

#6



Katherine Douglas *Public Comment*

From: Daniel Gullett <dgullett@sblandtrust.org>
Sent: Friday, July 10, 2026 11:27 AM
To: sbcob
Cc: Tuttle, Alex; Carlson, Zoe; Meredith Hendricks; Devin Rothman
Subject: BOS Public Comment - July 14, 2026 - Item 6: Utility-Scale Solar Amendments Project
Attachments: Utility-Scale Solar Amendments Project - BOS - Land Trust Comment Letter (7.10.2026).pdf

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Dear Clerk of the Board,

Please find attached a public comment letter from the Land Trust for Santa Barbara County regarding the Utility-Scale Solar Amendments Project scheduled for the July 14, 2026 Board of Supervisors hearing.

Please distribute the letter to the Board of Supervisors and include it in the public record for the item.

Thank you!

Daniel Gullett

Land Use Planner

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The Land Trust
FOR SANTA BARBARA COUNTY

We moved! Please note our new office location: 1332 Anacapa St., Suite 101



The Land Trust

FOR SANTA BARBARA COUNTY

OUR MISSION

THE LAND TRUST FOR SANTA BARBARA COUNTY CONSERVES NATURAL RESOURCES, AGRICULTURAL LAND AND OPEN SPACES FOR THE BENEFIT OF PRESENT AND FUTURE GENERATIONS.

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July 10, 2026

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

RE: Utility-Scale Solar Amendments Project, July 14, 2026 Board Hearing

Dear Chair Nelson and Members of the Board:

The Land Trust for Santa Barbara County appreciates the County's work to advance renewable energy while maintaining long-term stewardship of Santa Barbara County's agricultural, natural, scenic, and coastal landscapes. The Land Trust's mission is to conserve natural resources, agricultural land, and open spaces for the benefit of present and future generations. We support expanding solar energy as part of the region's climate and resilience strategy, particularly on rooftops, parking areas, previously disturbed lands, and other built-environment sites where solar can be deployed with limited conflict.

The Land Trust submitted comments on the Draft Program EIR and ordinance framework in September 2025 and again to the County Planning Commission in March 2026. Those comments emphasized directing solar first to disturbed and developed lands, protecting wildlife movement corridors, productive agricultural soils, scenic and coastal resources, and ensuring strong long-term stewardship standards.

We appreciate that staff and the Planning Commission have addressed some of these concerns through revisions to the ordinance, particularly by improving the treatment of low-conflict Tier 1 solar on parking lots, developed or improved areas, and small ground-mounted systems where appropriate.

At this stage, our comments are focused on making the ordinance more durable, clear, and consistent with the County's long-term stewardship responsibilities. Because the Board is being asked to certify a Program EIR, adopt a Statement of Overriding Considerations, amend the County's zoning ordinances and land use plans, and authorize future Local Coastal Program amendments, careful implementation language is important. We respectfully request that the Board address the following points as part of adoption.

1. Apply scenic corridor protections to all scenic corridors identified in the Final PEIR.

The Board should retain and expand the scenic corridor standards now included in the ordinance. This recommendation is directly tied to the Final PEIR's aesthetics analysis. The Final PEIR concludes that future community-scale and utility-scale solar facilities may result in significant and unavoidable impacts to public scenic vistas, local or state scenic corridors, and the existing visual character or quality of public views.

The ordinance currently appears to apply the 2,000-foot scenic corridor restriction to state scenic highways. However, the Final PEIR identifies significant and unavoidable impacts to local and state scenic corridors and identifies additional County scenic corridors on page 3.1-2 and Figure 3.1-1.

The same review standard should apply to all County-identified scenic corridors listed on page 3.1-2 and depicted in Figure 3.1-1 of the Final PEIR (attached), not only formally designated state scenic highways. This would not prohibit community-scale or utility-scale solar facilities in those locations. It would simply require project-level visual analysis, including photo simulations and public-viewpoint analysis, to demonstrate how the project avoids or minimizes adverse visual impacts.

At a minimum, community-scale and utility-scale facilities within those corridors should be required to satisfy one of the ordinance's scenic protection pathways: the facility is obscured from public views by existing landforms or vegetation; the facility is located on a previously developed urban or industrial site, with onsite lines undergrounded to the maximum extent practicable; or the facility receives applicable visual review based on public-viewpoint analysis and photo simulations.

2. Require a low-conflict siting analysis for community-scale and utility-scale facilities.

Community-scale and utility-scale applications should include a low-conflict siting analysis. Applicants should identify whether rooftops, parking lots, existing developed areas, degraded or disturbed lands, brownfields, former industrial sites, and sites near existing electrical infrastructure were evaluated before proposing conversion of agricultural land, scenic rural landscapes, habitat areas, or conservation-priority lands.

This would not prohibit solar where it would otherwise be allowed. It would simply help ensure that higher-conflict sites are not selected before lower-conflict alternatives are considered.

