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Katherine Douglas Public Comment

From:	Ben Schwartz <ben@clean-coalition.org>
Sent:	Friday, July 10, 2026 12:00 PM
To:	Villalobos, David
Cc:	Craig Lewis; Isabel Stice; Katie Davis; Maureen Ellenberger; Michael Chiacos
Subject:	Clean Coalition/Sierra Club/CEC Comments on Utility-Scale Solar Ordinance
Attachments:	Joint USS Comments for July 14 Board of Supervisors Meeting (06_bs, 10 Jul 2026).pdf

Hi David,

Attached below is a joint comment letter from Clean Coalition, Sierra Club, and Community Environmental Council (CEC). The Joint Comments express support for the proposed ordinance and advocate for including standalone energy storage up to 1 acre (40 MWh) in Tier 1, exempt from a planning permit. We appreciate the opportunity to comment and participate in the process to modernize the Utility-Scale Solar ordinance.

Best regards,

Ben Schwartz

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July 10, 2026

Santa Barbara County Board of Supervisors
105 East Anapamu Street,
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To the Santa Barbara County Board of Supervisors,

Together, the undersigned organizations[1] urge the Board of Supervisors to adopt the Utility-Scale Solar Ordinance recommended by the Planning Commission, and to resolve the remaining policy question of standalone storage by extending Tier 1 treatment to standalone storage systems up to 1 acre (40 MWh), exempt from planning permit requirements. This request is supported for five principal reasons:

- The Planning Commission's Tier 1 rationale for paired solar+storage establishes the foundation for streamlined standalone storage.
- Standalone storage is essential to fulfilling the County's adopted energy strategy.
- The Board is the appropriate body to resolve the remaining policy question.
- Standalone storage strengthens the County's resilience and reliability.
- Tier 1 classification does not eliminate regulatory oversight.

The proposed ordinance represents a significant step toward achieving the Board's vision—as laid out in the Strategic Energy Plan (SEP) and Energy Assurance Plan (EAP)—to remove barriers to the development of local renewable energy in the County. Due to the County's unique geography, location at the end of two utility electrical grids, and desire for climate resilience, this practical policy update will support both local and state grid needs.

Planning permit requirements that have previously restricted or prohibited opportunities for front-of-meter (FOM) solar installations in the County are now designed to correlate the planning permit requirement with the significance of a project's environmental impacts. The proposed 3-tier system appropriately streamlines planning permitting requirement for solar and solar+storage projects deployed on the built environments (e.g., rooftops, parking lots, and parking structures) that have minimal environmental impacts, while imposing a commensurately greater permitting burden for utility-scale projects above 30 acres. The proposed ordinance positions the County well on solar and paired solar+storage projects, but limits opportunities for standalone storage, which is regulated as a utility use requiring a discretionary Conditional Use Permit (CUP).

During discussions with County staff and in comments submitted to the Planning Commission, the Clean Coalition recommended including standalone energy storage systems up to 0.25 acres (approximately 10 MWh) in Tier 1. This threshold aligned directly with the proposed treatment of paired solar+storage projects, which allows up to 0.25 acres of additional storage while

[1] The undersigned organizations consist of Clean Coalition, Sierra Club Santa Barbara – Ventura Chapter, and Community Environmental Council (CEC).

remaining exempt from planning permit requirements. County staff and the Planning Commission appropriately focused on implementing the proposed ordinance and refining the framework before them, rather than making broader policy determinations regarding the appropriate permitting pathway for standalone storage. The Board of Supervisors is uniquely positioned to resolve that remaining policy question and determine whether standalone storage should be addressed as part of this ordinance rather than deferred to a future process.

Based on Planning and Development staff's report at the May 6 Planning Commission hearing, the Board of Supervisors is the appropriate body to resolve the remaining policy question regarding standalone storage. The Clean Coalition continues to support Tier 1 treatment for standalone storage systems up to 0.25 acres, ensuring that residential, commercial, and industrial customers can deploy storage to improve resilience and address the poor power quality and outages that affect the South Coast. However, after further discussions among the coalition organizations, we collectively concluded that extending the Tier 1 exemption to standalone storage projects up to 1 acre would better support the County's broader resilience and clean energy objectives. A 1-acre threshold creates opportunities for strategically located projects—such as batteries adjacent to electrical substations, Community Microgrids, resilience hubs, and larger commercial or industrial facilities—that can provide substantially greater value to both local communities and the broader electric grid while maintaining a compact physical footprint.

