



**ADDENDUM TO
2011 GENERAL PLAN PROGRAM ENVIRONMENTAL IMPACT REPORT
(SCH 2009011031)
FOR THE 2015-2023 HOUSING ELEMENT UPDATE
October 14, 2014**

This Addendum to the certified Program Environmental Impact Report (EIR) for the 2011 General Plan, including the 2011 Housing Element, is prepared in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15164. An Addendum to a previous EIR may be prepared if only minor changes or additions are necessary to make the prior document adequate for the current project, and the changes involve no new significant impacts.

This EIR Addendum documents CEQA environmental impact analysis for the 2015 Housing Element update. The 2015 Housing Element Update would amend the City of Santa Barbara General Plan and replace the existing Housing Element, which was adopted in 2011.

State law requires all jurisdictions in Santa Barbara County to update their housing elements for the 2015-2023 planning period. The 2015 Housing Element includes new demographic and housing needs data, revised analysis of resources and constraints, and updated policies and implementation programs to reflect prior accomplishments and current circumstances. No changes are proposed in land use plans, housing policies, or development regulations that would raise new environmental issues or significant impacts that were not previously analyzed in the 2011 Program EIR certified for the General Plan. The Housing Element update reflects existing land use plans and regulations and would not approve any new development.

EIR ADDENDUM PROCEDURES

This EIR Addendum is prepared in accordance with State CEQA Guidelines Sections 15168 (Program EIR), 15162 (Subsequent EIRs), and 15164 (Addendum to an EIR).

Section 15168 provides that a Program EIR may be prepared on a series of actions characterized as one large project, such as a citywide General Plan update. This allows for a comprehensive consideration of policies and effects, and avoids later duplicative environmental analysis. When subsequent implementing actions are undertaken, the activities may be approved as within the scope of the Plan covered by the Program EIR when no new significant effects would occur. Section 15162 identifies criteria requiring a subsequent EIR when project or implementing actions would involve new significant impacts not identified in the prior Program EIR.

Section 15164 provides that an Addendum to a previous EIR may be prepared to document changes that make the prior EIR adequate for the current project when the changes do not involve new significant impacts or substantial increases in previously identified impacts.

The CEQA Guidelines provide that an EIR Addendum need not be circulated for public review, but is attached to the EIR. The decision-making body (City Council) considers the Addendum together with the certified EIR in making a decision on the project.

PRIOR ENVIRONMENTAL DOCUMENT

The Program Environmental Impact Report (EIR) for the 2011 General Plan update was certified by the Planning Commission in September 2010 and by City Council in December 2011. The General Plan Program EIR evaluated citywide effects on the environment from incremental growth to the year 2030 under General Plan policies and programs. The General Plan contemplates growth by the year 2030 of up to 1.5 million square feet of net additional commercial and other non-residential development and up to 2,800 additional housing units.

Class 1 Impacts

The EIR analysis identified significant traffic and climate change impacts that could not be fully mitigated (Class 1 impacts) from General Plan policies and citywide incremental growth to the year 2030. An increase from 13 to 20-26 roadway intersections at 77% or greater volume-to-capacity ratio was identified. Citywide greenhouse gas emissions were projected as increasing and therefore potentially not meeting State AB 32 emission reduction targets for 2020 and then-undefined SB 375 regional targets.

The EIR also identified that these traffic and climate change impacts could potentially be substantially reduced with implementation of a robust expansion of transportation demand management measures including parking pricing. These mitigation measures were included in the General Plan but City Council found that providing an upfront commitment as to the extent and method and timing of implementation was not feasible. As such, full mitigation credit was not given for the purpose of CEQA impact analysis. In adopting the General Plan, the City Council adopted findings of overriding consideration that the benefits of the Plan outweighed these potential significant impacts, thereby finding these impacts to be acceptable.

An Addendum to the FEIR (6-18-2012) for the City Climate Action Plan documented further analysis of climate change demonstrating that impacts associated with citywide greenhouse gas emissions would be less than significant.

