

TO: SANTA BARBARA COUNTY ASSOCIATION OF GOVERNMENTS
FROM: MICHAEL BECKER, DIRECTOR OF PLANNING
DATE: August 11, 2021
SUBJECT: CEQA-Required Findings and Statement of Overriding Considerations for the Connected 2050 Regional Transportation Plan-Sustainable Communities Strategy; State Clearinghouse No. 2020120233

I. PROJECT DESCRIPTION

The original RTP was adopted by SBCAG in 1975 and the latest RTP/SCS was adopted in 2013 and updated in 2017. Connected 2050 reflects changes in legislative requirements, local land use policies, and resource constraints.

The RTP/SCS plans how the Santa Barbara County region will meet its transportation needs for the 30-year period from 2020 to 2050, considering existing and projected future land use patterns as well as forecast population and job growth. The RTP/SCS plans for and programs the approximately \$11.3 billion in revenues expected to be available to the region from all transportation funding sources over the course of the planning period. It identifies and prioritizes expenditures of this anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle and pedestrian, as well as transportation demand management measures and intelligent transportation systems.

The RTP/SCS is based on a preferred land use and transportation scenario which lays out a pattern of future growth and transportation system investment for the region emphasizing a transit-oriented development and an urban infill approach to land use and housing, located near existing high quality transportation corridors. Accordingly, population and employment growth is allocated principally within existing urban areas near public transit. Allocation of future growth directly addresses jobs-housing balance issues by emphasizing job growth and economic opportunity in the North County and housing growth in the South County.

The preferred scenario consists of three core, inter-related components:

1. A land use plan, including residential densities and building intensities sufficient to accommodate projected population, household and employment growth;
2. A multi-modal transportation network to serve the region's transportation needs; and
3. A "regional greenprint" cataloguing open space, habitat, and farmland as constraints to urban development.

The plan identifies transportation system needs consistent with the preferred scenario and includes comprehensive lists of programmed and planned transportation investments that are intended to meet performance goals for mobility, safety, congestion relief, system preservation and

environmental protection. In addition to its other components, the preferred scenario also includes an enhanced transit strategy that creates a framework for future transit service expansion at such time as new revenue sources become available. Recognizing the uncertain nature of future new revenue sources, it takes a targeted, balanced and flexible approach to expanding transit service as needed in the future. The enhanced transit strategy commits to transit service expansion as new revenue sources become available, (1) identifying when transit enhancements are actually needed through quantitative triggers, and (2) protecting existing funding for competing local demands, such as street and road maintenance. The enhanced transit strategy is a strategy for the future. It does not change the list of fiscally constrained, programmed and planned transportation projects.

The plan is organized into six chapters:

1. **Executive Summary.** Includes an overview of Connected 2050, the preferred scenario and its performance, an explanation of the planning process, and the allocation of transportation funding.
2. **A Vision for the Region: Connecting Communities.** Discusses legal authority, the overall purpose of Connected 2050, and transportation-related issues and challenges faced by the region. In addition, describes existing transportation infrastructure and needs for all modes of transportation. This chapter discusses the goals, objectives, and policies guiding Connected 2050, as well as the performance measures used to gauge its performance.
3. **Sustainable Communities Strategy (SCS).** Describes the alternative scenarios studied, existing land uses, forecast population growth, housing needs, economic and employment conditions, greenhouse gas emissions, and details the preferred scenario and its performance.
4. **Social Equity – Title VI and Environmental Justice.** Identifies communities of minority and low-income populations to ensure these communities are not negatively impacted by future transportation projects and provide benefits to all socioeconomic groups.
5. **Financial Element.** Describes how Connected 2050 allocates and applies existing and new sources of revenue, and fiscal constraints.
6. **Action Element.** Describes programmed and planned transportation projects, the enhanced transit strategy, and illustrative projects.

Of these six chapters of Connected 2050, the Sustainable Communities Strategy, Policy Element, and the Action Element (Chapters 2, 3, and 6) are the three that include provisions with the potential to create physical changes to the environment and are the primary focus for analysis in the Draft EIR.

II. THE RECORD

The Santa Barbara County Association of Governments (SBCAG) is the custodian of the documents and other material which constitute the record of the proceedings upon which its decision is based. The SBCAG offices are located at 260 N. San Antonio Road, Suite B, Santa Barbara, CA 93110. The documents can also be found on their website at: <http://www.sbcag.org/2021-rtp.html>.

For the purposes of CEQA and the Findings IV-V, the record of the Santa Barbara County Association of Governments (SBCAG) relating to the plan includes:

1. The Connected 2050 Regional Transportation Plan-Sustainable Communities Strategy Draft EIR (2020) and Responses to Comments (2021).

2. The Connected 2050 Regional Transportation Plan-Sustainable Communities Strategy Final EIR (2021).
3. The Connected 2050 Regional Transportation Plan-Sustainable Communities Strategy document.
4. Matters of common knowledge to SBCAG, which it considers, such as:
 - a. The Santa Barbara County Comprehensive Plan, including the land use maps and elements thereof;
 - b. The text of the Land Use Element;
 - c. General Plans of all eight cities in Santa Barbara County;
 - d. The California Environmental Quality Act (CEQA) and the CEQA Guidelines;
 - e. The Santa Barbara County Air Pollution Control District’s Ozone Plan;
 - f. Other formally adopted County, State and federal regulations, statutes, policies, and ordinances;
 - g. Additional documents referenced in the Draft EIR for Connected 2050 Regional Transportation Plan-Sustainable Communities Strategy.

III. CERTIFICATION OF THE FINAL PROGRAMATIC ENVIRONMENTAL IMPACT REPORT

The Santa Barbara County Association of Governments (SBCAG) certifies the following with respect to the Connected 2050 Regional Transportation Plan-Sustainable Communities Strategy (Connected 2050) Final EIR:

- A. SBCAG has reviewed and considered the Connected 2050 Draft EIR and Final EIR.
- B. The Final Environmental Impact Report for the Connected 2050 Regional Transportation Plan-Sustainable Communities Strategy has been completed in compliance with the California Environmental Quality Act.
- C. The Final Environmental Impact Report, and all related public comments and responses have been presented to SBCAG, and they have reviewed and considered the information contained in the Final Environmental Impact Report prior to approving Connected 2050.
- D. The Connected 2050 Final EIR reflects the independent judgment of SBCAG, acting as the lead agency for the project.

IV. FINDINGS FOR IMPACTS IDENTIFIED AS LESS THAN SIGNIFICANT

The findings below are for less than significant impacts. Less than significant impacts are impacts that may be adverse, but do not exceed the threshold levels and does not require mitigation measures.

A. Air Quality

1. **Impact AQ-1.** Implementation of Connected 2050 would result in an overall reduction of on-road vehicle emissions when compared to existing conditions and the future “No Project” scenario. Therefore, long-term operational impacts would be *less than significant*.
 - a. **Mitigation** – No mitigation is required.

- b. **Findings** – The operational impacts of the Connected 2050 on the attainment of state and federal air quality standards are less than significant.
 - c. **Supportive Evidence** - Please refer to pages 4.2-12 through 4.2-12 of the Draft EIR, incorporated herein by reference.
2. **Impact AQ-3.** Implementation of Connected 2050 would result in an overall reduction of on-road vehicle emissions when compared to baseline conditions and the 2050 “No Project” Scenario. Therefore, long-term operational impacts would be *less than significant*.
- a. **Mitigation** – No mitigation is required.
 - b. **Findings** – The operational impacts of Connected 2050 would contribute to a reduction of air pollutant emissions.
 - c. **Supportive Evidence** - Please refer to pages 4.2-15 through 4.2-17 of the Draft EIR, incorporated herein by reference.
- B. Biology**
1. **Impact BIO-4.** Implementation of transportation improvements and the and the land use scenario envisioned by Connected 2050 would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy. Therefore, impacts would be *less than significant*.
- a. **Mitigation** – No mitigation is required.
 - b. **Findings** –Implementation of Connected 2050 projects under the future land use scenario as well as proposed transportation projects would not conflict with local policies or ordinances protecting biological resources.
 - c. **Supportive Evidence** – Please refer to page 4.3-40 through 4.3-41 of the Draft EIR, incorporated herein by reference.
- C. Cultural Resources**
1. **Impact CR-3.** Construction activity associated with transportation improvement projects and the land use development envisioned by implementation of Connected 2050 may result in disturbance to human remains throughout the SBCAG region. Potential impacts to human remains would be less than significant.
- a. **Mitigation**– No mitigation is required.
 - b. **Findings** – Adherence to existing regulations would reduce impacts to less than significant levels.
 - c. **Supportive Evidence** – Please refer to page 4.4-15 through 4.4-16 of the Draft EIR, incorporated herein by reference.
- D. Energy**
1. **Impact E-1.** Future transportation improvement projects and implementation of the land use scenario envisioned by Connected 2050 not result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be *less than significant*.

- a. **Mitigation**– No mitigation is required.
 - b. **Findings** – Impacts would be less than significant. Implementation would not result in wasteful or inefficient energy consumption in the region.
 - c. **Supportive Evidence** – Please refer to pages 4.5-11 through 4.5-13 of the Draft EIR, incorporated herein by reference.
2. **Impact E-2.** Connected 2050 would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This impact would be *less than significant*.
- a. **Mitigation** – No mitigation is required.
 - b. **Findings** – Impacts would be less than significant. Implementation would comply with state/local plans for renewable energy or energy efficiency.
 - c. **Supportive Evidence** – Please refer to pages 4.5-13 through 4.5-15 of the Draft EIR, incorporated herein by reference.

E. Environmental Justice

1. **Impact EJ-1.** Implementation of Connected 2050 would not lead to disproportionately high and adverse human health or environmental impacts to the minority populations, low-income populations, low community engagement populations and/or populations with low mobility in the SBCAG region. Impacts would be *less than significant impact*.
- a. **Mitigation** – No mitigation is required.
 - b. **Findings** – Programmed and planned projects proposed in Connected 2050 would not disproportionately expose minority populations, low-income population or low-mobility populations to adverse environmental impacts. Impacts would be less than significant.
 - c. **Supportive Evidence** - Please refer to page 4.6-17 through 4.6-19 of the Draft EIR, incorporated herein by reference.
2. **Impact EJ-2.** The mobility benefits derived from Connected 2050, in terms of travel times and accessibility by transit, and/or single-occupancy vehicles, would not be substantially less for minority populations, low-income populations, low community engagement populations, and/or populations with low mobility in the SBCAG region. Impact would be *less than significant*.
- a. **Mitigation** – No mitigation is required.
 - b. **Findings** – By improving mobility for minority populations and communities of concerns, as well as non-minority populations, impacts would be considered less than significant.
 - c. **Supportive Evidence** - Please refer to page 4.6-19 through 4.6-20 of the Draft EIR, incorporated herein by reference.

F. Geology and Soils

1. **Impact GEO-2.** Grading associated with transportation improvements and future projects included in land use scenario envisioned in Connected 2050 could cause soil erosion and loss of top soil. However, compliance with applicable regulations would ensure that impacts would remain *less than significant*.

- a. **Mitigation** – No mitigation is required.
- b. **Findings** – Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant effects of grading on the environment to a less than significant level.
- c. **Supportive Evidence** – Please refer to page 4.7-18 through 4.7-19 of the Draft EIR, incorporated herein by reference.

G. Greenhouse Gas Emissions

- 1. **Impact GHG-2.** Implementation of Connected 2050 would not result in a significant increase in total GHG emissions mobile and land use sources compared to 2020 conditions. Impacts would be *less than significant*.
 - a. **Mitigation** – No mitigation is required.
 - b. **Findings** – Connected 2050 would result in a net-decrease in overall transportation-related emissions in the County and the plan would not generate GHG emissions that may have a significant impact on the environment, such as sea level rise, increased magnitude of wildfires, or increased incidence of extreme heat days.
 - c. **Supporting Evidence** – Please refer to page 4.8-18 of the Draft EIR, incorporated herein by reference.

H. Hydrology and Water Quality

- 1. **Impact HYD-1.** Implementation of proposed transportation improvements and future projects included in the land use scenario envisioned in Connected 2050 could result in substantial eroded sediments and contaminants in runoff, as well as changes in drainage patterns which could degrade surface and ground water quality. However, compliance with Federal, State and local regulations would reduce impacts to water quality to *less than significant levels*.
 - a. **Mitigation** – No mitigation is required.
 - b. **Findings** – Development under Connected 2050 would not substantially degrade water quality or violate water quality standards because compliance with state regulation such as NPDES and MS4 permits would require implementation of BMPs and development to reduce discharge of runoff and maintain water quality. In addition, local ordinances require measures such as erosion control reduce the discharge of pollutants into storm drain systems.
 - c. **Supportive Evidence** – Please refer to page 4.9-13 through 4.9-15 of the Draft EIR, incorporated herein by reference.
- 2. **Impact HYD-3.** Implementation of proposed transportation improvements and future projects included in the land use scenario envisioned in Connected 2050 could incrementally increase stormwater flows and change drainage patterns in the SBCAG region. Impacts would be *less than significant*.
 - a. **Mitigation** – No mitigation is required.

