

ATTACHMENT M: COUNTY PLANNING COMMISSION STAFF REPORT, DATED MARCH 11, 2026

COUNTY PLANNING COMMISSION
Staff Report for Utility Scale Solar Amendments

Hearing Date: March 11, 2026

Deputy Director: Alex Tuttle

Staff Report Date: March 3, 2026

Division: Long Range Planning

Case Nos.: 24ORD-00028, 24ORD-00029

Supervising Planner: Whitney Wilkinson

Environmental Document: 25EIR-00003

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1.0 REQUEST

Hearing on the request of the County of Santa Barbara Planning and Development Department (P&D) that the County Planning Commission consider the following:

- Case No. 24ORD-00028: an Ordinance amending the County Land Use and Development Code (LUDC) to clarify what types of solar projects are exempt from planning permits, update definitions, create new and revised regulations regarding solar energy systems and facilities, revise applicable development standards, provisions, permit processing procedures, performance standards, and zoning requirements for solar projects;
- Case No. 24ORD-00029: an Ordinance amending to Article II – the Coastal Zoning Ordinance (CZO) to clarify what types of solar projects are exempt from planning permits, update definitions, create new and revised regulations regarding solar energy systems and facilities, revise applicable development standards, provisions, permit processing procedures, performance standards, and zoning requirements for solar projects.

2.0 RECOMMENDATION AND PROCEDURES

Follow the procedures outlined below and make recommendations to the Board of Supervisors (Board). Your Commission's motion should include the following:

Case No. 24ORD-00028

1. Make the required findings for approval, including CEQA findings, and recommend that the Board make the required findings for approval, including CEQA findings, for the proposed LUDC amendments, Case No. 24ORD-00028 (Attachment A);

2. Recommend that the Board certify the Utility Scale Solar Amendments Program Environmental Impact Report (PEIR), County Environmental Document No. 25EIR-00003 (Attachment B); and
3. Adopt a resolution (Attachment C) recommending that the Board approve Case No. 24ORD-00028, an ordinance amending the LUDC (Attachment C.3) with new and revised regulations for solar energy systems and facilities.

Refer back to staff if the County Planning Commission takes other than the recommended action for appropriate findings

Case No. 24ORD-00029

1. Make the required findings for approval, including the California Environmental Quality Act (CEQA) findings, and recommend that the Board make the required findings for approval, including CEQA findings, for the proposed amendments to the CZO, Case No. 24ORD-00029 (Attachment A);
2. Recommend that the Board certify the Utility Scale Solar Amendments Program Environmental Impact Report (PEIR), County Environmental Document No. 25EIR-00003 (Attachment B); and
3. Adopt a resolution (Attachment C) recommending that the Board approve Case No. 24ORD-00029, an ordinance amending Article II – Coastal Zoning Ordinance (Attachment C.4) with new and revised regulations for solar energy systems and facilities.

3.0 JURISDICTION

The County Planning Commission is considering the proposed LUDC and CZO amendments pursuant to Santa Barbara County Code Section 2-25.2. The Santa Barbara County Code states that the County Planning Commission, as the designated planning agency for the unincorporated

area of the county, provide recommendations on proposed amendments to the LUDC and CZO to the Board.

4.0 ISSUE SUMMARY

The County of Santa Barbara (County) proposes to adopt the Utility Scale Solar Amendments project (Project). The Project updates the County's policies and regulatory framework to allow solar energy systems and facilities, including utility-scale solar and accompanying battery energy storage systems (Battery ESS), throughout the unincorporated area, consistent with Board direction provided on July 13, 2021 and recommendations in the Board-adopted Strategic Energy Plan (2019). Specifically, the Project removes the Utility-Scale Solar Photovoltaic Overlay in the Cuyama Valley to expand where utility-scale solar may be permitted, sets forth permit requirements and associated standards for solar energy systems and facilities of various sizes, amends the Uniform Rules to allow for solar energy systems and facilities on land under Williamson Act Contract, and includes amendments for consistency between the CZO, MLUDC, LUDC, Comprehensive Plan Land Use Element, and Coastal Land Use Plan. A PEIR has been completed for the project in compliance with CEQA.

5.0 PROJECT INFORMATION

5.1 Background Information

On October 7, 2014, the Board adopted Land Use and Development Code Chapter 35-59 (Utility-Scale Photovoltaic Facilities) and related amendments to the Land Use Element of the County Comprehensive Plan. These provisions only allow utility-scale solar facilities in the 600-acre Utility-Scale Solar Photovoltaic Overlay in the Cuyama Valley. Smaller solar photovoltaic systems for on-site use are also allowed per the County zoning ordinances in the Inland Areas and Coastal Zone consistent with requirements set forth in State Law.

On September 10, 2019, the Board adopted the Strategic Energy Plan to stimulate local renewable energy development. The Strategic Energy Plan identified the capacity for up to 2,925 megawatts (MW) of solar photovoltaic energy to be generated annually from utility-scale and smaller-scale distributed solar systems within the County of Santa Barbara and recommended amending the County zoning ordinances to increase solar development opportunities. On July 13, 2021, the Board directed staff to draft amendments to the Comprehensive Plan and

Ordinances to allow for utility-scale solar on Professional & Institutional (PI), Agricultural (AG I and AG II), Public Utilities (PU), Industrial (M-1, M-2, M-RP), and Coastal-Related Industry (M-CR) zones. The Board also directed staff to draft amendments to the Uniform Rules to allow utility-scale solar on contracted lands.

5.2 Project Description

Solar energy systems and facilities would be categorized based on size. The smaller-scale systems (e.g., rooftop, building-integrated, and small ground-mounted solar energy systems) would be categorized as Tier 1 or Tier 2, and be either exempt or subject to streamlined ministerial approval. Tier 1 or 2 systems could occur on all unincorporated County lands, regardless of the zoning designation. Larger solar energy facilities (e.g., community-scale and utility-scale) would be categorized as Tier 3 and Tier 4, respectively. Tier 3 or 4 facilities would be allowed on lands zoned for agriculture, public utilities, light or general industry, and professional or institutional uses.

