to *Plan Santa Barbara.*	**Public Services:** Impacts from increased demand for police and fire services would be less than *Plan Santa Barbara.* Impacts from increased demand for parks, Waterfront and recreational services would be less than *Plan Santa Barbara,* although new mixed use downtown development would not be required to provide community benefits parks as under *Plan Santa Barbara.* Impacts from increased school enrollment growth would be less than *Plan Santa Barbara.*	**Public Services:** Impacts from increased demand for police and fire services would be greater than *Plan Santa Barbara,* but would be addressed by existing policies and programs. Impacts from increased demand for parks, Waterfront and recreational services would be, but would be addressed by existing policies and programs. Impacts from increased school enrollment growth would be greater than *Plan Santa Barbara,* but would be addressed by existing policies and programs.
Public Utilities: Increases in water demand (791 AFY) would be well within the capacity of the City's long term supplies in average years and demand could be met during a 5 year drought by existing supplies inc combination with approved reserve supplies such as the Desalination Facility; impacts would be less than significant (Class 3). Increases in wastewater flows (0.55 MGD) would be within system capacities and impacts would be less than significant (Class 3). Increased generation of solid waste would incrementally contribute to the Tajiguas Landfill reaching capacity and	**Public Utilities:** Increases in water demand (829 AFY) would be slightly greater than under *Plan Santa Barbara,* but with similar impacts. Increased sewage flows (0.58 MGD) would be slightly greater than under *Plan Santa Barbara,* but well within system capacities. Potentially significant solid waste impact slightly greater than *Plan Santa Barbara,* but reduced to less than significant by application of *Plan Santa Barbara* mitigation measures.	**Public Utilities:** Increases in water demand (510 AFY) would be less than under *Plan Santa Barbara,* but with lower impacts. Increased sewage flows (0.36 MGD) would be less than under *Plan Santa Barbara* and well within system capacities. Decreased generation of solid waste would remain potentially significant similar to *Plan Santa Barbara,* but reduced to less than significant by application of *Plan Santa Barbara* mitigation measures.	**Public Utilities:** Increases in water demand (958 AFY) would be greater than under *Plan Santa Barbara,* but less than significant as regular and drought year supplies would remain adequate. Increased sewage flows (0.67 MGD) would be greater than under *Plan Santa Barbara,* but well within system capacities. Increased generation of solid waste would be greater and remain potentially significant similar to *Plan Santa Barbara,* but reduced to less than significant by application of *Plan Santa Barbara* mitigation measures.

Table 22.2: Summary of Comparative Impacts (Continued)

Project *Plan Santa Barbara*	No Project Existing Policies Alternative	Lower Growth Alternative	Additional Housing Alternative
this facility would close by 2023, creating potentially significant impacts. With mitigation measures to reduce waste generation and establish additional waste-to-energy and/or landfill capacity, solid waste impacts less than significant (Class 2).			
Transportation: Projected citywide increases in traffic volumes of an average of 16% would create potentially significant impacts by increasing congestion on some area roads and at 21 key intersections beyond the City's adopted threshold of LOS C (0.77 volume to capacity ratio [v/c]), with 15 of these intersections experiencing slight to moderately severe congestion (LOS C/D) and 6 becoming severely congested at level of service (LOS) E-F at the PM peak hour. Impacts would be lessened but not avoid by existing and proposed policies. Vigorous trip reduction mitigation measures (e.g. parking and transportation demand management, transit passes, safe routes to schools) could substantially reduce congestion at most but not all impacted intersections (Class 1). Development under *Plan Santa Barbara* would contribute trips to US Hwy 101 and SR 154 where traffic volumes are anticipated to increase by approximately 14%, contributing to potentially cumulatively considerable impacts to these facilities associated with declines in LOS due to regional traffic growth. Trip reduction mitigation measures (e.g. parking and transportation demand management, transit passes, safe routes to	**Transportation:** Projected citywide increases in traffic volumes of an average of 17% would result incrementally greater increases in congestion at 27 impacted intersections, with 12 operating at LOS C/D and 10 at LOS E or F during the PM peak hour. Application of trip reduction mitigation measures could substantially reduce congestion at most but not all intersections. Increased congestion at a number of intersections would remain significant. Higher levels of traffic growth would contribute to incrementally greater congestion on US Hwy 101 and SR 154 with impacts similar but slightly greater than *Plan Santa Barbara*. Higher levels of traffic growth would contribute incrementally greater congestion at regional area intersections with impacts similar to but slightly greater than *Plan Santa Barbara*.	**Transportation:** Although development would be substantially lower, lack of trip reduction measures would contribute to projected citywide increases in traffic volumes of an average of 12% would result in similar increases in congestion at 19 impacted intersections, with 11 operating at LOS C/D and 7 at LOS E or F during the PM peak hour.. Application of vigorous trip reduction mitigation measures could substantially reduce congestion at most but not all intersections. Increased congestion at a number of intersections would remain significant. Traffic growth would contribute incrementally to congestion on US Hwy 101 and SR 154 with impacts similar to but slightly less than *Plan Santa Barbara*. Traffic growth would contribute incrementally greater congestion at regional area intersections with impacts similar to but slightly less than *Plan Santa Barbara*.	**Transportation:** Substantially greater residential and less non-residential growth combined with vigorous trip reduction measures would substantially decrease projected citywide increases in traffic volumes to an average of 4%, limiting increases in congestion to 14 impacted intersections, with 9 operating at LOS C/D and 4 at LOS E or F during the PM peak hour. While increased congestion would remain significant, impacts would be substantially reduced. Traffic growth would contribute incrementally to congestion on US Hwy 101 and SR 154 with impacts substantially less than *Plan Santa Barbara*. Traffic growth would contribute incrementally greater congestion at regional area intersections with impacts substantially less than *Plan Santa Barbara*.

