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Katherine Douglas *Public Comment*

From: Ana Citrin <ana.citrin@gaviotacoastconservancy.org>
Sent: Friday, July 10, 2026 12:00 PM
To: sbcob
Subject: Solar Ordinance comments for the Board
Attachments: GCC BOS Comments_Solar Ordinance_7-10-26_FINAL.pdf

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Dear Clerk, please accept the attached comments on behalf of GCC. Thank you!

Ana Citrin
Legal and Policy Director



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July 10, 2026

Santa Barbara County Board of Supervisors
105 East Anapamu St.
Santa Barbara, CA 93101

RE: Utility-Scale Solar Amendments Project

Dear Chair Nelson and Supervisors,

The Gaviota Coast Conservancy (GCC) is a California public benefit organization dedicated to permanently protecting the rural character and environmental integrity of the Gaviota Coast for present and future generations. GCC understands the importance of transitioning to renewable energy to avoid the catastrophic effects of climate change and supports expanding solar energy systems including community-scale solar energy facilities on the Gaviota Coast. The Utility-Scale Solar Amendments Project will lay the groundwork for this transition and we **support its adoption**, with the incorporation of protections for the County's agricultural lands, viewsheds, and resource sensitive areas.

- We support the proposed Tier 1 and Tier 2 provisions including changes proposed by the Clean Energy Coalition and recommended by the Planning Commission.
- For Tier 2 and 3 facilities, we support protections for agricultural lands included in Staff's recommendation, including the 16,000 acre County-wide cap recommended by the Planning Commission, and amendments to the Uniform Rules.
- For agriculturally zoned lands on the Gaviota Coast, we urge the Board to limit the Tier 3 facilities to protect the largest continuous stretch of rural coastal land and healthiest remaining coastal ecosystem in the southern half of California.

The Gaviota Coast is a global biodiversity hotspot and refuge for endemic species that are threatened by human development. Important Native American cultural sites and historic resources are also prevalent throughout the Gaviota Coast. Furthermore, agriculture on the Gaviota Coast continues a long legacy of coastal California agricultural history and sustains the rural landscape. To protect these irreplaceable resources, GCC has consistently fought to prevent industrialization of the Gaviota Coast.

The Gaviota Coast Plan was developed over many years through a structured process that incorporated the input of a diverse range of stakeholders (the GavPAC), refined the Plan through many public hearings before the Planning Commission, Board of Supervisors, and Coastal Commission, to arrive at a document that reflects the goals and

objectives of the community. Future opportunities for renewable energy projects on the Gaviota Coast were discussed throughout the process, and the Gaviota Coast Plan struck a delicate balance in articulating what future enabling ordinance(s) should be considered. Specifically, the Gaviota Coast Plan provides:

Action TEI-7: Enabling Ordinance for Small Scale, Community Scale, and Utility Scale Wind Energy Generation and Community Scale Solar Energy Generation. Create an enabling ordinance for small-scale wind energy into the Coastal Zone. If results from studies shows that there are appropriate resources in this area then create an enabling ordinance for community and utility-scale wind energy and extend the enabling ordinance for community-scale solar energy into the Coastal Zone, west of the Gaviota Pass viewshed.


Importantly, Action TEI-7 provides only for community-scale - and not utility-scale - solar energy projects. This recognizes that utility-scale solar energy projects are not appropriate for the Gaviota Coast (See Gaviota Coast Plan, pp. 7-23 – 7-24). Impacts to agriculture are a concern throughout the Gaviota Coast Plan Area which is overwhelmingly zoned Ag-II. Visual impacts to public viewsheds are heightened on the eastern Gaviota Coast, and biological and cultural resource constraints are heightened on areas west of Gaviota pass that are less accessible to the public (and where sensitive resources are already being impacted by the Strauss Wind Energy Project west of Lompoc, and by the dramatic increase in rocket launch activity from Vandenberg Space Force Base).

The EIR identifies two alternatives that meaningfully reduce the potential for significant impacts on the Gaviota Coast, while still allowing for the meaningful expansion of solar energy projects within the County (Alternatives 2 and 3). The Draft EIR identifies Alternative 3, Removal of Utility-Scale Solar in Coastal Areas, as the environmentally superior alternative (Final EIR p. 4-33). Alternative 3 ensures that resource protection, agriculture, and public recreation remain the priority in coastal areas, while only reducing land available for utility-scale facilities by eight percent (id., p. 4-21). Limiting Tier 3 on agriculturally zoned lands on the Gaviota Coast, or within the Coastal Zone on the Gaviota Coast, would reduce land available for utility-scale facilities by a much smaller extent than Alternatives 2 or 3, while also meaningfully reducing the Project's significant impacts in a particularly sensitive area.

To protect the sensitive resources of the Gaviota Coast from the significant and adverse impacts of industrial scale solar, in a manner consistent with the Gaviota Coast Plan, we respectfully request that the Board of Supervisors approve the ordinance *with* this feasible protection measure.¹

¹ According to CEQA's "substantive mandate", if there are feasible alternatives or feasible mitigation measures available which would substantially lessen a project's significant environmental effects, the County can only approve that feasible environmentally superior alternative. (*Citizens for Goleta Valley* (1990) 52 Cal. 3d 562, 564-565; Pub. Res. Code § 21002)

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ana Citrin', written over a horizontal line.

Ana Citrin, GCC Legal and Policy Director