- b. **Findings** – Existing regulations provide adequate analysis of potential impacts and preventative measures to limit or avoid substantial runoff during project construction and operation.
 - c. **Supportive Evidence** – Please refer to page 4.9-18 of the Draft EIR, incorporated herein by reference.
3. **Impact HYD-4.** Implementation of proposed transportation improvements and future projects included in the land use scenario envisioned in Connected 2050 could be subject to flood hazards due to storm events, flooding, and/or dam failure in the SBCAG region. However, adherence to existing regulations would ensure impacts to water quality would be *less than significant*.
- a. **Mitigation** – No mitigation is required.
 - b. **Findings** – Implementation of Connected 2050 would not substantially degrade water quality or violate water quality standards because compliance with state regulations such as NPDES and MS4 permits would require implementation of BMPs and development to reduce discharge of pollutants in runoff and maintain water quality. In addition, local ordinances require measures such as erosion control reduce the discharge of pollutants into storm drain systems. Although individual projects included in the Connected 2050 have the potential to adversely affect water quality at a project-specific level, projects would adhere to existing regulations regarding risks from water quality pollutants.
 - c. **Supportive Evidence** – Please refer to page 4.9-19 through 4.9-20 of the Draft EIR, incorporated herein by reference.

I. Land Use

1. **Impact LU-1.** Implementation of proposed transportation improvements and the land use scenario envisioned by Connected 2050 would not physically divide an established community. This impact would be *less than significant*.
- a. **Mitigation – Mitigation** – No mitigation is required.
 - b. **Findings** – Buildout of the SCS land use scenario would result in more compact development in those established communities. The existing and new road projects contained in Connected 2050 originate from either local circulation plans or state projects supported by individual cities and/or the County. The projects have therefore been coordinated with and integrated into local plans that support and connect communities consistent with state planning law.
 - c. **Supportive Evidence** – Please refer to page 4.10-10 through 4.9-11 of the Draft EIR, incorporated herein by reference.

J. Transportation and Circulation

1. **Impact T-1.** Connected 2050 would generally be consistent with programs, plans, ordinances and policies affecting the circulation system. Impacts would be *less than significant*.
- a. **Mitigation** – No mitigation is required.

- b. **Findings** – Connected 2050 would update and be consistent with existing programs, plans, ordinances and policies affecting the circulation system.
- c. **Supporting Evidence** – Please refer to page 4.12-24 through 4.12-26 of the Draft EIR, incorporated herein by reference.

V. FINDINGS FOR IMPACTS IDENTIFIED AS LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

These impacts are those which are significant but can be reduced to below the significance threshold level with implementation of reasonably available and feasible mitigation measures.

A. Air Quality

- 1. **Impact AQ-5.** Re-entrained dust has the potential to increase airborne PM10 and PM2.5 levels in the SBCAG region. The increase in growth expected through 2050, the horizon year for Connected 2050 and would result in additional vehicle miles traveled compared to baseline conditions, which would add to the particulate emission levels in the area. However, total re-entrained dust levels would be lower with implementation of Connected 2050 than 2020 existing conditions. Implementation of mitigation measure AQ-2(a) and AQ-5 and SBCAPCD control measures would further reduce such emissions. Impacts would be *less than significant with mitigation incorporated.*

a. Mitigation –

AQ-5 Project-Level PM10 Emissions Reduction. Implementing agencies shall evaluate PM10 emissions as part of project-specific CEQA review and discretionary approval decisions for land use projects within the SBCAG region. Where project-level significant impacts are identified, implementing agencies shall identify and implement measures that reduce PM10 emissions below SBCAPCD standards to the extent feasible. PM10 emissions reduction measures may include:

- Require new residential and commercial construction to apply dust suppressants, including water and non-toxic surfactants, and to comply with the maximum feasible dust and emissions control measures recommended by SBCAPCD, to reduce particulate matter emissions from construction areas.
- Require new construction projects to use the newest available (Tier 3 or better) construction equipment, which generate lower emissions of diesel particulate matter when operating.

- b. **Findings** – Projects under Connected 2050 would be required to comply with the fugitive dust control measures as mentioned in Mitigation Measure AQ-2(a) and AQ-5. Compliance would reduce exposure to sensitive receptors to substantial pollutant concentrations due to construction of Connected 2050. Impacts would be less than significant with mitigation incorporated.
- c. **Supportive Evidence** – Please refer to pages 4.2-22 through 4.2-23 of the Draft EIR, incorporated herein by reference.

B. Biological Resources

1. **Impact BIO-1.** Implementation of transportation improvements and the land use scenario envisioned by Connected 2050 may result in impacts to special status plant and animal species either directly or through habitat modifications. Impacts would be *less than significant with mitigation incorporated*.

- a. **Mitigation –**

BIO-1 (a) Biological Resources Screening and Assessment. On a project-by-project basis, a preliminary biological resource screening shall be performed to determine whether the project has any potential to impact biological resources. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a biological resources assessment (BRA) or similar type of study to document the existing biological resources within the project footprint plus an appropriate buffer determined by a qualified biologist and to determine the potential impacts to those resources. The BRA shall evaluate the potential for impacts to all sensitive biological resources including, but not limited to special-status species, nesting birds, wildlife movement, sensitive plant communities/critical habitat and other resources judged to be sensitive by local, state, and/or federal agencies. In addition, the assessment shall document potential modifications to existing infrastructure suitable for wildlife movement (e.g., culvert, underpass). Pending the results of the BRA, design alterations, further technical studies (i.e., protocol surveys) and/or consultations with the USFWS, CDFW and/or other local, state, and federal agencies may be required. The following Mitigation Measures [BIO-1(b) through BIO-1(k)] shall be incorporated, only as applicable, into the BRA for projects where specific resources are present, or may be present, and may be impacted by the project. Note that specific surveys described in the mitigation measures below may be completed as part of the BRA where suitable habitat is present.

BIO-1 (b) Special-status Plant Species Surveys. If the project-specific BRA determines that special-status plant species may occur on-site, surveys for special-status plants shall be completed prior to any vegetation removal, grubbing, or other construction activity within each segment (including staging and mobilization). The surveys shall be floristic in nature and shall be seasonally timed to coincide with the blooming period of the target species identified in the project-specific BRA. All plant surveys shall be conducted by a qualified biologist approved by the implementing agency no more than two years before initial ground disturbance. All special-status plant species identified on-site shall be mapped onto a site-specific aerial photograph and topographic map. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the implementing agency, and the CDFW and/or USFWS, as appropriate, for review and approval.

BIO-1 (c) Special Status Plant Species Avoidance, Minimization, and Mitigation. If State listed or California Rare Plant List 1B species are found during special-status plant surveys [pursuant to Mitigation Measure BIO-1(b)], then the project shall be re-designed to avoid impacting these plant species, if feasible. Rare plant occurrences that are not within the immediate disturbance footprint, but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm.

BIO-1 (d) Restoration and Monitoring. If special-status plants species cannot be avoided and will be impacted by a project implemented under Connected 2050, all impacts shall be mitigated at a minimum ratio of 2:1 (number of acres/individuals restored to number of acres/individuals impacted) for each species as a component of habitat restoration. A restoration plan shall be prepared and submitted to the jurisdiction overseeing the project for approval (e.g., if a state listed plant species will be impacted, the restoration plan shall be submitted to the CDFW for approval). The restoration plan shall include, at a minimum, the following components:

- Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type)
- Goal(s) of the compensatory mitigation project [type(s) and area(s) of habitat to be established, restored, enhanced, and/or preserved including specific functions and values of habitat type(s) to be established, restored, enhanced, and/or preserved]
- Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values)
- Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan)
- Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule)
- Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports)
- Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type
- An adaptive management program and remedial measures to address any shortcomings in meeting success criteria
- Notification of completion of compensatory mitigation and agency confirmation

- Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism)

BIO-1 (e) Endangered/Threatened Species Habitat Assessment and Protocol Surveys.

Specific habitat assessment and survey protocols are established for several federally and state Endangered or Threatened species. If the results of the BRA determine that suitable habitat may be present then any such species' protocol habitat assessments/surveys shall be completed in accordance with CDFW and/or USFWS protocols prior to issuance of any construction permits. If through consultation with the CDFW and/or USFWS it is determined that protocol habitat assessments/surveys are not required, said consultation shall be documented prior to issuance of any construction permits. Each protocol has different survey and timing requirements, and therefore the applicant(s) for each project shall be responsible for ensuring they understand the protocol requirements.

BIO-1 (f) Endangered/Threatened Species Avoidance and Minimization. The habitat requirements of endangered and threatened species throughout the County are highly variable. The potential impacts from any given project implemented under Connected 2050 are likewise highly variable. However, there are several avoidance and minimization measures that can be applied for a variety of species to reduce the potential for impact, with the final goal of no net loss of the species. Project sponsors shall select appropriate measures, as applicable, from the following measures that may be applied to aquatic and/or terrestrial species:

- Ground disturbance shall be limited to the minimum necessary to complete the project. The project limits of disturbance shall be flagged. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance.
- All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31, if feasible, to avoid impacts to sensitive aquatic species.
- All projects occurring within or adjacent to sensitive habitats that may support federally and/or state Endangered/Threatened species shall have a CDFW and/or USFWS-approved biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for Endangered/Threatened species. Alternatively, and upon approval by CDFW and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are being fully implemented.
- No Endangered/Threatened species shall be captured and relocated without expressed, authorized permission from the CDFW and/or USFWS.
- If at any time during construction of the project an Endangered/Threatened

species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with CDFW and/or USFWS as appropriate.

- For all projects occurring in areas where Endangered/Threatened species may be present and are at risk of entering the project site during construction, exclusion fencing shall be placed along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of 3 feet above grade and 2 feet below grade and shall be attached to wooden stakes placed at intervals of not more than 5 feet. The fence shall be inspected weekly and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.
- All vehicle maintenance/fueling/staging shall occur a minimum of 100 feet away from any riparian habitat or water body. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.
- No equipment shall be permitted to enter wetted portions of any affected drainage channel.
- All equipment operating within streams shall be in good conditions and free of leaks. Spill containment shall be installed under all equipment staged within stream areas and extra spill containment and clean up materials shall be located in close proximity for easy access.
- If project activities could degrade water quality, water quality sampling shall be implemented to identify the pre-project baseline, and to monitor during construction for comparison to the baseline.
- If water is to be diverted around work sites, a diversion plan shall be submitted (depending upon the species that may be present) to the CDFW, RWQCB, USFWS, and/or NMFS for their review and approval prior to the start of any construction activities (including staging and mobilization). If pumps are used, all intakes shall be completely screened with wire mesh not larger than five millimeters to prevent animals from entering the pump system.
- At the end of each work day, excavations shall be secured with cover or a ramp provided to prevent wildlife entrapment.
- All trenches, pipes, culverts or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.
- The CDFW/USFWS-approved biologist shall remove invasive aquatic species such as bullfrogs and crayfish from suitable aquatic habitat whenever observed and shall dispatch them in a humane manner and dispose of properly.

- If any federal and/or state protected species are harmed, the CDFW/USFWS-approved biologist shall document the circumstances that led to harm and shall determine if project activities should cease or be altered in an effort to avoid additional harm to these species. Dead or injured special status species shall be disposed of at the discretion of the CDFW and USFWS. All incidences of harm shall be reported to the CDFW and USFWS within 24 hours.

BIO-1 (g) Non-Listed Special Status Animal Species Avoidance and Minimization.

