




air pollution control district
SANTA BARBARA COUNTY

Agenda Item: H-1
Agenda Date: October 16, 2025
Agenda Placement: Regular
Estimated Time: 15 minutes
Continued Item: No

Board Agenda Item

TO: Air Pollution Control District Board

FROM: Aeron Arlin Genet, Air Pollution Control Officer 

CONTACT: Emily Waddington, Air Quality Specialist, (805) 979-8334

SUBJECT: Land Use and California Environmental Quality Act Program

RECOMMENDATION:

Receive and file a presentation on the District's Land Use and California Environmental Quality Act (CEQA) Program.

BACKGROUND:

The California Environmental Quality Act is a state statute passed in 1970 that requires public agencies to identify and disclose the potential environmental impacts of their proposed projects and mitigate significant impacts, if feasible. The District complies with CEQA when approving plans, rules, and permits. In line with CEQA and the District's mission to protect the people and environment of Santa Barbara County from the effects of air pollution, the District's Planning Division works with local land use agencies to review new development projects and address their potential air quality impacts. In this capacity the District's goals are to:

- inform land use agencies of District regulatory requirements,
- suggest measures to promote clean air and protect public health,
- ensure that air quality and greenhouse gas impacts are properly assessed and disclosed, and
- recommend feasible mitigation of adverse air quality impacts.

The District's CEQA responsibilities extend to all eight incorporated cities, the unincorporated county, and offshore sources. The District fulfills several roles under CEQA:

- **Lead Agency** - As a lead agency, the District analyzes and prepares CEQA documents on its own activities such as air quality plans, rule development activities, and issuance of District permits.
- **Responsible Agency** - As a responsible agency, the District reviews CEQA documents prepared by other lead agencies with the aim to reduce or avoid air quality impacts and to

Aeron Arlin Genet, Air Pollution Control Officer

ensure that the document is adequate to fulfill CEQA requirements for District permit issuance.

- **Commenting Agency** - As a commenting agency, the District provides guidance to the lead agency to lessen adverse air quality impacts on projects that do not require a District permit but may still affect air quality.

DISCUSSION:

Interagency Review

District staff coordinate with the lead agency (usually the county or city land use authority) throughout the land use development approval process. The District evaluates project applications for incompleteness items, inconsistency items, and any potential air quality concerns (e.g., land use incompatibilities). The District may assist the lead agency with reviewing air quality or greenhouse gas technical reports or other required/recommended analyses such as health risk assessments for projects that emit toxic air contaminants. The District issues comment letters to the lead agency outlining applicable District and state air pollution requirements and recommended measures to reduce air quality impacts. The District also reviews and comments on public CEQA documents such as Mitigated Negative Declarations (MNDs) and Environmental Impact Reports (EIRs). The District reviews more than 100 land use development projects per year; in 2024, the District reviewed 114 projects.

District Permitting

All District discretionary permits (primarily Authority to Construct [ATC] permits) are subject to CEQA review. On average, the District issues 115 discretionary permits per calendar year, acting as the CEQA lead agency on the vast majority, and as the responsible agency for approximately one dozen permits each year.

When the District is a responsible agency on a project, staff works closely with the lead agency to ensure the District can rely on the lead agency's CEQA document. Whenever possible, the District recommends completing technical analysis that will be required for District permit issuance up front as part of the of the lead agency's CEQA review. This not only helps to facilitate an adequate, defensible CEQA document, but also streamlines District permit issuance by avoiding duplicative and/or subsequent analysis to satisfy the District's CEQA obligations.

Common Air Quality Concerns and Land Use Conflicts

There are several air quality concerns that the District is mindful of when reviewing land use projects. Most common are incompatibility issues with placement of new sources of toxic air contaminants (TACs) near proposed or existing sensitive receptors (such as residences, childcare facilities, schools, elderly care facilities, or hospitals), and placement of new sensitive receptors near existing sources of TACs. Common sources of TACs that pose a concern when sited proximate to sensitive land uses are operations or equipment that emit diesel particulate matter (including Highway 101, large diesel engines/generators, and facilities with heavy truck travel), gas stations, and various industrial operations. Land uses that generate dust and odors near sensitive receptors have the potential to also result in District Rule 303, Nuisance issues.

To address incompatibly issues, the District recommends measures to minimize the air quality impact, such as incorporation of an odor abatement plan, project design features to reduce exposure to highway emissions, or measures to reduce emissions from operational or construction equipment. To abate impacts from proximity to TAC emissions, the District regularly recommends siting criteria based on the California Air Resources Board (CARB's) *Air Quality and Land Use Handbook: A Community Health Perspective*.¹ This Handbook presents common sources of TACs such as freeways, distribution centers, dry cleaners, and gas stations, and a minimum distance that sensitive receptor locations should be placed from the source, based on findings from scientific studies.

Projects that generate significant emissions that exceed applicable CEQA thresholds are also of concern and the District closely reviews, analyses, and proposes mitigation to ensure impacts are reduced to the maximum extent feasible.

CEQA Resources

The District maintains several guidance documents and tools at www.ourair.org/land-use, including newly developed resources and recently updated references:

- **Environmental Review Guidelines** (first adopted in 1995, most recently updated in 2015) - outlines the District's internal CEQA implementation procedures.
- **CEQA Handbook** (updated October 2025) - provides guidance on preparing the air quality sections of CEQA documents, including required content, technical analyses, special project considerations, and mitigation measures.
- **Calculator Tools** - associated with the *CEQA Handbook* and include a winery emissions calculator and a peak day trip rate calculator for projects that involve special events.
- **Quick Reference Guide** - offers a checklist of common potential incompleteness/inconsistency items, permitting/regulatory advisories, and recommended best practices to address air quality concerns.

The District recommends the use of the California Emissions Estimator Model, or CalEEMod, available at www.caleemod.com for estimating construction and operational emissions of criteria pollutants and greenhouse gases for a variety of land use project types. CalEEMod is owned by the California Air Pollution Control Officer's Association (CAPCOA) and District staff currently participate in the CAPCOA focus group that guides the framework and direction of the model, including managing the model's ongoing updates. District staff regularly assist land use agencies with review of a project's CalEEMod analysis. Additionally, the *CEQA Handbook* provides guidance for use of CalEEMod and interpreting its results.

In the near future, District staff will host a training for land use agencies on these resources and the District's CEQA role. Ongoing coordination with land use/lead agencies countywide helps ensure that air quality impacts of new land use projects are properly assessed and mitigated through the land use review and CEQA process.

FISCAL IMPACT:

The costs for the District's CEQA and land use review efforts and activities described above are included in the budget approved by your Board. There are no additional fiscal impacts.

¹ Available at: ww2.arb.ca.gov/our-work/programs/resource-center/strategy-development/land-use-resources