

8.1 Growth-Inducing

Section 15126.2(d) of the State California Environmental Quality Act (CEQA) Guidelines requires consideration of a project's potential to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. This potential economic or population growth is known as the Project's growth-inducing impact and is distinguished from the direct economic, population, or housing growth of a Project because it is an indirect result of implementation of a Project that would not have taken place in the absence of the Project and that exceeds planned growth. Growth inducement can result from new development that increases employment levels, removes barriers to development, or provides resources that lead to secondary growth. Induced growth in any area should not be assumed to be inherently beneficial, detrimental, or of little significance to the environment. It should, however, be analyzed to facilitate an understanding of how it could potentially affect the surrounding environment.

The County of Santa Barbara Comprehensive Plan recognizes that certain forms of growth are beneficial, both economically and socially. The proposed Project would revise the existing Conditional Use Permit (CUP) for Cate School to allow for phased construction of new buildings, refurbishment and expansion of existing buildings on the campus; permission to broaden uses of its onsite childcare center; and allow for a slight increase in enrollment (by seven percent, or 20 students). Growth resulting from the proposed Project would include increases in student and staff populations, faculty families residing on-site, and temporary populations attending school events. It is expected that student enrollment at Cate School would increase by 20 students from 280 to 300, the number of children in onsite daycare facilities at one time would increase from 17 to 28, and that the school would add two additional maintenance staff over the course of build-out. As a result of the modified daycare operations, up to two additional daycare staff could also be hired. The proposed Project would also allow for additional boarders and faculty to reside on-site, thereby increasing the permanent population on campus. The number of student boarders is expected to increase from 220 to 259. New faculty residences would house 15 to 20 additional members of the existing faculty onsite, as well as their families. In addition to students and staff, temporary populations that attend school activities (e.g., parents and relatives) would incrementally increase due to the corresponding increases in enrollment. Construction activities during implementation of the proposed Project would result in increases in temporary worker populations during construction phases. Each phase of construction would require nine to 42 average daily construction-related employees, depending on the phase. These increases in on-site population would not be significantly growth inducing and there is no element of the Project that would encourage significant new growth on the campus beyond what is currently proposed.

Growth-inducing impacts are caused by those elements of a Project that tend to foster or encourage population growth, either directly or indirectly. Indirect catalysts for growth include the establishment of infrastructure or other conditions at the Project site that would potentially lead to growth in surrounding areas or expansion of a certain type of use. The Project is not expected to require development of new utility infrastructure beyond proposed improvements and new connections to existing systems. Existing infrastructure, utilities, and public services are sufficient to

accommodate anticipated growth as described in detail in Subsection 4.10, *Public Facilities*. Improved infrastructure and access roadways compliant with fire safety development standards are incorporated into the proposed Project and would provide a sufficient level of infrastructure for the anticipated growth. Such infrastructure improvements would be of a local scale that would not induce growth to a significant level.

8.2 Significant and Unavoidable Impacts

Section 15126 of the CEQA Guidelines requires that all aspects of a Project must be considered when evaluating its impact on the environment. As part of this analysis, the Environmental Impact Report (EIR) must also identify: (1) significant environmental effects of a proposed Project; and (2) significant environmental effects that cannot be avoided if a proposed Project is implemented.

8.2.1 Proposed Project

Sections 3.0, 4.0, and 6.0 of this EIR provide a comprehensive evaluation of the environmental effects of the Project and alternatives. These impacts, along with identified mitigation measures, are summarized in Table ES-1, *Summary of Environmental Impacts and Mitigation Measures*, which is contained in the Executive Summary of this EIR. As described in Sections 3.0 and 4.0, and in compliance with CEQA Section 15128, there are no significant and unavoidable impacts associated with the Project. Impacts that would be less than significant with mitigation (Class II) have been identified in this EIR for fire protection, noise, aesthetics/visual resources, air quality, biological resources, cultural resources, geologic processes, historic resources, land use, public facilities, recreation, transportation/circulation, and water resources/flooding water. In the resource areas of agricultural resources, energy, and hazardous materials/risk of upset, less than significant impacts were identified (Class III).

Existing policies and development standards as well as the Project's proposed mitigations would help to reduce potential significant impacts to a less than significant level. Policies include development standards in the County of Santa Barbara Article II Coastal Zoning Ordinance (Article II) and the County's Comprehensive Plan, which require that the County's land use planning decisions be consistent with the available resources and services.