5.3 LUDC and CZO Amendments

The proposed Project includes amendments to the LUDC that allow building-integrated, roof-mounted, and small ground-mounted solar systems as Tier 1 solar systems and are exempt from planning permits, similar to current requirements. These systems are generally intended to support energy generation for on-site use. Tier 2 Solar Energy Systems include ground-mounted systems that are greater than 0.5 acres up to and including 5 acres in size on developed or improved areas (e.g., solar canopies over a parking lot) and would be allowed with a Zoning Clearance. These systems may be for on or off-site use, such as a microgrid system. Tier 3 projects up to 30 acres in size (community-scale) would be permitted with a Minor CUP and Tier 4 projects (over 30 acres, utility-scale) would be permitted with a Major CUP. Proposed Tier 3 and 4 projects in the Public Utilities (PU) zone would be allowed with a Development Plan in lieu of a CUP.

Proposed new development standards include height and setback requirements for Solar Energy Systems (Tier 1 and 2) and Facilities (Tier 3 and 4). New development standards for Tier 3 and 4 Solar Energy Facilities (and Tier 2, as applicable) also include requirements for protecting scenic resources, landscaping and screening, site coverage restrictions, requirements to protect agricultural and biological resources, vegetation maintenance requirements, geologic hazard and hazardous material avoidance, fire prevention and emergency management, noise level reduction requirements, traffic hazard prevention, fencing and signage requirements, transmission, power and communication line requirements, waste reduction and decommissioning plan requirements, construction ignition risk reduction requirements, and

operational site safety management plan requirements, as applicable. The Project also clarifies that permitting of standalone battery energy storage systems (Battery ESS) is currently allowed as public utility facilities or private services uses in the Code. Battery ESS is also proposed to be allowed as a component of Solar Energy Systems or Facilities, but must be commensurate in size to the solar project.

The proposed Project includes amendments to the CZO similar to the LUDC amendments with the only exception being that ground-mounted Tier 1 and 2 systems would require a CDP instead of being exempt or subject to a Zoning Clearance, and Tier 3 and 4 projects would require a CDP in addition to their other discretionary approvals. The table below provides additional information on the proposed solar permitting tiers and permitting framework for both the LUDC and CZO.

Tier	Zones Where Allowed	Planning Permit Requirement	Proposed Classification	Allowable System Size	Site Development Considerations
Tier 1	All Zones	Exempt	Building-integrated or roof-mounted solar energy system	All system sizes	May be located on any existing or proposed buildings or structures
		Exempt or CDP (CZO)	Small ground-mounted solar energy system	Up to and including 0.5 acres	May be allowed on undeveloped land or existing developed land.
Tier 2	All zones	Zoning Clearance (LUDC) or CDP (CZO)	Large ground-mounted solar energy system	Greater than 0.5 and up to and including 5.0 acres	Only allowed on developed or improved areas (e.g. legally paved, graded, cleared, or scarified). AG, RMZ, REC, and MT-zoned sites must produce power primarily for onsite use.
Tier 3	AG-I, AG-II; PI; M-1, M-2, M-RP, M-CR	Minor CUP and CDP (CZO)	Community-scale solar energy facility	Greater than 0.5 and up to and including 30 acres	May be allowed on undeveloped land or existing developed land
	PU	Development Plan and CDP (CZO)			

Tier	Zones Where Allowed	Planning Permit Requirement	Proposed Classification	Allowable System Size	Site Development Considerations
Tier 4	AG-I, AG-II; PI; M-1, M-2, M-RP, M-CR	Major CUP and CDP (CZO)	Utility-scale solar energy facility	Greater than 30 acres	May be allowed on undeveloped land or existing developed land
	PU	Development Plan and CDP (CZO)			

Key to Zone Symbols: AG-I= Agriculture I, AG-II = Agriculture II, PI = Professional and Institutional, M-1 = Light Industry, M-2 = General Industry, M-RP = Industrial Research Park, M-CR = Coastal-Related Industry, PU = Public Utilities

5.4 Comprehensive Plan Amendments

The proposed Project includes amendments to the Comprehensive Plan Land Use Element, which include revising definitions and deleting Policy 15, Utility-Scale Solar Photovoltaic Facility Policy, for consistency. Similar consistency-related updates to the Coastal Land Use Plan are also proposed.

5.5 Uniform Rules Amendments

Over 64% of privately owned AG-II zoned lands (493,600 acres) are enrolled in the County’s Agricultural Preserve Program. The Agricultural Preserve Program allows land to be enrolled in Williamson Act or Farmland Security Zone contracts and restricts agricultural, open space, or recreational uses in exchange for reduced property tax assessments. Consistent with Board direction, the proposed Project includes amendments to the Uniform Rules for Agricultural Preservation to allow for community-scale and utility-scale solar as a compatible use on land under Williamson Act contract.

The Agricultural Preserve Advisory Committee (APAC) oversees implementation of the Williamson Act through a set of rules (Uniform Rules) that define eligibility requirements and compatible uses to which each participating landowner must adhere to receive a reduced tax assessment.

Staff presented the proposed amendments to the Uniform Rules to APAC on September 12, 2024. APAC provided feedback on alternative amendments to the Uniform Rules that staff included in the PEIR as Alternative 2 to the proposed project. Staff returned to APAC on December 11, 2025, with revised proposed amendments to the Uniform Rules. Staff proposed amendments to the Uniform Rules included:

1. Definitions for Agrivoltaics, compatible use, solar energy systems or facilities, and solar-use easement,
2. Consistency updates to the definitions for development envelope,
3. Updates to the compatibility guidelines specifying the following allowable sizes for solar energy systems and facilities for off-site use:
 - a. On prime land, 10% of the premises, or 10 acres, whichever is less, with minimum premises size of 40 acres.
 - b. On nonprime land, 15% of the premises, or 100 acres, whichever is less, with minimum premises size of 100 acres.
4. Updates specifying solar energy systems and facilities are incompatible land uses with open space (Uniform Rule 3) and recreation Williamson Act contracts (Uniform Rule 4), and
5. Updated language clarifying the process for simultaneously rescinding a Williamson Act contract and entering into a Solar-Use Easement in accordance with California Department of Conservation requirements.