Several State Species of Special Concern may be impacted by projects implemented under Connected 2050. The ecological requirements and potential for impacts is highly variable among these species. Depending on the species identified in the BRA, several of the measures identified under BIO-1(f) shall be applicable to the project. In addition, measures shall be selected from among the following to reduce the potential for impacts to non-listed special status animal species:

- For non-listed special-status terrestrial amphibians and reptiles, coverboard surveys shall be completed within three months of the start of construction. The coverboards shall be at least four feet by four feet and constructed of untreated plywood placed flat on the ground. The coverboards shall be checked by a qualified biologist once per week for each week after placement up until the start of vegetation removal. All non-listed special status and common animals found under the coverboards shall be captured and placed in five-gallon buckets for transportation to relocation sites. All relocation sites shall be reviewed by the project sponsor and shall consist of suitable habitat. Relocation sites shall be as close to the capture site as possible but far enough away to ensure the animal(s) is not harmed by construction of the project. Relocation shall occur on the same day as capture. CNDDDB Field Survey Forms shall be submitted to the CDFW for all special status animal species observed.
- Pre-construction clearance surveys shall be conducted within 14 days prior to the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 200 foot buffer, if feasible, and shall identify all special status animal species that may occur on-site. All non-listed special status species shall be relocated from the site either through direct capture or through passive exclusion. A report of the pre-construction survey shall be submitted to SBCAG/and or the local jurisdiction for their review and approval prior to the start of construction.
- A qualified biologist shall be present during all initial ground disturbing activities, including vegetation removal, to recover special status animal species unearthed by construction activities.
- Upon completion of the project, a qualified biologist shall prepare a Final Compliance report documenting all compliance activities implemented for the project, including the pre-construction survey results. The report shall be submitted within 30 days of completion of the project.

- If special status bat species may be present and impacted by the project, a qualified biologist shall conduct presence/absence surveys within 30 days prior to the start of construction presence/absence surveys for special status bats in consultation with the CDFW where suitable roosting habitat is present and in consultation with the CDFW. Surveys shall be conducted using acoustic detectors and by searching tree cavities, crevices, and other areas where bats may roost. If active roosts are located, exclusion devices such as netting shall be installed to discourage bats from occupying the site in consultation with the CDFW. If a roost is determined by a qualified biologist to be used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultations with the CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately.

BIO-1 (h) Preconstruction Surveys For Nesting Birds. For any construction activities occurring during the nesting season (generally February 1 to September 15), surveys for nesting birds (covered by the California Fish and Game Code and the Migratory Bird Treaty Act) shall be conducted by a qualified biologist no more than 14 days prior to vegetation removal. The surveys shall include the entire segment disturbance area plus a 200-foot buffer around each project site. If active nests are located, all construction work shall be conducted outside an established buffer area around the nest. The buffer shall be a minimum of 50 feet for non-raptor bird species and at least 150 feet for raptor species, but appropriate buffer size will be determined by a qualified biologist. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed, and young have fledged the nest prior to removal of the buffer. A report of these preconstruction nesting bird surveys shall be submitted to SBCAG and/or the local jurisdiction.

BIO-1 (i) Monarch Butterfly Avoidance and Minimization. Prior to completion of the final design, a qualified biologist shall review the project for the potential to impact monarch butterflies. If known or potential winter roost sites may be impacted, the biologist shall make recommendations to avoid impacts including, but not limited to, relocation/redesign of project features to avoid roost sites, guidance regarding tree removal and trimming at roost sites, and recommendations regarding planting additional roost trees.

Between October 1 and March 1, construction shall not occur within 100 feet of known or potential roost sites, if feasible. If construction must occur during this period, a qualified biologist shall survey known and potential roost sites to

confirm occupancy by monarch butterflies prior to start of any construction within 100 feet. Multiple surveys may be necessary, and the closest known roost sites shall be used as voucher sites to confirm the timing of butterfly arrival. If monarch butterflies are found at a roost site, construction shall not occur within 100 feet of the roost site until the biologist has determined that the butterflies have left the area. The biologist shall visit the voucher sites to confirm that butterflies have left the region.

BIO-1 (j) Worker Environmental Awareness Program (WEAP). Prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend WEAP training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the project area. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of the project. All employees shall sign a form documenting that they have attended the WEAP and understand the information presented to them. The form shall be submitted to SBCAG and/or the local jurisdiction to document compliance.

BIO-1 (k) Tree Protection. If it is determined that construction may impact trees protected by local agencies, the project sponsor shall procure all necessary tree removal permits. A tree protection and replacement plan shall be developed by a certified arborist, as appropriate. The plan shall include, but would not be limited to, an inventory of trees within the construction site, setbacks from trees and protective fencing, restrictions regarding grading and paving near trees, direction regarding pruning and digging within root zone of trees, and requirements for replacement and maintenance of trees. If protected trees will be removed, replacement tree plantings of the same or similar species in accordance with local agency standards, but at a minimum ratio of 2:1 (trees planted to trees impacted), shall be installed on-site or at an approved off-site location, and a restoration and monitoring program shall be developed in accordance with B-1(d) and shall be implemented for a minimum of seven years or until stasis has been determined by certified arborist. If a protected tree will be encroached upon, but not removed, a certified arborist shall be present to oversee all trimming of roots and branches.

- b. Findings** – Changes or alterations have been required in, or incorporated into, the project, in addition to compliance with existing regulations, which avoid or substantially lessen the significant effects on for special status plant and animal species to a less than significant level.
- c. Supportive Evidence** – Please refer to pages 4.3-28 through 4.3-35 of the Draft EIR, incorporated herein by reference.

2. **Impact BIO-2.** Implementation of transportation improvements proposed and the land use scenario envisioned by Connected 2050 may result in impacts to sensitive habitats, including State and federally protected wetlands. This impact would be *less than significant with mitigation incorporated*.

a. **Mitigation -**

BIO-2 (a) Jurisdictional Delineation. If projects implemented under Connected 2050 occur within or adjacent to wetland, drainages, riparian habitats, or other areas that may fall under the jurisdiction of the CDFW, USACE, RWQCB, and/or CCC, a qualified biologist shall complete a jurisdictional delineation. The jurisdictional delineation shall determine the extent of the jurisdiction for each of these agencies and shall be conducted in accordance with the requirement set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the implementing agency, USACE, RWQCB, CDFW, and CCC, as appropriate, for review and approval. If jurisdictional areas are expected to be impacted the RWQCB would require a Waste Discharge Requirements (WDR) permit and/or Section 401 Water Quality Certification (depending upon whether or not the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, a Streambed Alteration Agreement pursuant to Section 1600 et seq. of the California Fish and Game Code would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority a permit pursuant to Section 404 of the Clean Water Act would likely be required. The CCC would also require a coastal development permit for projects falling within their jurisdiction.

BIO-2(b) Wetland and Riparian Habitat Restored. Impacts to jurisdictional wetland and riparian habitat shall be mitigated at a minimum ratio of 2:1 (acres of habitat restored to acres impacted), and shall occur on-site or as close to the impacted habitat as possible. A mitigation and monitoring plan shall be developed by a qualified biologist in accordance with mitigation measure B-1(d) above and shall be implemented for no less than five years after construction of the segment, or until the SBCAG/local jurisdiction and/or the permitting authority (e.g., CDFG or USACE) has determined that restoration has been successful.

BIO-2(c) Landscaping Plan. If landscaping is proposed for a specific project, a qualified biologist/landscape architect shall prepare a landscape plan for that project. This plan shall indicate the locations and species of plants to be installed. Drought tolerant, locally native plant species shall be used. Noxious, invasive, and/or non-native plant species that are recognized on the Federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Lists 1, 2, and 4 shall not be permitted. Species selected for planting shall be similar to those species found in adjacent native habitats.

BIO-2(d) Sensitive Vegetation Community Avoidance and Mitigation. If the results of measure B-1(a) indicates projects implemented under Connected 2050

would impact sensitive vegetation communities, impacts to sensitive communities shall be avoided through final project design modifications.

If the implementing agency determines that sensitive communities cannot be avoided, impacts shall be mitigated on-site or offsite at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist. Temporarily impacted areas shall be restored to pre-project conditions. A Restoration Plan shall be developed by a qualified biologist and submitted to the agency overseeing the project for approval.

BIO-2(e) Invasive Weed Prevention and Management Program. Prior to start of construction for each project, an Invasive Weed Prevention and Management Program shall be developed by a qualified biologist to prevent invasion areas adjacent native habitat by non-native plant species. A list of target species shall be included, along with measures for early detection and eradication.

All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six (6) weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan.

BIO-2(f) Wetlands, Drainages and Riparian Habitat Best Management Practices During Construction. The following best management practices shall be required for development within or adjacent to wetlands, drainages, or riparian habitat:

- Access routes, staging and construction areas shall be limited to the minimum area necessary to achieve the project goal and minimize impacts to other waters including locating access routes and ancillary construction areas outside of jurisdictional areas.
- To control sedimentation during and after project implementation, appropriate erosion control materials shall be deployed to minimize adverse effects on jurisdictional areas in the vicinity of the project.
- Project activities within the jurisdictional areas should occur during the dry season (typically between June 1 and November 1) in any given year, or as otherwise directed by the regulatory agencies.
- During construction, no litter or construction debris shall be placed within jurisdictional areas. All such debris and waste shall be picked up daily and properly disposed of at an appropriate site.
- All project-generated debris, building materials and rubbish shall be removed from jurisdictional areas and from areas where such materials could be washed into them.
- Raw cement, concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to aquatic species resulting from project-related activities,

shall be prevented from contaminating the soil and/or entering wetlands, drainages or riparian habitat.

- All refueling, maintenance and staging of equipment and vehicles shall occur at least 100 feet from bodies of water and in a location where a potential spill would not drain directly toward aquatic habitat (e.g., on a slope that drains away from the water source). Prior to the onset of work activities, a plan must be in place for prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should an accidental spill occur.
- b. Findings** – Changes or alterations have been required in, or incorporated into, the project, in addition to compliance with existing regulations, which avoid or substantially lessen the significant effects on sensitive habitats, including State and federally protected wetlands to a less than significant level.
- c. Supportive Evidence** – Please refer to pages 4.3-35 to 4.3-38 of the Draft EIR, incorporated herein by reference.

C. Geology and Soils

- 1. Impact GEO-1.** Implementation of the proposed transportation improvements and future projects included in the land use scenario envisioned in Connected 2050 would not substantially risk exacerbating seismic hazards, including fault rupture, ground-shaking, liquefaction, and landslides that could be expose people or structures to substantial adverse effects. Connected 2050 projects would be located on potentially unstable soils or in areas of lateral spreading, subsidence, or high liquefaction potential. Impacts would be *less than significant with mitigation incorporated* for projects on unstable soils, in areas with risk of liquefaction, expansive or compressible soils, or landslides.

a. Mitigation –

GEO-1 (a) Geotechnical Analysis. If a Connected 2050 project is located in an area of moderate to high liquefaction, lateral spreading and/or subsidence potential or in underground areas located in an area of high groundwater potential, the implementing agency shall ensure that these structures are designed based upon site specific geology, soils and earthquake engineering studies conducted by a qualified geotechnical expert. Projects shall follow the recommendations of these studies. Possible design measures include, but would not be limited to: deep foundations, removal of liquefiable materials and dewatering.

GEO-1 (b) Hillside Stability Evaluation. If a Connected 2050 project requires cut slopes over 15 feet in height, located on slopes exceeding 20 percent grade, or is located in areas of bedded or jointed bedrock, the implementing agency shall ensure that hillside stability evaluations and/or specific slope stabilization studies are conducted by a qualified geotechnical expert. Projects shall follow the recommendations of these studies. Possible stabilization methods include buttresses, retaining walls and soldier piles.

GEO-1 (c) Paleontological Resources Impact Minimization. Prior to any ground disturbance, the implementing agency of a Connected 2050 project involving ground disturbing activities (including grading, trenching, foundation work and other excavations) within intact (previously-undisturbed) deposits shall retain a qualified paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for Qualified Professional Paleontologist (SVP 2010), to conduct a Paleontological Resources Assessment (PRA). The PRA shall determine the age and paleontological sensitivity of geologic formations underlying the proposed disturbance area, consistent with SVP Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010) guidelines for categorizing paleontological sensitivity of geologic units within a project area. If underlying formations are found to have a high potential (sensitivity) for paleontological resources, the following measures shall apply:

- b. Findings** – Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant effects on the environment related to geology and soils to a less than significant level.
- c. Supportive Evidence** – Please refer to pages 4.7-15 through 4.7-18 of the Draft EIR, incorporated herein by reference.

D. Greenhouse Gas Emissions

1. Impact GHG-1. Construction of the transportation improvement projects and development of future land use patterns envisioned by Connected 2050 would generate temporary short-term GHG emissions that may have a significant impacts on the environment. Impacts would *significant but mitigable*.

a. Mitigation –

GHG-1. Construction GHG Reduction Measures. The implementing agency shall incorporate the most recent GHG reduction measures and/or technologies for reducing diesel particulate and NOX emissions measures for off-road construction vehicles during construction. The measures shall be noted on all construction plans and the implementing agency shall perform periodic site inspections. Current GHG-reducing measures include the following:

- Use of diesel construction equipment meeting CARB's Tier 4 certified engines wherever feasible for off-road heavy-duty diesel engines and comply with the State Off-Road Regulation. Where the use of Tier 4 engines is not feasible, Tier 3 certified engines shall be used; where the use of Tier 3 engines are not feasible, Tier 2 certified engines shall be used;
- Use of on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
- All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the five-minute idling limit;

- Use of electric powered equipment in place of diesel-powered equipment when feasible;
 - Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and
 - Use of alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel, in place of diesel-powered equipment for 15 percent of the fleet;
 - Use of materials sourced from local suppliers; and
 - Recycling of at least 75 percent of construction waste materials.
- b. Findings** – With implementation of the above mitigation, implementing agencies would reduce short-term GHG emissions from individual projects to the maximum extent feasible. Impacts related to GHG emissions associated with construction activity would be less than significant.
- c. Supportive Evidence** – Please refer to pages 4.8-16 through 4.8-18 of the Draft EIR, incorporated herein by reference.