3. Provide heightened protection for the Coastal Zone and Gaviota Coast Planning Area.

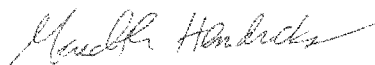
The Board should give special consideration to the Coastal Zone and the Gaviota Coast Planning Area. The Gaviota Coast contains significant agricultural, scenic, biological, cultural, and coastal resources. The Final PEIR identifies Alternative 3, which would remove utility-scale solar facilities from the Coastal Zone while preserving opportunities for smaller-scale coastal solar development.

The Board should adopt Alternative 3, or at minimum prohibit utility-scale solar facilities in the Gaviota Coast Planning Area except on previously disturbed industrial sites historically used for oil processing where utility-scale solar can be accommodated with fewer additional resource impacts. This approach would continue to support renewable energy while recognizing that large utility-scale facilities in rural coastal landscapes present a different level of potential conflict than rooftop, parking lot, community-scale, or disturbed-site solar.

These refinements would not undermine the County's renewable energy goals. They would make the ordinance more predictable, reduce avoidable conflicts, and help direct solar development toward locations where it can provide climate and resilience benefits with the least impact to agriculture, habitat, scenic resources, coastal resources, and rural landscapes.

The Land Trust respectfully requests that the Board strengthen and clarify the ordinance before adoption.

Sincerely,



Meredith Hendricks
Executive Director
The Land Trust for Santa Barbara County

3.1 Aesthetics

3.1.1 Introduction

This section describes potential impacts on aesthetic and visual resources in Santa Barbara County with future development of solar facilities enabled under the proposed Project. Lands under federal jurisdiction (such as the Los Padres National Forest and Vandenberg Space Force Base) are not included in the study area. Lands under state jurisdiction, including those of the University of California, Santa Barbara (UCSB), are also excluded from consideration as these lands are not subject to County land use plan requirements. Visual resources in this section include publicly accessible scenic vistas and corridors, and scenic highways in unincorporated county areas. This section also considers light and glare, which contribute to the visual quality and aesthetic character of Santa Barbara County.

The County received several comments pertaining to aesthetic and visual resources during the public scoping period. The City of Carpinteria requested that the EIR include an evaluation of direct, indirect, and cumulative impacts of visual resources in Carpinteria, including from structural elements, landform modifications, light, and glare. The City of Goleta suggested that the analysis should address potential impacts on scenic corridors, including those adjacent to Goleta, such as views from Highway 101, the foothills, and coastal areas. The comment also suggested that design standards should be considered to reduce visual impacts, such as requiring landscaping, buffering, or siting projects away from high-visibility areas (and not on highly visible slopes). The City of Goleta letter also commented on the potential for altering the visual character of rural areas or agricultural and open space lands.

3.1.2 Environmental Setting

Santa Barbara County Scenic Values Mapping

The County mapped scenic values based on the identified visual quality of lands as viewed from major roadways and edges of development. Scenic areas are defined by features regarded as having high levels of scenic quality and visual interest, notably including waterways, streams, rivers, reservoirs, the ocean, and hillside or mountainous landforms. Steep slopes and higher elevations provide vantage points for views and scenic vistas. The Comprehensive Plan describes three general levels of scenic value. High scenic value areas warrant strong consideration for open space protection. Moderate scenic value areas may be subject to development standards or design review before development is permitted. Low scenic value areas are not subject to standards for open space protection.

Scenic Vistas and Corridors

Scenic Values Model

In consideration of the scenic quality of the County and its communities, the County's Comprehensive Plan identifies the visual quality of the lands as viewed from major roadways and the edge of development. The Open Space Element includes an analysis of scenic values as informed by a model, which identified and ranked geographic scenic areas within the County. The countywide scenic values model considers water resources (i.e., reservoirs, rivers, streams, watersheds) as well as the vegetation surrounding the banks and shores and the habitats these lands support. The model also considers the terrain or predominant slope as these features additionally contribute to the visual landscape. The Open Space Element notes that

an important aspect of scenic quality is the backdrop of urban areas, much of which is beyond the one-quarter mile band shown on the maps. The background mountains and coastline form a strong image and inform the general open space concept of the unincorporated county.

State Scenic Highways

In recognition that Santa Barbara County is a destination for its scenic beauty, the Open Space Element also contains designated travel routes intended for the protection of scenic quality, based on destination routes, traffic capacity, and scenic value. Highway travel provides exposure to the County's visual attributes and scenic resources. Three state highways in the County are officially designated as State Scenic Highways (as discussed under state regulations). The designated scenic highways are listed below:

- State Route (SR) 1 (between the intersection of U.S. Highway 101 and Las Cruces and the City of Lompoc);
- SR 154 (entire length); and
- U.S. Highway 101 (from the City of Goleta's western boundary to SR 1 at Las Cruces).

Portions of other state highways that cross the County are identified as eligible routes (though not officially designated). These include SR 33 from the junction of SR 166 to the City of Ojai in Ventura County; SR 166 from Highway 33 west through Santa Barbara and San Luis Obispo counties to U.S. Highway 101; U.S. Highway 101 throughout its entire length through Santa Barbara County; and SR 150 from U.S. Highway 101 to the City of Ojai in Ventura County (County of Santa Barbara 2009a).