APAC created a sub-committee to finalize its recommended Uniform Rules amendments and voted to recommend these amendments to the Board at its January 2026 meeting. APAC's recommendations largely align with staff's recommendations except are slightly more restrictive (only 10% of the premises, or 100 acres, whichever is less with a minimum premises size of 100 acres) than those proposed by staff for solar systems on nonprime land. Pursuant to Government Code Section 51231, the Board is the decision-making body for amendments to the Uniform Rules regarding allowed uses on lands that are subject to agricultural preserve contracts. Furthermore, pursuant to Government Code Section 51239, APAC, not the County Planning Commission, advises the Board on the administration of the agricultural preserve program in the County. Except for the one difference stated above, staff has incorporated APAC's recommendations into the draft Uniform Rule amendments (Attachment D). The proposed amendments to the Uniform Rules, as recommended by APAC and by staff, are presented to the County Planning Commission for informational purposes only, and will be forwarded to the Board for a final decision.

5.6 Agricultural Advisory Committee Engagement and Feedback

Staff presented the Project to the Agricultural Advisory Committee (AAC) on August 8, 2024, and November 13, 2025. At the meeting in November 2025, the AAC provided the following feedback to staff for consideration by decision makers:

1. The agricultural community is interested in supporting the County's renewable energy objectives and would like to quickly install solar to support agricultural operations,

including anticipated future electrified farm equipment. The utility scale solar ordinance amendments should, therefore, not require discretionary planning permits for solar installations used exclusively for on-site agricultural operations.

2. The Agricultural Advisory Committee supports staff's recommendations for the Uniform Rules amendments and does not think they should be more restrictive as proposed by the Agricultural Preserve Advisory Committee.

After considering the AAC's feedback, the definition of Tier 2 solar systems was modified to allow ground-mounted solar energy systems (greater than 0.5 acres and up to 5 acres) permitted with a zoning clearance and to include systems that produce power for on-site agricultural use on both developed and improved areas of a site (e.g. legally paved, graded, cleared, or scarified).

5.7 Public Outreach and Stakeholder Engagement

Staff held a meeting for solar developers and other stakeholders on May 23, 2024. Staff presented a summary of the project, including a conceptual draft of the permitting tiers, allowable zones, and permit types for utility-scale, community-scale, and smaller solar energy systems and facilities. The feedback received from developers was incorporated into the draft project description where appropriate.

6.0 PROJECT ANALYSIS

6.1 Environmental Review

A Draft Program Environmental Impact Report (Case No. 25EIR-00003) was prepared to evaluate the project in compliance with the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15168. The Draft PEIR was released for public comment from August 19, 2025, to October 3, 2025. As identified in the PEIR, after implementation of the required mitigation measures, the project would result in the following significant and unavoidable adverse impacts to the environment, primarily related to future Tier 3 and 4 solar energy facilities:

- **Aesthetics.** The Project would result in potentially significant impacts from adverse effects to public scenic vistas (Impact AV-1), local or state scenic corridors (Impact AV-2), and degradation of existing visual character or quality of public views or conflict with applicable regulations governing scenic quality (Impact AV-3) associated with the future development of Tier 3 and Tier 4 solar energy facilities. Development standards and implementation of MM AV-1, which requires design review approval including siting and design considerations as applicable for Tier 3 and 4 projects, would reduce some adverse visual impacts. While development standards and mitigation would reduce some of the

impacts, because the specific locations and designs for future projects are unknown at this time, potentially significant and unavoidable impacts could result even with implementation of mitigation measure (MM) AV-1. The Project, in combination with future growth and related projects, would also contribute to potentially significant cumulative aesthetic impacts.

- **Agricultural Resources.** Future Tier 3 and Tier 4 solar energy facilities enabled under the Project could directly convert farmland into non-agricultural uses or otherwise impair agricultural land productivity by constructing, operating, and maintaining facilities on agricultural land (Impact AG-1). The zoning code amendments and mitigation measures would reduce some of the designated farmland impacts to insignificant levels (Impact AG-3). In addition, a decommissioning plan is required for Tier 3 and 4 solar projects that includes restoration to a condition suitable for agricultural usage if the project site is within an Agricultural zone district. MM AG-1 would require an assessment of agricultural viability that would serve as a benchmark for post-decommissioning restoration. However, the effectiveness at reducing all impacts is unknown, and the amendments as proposed do not require or guarantee decommissioning within a certain time frame. Therefore, even with implementation of MM AG-1, impacts would remain significant and unavoidable. The Project could also conflict with existing agricultural zoning or Williamson Act contracts (Impact AG-2). Compliance with the Uniform Rules and proposed development standards would offset most impacts and help preserve the viability of agricultural lands. The Uniform Rules amendments would support co-location of solar and agriculture (agrivoltaics) uses on agricultural preserve lands and require decommissioning similar to the requirements of MM AG-1. Additionally, landowners may elect to cancel or unenroll Williamson Act contracts to develop Tier 3 or 4 facilities without being subject to the Uniform Rules. Therefore, even with implementation of MM AG-1, impacts would remain significant and unavoidable. The Project would allow solar energy development that could involve cumulative effects resulting in the loss of or conversion of agricultural lands to non-agricultural uses, or otherwise reduce productivity for remaining agricultural lands due to land use conflicts. Therefore, the Project, in combination with future development and related projects in the unincorporated County, and even with implementation of MM AG-1, would incrementally contribute to a cumulative loss of farmland and impacts would be cumulatively significant and unavoidable.
- **Cultural Resources.** Implementation of MMs CR-1 through CR-6 would reduce many of the potential direct and indirect adverse effects to archaeological resources associated with the Project. However, given the high cultural sensitivity of the Project area, there is the potential for unintended impacts to unknown resources. Further, because the specific