G. Noise

- 1. Impact N-1.** Construction activity associated with transportation improvement projects, and other transit-oriented development envisioned by Connected 2050 would create temporary noise and vibration level increases in discrete locations throughout the SBCAG region. Construction-related noise and vibration impacts would be *less than significant with mitigation incorporated*.

a. Mitigation –

N-1 Construction Noise and Vibration Reduction

- Compliance with local Construction Noise and Vibration Regulations. Project sponsors of Connected 2050 projects shall ensure that, where residences or other noise sensitive uses are located within 800 feet of construction sites without pile driving, appropriate measures shall be implemented to ensure consistency with local noise ordinance requirements relating to construction. Specific techniques may include, but are not limited to, restrictions on construction timing, use of sound blankets on construction equipment, and the use of temporary walls and noise barriers to block and deflect noise.
- Pile Driving. For any project within 3,200 feet of sensitive receptors that requires pilings, the project sponsor shall require caisson drilling or sonic pile driving as opposed to pile driving, where feasible. This shall be accomplished through the placement of conditions on the project during its individual environmental review.
- Construction Equipment Noise and Vibration Control. Project sponsors shall ensure that equipment and trucks used for project construction utilize the best available noise control techniques (including mufflers, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds).

- Impact Equipment Noise Control. Project sponsors shall ensure that impact equipment (e.g., jack hammers, pavement breakers, and rock drills) used for project construction be hydraulically or electrically powered wherever feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatically powered tools is unavoidable, use of an exhaust muffler on the compressed air exhaust can lower noise levels from the exhaust by up to about 10 dBA. When feasible, external jackets on the impact equipment can achieve a reduction of 5 dBA. Whenever feasible, use quieter procedures, such as drilling rather than impact equipment operation.
- Construction Activity Timing Restrictions. The following timing restrictions shall apply to Connected 2050 activities creating noise levels at or above 65 dBA at a nearby dwelling unit, except where timing restrictions are already established in local codes or policies. Construction activities shall be limited to: Monday through Friday: 7 a.m. to 6 p.m. and Saturday: 9 a.m. to 5 p.m.
- Placement of Stationary Noise and Vibration Sources. Locate stationary noise sources as far from sensitive receptors as possible.
- Physical Impacts Due to Vibration. Implementing agencies of Connected 2050 projects utilizing heavy construction equipment shall estimate vibration levels generated by construction activities and use the Caltrans vibration damage potential threshold criteria to screen for and screen out projects as to their potential to damage buildings on site or near a project. (See Table Caltrans Vibration Damage Potential Threshold Criteria, pg.4.11-14 of DPEIR for threshold criteria)
- If construction equipment would generate vibration levels exceeding the threshold criteria, a structural engineer or other appropriate professional shall be retained to ensure vibration levels do not exceed the thresholds during project construction. The structural engineer shall perform the following tasks, at minimum:
 - Review the project's demolition and construction plans
 - Survey the project site and vulnerable buildings, including geological testing, if necessary
 - Prepare and submit a report to the lead agency or other appropriate party containing the following, at minimum:
 - Any information obtained from the surveys identified above
 - Any modifications to the estimated vibration thresholds based on building conditions, soil conditions and planned demolition and construction methods to ensure that vibration levels would remain below levels potentially damaging to vulnerable buildings
 - Specific mitigation measures to be applied during construction to ensure vibration thresholds (or Caltrans guidelines, in lieu of specific limits) are not exceeded, including modeling to demonstrate the ability of mitigation measures to reduce vibration levels below set limits
 - A monitoring plan to be implemented during demolition and

construction that includes post-demolition and post-construction surveys of the vulnerable building(s) and documentation demonstrating that the mitigation measures identified in the report have been applied

- Examples of mitigation that may be applied during demolition or construction include:
 - Prohibiting of certain types of construction equipment
 - Specifying lower-impact methods for demolition and construction, such as sawing concrete during demolition
 - Phasing operations to avoid simultaneous vibration sources
 - Installing vibration measure devices to guide decision-making
 - The implementing agency shall be responsible for implementing all the mitigation measures recommended in the report as detailed in the report's monitoring plan.
- b. Findings** – If a project is located near a sensitive receptor, the project sponsor would ensure that noise and vibration reduction measures are implemented during construction that would reduce noise and vibration levels below local and/or Caltrans standards.
- c. Supportive Evidence** – Please refer to pages 4.11-10 through 4.11-15 of the Draft EIR, incorporated herein by reference.
- 2. Impact N-2.** Implementation of Connected 2050 would increase operation (permanent) noise sources including traffic-generated noise levels on highways and roadways which could expose existing and future sensitive receptors to noise in excess of normally acceptable levels. Impacts would *less than significant with mitigation incorporated*.

a. Mitigation –

N-2 Traffic Noise Reduction

Sponsor agencies of a Connected 2050 projects shall complete detailed noise assessments for projects that may impact noise sensitive receptors using applicable guidelines (e.g., FTA Transit Noise and Vibration Impact Assessment for rail and bus projects and the Caltrans Traffic Noise Analysis Protocol for roadway projects). The project sponsor shall ensure that a noise survey is conducted that, at minimum:

- Determines existing and projected noise levels
- Determines the amount of attenuation needed to reduce potential noise impacts to applicable State and local standards
- Identifies potential alternate alignments that allow greater distance from, or greater buffering of, noise-sensitive areas
- If warranted, recommends methods for mitigating noise impacts, including:
 - Appropriate setbacks
 - Sound attenuating building design, including retrofit of existing structures with sound attenuating building materials
 - Use of sound barriers (earthen berms, sound walls, or some combination of

the two)

Where new or expanded roadways or transit are found to expose receptors to noise exceeding normally acceptable levels, the individual project lead agency shall implement techniques as recommended in the project-specific noise assessments. The preferred methods for mitigating noise impacts will be the use of appropriate setbacks and sound attenuating building design, including retrofit of existing structures with sound attenuating building materials where feasible. In instances where use of these techniques is not feasible, the use of sound barriers (earthen berms, sound walls, or some combination of the two) will be considered. Long expanses of walls or fences should be interrupted with offsets and provided with accents to prevent monotony. Landscape pockets and pedestrian access through walls should be provided. Whenever possible, a combination of elements should be used, including open grade paving, solid fences, walls, and landscaped berms. Determination of appropriate noise attenuation measures will be assessed on a case-by-case basis during a project's individual environmental review pursuant to the regulations of the applicable lead agency.

- b. **Findings** – Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant effects on operational transportation noise impacts to a less than significant level.
 - c. **Supportive Evidence** – Please refer to pages 4.11-15 through 4.11-18 of the Draft EIR, incorporated herein by reference.
3. **Impact N-3.** Connected 2050 would result in new truck, bus, and train traffic that could expose sensitive receptors and fragile buildings to excessive vibration levels. Rail project vibration as result of Connected 2050 would not be excessive. However, roadway vibration impacts as a result of Connected 2050 would be *less than significant with mitigation incorporated*.

a. **Mitigation** –

N-3 Vibration Mitigation for Transportation Projects. Implementing agencies of Connected 2050 projects shall comply with all applicable local vibration and groundborne noise standards, or in the absence of such local standards, comply with guidance provided by the FTA in Transit Noise and Vibration Impact Assessment (FTA 2018) to assess impacts to buildings and sensitive receptors and reduce vibration and groundborne noise. FTA recommended thresholds shall be used except in areas where local standards for groundborne noise and vibration have been established. Methods that can be implemented to reduce vibration and groundborne noise impacts include, but are not limited to:

Bus and Truck Traffic

- Constructing of noise barriers
- Use noise reducing tires and wheel construction on bus wheels
- Use vehicle skirts (i.e., a partial enclosure around each wheel with absorptive treatment) on freight vehicle wheels

- b. **Findings** – Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant effects on expose of sensitive receptors and fragile buildings to excessive vibration levels to a less than significant level.
- c. **Supportive Evidence** – Please refer to pages 4.11-18 through 4.11-19 of the Draft EIR, incorporated herein by reference.

H. Tribal Cultural Resources

1. **Impact TCR-1** Implementation of proposed transportation improvements and future projects included in the land use scenario envisioned by Connected 2050 has the potential to impact Tribal Cultural resources. Impacts would be *less than significant with mitigation incorporated*.

a. Mitigation –

TCR-1 Tribal Cultural Resources Impact Minimization. Implementing agencies shall comply with AB 52, which requires formal tribal consultation. If the implementing agency, through consultation with identified tribes through the AB 52 process, determines that a project may cause a substantial adverse change to a tribal cultural resource, they shall implement mitigation measures identified in the consultation process required under PRC Section 21080.3.2, or shall implement the following measures where feasible to avoid or minimize the project-specific significant adverse impacts:

- Avoidance and preservation of the resources in place, including, but not limited to: planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource
 - Protecting the traditional use of the resource
 - Protecting the confidentiality of the resource
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Native American monitoring by the appropriate tribe for all projects in areas identified as sensitive for potential tribal cultural resources and/or in the vicinity (within 100 feet) of known tribal cultural resources.
- If potential tribal cultural resources are encountered during ground-disturbing activities; work in the immediate area must halt and the appropriate tribal representative(s), the implementing agency, and an archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology (National Park Service [NPS] 1983) shall be contacted immediately to evaluate the find and determine the

proper course of action.

- b. **Findings** – Changes or alterations and above mitigation have been required in, or incorporated into, the project which avoid or substantially lessen the significant effects on Tribal Cultural Resources to a less than significant level with mitigation incorporated.
- c. **Supportive Evidence** – Please refer to pages 4.13-5 through 4.13-7 of the Draft EIR, incorporated herein by reference.

VI. FINDINGS FOR IMPACTS IDENTIFIED AS SIGNIFICANT AND UNAVOIDABLE

The unavoidable significant impacts of the project are found to be acceptable due to overriding considerations (See Section VIII). The findings below are for where implementation of the project may result in the following significant, unavoidable environmental impacts:

A. Aesthetics

- 1. **Impact AES-1.** Development of proposed transportation improvement projects under Connected 2050 would potentially adversely impact scenic resources and obstruct scenic areas from public reviewing areas through site-specific visual obstructions from future land use and transportation projects. Implementation of mitigation measures AES-1(a) through AES-1(e) would reduce impacts to the extent feasible. However, impacts would *remain significant and unavoidable*.

- a. **Mitigation** – The following mitigation measures would reduce project-specific impacts related to aesthetics to the degree feasible.

AES-1 (a) Tree Protection and Replacement. New roadways, extensions and widenings of existing roadways, bridge replacement and enhancements, trails and facility improvement projects shall avoid the removal of existing mature trees to the extent possible consistent with adopted local City and County policies as applicable. The implementing agency of a particular Connected 2050 project shall replace any trees lost at a minimum 2:1 basis and incorporate them into the landscaping design for the roadway when feasible, or as required by local or County requirements. The implementing agency also shall ensure the continued vitality of replaced trees through periodic maintenance (see mitigation measures prescribed in Section 4.3 Biological Resources, Impact B-1).

AES-1 (b) Design Measures for Visual Compatibility. The project sponsor shall require measures that minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Strategies to achieve this include:

- Siting or designing projects to minimize their intrusion into important viewsheds;
- Avoiding large cuts and fills when the visual environment (natural or urban) would be substantially disrupted;
- Ensuring that re-contouring provides a smooth and gradual transition between modified landforms and existing grade;

- Developing transportation systems to be compatible with the surrounding environments (e.g., colors and materials of construction material; scale of improvements);
- Designing and installing landscaping to add natural elements and visual interest to soften hard edges, as well as to restore natural features along corridors where possible after widening, interchange modifications, re-alignment, or construction of ancillary facilities. The implementing agency shall provide a performance security equal to the value of the landscaping/irrigation installation to ensure compliance with landscaping plans; and
- Designing new structures to be compatible in scale, mass, character and architecture with existing structures.

AES-1 (c) Discouragement of Architectural Features that Block Scenic Views.