Table 22.2: Summary of Comparative Impacts (Continued)

Project *Plan Santa Barbara*	No Project Existing Policies Alternative	Lower Growth Alternative	Additional Housing Alternative
schools) could substantially reduce the City's contribution to such congestion and the Deficiency Plan for US Hwy 101 and Phase 3 Safety Improvements for SR 154 would reduce such impacts to less than substantial. Development under *Plan Santa Barbara* and at the City Airport would incrementally contribute to projected potentially significant congestion at intersections in the City of Goleta and County. Adopted measures in the City of Goleta General Plan, Goleta Transportation Improvement Plan would reduce contribution to impacts to less than considerable.			
ADDITIONAL ENVIRONMENTAL ANALYSIS			
Project ***Plan Santa Barbara***	**No Project Existing Policies Alternative**	**Lower Growth Alternative**	**Additional Housing Alternative**
Energy: Projected increase of 11.1% in electricity consumption, 8.8% increase in natural gas consumption, and a 29.8% increase in transportation fuel consumption. The combination of existing standards and proposed *Plan Santa Barbara* policies combined with mitigation measures to reduce vehicle trip generation through improved TDM programs and parking management policies would offset much of the potential increase in energy consumption.	**Energy:** Overall energy consumption slightly higher than under *Plan Santa Barbara*, with an 12% increase in electricity consumption, and 9.6% increase in natural gas consumption, and an 31.3% increase in transportation fuel consumption. Existing energy standards and similar mitigation as described for *Plan Santa Barbara* would offset much of this potential increase.	**Energy:** Overall energy consumption somewhat lower than under *Plan Santa Barbara*, with an 6.1% increase in electricity consumption, and 5.3% increase in natural gas consumption, and an 22.2% increase in transportation fuel consumption. Existing energy standards and similar mitigation as described for *Plan Santa Barbara* would offset much of this potential increase.	**Energy:** Overall energy consumption substantially lower than under *Plan Santa Barbara*, with an 8.2% increase in electricity consumption, an 8.6% increase in natural gas consumption, and a 10.3% increase in transportation fuel consumption. Existing energy standards and similar mitigation as described for *Plan Santa Barbara* would offset much of this potential increase.
Global Climate Change: Projected increases in development could result in a 21.1% increase in GHG emissions from existing. This would come from two primary sources, buildings (27,671 metric tons CO2e) and transportation (238,410 metric tons CO2e).	**Global Climate Change:** Projected increases in development could result in a 23.0% increase in GHG emissions from existing, 2.0% greater than forecast under *Plan Santa Barbara*. This would come from two primary sources, buildings (30,243 metric tons CO2e)	**Global Climate Change:** Projected increases in development could result in a 15.5% increase in GHG emissions from existing, but would be 4.0% less than forecast under *Plan Santa Barbara*. This would come from two primary sources, buildings (15,025 metric tons	**Global Climate Change:** Projected increases in development could result in a 6.1% increase in GHG emissions from existing, but would be 12.4% less than forecast under *Plan Santa Barbara*. This would come from two primary sources, buildings (22,753 metric tons