Local Corridors with Scenic Values

The County Comprehensive Plan Environmental Resources Management Element (ERME) combines the results of the scenic corridors and scenic values model to identify travel routes with the highest scenic values, as listed below and shown in **Figure 3.1-1, Scenic Corridors**.

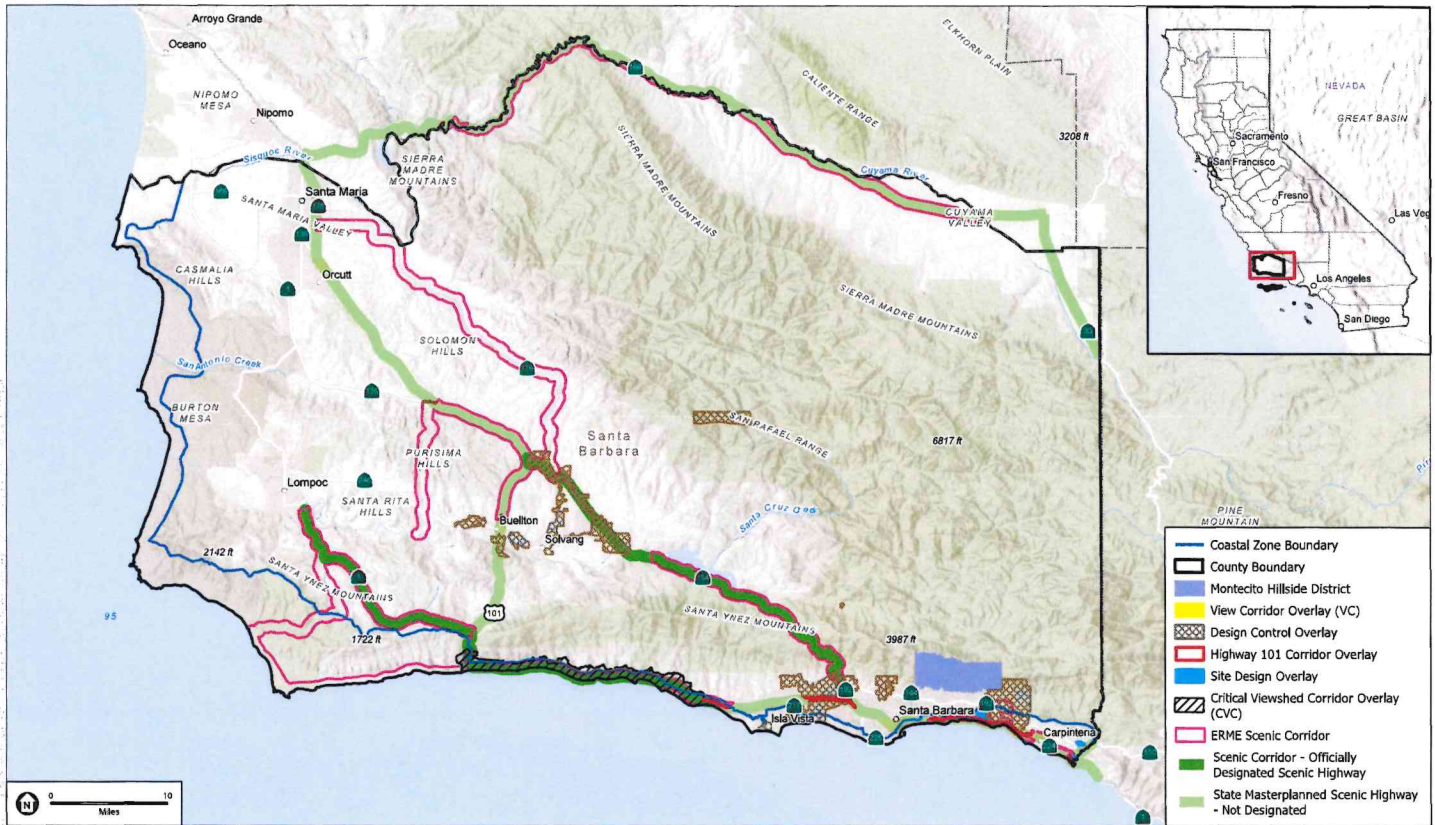
In addition, scenic vistas and corridors are considered in the County's adopted community plans (see Section 3.1.3). Scenic corridors, as identified by the County, are listed below:

North County

- U.S. Highway 101: Los Alamos-Buellton
- SR 1: Lompoc-U.S. 101
- SR 154: Los Olivos-U.S. 101
- SR 154: Lake Cachuma-Santa Barbara
- SR 166: Santa Maria-Cuyama
- SR 176: Santa Maria-Los Olivos
- Jalama Road: SR 1-Jalama County Park
- Jalama County Park-Gaviota Beach State Park
- Drum Canyon Road: Los Alamos-Lompoc-Buellton

South Coast

- U.S. Highway 101: Gaviota Beach-South Coast Urban Complex
- U.S. Highway 101: Montecito-Rincon Point
- U.S. Highway 101: Goleta North Junction of Highway 1
- Toro Canyon Park-Serena Park



SOURCE: ESA, 2024, County of Santa Barbara, 2024

Santa Barbara County Utility-Scale Solar Amendments

Figure 3.1-1
Scenic Resources