Project sponsors shall design projects to minimize contrasts in scale and massing between the project and surrounding natural forms and development. Setbacks and acoustical design of adjacent structures shall be preferentially used as mitigation for potential noise impacts arising from increased traffic volumes associated with adjacent land development. The use of sound walls, or any other architectural features that could block views from the scenic highways or other view corridors, shall be discouraged to the extent possible. Where use of sound walls is found to be necessary, walls shall incorporate offsets, accents and landscaping to prevent monotony. In addition, sound walls shall be complementary in color and texture to surrounding natural features.

AES-1 (d) Recontouring for Adjacent Landforms. Where a particular Connected 2050 project affects adjacent landforms, the local jurisdiction in which the project is located shall ensure that recontouring provides a smooth and gradual transition between modified landforms and existing grade to the extent feasible. This requirement can be accomplished through the placement of conditions on the project by the implementing agency during the project specific environmental review.

AES-1 (e) Landscaping for Landform Variation. The local jurisdiction in which a particular project is located shall ensure that associated landscape materials and design enhance landform variation, provide erosion control and blend with the natural setting. This requirement can be accomplished through the placement of conditions on the project by the local jurisdiction during individual environmental review. To ensure compliance with approved landscape plans, the implementing agency shall provide a performance security equal to the value of the landscaping/irrigation installation.

Mitigation measures AES-1(a) through AES-1(e) would also incrementally reduce potential impacts.

following:

- Lighting shall consist of cutoff-type fixtures that cast low-angle illumination to minimize incidental spillover of light into adjacent properties and undeveloped open space. Fixtures that project light upward or horizontally shall not be used.
- Lighting shall be directed away from habitat and open space areas adjacent to the project site.
- Light mountings shall be downcast, and the height of the poles minimized to reduce potential for backscatter into the nighttime sky and incidental spillover of light onto adjacent private properties and undeveloped open space. Light poles will be 20 feet high or shorter. Luminary mountings shall have non-glare finishes.
- Exterior lighting features shall be directed downward and shielded in order to confine light to the boundaries of the subject project. Where more intense lighting is necessary for safety purposes, the design shall include landscaping to block light from sensitive land uses, such as residences.

AES-3 (c) Glare Reduction Measures. Implementing agencies shall minimize and control glare from transportation and infill development projects near glare-sensitive uses through the adoption of project design features such as:

- Planting trees along transportation corridors to reduce glare from the sun;
- Creating tree wells in existing sidewalks;
- Adding trees in new curb extensions and traffic circles;
- Adding trees to public parks and greenways;
- Landscaping off-street parking areas, loading areas, and service areas;
- Limiting the use of reflective materials, such as metal;
- Using non-reflective material, such as paint, vegetative screening, matte finish coatings, and masonry;
- Screening parking areas by using vegetation or trees;
- Using low-reflective glass; and
- Complying with applicable general plan policies, municipal code regulations, city or local controls related to glare
- Tree species planted to comply with this measure shall provide substantial shade cover when mature. Utilities shall be installed underground along these routes wherever feasible to allow trees to grow and provide shade without need for severe pruning.

b. Findings – Implementation of the above mitigation measures would reduce project-specific impacts to the extent feasible. However, it cannot be guaranteed that all future project-level impacts related to light and glare can be mitigated. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.

c. Supportive Evidence – Please refer to pages 4.1-10 through 4.1-12 of the Draft EIR, incorporated herein by reference.

B. Air Quality

1. **Impact AQ-2.** Construction activities associated with the future transportation improvement projects and implementation of the land use scenario envisioned by Connected 2050 would create fugitive dust and ozone precursor emissions and could violate air quality standards, contribute to existing or projected air quality violations, or result in a cumulatively considerable new increases in PM₁₀ or Ozone precursor emissions. Therefore, impacts would *remain significant and unavoidable*.

a. **Mitigation** – The following mitigation measures would reduce project-specific impacts related to aesthetics to the degree feasible.

AQ-2 (a) Application of SBCAPCD Feasible Mitigation Measures. For all projects, the implementing agency shall incorporate the most recent SBCAPCD feasible mitigation measures and/or technologies for reducing inhalable particles based on analysis of individual sites and project circumstances. Current SBCAPCD feasible mitigation measures include the following. Additional and/or modified measures may be adopted by SBCAPCD prior to implementation of individual projects under Connected 2050. The most current list of feasible mitigation measures at the time of project implementation shall be used.

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible, especially during times of severe or extreme drought. However, reclaimed water should not be used in or around crops for human consumption.
- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.
- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or applying dust palliatives, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. During times of severe or extreme drought, the use of soil binders and/or dust palliatives should be prioritized over watering.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations

shall be minimized to prevent fugitive dust created by on-site operations from becoming a nuisance or hazard.

- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.
- Prior to land use clearance, the applicant shall include, as a note on a separate informational sheet to be recorded with map, these dust control requirements. All requirements shall be shown on grading and building plans.

AQ-2 (b) Diesel Equipment Emissions Standards. The implementing agency shall ensure, to the maximum extent feasible, that diesel construction equipment meeting CARB Tier 4 emission standards for off-road heavy-duty diesel engines is used. If use of Tier 4 equipment is not feasible, diesel construction equipment meeting Tier 3 (or if infeasible, Tier 2) emission standards shall be used. These measures shall be noted on all construction plans and the implementing agency shall perform periodic site inspections. environment (natural or urban) would be substantially disrupted;

AQ-2 (c) Electric Construction Equipment. The implementing agency shall ensure that to the extent feasible, construction equipment utilizes electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.

AQ-2 (d) Diesel Particulate Emission Reduction Measures. For all projects, the implementing agency shall incorporate the following diesel particulate emission reduction measures when feasible based on analysis of individual sites and project circumstances:

- On-road heavy-duty equipment with model year 2010 engines or newer should be used to the maximum extent feasible.
- Equipment/vehicles using alternative fuels, such as compressed natural gas, liquefied natural gas, propane or biodiesel, should be used on-site where feasible.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.

- Construction worker trips should be minimized by requiring carpooling and by providing for lunch on-site.
 - Construction truck trips should be scheduled during non-peak hours to reduce peak hour emissions whenever feasible.
 - Proposed truck routes should minimize to the extent feasible impacts to residential communities and sensitive receptors.
 - Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes to buildings, air conditioners, and windows.
- b. Findings** – Implementation of the above mitigation measures would reduce project-specific impacts to the extent feasible; however, implementation of these measures would not guarantee that the impact would be reduced to less than significant. Impacts to short-term emissions and violation to air quality standards could occur, thus impacts would remain significant and unavoidable. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.
- c. Supportive Evidence** – Please refer to pages 4.2-13 through 4.2-15 of the Final EIR, incorporated herein by reference.
- 2. Impact AQ-4.** Construction activities associated with the future transportation improvement projects and implementation of the land use scenario envisioned by Connected 2050 may increase exposure to hazardous air pollutants and odorous compounds. Implementation of Connected 2050 would not result in significant regional increases in toxic air emissions or odorous compounds when compared to the existing conditions and the future “No Project” scenario. However, localized increases may occur as a result of infill and transit oriented development facilitated by Connected 2050’s land use scenario. Therefore, impacts would *remain significant and unavoidable*.
- a. Mitigation** – The following mitigation measures would reduce project-specific impacts related to aesthetics to the degree feasible.
- AQ-4 Health Risk Reduction Measures.** Transportation implementing agencies shall implement the following measures:
- During project-specific design and CEQA review, the potential localized particulate (PM₁₀ and PM_{2.5}) impacts and their health risks shall be evaluated for the project. Localized particulate matter concentrations shall be estimated using procedures and guidelines consistent with U.S. EPA 2015’s *Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas*. If required based on the project-level hotspot analysis, project-specific mitigation shall be added to the project design concept or scope to ensure that local particulate (PM₁₀ and PM_{2.5}) emissions would not reach a concentration at any location that would cause estimated cancer risk to exceed the SBCAPCD health risk notification level threshold of 10 in one million. Per the U.S. EPA guidance (2015), potential mitigation measures to be considered may include but shall not be limited to: providing a retrofit program for older higher emitting vehicles, anti-idling requirements or

policies, controlling fugitive dust, routing traffic away from populated zones and replacing older buses with cleaner buses. These measures can and should be implemented to reduce localized particulate impacts as needed.

- Retain a qualified air quality consultant to prepare a health risk assessment (HRA) in accordance with CARB and OEHHA requirements to determine the exposure of nearby residents to TAC concentrations. The HRA shall be conducted in accordance with the latest iteration of the SBCAPCD Modeling Guidelines for Health Risk Assessments: Form-15i.
- If impacts result in increased risks to sensitive receptors above significance thresholds, Plant trees and/or vegetation suited to trapping TACs and/or sound walls between sensitive receptors and the pollution source. This measure would trap TACs emitted from pollution sources such as highways, reducing the amount of TACs to which residents and other sensitive populations would be exposed.
- In addition, consistent with the general guidance contained in CARB's Air Quality and Land Use Handbook (April 2005) and Technical Advisory on Strategies to Reduce Air pollution Exposure Near High-Volume Roadways (April 2017), for land use projects, appropriate and feasible measures shall be incorporated into project building design for residential, school and other sensitive uses located within 500 feet, or other distance as determined by the lead agency, of freeways, heavily travelled arterials, railways and other sources of diesel particulate matter, including roadways experiencing significant vehicle delays (CARB 2005). The appropriate measures shall include one or more of the following methods, as determined by a qualified professional, as applicable. The implementing agency shall incorporate health risk reduction measures based on analysis of individual sites and project circumstances. These measures may include:
 - Avoid siting new sensitive land uses within 500 feet of a freeway or railway.
 - Require development projects for new sensitive land uses to be designed to minimize exposure to roadway-related pollutants to the maximum extent feasible through inclusion of design components including air filtration and physical barriers.
 - Do not locate sensitive receptors near the entry and exit points of a distribution center.
 - Locate structures and outdoor living areas for sensitive uses as far as possible from the source of emissions. As feasible, locate doors, outdoor living areas and air intake vents primarily on the side of the building away from the freeway or other pollution source. As feasible, incorporate dense, tiered vegetation that regains foliage year-round and has a long-life span between the pollution source and the project.
 - Maintain a 50-foot buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year).
 - Install, operate and maintain in good working order a central heating and ventilation (HV) system or other air take system in the building, or in each

individual residential unit, that meets the efficiency standard of the MERV 13. The HV system should include the following features: Installation of a high efficiency filter and/or carbon filter-to-filter particulates and other chemical matter from entering the building. Either HEPA filters or ASHRAE 85% supply filters should be used. Ongoing maintenance should occur.

- Retain a qualified HV consultant or Home Energy Rating Systems (HERS) rater during the design phase of the project to locate the HV system based on exposure modeling from the mobile and/or stationary pollutant sources.
- Maintain positive pressure within the building.
- Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air.
- Achieve a performance standard of at least 4 air exchanges per hour of recirculation. Achieve a performance standard of 0.25 air exchanges per hour of in unfiltered infiltration if the building is not positively pressurized.
- Require project owners to provide a disclosure statement to occupants and buyers summarizing technical studies that reflect health concerns about exposure to highway exhaust emissions.
- Implement feasible attenuation measures needed to reduce potential air quality impacts to sensitive receptors such as air filtration systems.

b. Findings – Although implementation of the above mitigation would reduce health risks, individual receptors may still be exposed to substantial hazardous air pollutant concentrations that would have significant health risk effects. Therefore, impacts would remain significant and unavoidable. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.

c. Supportive Evidence – Please refer to pages 4.2-18 through 4.2-21 of the Final EIR, incorporated herein by reference.

C. Biological Resources

1. Impact BIO-3. Implementation of transportation improvements proposed and the land use scenario envisioned by Connected 2050 may impact wildlife movement, including fish migration, and/or impede the use of native wildlife nursery. This impact would be *significant and unavoidable*.

a. Mitigation – Mitigation measures BIO-3(a) through BIO-3(c) address the potential for impacts due to invasive plant species. In addition, the following measures are required for projects listed in Table 4.3-2 in Section 4.3, *Biological Resources*, of the Draft EIR:

BIO-3(a) Fence and Lighting Design. All projects including long segments of fencing and lighting shall be designed to minimize impacts to wildlife. Fencing should allow wildlife movement through riparian or other natural habitat when feasible. Where fencing is required for public safety concerns, the fence shall be designed to permit wildlife movement by incorporating design features such as:

- A minimum 16 inches between the ground and the bottom of the fence to provide clearance for small animals;

- A minimum 12 inches between the top two wires, or top the fence with a wooden rail, mesh, or chain link instead of wire to prevent animals from becoming entangled; and
- If privacy fencing is required near open space areas, openings at the bottom of the fence measure at least 16 inches in diameter shall be installed at reasonable intervals to allow wildlife movement.