locations and designs for future projects are unknown at this time, impacts are considered significant and unavoidable and the Project may still result in a cumulatively considerable contribution to archaeological resources. Implementation of MMs TCR-1 through TCR-3 would reduce direct and indirect adverse effects and may result in a cumulatively considerable contribution to tribal cultural resources associated with Tier 2, 3, and 4 Projects. However, given the high sensitivity of the Project area, there is the potential for unintended impacts to unknown tribal cultural resources and impacts are considered significant and unavoidable. Similarly, implementation of MM PR-1 through PR-4 would reduce potential adverse effects including cumulative effects to unique paleontological resources or sites, but due to the unknown number, location, and design of future Tier 3 and 4 facilities, impacts are considered significant and unavoidable and could be cumulatively considerable. Therefore, the Project would contribute to a significant and unavoidable cumulative impact. In addition, the incremental impact of the future solar energy facilities enabled by the Project, combined with those of the cumulative projects, could result in a cumulative impact on paleontological resources.

Based on the analysis provided in the PEIR, the proposed Project would also result in potentially significant but mitigable impacts related to: Air Quality, Biological Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise, Transportation, Utilities and Services Systems, and Wildfire. The programmatic mitigation measures identified in the PEIR will be incorporated as development standards in the LUDC and CZO ordinance amendments or applied as mitigation to projects that tier from the PEIR. The full PEIR, including the Mitigation Monitoring and Reporting Program, is included as Attachment B.

As required under CEQA, the PEIR evaluated a reasonable range of alternatives to the project that would avoid or substantially lessen significant environmental effects. The PEIR evaluated three alternatives: the No Project alternative, Reduction of Solar on Williamson Act-Contracted Lands, and Removal of Utility-Scale Solar in Coastal Areas. The PEIR identified the Removal of Utility-Scale Solar in Coastal Areas alternative as the Environmentally Superior Alternative. However, this alternative does not fully meet the project objectives, and as further discussed in the CEQA Findings (Attachment A), is not recommended for approval.

6.2 Comprehensive Plan Consistency

The following analysis includes a general discussion of the Project's consistency with the County's Comprehensive Plan. Future projects enabled under these ordinance amendments will be evaluated for consistency with applicable Comprehensive Plan policies on a project-by-project

basis. As discussed below and in the findings (Attachment A), the proposed Project is consistent with the Comprehensive Plan. The proposed project will provide clear, consistent regulations regarding solar energy systems and facilities.

REQUIREMENT	DISCUSSION
Aesthetics/Visual Resources	
<p><i>Coastal Land Use Plan Coastal Act Policy 30251: The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.</i></p>	<p>Consistent: The Project would enable a range of solar energy system and facility uses by creating a tiered permitting approach. Solar facilities would undergo permit review and be subject to County regulations protecting visual resources, including public views, to control where and how development is sited in the Coastal Zone. For developments within the Coastal Zone, ground mounted Tier 1 and 2 solar energy systems would require a Coastal Development Permit (CDP) while Tier 3 and 4 systems would also require a Conditional Use Permit (CUP) and may include site-specific standards relating to applicable plans for development. CDP standards would ensure that scenic views are maintained and that activities are compatible with surrounding areas. In addition, proposed development standards included in the CZO amendments would require Tier 3 and Tier 4 facilities to be designed and located in a manner to minimize adverse visual impacts. The development standards would not allow solar facilities to be within identified scenic areas unless properly screened from view. Such standards would ensure that future solar energy system and facility development sited within the Coastal Zone would protect scenic and visual qualities.</p>
<p><i>Coastal Land Use Plan Policy 4-3: In areas designated as rural on the land use plan maps,</i></p>	<p>Consistent: Tier 1 solar developments would be roof-mounted, building integrated, or small</p>

REQUIREMENT	DISCUSSION
<p><i>the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.</i></p>	<p>ground-mounted structures that, because of their size and location, would be compatible with rural areas and the natural environment. Tier 2 through 4 developments would be reviewed for compliance with relevant plans, development standards, and practices. Such standards would include siting, height restrictions, landscaping and screening requirements, as applicable, that would ensure that the character of the surrounding natural environment would not be adversely affected. In addition, the Project would require larger Tier 3 and Tier 4 facilities to be designed and located in a manner to minimize adverse visual impacts. Development standards in the MLUDC and CZO as well as mitigation measures in the PEIR would require siting of solar facilities to consider adverse effects on scenic areas. Such standards would ensure that future solar energy system and facility developments would protect scenic and visual qualities.</p>
<p><i>Coastal Land Use Plan Policy 4-5:</i> <i>In addition to that required for safety (see Policy 3-4), further bluff setbacks may be required for oceanfront structures to minimize or avoid impacts on public views from the beach. Bluff top structures shall be set back from the bluff edge sufficiently far to ensure that the structure does not infringe on views from the beach except in areas where existing structures on both sides of the proposed structure already impact public views from the beach. In such cases, the new structure shall be located no closer to the bluff's edge than the adjacent structures.</i></p>	<p>Consistent: Some Tier 1 and all Tier 2 solar energy systems would require a CDP within the Coastal Zone while Tier 3 and 4 systems would also require a minor or major CUP and may include site-specific standards relating to applicable plans for development. Where a CDP is required, Coastal Zone review standards would ensure that new development regardless of size would be required to set back from the bluff edge sufficiently so as to not infringe on views from the beach.</p>
<p>AGRICULTURAL RESOURCES</p>	