Class 2 Impacts

The EIR analysis identified the following potentially significant impacts that could be mitigated to less than significant levels (Class 2 impacts): air quality (*diesel emissions*); biological resources (*upland and creek/riparian habitats and species*); geological conditions (*sea cliff retreat*); heritage resources (*effects of development on historic resources*); hydrology (*extended range sea level rise*); noise (*transportation noise*); open space (*loss or fragmentation of open space*); public utilities (*solid waste management*); and transportation (*intersections with roadway improvement mitigation; roadway corridor congestion*).

Identified mitigation measures associated with these impacts were incorporated into the General Plan as policies and programs.

Class 3 Impacts

The EIR analysis concluded that with policies and programs already in place, the following other impacts would be less than significant (Class 3 impacts): air quality (*consistency with Clean Air Plan for air quality standards; construction emissions*); biological resources (*grasslands; coastal resources; individual specimen trees*); geological conditions (*seismic, geologic, soil hazards*); hazards (*accident risks, wildfire; hazardous materials*); heritage resources (*archeological and paleontological resources*); hydrology and water quality (*development in floodplains and near creeks; storm water runoff; water quality of creeks, groundwater, coastal and marine water*); noise (*noise guidelines; mixed use nuisance noise; construction noise*); open space and visual resources (*scenic views; community character; lighting*); public services (*police; fire protection; parks and recreation; schools*); public utilities (*water supply, wastewater treatment*); transportation (*reduction in per capita vehicle commute trips - Class 4 beneficial*).

Additional Environmental Analysis

The EIR also included detailed analysis of impacts associated with energy, climate change (both greenhouse gas emissions contributing to climate change, and climate change effects on the City), population and jobs/housing balance, and socioeconomic issues.

CHANGES IN ENVIRONMENTAL CIRCUMSTANCES

No substantial changes in environmental circumstances on the ground have occurred since the December 2011 General Plan adoption and Program EIR certification.

A small amount of development has occurred, mostly redevelopment and small addition projects, with associated incremental changes in the physical environment. Net new development citywide occurring in the period January 2012 through June 2014 is estimated at 369 net additional housing units, and 12,315 net additional square feet of nonresidential development,

The City is currently in the midst of a multi-year drought condition, which was identified in the EIR as a periodically occurring circumstance. Gradual changes to traffic conditions have occurred, as was forecasted in the EIR.

No changes to relevant Federal or State environmental regulations or guidelines have occurred. The Program EIR addressed climate change issues and greenhouse gas generation consistent with State regulations evolving in recent years.

In June 2014, the City updated its traffic impact significance thresholds used in the CEQA environmental review of development projects. The thresholds maintain the same standard for

defining an impacted intersection (intersection volume-to-capacity ratio of more than 0.77 level of service during peak travel times). In recognition of City General Plan land use and traffic management policies, the thresholds were updated to relate significant project impacts to intersections identified in the Program EIR as already impacted or forecasted to become impacted by the year 2030 due to citywide growth under the General Plan. No change to the Program EIR analysis of citywide traffic impacts of the General Plan results from this CEQA threshold change.

The State of California dissolved Redevelopment Agencies, resulting in the loss of some sources of housing development subsidies.

The Regional Housing Needs Assessment (RHNA) adopted by the Santa Barbara County Association of Governments (SBCAG) on August 15, 2013 identifies a total housing need of 11,030 units for Santa Barbara County as a whole and 4,099 units for the City of Santa Barbara during the 2014-2022 projection period. This represents a reduction from the 2008 assessments for 2007-2014 on which the 2011 City Housing Element was based (11,600 units for County and 4,388 units for City). The 2015 Housing Element reflects a reduction in housing need to 4,099 units, based upon the slower pace of forecasted growth due to the effects of the economic recession. This reduced level of growth could result in a corresponding reduction in associated environmental impacts as compared to the assumptions contained in the General Plan EIR, or impacts identified in the EIR could occur over a longer period.