If fencing must design in such a manner that wildlife passage would not be permitted, wildlife crossing structures shall be incorporated into the project design as appropriate.

Similarly, lighting installed as part of any project shall be designed to be minimally disruptive to wildlife. This may be accomplished through the use of hoods to direct light away from natural habitat, using low intensity lighting, and using a few lights as necessary to achieve the goals of the project.

BIO-3 (b) Maintain Connectivity in Drainages. No permanent structures shall be placed within any drainage or river that would impede wildlife movement (i.e., no hardened caps or other structures in the stream channel perpendicular to stream flow be left exposed or at depth with moderate to high risk for exposure as a result of natural bed scour during high flow events and thereby potentially create impediments to passage).

- In addition, upon completion of construction within any drainage, areas of stream channel and banks that are temporarily impacted shall be returned to pre-construction contours and in a condition that allows for unimpeded passage through the area once the work has been complete.
- If water is to be diverted around work sites, a diversion plan shall be submitted to SBCAG, and/or local jurisdiction for review and approval prior to issuance of project construction permits/ approvals. The diversion shall be designed in a way as to not impede movement while the diversion is in place.

BIO-3 (c) Construction Best Management Practices to Minimize Disruption to Wildlife.

The following construction Best Management Practices (BMPs) shall be incorporated into all grading and construction plans in order to minimize temporary disruption of wildlife, which could hinder wildlife movement:

- Designation of a 20 mile per hour speed limit in all construction areas.
- Daily construction work schedules shall be limited to daylight hours only.
- Mufflers shall be used on all construction equipment and vehicles shall be in good operating condition.
- All trash shall be placed in sealed containers and shall be removed from the project site a minimum of once per week.
- No pets are permitted on project site during construction.

b. Findings – Changes or alterations have been required in, or can be incorporated in to the project which avoid or substantially lessen the significant environmental effects as identified in the Draft EIR; however, these effects on wildlife movement have not been lessened to a

less than significant level. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.

- c. **Supportive Evidence** – Please refer to pages 4.3-38 through 4.3-40 of the Draft EIR, incorporated herein by reference.

D. Cultural Resources

1. **Impact CR-1.** Transportation improvements and the land use scenario envisioned by Connected 2050 may result in alteration and modification of historical resources throughout the SBCAG region. Potential impacts to historical resources would be *significant and unavoidable*.

- a. **Mitigation** –

CR-1 Historical Resources Impact Minimization. Prior to individual project permit issuance, the implementing agency of a Connected 2050 project involving earth disturbance or construction of permanent above ground structures or roadways shall prepare a map defining the impact zone. This map shall indicate the areas of primary and secondary disturbance associated with construction and operation of the facility and will help in determining whether known historical resources are located within the impact zone. If a structure greater than 45 years in age is within the identified impact zone, a survey and evaluation of the structure(s) to determine their eligibility for recognition under State, federal, or local historic preservation criteria shall be conducted. The evaluation shall be prepared by an architectural historian, or historical architect meeting the Secretary of the Interior’s Standards and Guidelines for Archeology and Historic Preservation, Professional Qualification Standards. The evaluation shall comply with CEQA Guidelines section 15064.5(b). Study recommendations shall be implemented, which may include, but would not be limited to, the following:

- Realign or redesign projects to avoid impacts on known historic resources where possible.
- If avoidance of a significant architectural/built environment resource is not feasible, additional mitigation options include, but are not limited to, specific design plans for historic districts, or plans for alteration or adaptive re-use of a historical resource that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring and Reconstructing Historic Buildings.
- Comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect historic resources.

- b. **Findings** – Changes or alterations have been required in, or can be incorporated in to the project which avoid or substantially lessen the significant environmental effects as identified in the Draft EIR; however, the effects on historic resources and structures have not been

lessened to a less than significant level. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.

c. **Supportive Evidence** – Please refer to pages 4.4-12 through 4.4-13 of the Draft EIR, incorporated herein by reference.

2. **Impact CR-2.** Construction activity associated with transportation improvement projects, and land use development envisioned by the implementation of Connected 2050 may result in disturbances to archeological resources throughout the SBCAG region. Potential impacts to archeological resources would be *significant and unavoidable*.

a. **Mitigation** –

CR-1 Archaeological Resources Impact Minimization. Before construction activities, implementing agencies shall retain a qualified archaeologist to conduct a record search at the Central Coast Information Center to determine whether the project area has been previously surveyed and whether resources were identified. When recommended by the Information Center, implementing agencies shall retain a qualified archaeologist to conduct archaeological surveys before construction activities. Implementing agencies shall follow recommendations identified in the survey, which may include, but would not be limited to: subsurface testing, designing and implementing a Worker Environmental Awareness Program (WEAP), construction monitoring by a qualified archaeologist, or avoidance of sites and preservation in place. Recommended mitigation measures will be consistent with CEQA Guidelines Section 15126.4(b)(3) recommendations.

In the event that evidence of any prehistoric or historic-era subsurface archaeological features or deposits are discovered during construction-related earthmoving activities (e.g., ceramic shard, trash scatters, lithic scatters), all ground-disturbing activity in the area of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. If the find is a prehistoric archaeological site, the appropriate Native American group shall be notified. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the archaeologist determines that further information is needed to evaluate significance, a testing plan shall be prepared and implemented. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the implementing agency to avoid disturbance to the resources, and if complete avoidance is not feasible in light of project design, economics, logistics and other factors, shall recommend additional measures such as the preparation and implementation of a data recovery plan. All cultural resources work shall follow accepted professional standards in recording any find including submittal of standard DPR Primary Record forms (Form DPR 523) and

location information to the appropriate California Historical Resources Information System office for the project area.

Implementing agencies shall comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect archaeological resources.

- b. Findings** – Changes or alterations have been required in, or can be incorporated in to the project which avoid or substantially lessen the significant environmental effects as identified in the Draft EIR; however, the effects on archaeological resources have not been lessened to a less than significant level. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.
- c. Supportive Evidence** – Please refer to pages 4.4-14 through 4.4-15 of the Draft EIR, incorporated herein by reference.

E. Geology and Soils

- 1. Impact GEO-3.** Implementation of the proposed transportation improvements and the land use scenario envisioned by Connected 2050 could cause a substantial adverse change in or disturb known and unknown paleontological resources as defined in CEQA Guidelines 15064.5. Impacts would be *significant and unavoidable*.

a. Mitigation –

GEO-3 Paleontological Resources Impact Minimization. Prior to any ground disturbance, the implementing agency of a Connected 2050 project involving ground disturbing activities (including grading, trenching, foundation work and other excavations) within intact (previously-undisturbed) deposits shall retain a qualified paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for Qualified Professional Paleontologist (SVP 2010), to conduct a Paleontological Resources Assessment (PRA). The PRA shall determine the age and paleontological sensitivity of geologic formations underlying the proposed disturbance area, consistent with SVP Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010) guidelines for categorizing paleontological sensitivity of geologic units within a project area. If underlying formations are found to have a high potential (sensitivity) for paleontological resources, the following measures shall apply:

- **Paleontological Mitigation and Monitoring Program.** A qualified paleontologist shall prepare a Paleontological Mitigation and Monitoring Program to be implemented during ground disturbance activity. This program shall outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration (i.e., in what locations and at what depths paleontological monitoring shall be required), salvage and preparation of fossils, the final mitigation and monitoring report and paleontological staff qualifications.

- Paleontological Worker Environmental Awareness Program (WEAP). Prior to the start of ground disturbance activity greater than two feet below existing grade, construction personnel shall be informed on the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.
- Paleontological Monitoring. Ground disturbing activity with the potential to disturbed geologic units with high paleontological sensitivity shall be monitored on a full-time basis by a qualified paleontological monitor. Should no fossils be observed during the first 50 percent of such excavations, paleontological monitoring could be reduced to weekly spot-checking under the discretion of the qualified paleontologist. Monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources.
- Salvage of Fossils. If fossils are discovered, the implementing agency shall be notified immediately, and the qualified paleontologist (or paleontological monitor) shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the paleontologist should have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner.
- Preparation and Curation of Recovered Fossils. Once salvaged, fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection, along with all pertinent field notes, photos, data and maps.
- Final Paleontological Mitigation and Monitoring Report. Upon completion of ground disturbing activity (and curation of fossils if necessary) the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. The report shall be submitted to the sponsor agency. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.

b. Findings – Changes or alterations have been required in, or can be incorporated in to the project which avoid or substantially lessen the significant environmental effects as identified in the Draft EIR; however, the effects on paleontological resources have not

been lessened to a less than significant level. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.

- c. **Supportive Evidence** – Please refer to pages 4.7-19 through 4.7-21 of the Draft EIR, incorporated herein by reference.

F. Greenhouse Gas Emissions

1. **Impact GHG-3.** Implementation of Connected 2050 would not conflict with regional SB 375 per capita passenger vehicle CO₂ emission reduction targets but would potentially conflict with SB 32, the 2017 Scoping Plan, and EOS S-3-05 and B-55-18. Impacts would be *significant and unavoidable*.

- a. **Mitigation** – Connected 2050 would facilitate infill and TOD land use development as well as transit and alternative transportation projects, which would improve the transportation network in the SBCAG planning region and encourage the use of transportation modes other than passenger vehicles. Furthermore, by achieving its SB 375 target, Connected 2050 technically contributes its share of transportation related GHG emission reductions towards meeting the State’s GHG reduction target for 2030 under SB 32. However, the expected GHG emissions associated with VMT in the SBCAG region in year 2030 would not be consistent with the State’s GHG reduction target for 2030, which would conflict with the state’s ability to achieve SB 32, EO S-3-05, and EO B-55-18 GHG reduction goals. SBCAG does not have land use authority to implement additional VMT reductions that would result in additional transportation related GHG emission reductions. Therefore, for land use projects under their jurisdiction, the cities and counties in the SBCAG region can and should implement measures to encourage infill and TOD land use development and reduce VMT, thereby reducing GHG emissions associated with individual development projects. In addition, implementing agencies can and should implement the following measures, where relevant to land use projects implementing Connected 2050. Project-specific environmental documents may adjust these mitigation measures as necessary to respond to site-specific conditions.

GHG-3 Transportation-Related GHG Reduction Measures. The implementing agency shall incorporate the most recent GHG reduction measures and/or technologies for reducing VMT and associated transportation-related GHG emissions. The measures shall be incorporated into construction plans, as appropriate, and the implementing agency shall verify implementation when practicable. Current GHG-reducing measures include the following:

- Installation of electric vehicle charging stations beyond those required by State and local codes
- Utilization of electric vehicles and/or alternatively-fueled vehicles in company fleet
- Provision of dedicated parking for carpools, vanpool, and clean air vehicles
- Provision of vanpool and/or shuttle service for employees
- Implementation of reduced parking minimum requirements

- Implementation of maximum parking limits
 - Provision of bicycle parking facilities beyond those required by State and local codes
 - Provision of a bicycle-share program
 - Expansion of bicycle routes/lanes along the project site frontage
 - Provision of new or improved transit amenities (e.g., covered turnouts, bicycle racks, covered benches, signage, lighting) if project site is located along an existing transit route
 - Expansion of existing transit routes
 - Provision of transit subsidies
 - Expansion of sidewalk infrastructure along the project site frontage
 - Provision of safe, pedestrian-friendly, and interconnected sidewalks and streetscapes
 - Provision of employee lockers and showers
 - Provision of on-site services that reduce the need for off-site travel (e.g., childcare facilities, automatic teller machines, postal machines, food services)
 - Provision of alternative work schedule options, such as telework or reduced schedule (e.g., 9/80 or 10/40 schedules), for employees
 - Implementation of transportation demand management programs to educate and incentivize residents and/or employees to use transit, smart commute, and alternative transportation options
- b. Findings** – Changes or alterations have been required in, or can be incorporated in to the project which avoid or substantially lessen the significant environmental effects as identified in the Draft EIR; however, implementation of project-level GHG-reducing measures may not be feasible and cannot be guaranteed on a project-by-project basis. Additionally, it is speculative at this time to forecast whether project-level GHG emission reductions would be sufficient to achieve a county-wide reduction in GHG emissions of 40 percent below 1990 levels by 2030. Therefore, this impact would remain significant and unavoidable. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.
- c. Supporting Evidence** – Please refer to pages 4.8-20 through 4.8-24 of the Draft EIR, incorporated herein by reference.