Table 22.2: Summary of Comparative Impacts (Continued)

Project *Plan Santa Barbara*	No Project Existing Policies Alternative	Lower Growth Alternative	Additional Housing Alternative
In order to offset this increase in GHG emissions, aggressive mitigation measures to reduce vehicle trip generation through improved TDM programs and parking management policies would be required. However, GHG emissions would still be increased beyond estimated 1990 levels and would be inconsistent with AB 32 directives, as significant impact. Increased population would place added demand on potentially limited water supplies. Greater population could expose more people to climate-change induced increases in hazards such as coastal inundation, wildfire and sea cliff erosion.	and transportation (270,498 metric tons CO2e). Similar to *Plan Santa Barbara*, even with aggressive mitigation measures GHG emissions would still be increased beyond estimated 1990 levels and would be inconsistent with AB 32 directives. Population increase would be similar to *Plan Santa Barbara*, so use of climate change-impacted resources and exposure to hazards would also be similar.	CO2e) and transportation (187,901 metric tons CO2e). Similar to *Plan Santa Barbara*, even with aggressive mitigation measures GHG emissions would still be increased beyond estimated 1990 levels and would be inconsistent with AB 32 directives. Population increase would be substantially lower than *Plan Santa Barbara*, so use of climate change-impacted resources and exposure to hazards would also be somewhat reduced, although exposure of existing homes, businesses and facilities would remain similar to *Plan Santa Barbara*.	CO2e) and transportation (49,290 metric tons CO2e). This alternative would come close to meeting AB 32 objectives, but would remain significant. Substantially greater population growth as compared to *Plan Santa Barbara* would expose more people to potential climate change-related hazards such as coastal flooding, and would create added demand for potentially more limited water resources, although exposure of existing homes, businesses and facilities would remain similar to *Plan Santa Barbara*.
Socioeconomic Issues: *Plan Santa Barbara* policies could generally benefits lower-income populations from additional affordable housing opportunities; however, demolition of older affordable homes would continue and the affordable housing supply would not meet citywide or regional needs. Development could displace existing neighborhood-serving commercial uses, or limit future development of such uses. However, *Plan Santa Barbara* policies would emphasize retention and development of neighborhood-serving commercial and public facility resources. Increased pollutant emissions and roadway noise resulting from increases in traffic levels could disproportionately affect low-income and minority populations. Mitigation to reduce vehicle trips and consider installation of sound walls and other barriers could offset this effect.	**Socioeconomic Issues:** Production of affordable housing would decline with more severe effects on lower-income households. Development could displace existing neighborhood-serving commercial uses, or limit future development, similar to or slightly more severe than *Plan Santa Barbara*. Increased pollutant emissions and roadway noise resulting from increases in traffic levels would be greater than *Plan Santa Barbara*.	**Socioeconomic Issues:** Decreased housing production and a steep decline in provision of affordable housing would create more severe impact to low income households than *Plan Santa Barbara*. Decreased development could displace fewer existing neighborhood-serving commercial uses with impacts less than *Plan Santa Barbara*. Increased pollutant emissions and roadway noise resulting from increases in traffic levels would be less than *Plan Santa Barbara*.	**Socioeconomic Issues:** Substantially increased housing production and improved provision of affordable housing would create substantially less severe impact to low income households than *Plan Santa Barbara*. Substantially increased development could displace more existing neighborhood-serving commercial uses with impacts greater than *Plan Santa Barbara*. Increased pollutant emissions and roadway noise resulting from increases in traffic levels would be substantially less than *Plan Santa Barbara*.

Table 22.2: Summary of Comparative Impacts (Continued)