CURRENT PROJECT DESCRIPTION, IMPACTS AND MITIGATION

The General Plan is the primary planning policy document for the City. The Housing Element analyzes current and future housing needs and describes the City's strategies and policies to address those needs. The last update to the Housing Element was adopted in 2011. Senate Bill 375 of 2008 established new requirements for updating Housing Elements on an eight-year cycle concurrent with every other update to the Regional Transportation Plan. The 2015-2023 planning period is referred to as the fifth Housing Element cycle in reference to the five required updates since the comprehensive revision to state housing element law in 1980.

Changes in the 2015 Housing Element

Summarized below are the major components of the 2015 Housing Element along with the proposed changes in each section.

- Evaluation of progress in implementing the prior Housing Element

This section describes the City's progress in implementing the policies and programs described in the 2011 Housing Element, and it supersedes the evaluation contained in the 2011 Housing Element. No changes are proposed in this section that would result in substantial changes to development patterns or environmental impacts analyzed in the previous EIR.

- Housing needs assessment

This section incorporates more recent data from the U.S. Census Bureau and other sources regarding the characteristics of the City's population, households, employment and housing stock. An important component of this section analyzes future housing needs for the 2015-2023 planning period based on the 2013 RHNA adopted by SBCAG (see discussion above). The City's projected housing need has decreased from 4,388 units in the prior planning period to 4,099 units in the 2015-2023 period. No changes are proposed in this section that would result in substantial changes to development patterns or environmental impacts analyzed in the previous EIR.

- Analysis of potential constraints to housing

This section has been updated to reflect changes related to governmental constraints (such as revisions to City zoning regulations adopted after the prior Housing Element was prepared and the availability of infrastructure) and non-governmental constraints (such as the cost of land and construction). No changes are proposed in this section that would result in substantial changes to development patterns or environmental impacts analyzed in the previous EIR.

- Analysis of potential sites for housing development

This section analyzes the capacity for housing development based on a parcel-specific inventory of sites where residential development could occur. The analysis is based on existing General Plan land use policy and zoning regulations. No changes are proposed in this section that would result in substantial changes to development patterns or environmental impacts analyzed in the previous EIR.

- Goals, policies and 8-year work program

This section describes the City's goals and policies related to housing, and presents an 8-year work program to address those goals and policies. No changes to the City's goals are proposed. Many of the policies and programs reflect the City's ongoing commitment to facilitate development of housing for low- and moderate-income persons, and housing for persons with disabilities or other special needs. Refinements to policies and programs are proposed to reflect the reduction in funding resulting from the 2012 statewide dissolution of redevelopment agencies (e.g., discontinuation of some types of housing rehabilitation loans), and the elimination of programs that were completed in the prior planning period (e.g., adoption of emergency shelter regulations, and Average Unit Size Density regulations). No changes to land use plans or regulations are proposed that would result in substantial changes to development patterns or environmental impacts analyzed in the previous EIR.

In summary, the 2015 Housing Element includes updated information related to housing needs, constraints and land resources, as well as minor refinements to policies and programs to reflect completed programs and changed circumstances. Many Housing Element programs are intended to facilitate fair housing and development of housing that is affordable and accessible to persons with disabilities or other special needs. New housing development is anticipated consistent with

current City land use plans and regulations, but at a somewhat slower pace than was assumed in the prior Housing Element due to the lingering effects of the recession and loss of some sources of housing subsidies.

No changes from impact significance classifications identified in the 2011 General Plan Program EIR (i.e., Class 1, 2, or 3 impacts) would result from the updated information, policies and programs contained in the 2015 Housing Element Amendment. No new mitigation measures are required or proposed.

CEQA FINDING

Based on the Addendum review of the 2015 Housing Element, in accordance with State CEQA Guidelines Section 15612, no Subsequent Negative Declaration or Environmental Impact Report is required for the project because the project setting, description, impacts, and mitigations do not involve new significant impacts or a substantial increase in the severity of impacts previously identified in the final General Plan Program EIR.

This Addendum, together with the certified General Plan Program EIR, constitutes adequate environmental documentation in compliance with CEQA for the 2015 Housing Element Amendment.

Prepared by: John Douglas, J. H. Douglas & Associates **Date:** October 14, 2014

Reviewed by  **Date:** October 15, 2014
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