G. Hydrology and Water Quality

- 1. Impact HYD-2.** Implementation of proposed transportation improvements and future projects included in the land use scenario envisioned in Connected 2050 would increase water demand (including demand for groundwater) in the SBCAG region, which may lead to a decrease in water supplies. This demand may potentially require new or expanded water supplies, entitlements, or facilities and lead to conflicts with sustainable groundwater management plans. Impacts would be *significant and unavoidable*.

a. Mitigation –

HYD-2 (a) Construction Dust Suppression Water Supply. All Connected 2050 projects, where feasible, reclaimed and/or recycled water shall be

used for dust suppression during construction activities. This measure shall be noted on construction plans and shall be spot checked by the local jurisdiction.

HYD-2 (b) Landscape Watering. In jurisdictions that do not already have an appropriate local regulatory program related to landscape watering, Connected 2050 projects that include landscaping shall be designed with drought tolerant plants and drip irrigation. When feasible, native plant species shall be used. In addition, landscaping associated with proposed improvements shall be maintained using reclaimed and/or desalinated water when feasible.

HYD-2 (c) Porous Pavement. In jurisdictions that do not already have an appropriate local regulatory program related to porous pavement, the sponsor of a Connected 2050 project that involves streetscaping, parking, transit and land use improvements shall ensure that porous pavement materials are utilized, where feasible, to allow for groundwater percolation.

HYD-2 (d) Water Infrastructure Improvements. The sponsor of Connected 2050 projects that would require potable water service shall coordinate with water supply system operators to ensure that the existing water supply systems have the capacity to handle the increase. If the current infrastructure servicing the project site is found to be inadequate, infrastructure improvements for the appropriate public service or utility should be provided by the implementing agency.

HYD-2 (e) Water Infrastructure Improvements. The sponsor of Connected 2050 projects that would require potable water service shall coordinate with water supply system operators to ensure that the existing water supply systems have the capacity to handle the increase. If the current infrastructure servicing the project site is found to be inadequate, infrastructure improvements for the appropriate public service or utility should be provided by the implementing agency.

- b. Findings** – The land use scenario envisioned by Connected 2050 along with transportation projects are water intensive and may result in the need for additional water supply, even with the implementation of mitigation measures listed above. Given the overdraft conditions of area groundwater basins and other regional water supply concerns, impacts would remain significant and unavoidable.
- c. Supportive Evidence** – Please refer to pages 4.9-15 through 4.9-17 of the Draft EIR, incorporated herein by reference.

H. Land Use

1. **Impact LU-2.** Connected 2050 may not be consistent with every applicable adopted State and local land use policy or regulation adopted for the purpose of avoiding or mitigating environmental effects. This impact would be *significant and unavoidable*.
 - a. **Mitigation** – Mitigation measures are provided for applicable resources throughout this section of the EIR to reduce impacts. However, impacts for some resources would remain significant and unavoidable.
 - b. **Findings** – Changes or alterations have been required in, or can be incorporated in to the project which avoid or substantially lessen the significant environmental effects as identified in the Draft EIR; however it cannot be known with certainty that all impacts can be avoided. Impacts include those related to wildland fire hazard, locating sensitive receptors in areas with unacceptable noise levels, or increases in VMT. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.
 - c. **Supportive Evidence** – Please refer to pages 4.10-11 through 4.10-13 of the Draft EIR, incorporated herein by reference.
 2. **Impact LU-3.** Implementation of transportation improvements and the land use scenario envisioned by Connected 2050 could result in the conversion of prime or non-prime agricultural lands into non-agricultural use. The overall impact to agriculture would be a *significant and unavoidable*.
 - a. **Mitigation** – The County and cities in the SBCAG region can and should implement these measures, where relevant to land use projects implementing Connected 2050. Project-specific environmental documents may adjust these mitigation measures as necessary to respond to site-specific conditions.
- LU-3 Agricultural Resource Impact Avoidance and Minimization.** Implementing agencies shall implement measures, where feasible based on project-and site-specific considerations that include, but are not limited to those identified below.
- Require project relocation or corridor realignment, where feasible, to avoid Important Farmland, agriculturally-zoned land and/or land under Williamson Act contract;
 - Compensatory mitigation at a minimum 1:1 (impacted : replaced) acreage ratio with Important Farmland of equivalent or better quality, where feasible;
 - Require acquisition of conservation easements on land at least equal in quality and size as mitigation for the loss of Important Farmland; and/or
 - Institute new protection of farmland in the project area or elsewhere through the use of long-term restrictions on use, such as 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.) or 10-year, annually renewed, Williamson Act contracts (Government Code Section 51200 et seq.).

- b. **Findings** – Changes or alterations have been required in, or can be incorporated in to the project which avoid or substantially lessen the significant environmental effects as identified in the Draft EIR; however it cannot be known with certainty whether all Important Farmland could be avoided, or whether compensation would completely prevent the loss of Important Farmland. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.
- c. **Supportive Evidence** – Please refer to pages 4.10-13 through 4.10-15 of the Draft EIR, incorporated herein by reference.

I. Noise

- 2. **Impact N-4.** Connected 2050 envisions land development near transit and other transportation facilities, which may place sensitive receptors in areas with unacceptable noise levels. Impacts would be *significant and unavoidable*.

- a. **Mitigation** –

- N-4 Noise Mitigation for Land Uses.** If a Connected 2050 land use project is located in an area with exterior ambient noise levels above local noise standards, the implementing agency shall ensure that a noise study is conducted to determine the existing exterior noise levels in the vicinity of the project. If the project would be impacted by ambient noise levels, feasible attenuation measures shall be used to reduce operational noise to meet acceptable standards. In addition, noise insulation techniques shall be utilized to reduce indoor noise levels to thresholds set in applicable State and/or local standards. Such measures may include, but are not limited to: dual-paned windows, solid core exterior doors with perimeter weather stripping, air conditioning system so that windows and doors may remain closed, and situating exterior doors away from roads. The noise study and determination of appropriate mitigation measures shall be completed during the project's individual environmental review.

- b. **Findings** – Changes or alterations have been required in, or can be incorporated in to the project which avoid or substantially lessen the significant environmental effects as identified in the Draft EIR; however, even with implementation of Mitigation Measure N-4 noise from buildout of Connected 2050 may continue to impact nearby noise sensitive receptors and exceed acceptable standards. Impacts would remain significant and unavoidable. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.

- c. **Supportive Evidence** – Please refer to pages 4.11-18 through 4.11-19 of the Draft EIR, incorporated herein by reference.

J. Transportation and Circulation

- 1. **Impact T-2.** Connected 2050 would result in VMT per capita reduction of 7% when compared to the regional baseline VMT which does not meet the VMT reduction threshold of 14.3%. This impact would be *significant and unavoidable*.

- a. **Mitigation**

- T-2 (a) Strategies to reduce VMT from future land use development.**

Implementing agencies shall require implementation of VMT reduction strategies through transportation demand management (TDM) programs, impact fee programs, mitigation banks or exchange programs, in-lieu fee programs, and other land use project conditions that reduce VMT. Programs shall be designed to reduce VMT from existing land uses, where feasible, and from new discretionary residential or employment land use projects. The design of programs and project-specific mitigation shall focus on VMT reduction strategies that increase travel choices and improve the comfort and convenience of sharing rides in private vehicles, using public transit, biking, or walking. Modifications may include but are not limited to:

- Provide car-sharing, vanpool, bike sharing, and ride-sharing programs
- Implement or provide access to commute reduction programs
- Provide a bus rapid transit system
- Improve pedestrian or bicycle networks, or transit service
- Provide transit passes
- Encourage tele-commute programs
- Incorporate affordable housing into the project
- Increase density
- Increase mixed uses within the project area
- Incorporate improved pedestrian connections within the project/neighborhood
- Incentivize development in low VMT communities
- Incentivize housing near commercial and offices
- Increase access to goods and services, such as groceries, schools, and daycare
- Incorporate neighborhood electric vehicle network
- Orient the project toward transit, bicycle, and pedestrian facilities
- Provide traffic calming
- Provide bicycle parking
- Limit parking
- Separate out parking costs
- Provide parking cash-out programs

T-2 (a) Strategies to reduce VMT from planned transportation projects. Roadway capacity expansion projects shall include demand management and transportation systems management and operations (TSMO) including the implementation of complementary facilities that expand travel options for transit, rideshare, biking, and walking. Options could include, but are not limited to:

- Tolling new lanes to encourage carpools and fund transit improvements
- Converting existing general-purpose lanes to HOV or HOT lanes

- Implementing Intelligent Transportation Systems strategies to improve passenger throughput on existing lanes
- b. Findings** – Changes or alterations have been required in, or can be incorporated in to the project which avoid or substantially lessen the significant environmental effects as identified in the Draft EIR; however, the implementation of project-level VMT reducing measures may not be feasible and cannot be guaranteed on a project-by-project basis. Additionally, it is unlikely that an increase in daily per capita VMT above existing conditions could be fully avoided in 2050, due to factors unrelated to discretionary approvals, such as population growth in the region. Therefore, this impact would remain significant and unavoidable. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.
- c. Supporting Evidence** – Please refer to pages 4.12-27 through 4.12-29 of the Draft EIR, incorporated herein by reference.

I. Wildfire

- 1. Impact WF-1** Connected 2050 includes projects within areas of moderate, high, and very high severity zones and near (within 2 miles) of SRA's that could expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Connected 2050 projects could also potentially ignite fires and therefore risk exacerbating the potential for loss or damage from wildfires. Impacts would be *significant and unavoidable*.

a. Mitigation –

WF-1(a) Wildfire Risk Reduction. If an individual transportation or land use project included in Connected 2050 is located within or less than 2 miles from an SRA or very high fire hazard severity zones, the implementing agency shall require appropriate mitigation to reduce the risk. Examples of mitigation to reduce risk of loss, injury or death from wildlife include, but are not limited to:

- Require the use of fire-resistant vegetation native to Santa Barbara County and/or the local microclimate of the project site and discourage the use of fire-prone species especially nonnative, invasive species.
- Require a fire safety plan be submitted to and approved by the local fire protection agency. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase of the project.
- Prohibit certain project construction activities with potential to ignite wildfires during red-flag warnings issued by the National Weather Service for the project site location. Example activities that should be prohibited during red-flag warnings include welding and grinding outside of enclosed buildings.
- Require fire extinguishers to be onsite during construction of projects. Fire extinguishers shall be maintained to function according to manufacturer

specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher. Where applicable, place conditions of approval on project requiring incorporation of recommendations to reduce the potential for fires specified in this mitigation measure, or other measures at least equally effective. Avoidance and preservation of the resources in place, including, but not limited to: planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

WF-1(b) Fire Protection Plan. Individual transportation or land use projects included in Connected 2050 shall prepare a Fire Protection Plan that meets SBCFD requirements. The plan shall contain (but not be limited to) the following provisions:

- All construction equipment shall be equipped with appropriate spark arrestors and carry fire extinguishers.
- A fire watch with appropriate firefighting equipment shall be available at the Project site at all times when welding activities are taking place. Welding shall not occur when sustained winds exceed that set forth by the SBCFD unless a SBCFD-approved windshield is on site.
- A vegetation management plan shall be prepared to address vegetation clearance around all WTGs and a regularly scheduled brush clearance of vegetation on and adjacent to all access roads, power lines, and other facilities.
- Operational fire water tanks shall be installed prior to construction.
- Provisions for fire/emergency services access if roadway blockage occurs due to large loads during construction and operation.
- Cleared, maintained parking areas shall be designated; no parking shall be allowed in non-designated areas.
- The need for and/or use of dedicated repeaters for emergency services.
- Appropriate Hot work permits (such as cutting and welding permits) shall be obtained from the jurisdictional fire agency.
- Compliance with California PRC 4291, 4442, and 4443.

WF-1(c) Smoking and Open Fires. Smoking and open fires shall be prohibited at individual transportation or land use projects sites included in Connected 2050 during construction and operations. A copy of the notification to all contractors regarding prohibiting smoking and burning shall be provided to the County.

WF-1(d) Red Flag Warning. Individual transportation or land use projects included in Connected 2050 shall participate in the Red Flag Warning program with local fire agencies and the National Weather Service. The Applicant shall stop work during Red Flag conditions to reduce the risk of wildlife ignition.

b. Findings – Changes or alterations have been required in, or can be incorporated in to the project which avoid or substantially lessen the significant environmental effects as identified in the Draft EIR; however, these measures would make structures and

transportation infrastructure more fire resistant and less vulnerable to loss in the event of a wildfire. These measures would also reduce the potential for construction of Connected 2050 projects to inadvertently ignite a wildfire. In addition, specific project impact regarding wildfire risk would be addressed prior to project implementation during the planning and design process. However, it is not possible to prevent a significant risk of wildfires or fully protect people and structures from the risks of wildfires, despite implementation of mitigation WF-1. These impacts are acceptable by reason of the overriding considerations discussed in Section VIII.