Since the Board first directed staff in 2019 to modernize the existing Utility-Scale Solar ordinance, the importance of energy storage has substantially increased. Energy storage is an extremely versatile resource, able to support grid reliability, provide energy resilience, and help reduce strain on local grid infrastructure when demand is highest, which makes it a critical foundation of the electrical grid of the future. In 2026, the majority of new projects are paired solar+storage or standalone storage.[2] The proposed ordinance appropriately ensures that the permit requirement for a paired solar+storage project is based on the size and type of solar.

However, standalone storage is not addressed within the tiered solar framework; instead, it is regulated as a utility use requiring a discretionary Conditional Use Permit (CUP). As proposed, a paired rooftop solar+storage project with up to 0.25 acres of energy storage would fall within Tier 1 and be exempt from a planning permit, while a physically identical 0.25-acre standalone storage project would instead require a discretionary CUP. Due to minimal environmental impacts, precedent grounded in the foundation of the ordinance update, and direct alignment with the County's adopted energy strategy, including streamlined planning permit requirements for small standalone energy storage is a sensible action to take in the context of amending this ordinance.

We recommend the following language to implement the amendment, requiring only a minor addition to the existing framework:

Standalone energy storage systems up to 1 acre (40 MWh) should be included in Tier 1 and exempt from the planning permit requirements.

[2] This is true of new Net Energy Metering projects and projects in the California Independent System Operator (CAISO) interconnection queue.

The Planning Commission's Tier 1 rationale for paired solar+storage establishes the foundation for streamlined standalone storage

The Planning Commission's inclusion of paired storage projects up to 0.25 acres demonstrates recognition that storage projects at this scale have a limited physical footprint and de minimis land-use impacts. The same reasoning applies with equal force to standalone storage systems of identical size. *A standalone battery occupying up to 0.25 acres or less possesses the same structure, footprint, site conditions, and land-use impacts of the storage component of a paired solar+storage project of the same size.*

Subjecting standalone storage to discretionary CUP review as a utility use—while exempting a paired solar+storage system with an identical storage footprint—produces inconsistent outcomes not grounded in any meaningful difference in land-use or environmental impact. Moreover, treating small standalone storage as equivalent to large utility-scale solar projects imposes heightened permitting requirements (e.g., increased cost and regulatory friction) onto standalone storage projects despite a substantially smaller footprint. Extending Tier 1 treatment to standalone storage up to 0.25 acres ensures that permitting remains proportionate to actual land-use and consistent across project configurations.

While the Planning Commission's rationale clearly supports Tier 1 treatment for standalone storage projects up to 0.25 acres, the coalition further recommends that the Board build upon that foundation. Extending the exemption to projects up to 1 acre recognizes that slightly larger standalone storage systems can provide substantially greater resilience and grid benefits while maintaining a compact physical footprint, particularly when deployed in strategically important locations such as adjacent to electrical substations.

To put the scale of the coalition's recommendation in perspective, the Vallecito Energy Storage Resilience (VESR) project, the first grid-scale battery energy storage system in Santa Barbara County, is a 40 MWh storage project that occupies 1 acre of land. Located adjacent to a distribution substation in Carpinteria, VESR demonstrates that a project of this size maintains a compact footprint while supporting multiple community and grid benefits that smaller systems cannot provide as effectively.

Vallecito Energy Storage Resilience Project. Tesla Battery Energy Storage System, 10 MW and 40 MWh, located on 1 acre of land in Carpinteria near the electrical substation (operational since 2021)

Locating battery energy storage systems near or adjacent to existing distribution substations enables a single project to provide multiple benefits—including improved local resilience, peak load management, support for nearby Community Microgrids, reduced electrical losses, and deferred distribution upgrades—while also reducing project costs by leveraging existing utility infrastructure. These factors create economies of scale compared to deploying numerous smaller batteries throughout the distribution system, although the magnitude of the benefit depends on grid architecture and the services the battery is designed to provide. Extending Tier 1 treatment to standalone storage projects up to 1 acre creates opportunities for strategically located storage that can maximize these resilience, reliability, and grid-support benefits while preserving a proportionate permitting framework.