REQUIREMENT	DISCUSSION
<p><i>Coastal Land Use Plan Policy 8-2:</i> <i>If a parcel is designated for agricultural use and is located in a rural area not contiguous with the urban/rural boundary, conversion to non-agricultural use shall not be permitted unless such conversion of the entire parcel would allow for another priority use under the Coastal Act, e.g., coastal dependent industry, recreation and access, or protection of an environmentally sensitive habitat. Such conversion shall not be in conflict with contiguous agricultural operations in the area, and shall be consistent with Section 30241 and 30242 of the Coastal Act.</i></p>	<p>Consistent: Some Tier 1 and all Tier 2, 3 and 4 developments would undergo County permit review to determine compliance with relevant plans, development standards, and policies. This would ensure that any solar development on land designed for an agricultural use is subordinate to the agricultural use and designed in a manner that avoids the conversion of the agricultural land to a non-agricultural use and is compatible with continued agricultural use on surrounding lands. In addition, the Project would require Tier 3 and Tier 4 facilities to minimize adverse agricultural impacts by permanently preserving off-site agricultural land of equal or better agricultural quality if the project involves the development of solar energy facilities on prime agricultural land and/or Important Farmland shown on the Department of Conservation’s Important Farmland Maps. Such standards would help ensure that any proposed solar energy system and facility developments on agricultural land are consistent with this policy.</p>
BIOLOGICAL RESOURCES	
<p><i>Coastal Land Use Plan Development Policy 2-11:</i> <i>All development, including agriculture, adjacent to areas designated on the land use plan or resource maps as environmentally sensitive habitat areas, shall be regulated to avoid adverse impacts on habitat resources. Regulatory measures include, but are not limited to, setbacks, buffer zones, grading controls, noise restrictions, maintenance of natural vegetation, and control of runoff.</i></p>	<p>Consistent: Tier 1 and 2 solar systems would largely be sited on existing developed or improved areas that lack biological resources. MM-BIO 1 would require that construction and staging areas for Tier 2 projects be located in previously disturbed areas.</p> <p>Tier 3 and 4 systems would require a minor or major CUP in addition to a CDP and may include site-specific standards relating to applicable plans for development. In addition, the PEIR’s</p>

REQUIREMENT	DISCUSSION
<p><i>Coastal Land Use Plan Coastal Act Policy 30240:</i></p> <p><i>a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.</i></p> <p><i>b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.</i></p> <p><i>Coastal Land Use Plan Environmentally Sensitive Habitat Area Policy 9-1:</i> <i>Prior to the issuance of a development permit, all projects on parcels shown on the land use plan and/or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an environmentally sensitive habitat area shall be found to be in conformity with the applicable habitat protection policies of the land use plan. All development plans, grading plans, etc., shall show the precise location of the habitat(s) potentially affected by the proposed project. Projects which could adversely impact an environmentally sensitive habitat area may be subject to a site inspection by a qualified biologist to be selected jointly by the County and the applicant.</i></p>	<p>MM-BIO 3 would require vegetation mapping and habitat assessment for all Tier 3 and Tier 4 facilities, and it would require these facilities be designed and located in a manner so as to minimize any adverse biological impacts. Further, this mitigation and MM-BIO 2, 4, 10, 11, 12, 13, 14, 15, and 16 would require the facility to avoid significant impacts to known sensitive natural communities, Environmentally Sensitive Habitats (ESH), rare and special-status plant species, special-status wildlife species and their habitats, critical habitat corridors, and nesting birds.</p> <p>Proposed development standards in the CZO amendments also include setbacks, geologic hazards avoidance, noise level reduction, and vegetation establishment and maintenance. Such standards would ensure that future solar energy facilities would avoid adverse impacts on habitat resources and disruption of habitat value, consistent with these policies.</p>

REQUIREMENT	DISCUSSION
<p><i>Coastal Land Use Plan Environmentally Sensitive Habitat Area Policy 9-18:</i> <i>Development shall be sited and designed to protect native grassland areas.</i></p> <p><i>Coastal Land Use Plan Environmentally Sensitive Habitat Area Policy 9-36:</i> <i>When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. All development shall be sited, designed, and constructed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion on native vegetation. In particular, grading and paving shall not adversely affect root zone aeration and stability of native trees.</i></p> <p><i>Coastal Land Use Plan Environmentally Sensitive Habitat Area Policy 9-36:</i> <i>When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. All development shall be sited, designed, and constructed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion on native vegetation. In particular, grading and paving shall not adversely affect root zone aeration and stability of native trees.</i></p>	
COASTAL LAND USE	
<p><i>Coastal Land Use Plan Policy 1-2:</i> <i>Where policies within the land use plan overlap, the policy which is the most protective of coastal resources shall take precedence.</i></p> <p><i>Coastal Land Use Plan Policy 1-3:</i> <i>Where there are conflicts between the policies set forth in</i></p>	<p>Consistent: In the Coastal Zone, development would require review as part of the CDP. During this review, the most protective coastal resource policies would prevail, the policies of the CLUP would take precedence over similar or conflicting policies of the County’s</p>

REQUIREMENT	DISCUSSION
<p><i>the coastal land use plan and those set forth in any element of the County’s Comprehensive Plan or existing ordinances, the policies of the coastal land use plan shall take precedence.</i></p> <p>Coastal Land Use Plan Policy 1-4: <i>Prior to the issuance of a coastal development permit, the County shall make the finding that the development reasonably meets the standards set forth in all applicable land use plan policies.</i></p>	<p>Comprehensive Plan, and the project would be evaluated and designed to ensure it reasonably meets the standards set forth in all applicable land use policies.</p>
LAND USE	
<p>Coastal Land Use Plan Development Policy 2-6/Land Use Element Land Use Development Policy 4: <i>Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan. Affordable housing projects proposed pursuant to the Affordable Housing Overlay regulations, special needs housing projects or other affordable housing projects which include at least 50% of the total number of units for affordable housing or 30% of the total number of units affordable at the very low income level shall be presumed to be consistent with this policy if the project has, or</i></p>	<p>Consistent: Some Tier 1 and 2 structures and all Tier 3 and 4 developments would undergo County permit review to determine compliance with this policy. The permit review would ensure that adequate public or private services and resources are available to serve the proposed development.</p>