Sections 3 and 4 of this EIR describe existing conditions and disclose potential impacts. A range of project alternatives, which could more fully address environmental concerns are also provided in Section 6, *Alternatives*. The County may also review guiding documents, such as the Santa Barbara County Coastal Zoning Ordinance (Article 2) and the Santa Barbara County Comprehensive Plan. Each resource section provides an overview of the County's policy context and a summary on how the Project meets County policy objectives and where it may raise concerns over consistency with other County policies. Because this Project would not result in significant unavoidable impacts, the County would not be required to adopt a Statement of Overriding Considerations.

8.2.2 Alternative 1 – Redesigned Project

Implementation of Alternative 1, which would avoid development on steep slopes in excess of 30 percent could generate similar impacts to the proposed Project. Impacts to geological processes would be slightly reduced; however, this alternative would involve Class II and Class III impacts, but ultimately no significant and unavoidable impacts.

8.2.3 Alternative 2 – Reduced Project

Implementation of Alternative 2, which would reduce the number of faculty residences by three in order to more completely avoid development on steep slopes in excess of 30 percent and to preserve a total of three key specimen trees, would result in similar impacts to the proposed Project, with slightly reduced impacts to biological resources and geological processes, as well as air quality and greenhouse gas emissions (GHG), energy, water, and public facilities but incrementally worse impacts to traffic and circulation. Selection of this alternative would involve Class II and Class III impacts, but ultimately no significant and unavoidable impacts.

8.2.4 Alternative 3 - No Project Alternative

Implementation of the No Project Alternative would result in a continued level of enrollment, staffing, and operations at Cate School as established under the 2007 CUP. The No Project Alternative would avoid all Project-related impacts and would not cause additional impacts on the physical environment. Selection of this alternative would result in no significant and unavoidable impacts.

8.3 Significant Irreversible Environmental Effects

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed Project. Specifically, Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a Project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The Project would involve a large commitment of nonrenewable resources;
- The proposed consumption of resources is not justified (e.g., the Project involves the wasteful use of energy); or
- The Project involves uses in which irreversible damage could result from any potential environmental accidents associated with the Project.

8.3.1 Proposed Project

As described in Sections 3 and 4, the construction and operation of the proposed Project would result in less than significant effects on baseline conditions after applicable required conditions, mitigation measures, and development standards are applied.

Construction of the Project would involve the consumption of building materials and energy, some of which are nonrenewable or locally limited natural resources (e.g., fossil fuels). Nonrenewable resources used for the proposed Project could no longer be used for other purposes. However, consumption/use of building materials and energy would be associated with any development in the region, including the Project, and these commitments of resources are neither unique nor unusual. The proposed Project would represent a negligible commitment to use of nonrenewable resources. In addition, as discussed in Section 3.3, *Air Quality and Greenhouse Gases*, use of these nonrenewable forms of fuel energy would contribute to the generation of GHGs with an incremental but less than significant contribution to global climate change. Therefore, while energy demand and use of non-renewable sources associated with the Project would not be significant, the Project would incrementally contribute to resultant secondary impacts to other resources, such as air quality and GHGs.

As described in the Section 4.10, *Public Facilities*, solid waste generated at the Project site, including green waste, would be disposed of in compliance with an approved Solid Waste Management Plan. Additionally, the proposed Project would involve minimal use or transport of hazardous materials and would be in compliance with a Hazardous Materials Business Plan. Therefore, it is not expected that the Project would result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment.

8.3.2 Alternative 1 – Redesigned Project

All irreversible environmental impacts described for the proposed Project in Section 7.3.1 would also apply to Alternative 1. Implementation of Alternative 1 would result in construction and operations similar to the Project. Therefore, impacts related to air quality and GHG emissions, use of non-renewable resources, hazardous materials, reduced impervious surfaces, and waste generation would be similar to those anticipated under implementation of the proposed Project, though somewhat reduced. Alternative 1 would not be expected to result in environmental events that could cause potentially irreversible damage to the natural or human environment.

8.3.3 Alternative 2 – Reduced Project

All irreversible environmental impacts described for the proposed Project in Section 7.3.1 would also apply to Alternative 2. This alternative comprises a reduced project and would therefore generate slightly less air quality and GHG emissions, use less non-renewable fuels, reduced impervious surfaces, and generate less solid waste than under implementation of the proposed Project. Further, Alternative 2 would not be expected to result in environmental events that could cause potentially irreversible damage to the natural or human environment.

8.3.4 No Project Alternative

Implementation of the No Project Alternative would result in continued operations the existing CUP. Irreversible environmental impacts resulting from construction would not occur under the No Project Alternative. Therefore, impacts related to air quality and GHG emissions, use of non-renewables, hazardous materials, and waste generation would be reduced compared to the Project. The No Project Alternative would not be expected to result in environmental events that could cause potentially irreversible damage to the natural or human environment.