Standalone storage is essential to fulfilling the County's adopted energy strategy

The County's Strategic Energy Plan (SEP) was commissioned by the Board of Supervisors with the following objectives: "to stimulate renewable energy development within the County of Santa Barbara, help meet aggressive state and local emissions reductions goals, and improve the resilience of the local electricity grid." One of the principal motivations for updating the Utility-Scale Solar ordinance was that the existing definition treated all FOM solar projects alike, effectively limiting renewable energy deployment throughout much of the County regardless of project size or environmental impact. In the years since the SEP's approval, it has become increasingly clear that the County's resilience strategy, codified in the EAP, cannot be achieved without a permitting framework that supports both renewable generation and energy storage.

The SEP's recommendations for the EAP identify battery storage as a key component for closing the resilience gap. The EAP itself sets explicit targets to increase both utility-scale and distributed energy storage capacity by 2030, recognizing that localized storage is essential for resilience, peak management, and efficiently integrating greater amounts of renewable energy.

These goals cannot be achieved solely through large, centralized projects; they require deployment of distributed storage at commercial, industrial, critical facilities, and other strategically located sites throughout the County.

As proposed, the ordinance's permitting pathway for standalone energy storage is not fully aligned with the energy storage objectives established in the EAP. There is no technical basis for treating standalone storage differently from paired storage of identical size. Yet the proposed ordinance subjects standalone storage to burdensome discretionary review while exempting a physically identical paired solar+storage system. *The result is a permitting framework that is technically inconsistent with the treatment of paired storage and strategically misaligned with the County's adopted resilience objectives.*

The Board is the appropriate body to resolve the remaining policy question

What began in 2019 as a minor definitional update to "Utility-Scale Solar" in County code has evolved into a comprehensive permitting framework that establishes categories of planning permit requirements for solar and solar+storage projects throughout the County. Resolving how standalone storage fits into that framework is not a departure from the Board's vision or the scope of this ordinance update; it is a necessary final step in the implementation of a unified clean energy policy that effectively advances the energy goals it was intended to support. The proposed amendment refines the ordinance's permitting framework by adjusting how small standalone storage projects are classified. It does not authorize a new type of development or change the characteristics of battery storage projects; it simply refines how small standalone storage projects are classified within the ordinance's permitting framework.

The Planning Commissioners reached a similar conclusion, choosing to recognize the value of energy storage and deferring the question of standalone storage to the Board, rather than excluding the issue from the revised ordinance recommended for adoption.

Amending the ordinance to include an exemption for standalone storage represents the most efficient and comprehensive opportunity to align the ordinance with the County's renewable energy and resilience goals. As the County works to achieve the 2030 energy goals outlined in the EAP, any additional permitting burden for standalone storage will impose cost increases and delays.

Lastly, it makes sense to make a change now to conserve time and staff resources. Deferring this issue to a future ordinance amendment would require a separate, potentially multi-year, process that consumes additional County resources and time to arrive at what would likely be the same guidelines. The present ordinance amendment process provides an appropriate and timely pathway for the Board to address storage comprehensively.

Standalone storage is essential to resilience and reliability in the County

The County's communities are dependent on energy infrastructure that faces multiple documented reliability challenges. The SEP recognizes this directly, identifying vulnerability to grid disruptions as reason to pursue both renewable energy development and local storage capacity. Likewise, the EAP prioritizes ensuring that critical facilities can maintain operations when the grid goes down. Concerns from the County have only grown more urgent since 2019.