REQUIREMENT	DISCUSSION
<p><i>is conditioned to obtain all necessary can and will serve letters at the time of final map recordation, or if no map, prior to issuance of land use permits.</i></p>	
GEOLOGY AND SOILS	
<p><i>Coastal Land Use Plan Policy 3-4:</i> <i>In areas of new development, above-ground structures shall be set back a sufficient distance from the bluff edge to be safe from the threat of bluff erosion for a minimum of 75 years, unless such standard will make a lot unbuildable, in which case a standard of 50 years shall be used. The County shall determine the required setback. A geologic report shall be required by the County in order to make this determination. At a minimum, such geologic report shall be prepared in conformance with the Coastal Commission’s adopted Statewide Interpretive Guidelines regarding “Geologic Stability of Bluff top Development.”</i></p> <p><i>Coastal Land Use Plan Policy 3-5:</i> <i>Within the required blufftop setback, drought-tolerant vegetation shall be maintained. Grading, as may be required to establish proper drainage or to install landscaping, and minor improvements, i.e., patios and fences that do not impact bluff stability, may be permitted. Surface water shall be directed away from the top of the bluff or be handled in a manner satisfactory to prevent damage to the bluff by surface and percolating water.</i></p> <p><i>Coastal Land Use Plan Policy 3-6:</i> <i>Development and activity of any kind beyond the required blufftop setback shall be constructed to insure</i></p>	<p>Consistent: For future solar development within the Coastal Zone, ground-mounted Tier 1 and 2 solar energy systems would require a CDP while Tier 3 and 4 systems would also require a minor or major CUP and may include site-specific standards relating to applicable plans for development. CDP standards would ensure that new development regardless of size would be required to set back from the bluff edge and developed in accordance with these policies. CUP standards would require a more rigorous level of County permit review that would aid in consistency with Coastal Zone goals. In addition, proposed Development Standards as defined in the CZO amendments would require the development of Tier 3 and Tier 4 facilities to abide by the setback standards of the applicable zone district. The development standards would require the applicant to provide documentation that the facilities would follow the setback standards of the applicable zone. The development standards would require Tier 3 and Tier 4 facilities to be designed and located in a manner to minimize adverse geologic impacts to avoid hazards including erosion. Such standards would ensure that any of the solar energy system and facility developments would be safe from the threat of bluff erosion.</p>

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<p><i>that all surface and subsurface drainage shall not contribute to the erosion of the bluff face or the stability of the bluff itself.</i></p> <p>Coastal Land Use Plan Policy 3-7: <i>No development shall be permitted on the bluff face, except for engineered staircases or accessways to provide beach access, and pipelines for scientific research or coastal dependent industry. Drainpipes shall be allowed only where no other less environmentally damaging drain system is feasible and the drainpipes are designed and placed to minimize impacts to the bluff face, toe, and beach. Drainage devices extending over the bluff face shall not be permitted if the property can be drained away from the bluff face.</i></p>	
HAZARDS/HAZARDOUS MATERIALS	
<p>Coastal Land Use Plan Coastal Act Policy 30253: <i>New development shall:</i></p> <p>(1) <i>Minimize risks to life and property in areas of high geologic, flood, and fire hazard.</i></p> <p>(2) <i>Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.</i></p> <p>Coastal Land Use Plan Policy 3-8: <i>Applications for grading and building permits, and applications for subdivision shall be reviewed</i></p>	<p>Consistent: Permit review would include review for compliance with relevant policies from the Seismic Safety and Safety Element, the California Fire Code, as well as the respective Fire District development standards to ensure that new development minimizes risks to life and property in areas of high hazard risk and that stability and structural integrity are sufficient to avoid contributions to erosion or alterations to natural landforms. In addition, the proposed development standards would require Tier 3 and Tier 4 facilities to be designed and located in a manner to minimize adverse geologic impacts to avoid hazards including erosion control and minimizing</p>

REQUIREMENT	DISCUSSION
<p><i>for adjacency to, threats from, and impacts on geologic hazards arising from seismic events, tsunami runup, landslides, beach erosion, or other geologic hazards such as expansive soils and subsidence areas. In areas of known geologic hazards, a geologic report shall be required. Mitigation measures shall be required where necessary.</i></p> <p>Seismic Safety and Safety Element Geologic and Seismic Protection Policy 1. <i>The County shall minimize the potential effects of geologic, soil, and seismic hazards through the development review process. Implement implementation measures.</i></p> <p>Seismic Safety and Safety Element Policy FIRE-1.0. <i>Continue to pursue and promote County fire prevention programs and control measures.</i></p>	<p>flooding. The development standards would require Tier 3 and Tier 4 facilities to include a fire prevention plan to mitigate fire hazards through construction and operation of the development. Policies and design/development standards from plans such as the County’s Seismic Safety and Safety Element would also be implemented to ensure that hazard risks are minimized for new development. This could include geologic studies and various mitigation measures relating to seismic events, tsunami runup, landslides, erosion, and other geologic hazards, if necessary. Such standards would ensure that any of the solar energy system and facilities minimize geologic and fire hazards.</p>
HYDROLOGY AND WATER QUALITY	
<p>Coastal Land Use Plan Coastal Act Policy 30231: <i>The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging wastewater reclamation, maintaining natural vegetation</i></p>	<p>Consistent. In the Coastal Zone, development would require review as part of the CDP, and for Tier 3 and 4 projects, a minor or major CUP. During this review, the County would ensure that the project meets the standards set forth in all applicable land use policies. The implementation of conditions imposed as a part of that review would ensure that the proposed uses and related development would not adversely affect biological productivity and water quality. In addition, the proposed development standards would require Tier 3 and Tier 4 facilities to be designed and located in a manner to minimize adverse geologic</p>