- c. **Supportive Evidence** – Please refer to pages 4.14-15 through 4.14-19 of the Draft EIR, incorporated herein by reference.

VII. FINDINGS FOR IDENTIFIED PROJECT ALTERNATIVES

The Santa Barbara County Association of Governments finds that the following project alternatives were identified in the Environmental Impact Report. Alternatives 1, 2, and 3, although feasible from a technical standpoint, compared to the proposed project were environmentally inferior and rejected for the following reasons stated below. The proposed project is the environmentally superior project, but in comparison of just the alternatives, the environmentally superior alternative is the No Project Alternative. Therefore, the EIR identifies an environmentally superior alternative among the other alternatives, that being Alternative 2.

- A. **Alternative 1: No Project Alternative (RTP/SCS Scenario 1)**. Only currently programmed and funded transportation system improvements (the current RTP/SCS's programmed projects list) would be implemented, with no changes to existing allowable land uses. Assumes current sub-regional growth trends continue consistent with the 2019 Regional Growth Forecast. This alternative also assumes the land use pattern described in the 2017 RTP/SCS. The No Project Alternative (Alternative 1) would result in reduced environmental impacts, as fewer transportation projects would be implemented. In addition, this alternative would not focus on infill development, concentrating individuals in infill areas, where increased criteria air quality pollutants and exposure to high levels of operational noise may occur. Because of the increased land development outside of existing urbanized areas compared to Connected 2050, Alternative 1 would increase environmental impacts associated with geology and soils, greenhouse gas emissions/climate change, hydrology and water quality, tribal cultural resources, and wildfire hazards. The significant and unavoidable environmental impacts of Connected 2050 would remain under Alternative 1. Although Alternative 1 could be the environmentally superior alternative, this alternative would not meet the SB 375 requirement for preparation of an SCS, nor reduce greenhouse gas emissions and vehicle miles traveled to the degree as the Connected 2050. This Alternative would not preserve open space, agricultural land, and sensitive biological resources, inconsistent with the project objectives. In addition, although Alternative 1 would implement committed transportation projects, it would not include other new transportation infrastructure projects identified by Connected 2050, as well as prioritize corridor investment projects along high quality transit corridors that serve multiple modes of travel, and prioritize projects for funding that are consistent with the Sustainable Communities Strategy goals.
- B. **Alternative 2: North County-weighted Jobs, South County-weighted Housing Alternative (RTP/SCS Scenario 4)**. This scenario begins with existing, adopted land uses, but applies weights to make specific growth distribution assumptions emphasizing job growth in the North County and housing

growth in the South County, within existing available land use capacity. It does not continue past trends and does not focus on infill development along transit corridors. Infill occurs only as supported by local plans. Alternative 2 could be considered environmentally superior to Connected 2050 primarily because, as shown in Table 6-1, environmental issue areas such as aesthetics, air quality, cultural resources (historic), and noise may see a slight decrease in potential environmental effects due to lower amounts of development in infill areas that may be located near sensitive receptors and/or potential historical resources. Although Alternative 2 would include regionally identified transportation projects, it would not include an SCS that would further concentrate development in urban areas. As such, Alternative 2 would not meet the objectives of the project, including: complying with applicable regulatory requirements; serving regional goals, objectives, policies and plans; and responding to community and regional transportation needs.

- C. **Alternative 3: Alternative Transportation Emphasis (RTP/SCS Scenario 5).** This alternative includes implementation of all programmed and planned transportation projects, as well as additional illustrative alternative transportation and transit projects. Illustrative projects are those included in the RTP, but that are conceptual and not tied to a specific funding source. Examples of such illustrative projects include expansion of the Metropolitan Transit District downtown transit center in the City of Santa Barbara, Bicycle Master Plan improvements in the City of Solvang, and construction of numerous active/multi-use paths (pedestrian and bicycle) throughout the SBCAG region. Unlike Connected 2050, which emphasizes infill and transit-oriented development, this alternative assumes current sub-regional growth trends continue consistent with the 2019 Regional Growth Forecast, and the land use scenario assumes existing adopted General Plan land uses. This alternative also assumes that by 2035, all local transit operators will double transit frequencies during peak hours and offer free fares; auto operating costs will be doubled to increase mode share to alternative transportation (bike, walk, and transit). Alternative 3 would result in both increased and decreased environmental impacts, in the areas of aesthetics, air quality, cultural resources, and noise, similar to Alternative 2. This is due to the addition of illustrative transit and alternative transportation projects. This alternative would result in slightly reduced environmental impacts for certain issue areas, by not concentrating infill development near sensitive receptors in urbanized areas with increased criteria air quality pollutants and noise. However, due to a more dispersed land use pattern and additional ground disturbance and operations of illustrative transit and alternative transportation projects compared to Connected 2050, this alternative would result in increased VMT and increased impacts for most issue areas. The increased overall VMT in the region from this alternative would increase potential long-term air quality and greenhouse gas emissions compared to Connected 2050. The significant and unavoidable impacts of Connected 2050 would remain and all mitigation measures would apply. Although this alternative would meet most of the project objectives, this alternative would not satisfy the basic project objectives compared to the proposed project such as reducing greenhouse gas emissions, reducing vehicle miles traveled, encouraging infill mixed use development along high quality transit corridors that serve multiple modes of travel, and prioritizing projects for funding that are consistent with the Sustainable Communities Strategy goals.

VIII. STATEMENT OF OVERRIDING CONSIDERATIONS

Findings pursuant to CEQA Guidelines sections 15093 and 15092.

- A. The project's significant, unmitigable, unavoidable adverse effects are as follows:

1. **Impact AES-1: adverse effect on a scenic vista, scenic resources within a state scenic highway**
2. **Impact AES-2: degradation of existing visual character (non-urbanized areas)**
3. **Impact AES-3: generation of new sources of light and glare.**
4. **Cumulative – Aesthetics (adverse effect on a scenic vista, scenic resources within a state scenic**
5. **highway, visual character, and light/glare)**
6. **Impact AQ-2: fugitive dust and ozone precursor emissions during construction**
7. **Impact AQ-4: exposure of sensitive receptors to substantial hazardous air pollutant**
8. **concentrations and objectionable odors**
9. **Cumulative – Air Quality (fugitive dust and ozone precursor emissions during construction and**
10. **exposure to substantial air pollutant concentrations/odors)**
11. **Impact BIO-3: interference with wildlife movement**
12. **Cumulative – Biological Resources (wildlife movement)**
13. **Impact CR-1: disturbance of known or unknown historical resources**
14. **Impact CR-2: disturbance of known and unknown archeological resources**
15. **Cumulative – Cultural Resources (historical and archaeological resources)**
16. **Impact GEO-3: disturbance of known and unknown paleontological resources**
17. **Cumulative – Geology and Soils (paleontological resources)**
18. **Impact GHG-3: conflict with SB 32, the 2017 Scoping Plan, and EOs S-3-05 and B-55-18**
19. **Cumulative – Greenhouse Gas Emissions (conflict with applicable plans/policies)**
20. **Impact HYD-2: increased water demand potentially requiring new or expanded water supplies, entitlements, or facilities**
21. **Cumulative – Hydrology and Water Quality (water supplies)**
22. **Impact LU-2: consistency with State and local land use plans, policies or regulations adopted for**
23. **the purpose of avoiding or mitigating environmental effects**
24. **Impact LU-3: conversion of Important Farmland to nonagricultural use**
25. **Cumulative - Land Use and Planning (conversion of agricultural land)**
26. **Impact N-4: placement of sensitive receptors in areas with unacceptable noise levels**
27. **Cumulative – Noise (exposure to excessive operational noise)**
28. **Impact T-2: increase in VMT per capita**
29. **Cumulative – Transportation and Circulation (increase in VMT)**

30. Impact TCR-1: adverse change to tribal cultural resources

31. Cumulative – Tribal Cultural Resources (adverse change to tribal cultural resources)

32. Impact WF-1: expose people or structures, either directly or indirectly, to wildfire risk and

33. exacerbating the potential for loss or damage from wildfires

34. Cumulative – Wildfire (direct and indirect exposure to wildfire hazards)

B. Findings – The Santa Barbara County Association of Governments has balanced the benefits of the proposed project against its unavoidable environmental impacts. Based on the consideration of the record as a whole, the Santa Barbara County Association of Governments finds that the benefits of the project outweigh the project’s unavoidable adverse environmental impacts listed above, thus the adverse environmental effects are considered “acceptable” for the reasons described below.

C. Supporting Evidence – One of the objectives of the RTP/SCS is to comply with applicable regulatory requirements, including CTC Guidelines and SB 375, including SB 375’s regional GHG reduction targets. As such, Connected 2050 intends to achieve a coordinated and balanced regional transportation system while reducing GHG emissions from passenger vehicles and light trucks to meet the regional GHG reduction targets set by the California Air Resources Board (ARB). Connected 2050 meets these requirements and achieves its identified objectives listed below.

1. Social, Economic and Region-wide Environmental Benefits. The project will result in the following social, economic, and region-wide environmental benefits:
 - a) The implementation of Connected 2050 transportation projects will provide for a comprehensive transportation system of facilities and services that meets the public's need for the movement of people and goods, and that is consistent with the social, and economic environmental goals and policies of the region and provides region-wide environmental benefits.
 - b) The project will improve transportation mobility and accessibility in the county, which is consistent with the social and economic goals and policies of the region and provides region-wide environmental benefits.
 - c) The project will improve air quality by reducing emissions of ozone precursors compared to future No Project conditions, which provides region-wide environmental benefits.
 - d) The SCS will contribute to a reduction in greenhouse gas (GHG) emissions from passenger vehicles and light trucks, helping Santa Barbara County to achieve the regional GHG reduction targets set by the California Air Resources Board (ARB), thus providing region-wide environmental benefits.
 - e) The project will promote consistency between the California Transportation Plan 2050, the regional transportation plan and other plans developed by cities, counties, districts, Native American Tribal Governments, and State and Federal agencies in

responding to Statewide and interregional transportation issues and needs, providing region-wide benefits, including region-wide environmental benefits.

- f) The construction of transportation projects will result in both short-term and long-term economic benefits to the County and its residents. Transportation projects will indirectly provide for a number of jobs relating to construction and maintenance.

IX. CEQA GENERAL FINDINGS

- A. The Santa Barbara County Association of Governments finds that changes or alterations have been incorporated into the project to mitigate, avoid and substantially lessen the significant impacts identified in the Draft EIR to the greatest degree feasible. These changes or alterations include mitigation measures and project modifications outlined herein and set forth in more detail in the Connected 2050 Regional Transportation Plan-Sustainable Communities Strategy Draft EIR.
- B. The Santa Barbara County Association of Governments finds that the project, as approved, includes an appropriate Mitigation Monitoring and Reporting Program. This mitigation monitoring program ensures that measures that avoid or substantially lessen the significant project impacts, as required by CEQA and the State CEQA Guidelines, will be implemented as described.

X. MITIGATION MONITORING AND REPORTING PROGRAM

The CEQA Lead Agency for each individual project listed in the RTP (Caltrans, Santa Barbara County, and the cities within Santa Barbara County), will be primarily responsible for ensuring that all project mitigation measures are complied with. Mitigation measures will be programmed to occur at, or prior to, the following milestones:

- *During individual environmental review.* These are measures that need to be undertaken during individual project-level environmental review of RTP transportation projects or SCS land use projects. These measures include items such as assessment of identification of specific project level noise reduction measures, and measures to reduce impacts on biological resources.
- *Prior to issuance of a grading permit.* These are measures that need to be undertaken before earth moving activities begin. These measures include items such as staking the limits of environmentally sensitive areas or vegetation to remain, confirming biological mitigation plans with resource agencies, and including pertinent design details in the project plans.
- *During project construction.* These measures are those that need to occur as the project is being constructed. They include monitoring the construction site for the proper implementation of dust and emission controls, erosion controls, biological protection, and examining grading areas for the presence of cultural and paleontological materials.
- *Following construction.* These measures apply to project components that would go into effect at completion of the project construction phase, including items such as management or monitoring plans (e.g., revegetation, etc.).

Connecting each of the mitigation measures to these milestones will integrate mitigation monitoring into existing SBCAG processes, as encouraged by CEQA. In each instance, implementation of the mitigation measure will be accomplished in parallel with another activity associated with the project.

- B.** As lead agency for the Connected 2050 Regional Transportation Plan-Sustainable Communities Strategy Draft EIR, the Santa Barbara County Association of Governments hereby certifies that the approved Mitigation Monitoring and Reporting Program is adequate to ensure the implementation of the mitigation measures described herein.