A 2026 Santa Barbara County Grand Jury report found that across all 3,144 counties in the United States, Santa Barbara ranks in the top 1% for overall disaster risk–a finding that affirms the geographical vulnerability established by County planning[3]. The South Coast's exposure is particularly concerning. Located at the end of SCE's grid and dependent on a single set of transmission lines running through 40 miles of wildfire-prone, mountainous terrain, it represents the County's most direct and immediate case for a local resilience solution independent of the transmission grid.[4]

Energy storage is central to a local response to these conditions. It enables homes, businesses, schools, critical facilities, and Community Microgrids to maintain electricity when the grid goes down while also helping reduce stress on the local electric system during periods of high demand. ***Beyond major outages, communities throughout the County continue to experience recurring problems with voltage fluctuations, power quality, and localized reliability that disrupt day-to-day operations.***[5] SCE has been unable to provide a meaningful long-term solution to these issues, leaving local customers to absorb the costs of unreliable electric service without recourse. These reliability issues affect businesses of every size—from restaurants and grocery stores to technology companies and manufacturers—reinforcing the need for a permitting framework that enables customers to deploy storage solutions that strengthen their own resilience.

1. BEGA North America (located in Carpinteria) Case Study: https://clean-coalition.org/news/bega-north-america-solar-microgrid-case-study-onsite-resilience-in-the-goleta-load-pocket/
2. South Coast Chamber of Commerce "Power On: Road to Recovery" White Paper: https://sbscchamber.com/power-on/
3. 2024 Second Outage in Two Weeks Costs Businesses Thousands: https://keyt.com/news/santa-barbara-s-county/2024/02/28/power-knocks-out-businesses-in-parts-of-downtown-santa-barbara-for-the-second-week-in-a-row/
4. 2025 Outage Impacting 7,200 including SB County Supervisors and SB City Council Meetings: https://www.edhat.com/news/power-outage-hit-downtown-santa-barbara-tuesday/

The persistence of these reliability challenges demonstrates that they are not isolated incidents but a broader pattern affecting communities throughout the County. Standalone storage is uniquely positioned to address these challenges in real time, putting solutions directly in the hands of the communities that need them rather than requiring them to wait for broader grid improvements that remain outside the County's control.

Schools, critical facilities, emergency services, manufacturers, grocery stores, restaurants, technology companies, and other commercial and industrial customers are among the institutions

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[3] Santa Barbara County Civil Grand Jury, *Is the County Neglecting Emergency Preparedness* (June 2026). https://sbcgj.org/wp-content/uploads/2026/06/Is-the-County-Neglecting-Emergency-Preparedness.pdf

[4] Grid reliability is the ability of the electric grid to deliver power consistently without interruptions. Energy resilience is the ability of the grid to withstand disruptions and restore power quickly after an outage.

[5] See the South Coast Chamber of Commerce, *Power On: A Roadmap to Recovery* White Paper (April 2025)

and businesses best positioned to benefit from standalone storage and to deploy it. ***Codifying burdensome permitting requirements for standalone storage—or limiting deployments to a few select zones—restricts the ability of these organizations to invest in a much-needed resilience solution.*** Including standalone storage up to 1 acre in Tier 1 ensures the ordinance delivers on the resilience commitments the County has already made, giving communities throughout the County greater ability to secure their own energy resilience.

A Tier 1 classification for standalone storage does not eliminate regulatory oversight
Standalone storage systems are still required to obtain building and electrical permits, comply with applicable development standards, undergo fire department review, and pass all required inspections prior to operation. The existing review process thoroughly addresses the relevant health, safety, and code compliance considerations. Providing a planning permit exemption for Tier 1 standalone storage does not eliminate these requirements. Rather, it ensures that planning permit requirements remain proportionate to a project's environmental impacts while preserving all applicable health, safety, and building code reviews.

Conclusion
The Planning Commission has established a strong permitting framework that appropriately aligns planning permit requirements with the environmental impacts of solar and paired solar+storage projects. Should the Board extend Tier 1 treatment to standalone storage systems up to 1 acre (40 MWh), it would complete that framework by ensuring the ordinance consistently supports the County's renewable energy, resilience, and streamlined permitting objectives. In taking this step, the Board would complete a permitting framework that faithfully implements the County's adopted SEP and EAP while positioning Santa Barbara County as a statewide model for integrating resilience, renewable energy, and practical land-use policy.

Sincerely,

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Sigrid Wright
CEO / Executive Director
Community Environmental Council

Maureen Ellenberger
Chair
Sierra Club Santa Barbara-Ventura Chapter

Dated: July 10, 2026