REQUIREMENT	DISCUSSION
<p><i>buffer areas that protect riparian habitats, and minimizing alteration of natural streams.</i></p>	<p>impacts and protect sensitive biological resources. Tier 3 and Tier 4 facilities would be required to minimize degradation of water quality during facility construction and operation. The development would be sited and designed to avoid significant geologic impacts considering groundwater conditions. Impacts to surface water due to sedimentation of streams shall be mitigated to the maximum extent feasible through adequate erosion and sediment controls during and after construction. Such standards would ensure that any of the solar energy system and facilities minimize degradation of water quality and hydrological resources.</p>
<p><i>Coastal Land Use Plan Policy 3-11/Land Use Element Flood Hazard Area Policy 1:</i> All development, including construction, excavation, and grading, except for flood control projects and non-structural agricultural uses, shall be prohibited in the floodway unless off-setting improvements in accordance with HUD regulations are provided. If the proposed development falls within the floodway fringe, development may be permitted, provided creek setback requirements are met and finish floor elevations are above the projected 100-year flood elevation, as specified in the Flood Plain Management Ordinance.</p> <p><i>Coastal Plan Policy 3-18:</i> Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from</p>	<p>Consistent: Some Tier 1 and all Tier 2, 3, and 4 developments would undergo County permit review. All projects (Tier 1-4) would be evaluated for potential flood effects or flagged for Flood Control review if determined to be in a floodway or flood hazard zone. This review would ensure that development sited within or near a flood hazard zone contains the required setbacks, building materials, construction methods, and utilities. Adherence to Santa Barbara County Code Chapter 15A, <i>Floodplain Management</i>, and Section 15A-16, <i>Standards of Construction</i>, would minimize or avoid flood hazards. In addition, the development standards would require Tier 3 and Tier 4 facilities to be designed and located in a manner to minimize adverse geologic impacts to avoid hazards including minimizing flooding. Such standards would ensure that any of the solar energy system and facilities minimize</p>

REQUIREMENT	DISCUSSION
<p><i>modified soil and surface conditions as a result of development. Water runoff shall be retained on-site whenever possible to facilitate groundwater recharge.</i></p> <p>Coastal Land Use Plan Policy 3-19/Land Use Element Hillside and Watershed Protection Policy 7: <i>Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.</i></p> <p>Land Use Element Flood Hazard Area Policy 3: <i>All development shall be reviewed in accordance with the requirements of County Code Chapter 15A-Floodplain Management and 15B-Development Along Watercourses.</i></p> <p>Seismic Safety and Safety Element Flood Policy 2: <i>The County shall evaluate whether development should be located in flood hazard zones, and identify construction methods or other methods to minimize damage if development is located in flood hazard zones pursuant to Government Code §65302(3)(g)(2)(ii).</i></p>	<p>geologic and flood hazards, onsite or downstream flooding, and would design the project to minimize the need for flood control measures.</p> <p>Projects of a certain size would trigger stormwater control requirements that would place additional requirements on projects during construction that prevent impacts to wetland, surface, and groundwater water quality.</p>
HILLSIDE AND WATERSHED PROTECTION	
<p>Coastal Land Use Plan Policy 3-13: <i>Plans for development shall minimize cut and fill</i></p>	<p>Consistent: Some Tier 1 and all Tier 2, 3, and 4 developments would undergo County permit</p>

REQUIREMENT	DISCUSSION
<p><i>operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.</i></p> <p>Coastal Land Use Plan Policy 3-14/Land Use Element Hillside and Watershed Protection Policy 2: <i>All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited for development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</i></p> <p>Coastal Land Use Plan Policy 3-16/Land Use Element Hillside and Watershed Protection Policy 4: <i>Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained throughout the development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping location.</i></p> <p>Coastal Land Use Plan Policy 3-17: <i>Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All</i></p>	<p>review to determine compliance with relevant plans and policies, depending on the location of development, as well as other associated permit conditions. This review would ensure that appropriate erosion and sediment control measures are implemented in accordance with Grading Ordinance regulations (Chapter 14 of the County Code). In addition, the development standards as defined in the proposed amendments would require Tier 3 and Tier 4 facilities to be designed and located in a manner to minimize adverse geologic impacts. Such standards would ensure that any of the solar energy system and facilities minimize geologic and sedimentation hazards through adequate erosion and sediment controls.</p> <p>All projects that require grading of more than 50 cubic yards are subject to grading plan review by the County. The County requires conformance with County Grading and Building Codes (Chapters 14 and 10, respectively, of the County Code) to address potential geologic hazards, and Best Management Practices (BMPs) may also be required to ensure the implementation of appropriate slope stability, soil protection, erosion, and sediment control measures, as necessary, in accordance with Grading Ordinance regulations.</p> <p>MM-BIO 9 Revegetation Plan would ensure areas temporarily disturbed during construction activities are revegetated with native plantings for Tier 3 and Tier 4 projects. Additionally, proposed development</p>