Project *Plan Santa Barbara*	No Project Existing Policies Alternative	Lower Growth Alternative	Additional Housing Alternative
Population and Jobs/Housing Balance: Job and housing growth would remain in balance. However, affordable housing production could likely decline and citywide new workforce demand for 2,977 affordable units could vastly exceed feasible affordable housing production. Imbalance between jobs/affordable housing would substantially worsen. *Plan Santa Barbara* policies to restrict commercial growth and increase housing production would partially address these issues. However, the loss of Redevelopment Agency funding for housing would be difficult to offset. Recommended policy measures to increase regional cooperation on affordable housing construction, provision of new funding sources, permit facilitation, and policy changes to favor affordable housing would partially offset severe shortfall in affordable housing.	**Population and Jobs/Housing Balance:** Jobs/housing balance would incrementally worsen due to higher nonresidential growth. Production of affordable housing would decline more steeply due to fewer policy incentives/requirements for affordable housing production less emphasis while demand would increase to 3,375 new affordable units, an amount far beyond like production. Application of recommended policy measures identified for *Plan Santa Barbara* would offset some of this imbalance, but it would remain substantial, greater than *Plan Santa Barbara*.	**Population and Jobs/Housing Balance:** Limited nonresidential growth would improve the jobs/housing balance. Production of affordable housing would decline steeply due to fewer policy incentives/requirements for affordable housing production and lower densities. However, less nonresidential growth would reduce new workforce demand for 1,062 new affordable units which would still exceed feasible affordable housing production. Application of recommended policy measures identified for *Plan Santa Barbara* would potentially offset some of these identified imbalances, but they would remain substantial, similar to *Plan Santa Barbara*.	**Population and Jobs/Housing Balance:** Substantially higher residential growth combined with less nonresidential growth would substantially improve the jobs/housing balance. Production of affordable housing improve due to stronger policy incentives/requirements for affordable housing production and higher. If affordable housing production matched historic levels of 30%, the approximately 1300 units produced would exceed new workforce demand for 1,062 new affordable units, improving the jobs/affordable housing balance.
Other CEQA Sections: Future growth under the *Plan Santa Barbara* General Plan update would result in the ongoing irreversible commitment of energy, water, and land/habitat resources to support new urban development. Additional vehicle travel would utilize limited roadway capacity, and waste generation would utilize limited landfill capacity. An increased commitment of social services and public maintenance services (e.g., transportation, police, fire, schools, parks, water, wastewater, and solid waste services) would also be required.	**Other CEQA Sections:** Incrementally greater irreversible commitment of energy resources, water, human resources, natural resources/land due to increased commercial development as compared to *Plan Santa Barbara*. Incrementally greater use of roadway capacity, landfill capacity, and social services and public maintenance services.	**Other CEQA Sections:** Lower irreversible commitment of energy resources, human resources, land, and natural resources due to decreased development as compared to *Plan Santa Barbara*. Incrementally less use of roadway capacity, and substantially less use of landfill capacity, social services and public maintenance services.	**Other CEQA Sections:** Substantially greater irreversible commitment of energy resources, human resources, and land/natural resources due to increased development as compared to *Plan Santa Barbara*. Substantially less use of roadway capacity, but substantially greater use of landfill capacity, social services and public maintenance services.

PLAN SANTA BARBARA - POLICY OPTION DECISION MATRIX

Key Issues	No Project	PlanSB	Lower Growth	Additional Housing
Growth Management (Non-Residential)	2.3 mil sq ft	2.0 mil sq ft	1.0 mil sq ft	1.0 mil sq ft
Growth Management Regulation Tools	Measure E findings extended 3 years	New Measure E findings & Adaptive Management Program	New Measure E findings	New Measure E findings & Adaptive Management Program
Residential Density (Highest Standard)	15-27 du/acre	27-34 du/acre	15-27 du/acre	27-60 du/acre
Unit Size	No limit	Smaller units	Smaller units	Smaller units
Building Size, Bulk, Scale & Height	Status Quo	Smaller Buildings	Smallest buildings	Status Quo
Affordable Housing Priority (2015 = no RDA)	15 - 27 du/acre 15% Inclusionary	27 - 34 du/acre 15-25% Inclusionary 50% Rental Overlay Consider 2nd Units	15 - 27 du/acre 15% Inclusionary	27 - 60 du/acre 40% Inclusionary 50% Rental Overlay More 2nd Units
Targeted Growth	Existing R3, R4 & Commercial zones	Smaller High Density districts adjacent to transit & commercial	Lower densities in EPV (downtown) & CP Zones	Smaller High Density districts adjacent to transit & commercial
New Transportation Programs	Circ Element implem. Limited alt transportation	Stronger Circ. Element implem. Expand alt transportation	Circ. Element implem. Limited alt transportation	Strong Trans. Demand Mngmt. Strong alt transportation Parking pricing
Environmental Protection Programs	Conserv. Element, LCP, CAP, etc. Energy conservation & green building	New habitat & restoration policies Expand energy conservation & green building	New habitat & restoration policies Expand energy conservation & green building	New habitat & restoration policies Expand energy conservation & green building

Name_____

Date_____

EXHIBIT E