REQUIREMENT	DISCUSSION
<p><i>cut and fill slopes shall be stabilized immediately with planting of native grasses and shrubs, appropriate nonnative plants, or with accepted landscaping practices.</i></p> <p>Land Use Element Streams and Creeks Policy 1. <i>All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.</i></p>	<p>standards, such as prohibiting Tier 3 and 4 solar energy facilities on slopes that exceed 20% and avoiding tree removal to the maximum extent feasible, would help to minimize grading and erosion potential and preserve native vegetation and natural features consistent with these policies.</p>
<p>Coastal Land Use Plan Environmentally Sensitive Habitat Area Policy 9-37: <i>The minimum buffer strip for major streams in rural areas, as defined by the land use plan, shall be presumptively 100 feet, and for streams in urban areas, 50 feet.</i></p> <p><i>These minimum buffers may be adjusted upward or downward on a case-by-case basis. The buffer shall be established based on an investigation of factors including soil type and stability of stream corridors; how surface water filters into the ground; slope of the land on either side of the stream; and location of the 100-year flood plain boundary, and after consultation with the Department of Fish and Game and Regional Water Quality Control Board in order to protect the biological productivity and water quality of streams.</i></p>	<p>Consistent: All new freestanding systems would need to comply with this policy. Some Tier 1 and all Tier 2, 3, and 4 developments would undergo County permit review to determine compliance. Permit review would ensure development adjacent to streams would follow rules relating to buffer strips and setbacks, including criteria affecting establishment of buffers.</p>
PUBLIC ACCESS, AND RECREATION	
<p>Coastal Land Use Plan Coastal Act Policy 30211: <i>Development shall not interfere with the public’s right of access to the sea where acquired through use, custom, or legislative</i></p>	<p>Consistent: Some Tier 1 and all Tier 2, 3, and 4 developments would undergo County permit review to determine compliance with relevant plans and policies. In the Coastal Zone,</p>

REQUIREMENT	DISCUSSION
<p><i>authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.</i></p> <p>Coastal Land Use Plan Policy 7-3: <i>For all new development between the first public road and the ocean, granting of lateral easements to allow for public access along the shoreline shall be mandatory. In coastal areas, where the bluffs exceed five feet in height, all beach seaward of the base of the bluff shall be dedicated. In coastal areas where the bluffs are less than five feet, the area to be dedicated shall be determined by the County, based on findings reflecting historic use, existing and future public recreational needs, and coastal resource protection. At a minimum, the dedicated easement shall be adequate to allow for lateral access during periods of high tide. In no case shall the dedicated easement be required to be closer than 10 feet to a residential structure. In addition, all fences, no trespassing signs, and other obstructions that may limit public lateral access shall be removed as a condition of development approval.</i></p>	<p>development would require review as part of the CDP and, for Tier 3 and 4 projects, a minor or major CUP. This review would ensure compliance with relevant plans, policies, and conditions of approval relating to the public’s right of access. County review would ensure that future solar facilities would not interfere with public access to the sea.</p>
CULTURAL RESOURCES	
<p>Coastal Land Use Plan Policy 10-2: <i>When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.</i></p> <p>Coastal Land Use Plan Policy 10-3: <i>When sufficient planning flexibility does not permit avoiding construction on archaeological or</i></p>	<p>Consistent: Some Tier 1 and all Tier 2, 3, and 4 developments would undergo County permit review to determine compliance with relevant plans and policies. All solar projects (Tier 1-4) would be evaluated for potential historical resources during Building Permit review. In the Coastal Zone, development would require review as part of the CDP and/or a minor or major CUP. This review would ensure</p>

REQUIREMENT	DISCUSSION
<p><i>other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.</i></p> <p>Coastal Land Use Plan Policy 10-5: <i>Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.</i></p>	<p>compliance with relevant plans, policies, and conditions of approval relating to archeological and cultural resources, including cultural resource mitigation measures from the PEIR.</p>
NOISE	
<p>Noise Element Policy 1: <i>In the planning of land use, 65dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in the project design.</i></p>	<p>Consistent: All non-exempt projects would be required to observe the County’s requirements regarding construction hours. Construction and maintenance activities are temporary, and future solar energy systems and facilities would produce very minimal noise during operation. In addition, the development standards would require Tier 3 and Tier 4 facilities to be designed and located in a manner to avoid any significant adverse construction and operational noise impacts to noise sensitive uses as determined by the Noise Element. Such standards would ensure that any of the solar energy system and facilities minimize noise impacts. Any future project would have conditions applied to ensure consistency with these development standards.</p>

7.0 MONTECITO PLANNING COMMISSION (MPC)

Montecito Planning Commission Recommendation

On February 18, 2026, the MPC voted 5-0 to recommend the Board adopt the MLUDC amendments and recommended to the CPC to recommend that the Board adopt the CZO amendments as recommended by staff.

8.0 APPEALS PROCEDURE

Comprehensive Plan amendments and Ordinance Amendments recommended for approval or denial are automatically forwarded to the Board of Supervisors for final action, therefore, the proposed amendments are not subject to appeal.

ATTACHMENTS

- A. Findings
- B. Final PEIR: <https://cosantabarbara.box.com/s/vctlxnw1dvt73o8ljz3rtsf332z2054i>
- C. Resolution
 - C.1. Land Use Element Board Resolution
 - C.2. Coastal Land Use Plan Board Resolution
 - C.3. Land Use and Development Code Amendments
 - C.4. Coastal Zoning Ordinance Amendments
- D. Draft Uniform Rules Amendments

ATTACHMENT A: FINDINGS
INCLUDED AS PART OF ATTACHMENT L TO THE BOARD AGENDA LETTER

**ATTACHMENT B: FINAL PEIR
INCLUDED AS ATTACHMENT B TO THE BOARD AGENDA LETTER**

**ATTACHMENT C-1: LAND USE ELEMENT BOARD RESOLUTION
INCLUDED AS ATTACHMENT F TO THE BOARD AGENDA LETTER**

**ATTACHMENT C-2: COASTAL LAND USE PLAN BOARD RESOLUTION
INCLUDED AS ATTACHMENT G TO THE BOARD AGENDA LETTER**

**ATTACHMENT C-3: LAND USE AND DEVELOPMENT CODE AMENDMENTS
INCLUDED AS ATTACHMENT C TO THE BOARD AGENDA LETTER**

**ATTACHMENT C-4: COASTAL ZONING ORDINANCE AMENDMENTS
INCLUDED AS ATTACHMENT D TO THE BOARD AGENDA LETTER**

**ATTACHMENT D: DRAFT UNIFORM RULES AMENDMENTS
INCLUDED AS ATTACHMENT H-1 TO THE BOARD AGENDA**