

CALIFORNIA COASTAL COMMISSION

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Th8c

DATE: August 28, 2025

TO: Commissioners and Interested Persons

FROM: Steve Hudson, Deputy Director
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Brooke Lutz, Coastal Program Analyst

SUBJECT: County of Santa Barbara Local Coastal Program Amendment No. LCP-4-STB-25-0017-1 Part D (Cannabis Odor) for public hearing and action at the September 11, 2025 Commission meeting in Fort Bragg.

SUMMARY OF STAFF RECOMMENDATION

The County of Santa Barbara is requesting an amendment to the Implementation Plan/Coastal Zoning Ordinance (IP/CZO) component of its certified Local Coastal Program (LCP) to update existing cannabis regulations related to odor control, including new odor thresholds, Odor Abatement Plan requirements, compliance timelines, and procedures for minor permit changes. The County is proposing the amendment to incorporate objective and enforceable odor standards that can be monitored and verified. These enforcement tools will help address the longstanding community concerns regarding cannabis odor within the County.

Staff recommends that the Commission, after public hearing, reject the proposed County of Santa Barbara LCP Amendment No. LCP-4-STB-25-0017-1 Part D as submitted, and approve the amendment only if modified pursuant to **four suggested modifications**. The suggested modifications are necessary to ensure that the proposed Implementation Plan/Coastal Zoning Ordinance (IP/CZO) amendment is consistent with and adequate to carry out the policies of the City's certified Land Use Plan (LUP), including the Chapter 3 policies of the Coastal Act which have been incorporated in their entirety in the County's certified LCP as guiding policies pursuant to Policy 1-1 of the Land Use Plan (LUP). The motions and resolutions for Commission action can be found starting on **page 5** of this staff report.

In October 2018, the California Coastal Commission certified LCP Amendment No. LCP-4-STB-18-0039-1-Part C, which established the IP/CZO provisions and development standards for the development and regulation of cannabis operations within the Coastal Zone of unincorporated Santa Barbara County. The LCP contains existing development standards related to the protection of coastal resources, including public views, environmentally sensitive habitat areas (ESHAs), and public

access. However, the LCP does not contain enforceable standards for odor control. The proposed amendment would maintain existing coastal resource protection development standards and update existing cannabis provisions to establish detailed, enforceable odor thresholds, require cannabis operators to prepare Odor Abatement Plans, set compliance timelines, and outline procedures for minor permit changes. The amendment applies to both new and existing cannabis operations and provides clear standards for implementation, helping to ensure that odor impacts are effectively managed and minimized for surrounding communities and adjacent land uses.

To ensure that all existing commercial cannabis operators comply with the updated cannabis regulations related to odor control, the County has mandated that the new provisions related to odor threshold and odor abatement plans become operative for all existing commercial cannabis operations within one year of adoption by the Santa Barbara County Board of Supervisors or upon Coastal Commission certification, whichever occurs later. However, the County's proposed implementation timeline of one year following the Board's adoption or upon Commission certification is vague and does not clearly define a compliance deadline for existing cannabis operators. Therefore, staff is recommending **Suggested Modification One (1)** to establish a specific implementation deadline for existing commercial cannabis operators to come into compliance. Specifically, **Suggested Modification One (1)** incorporates a deadline of March 18, 2026, which aligns with the County's suggested timeline of one year after Board of Supervisors approval of the proposed ordinance (Ordinance No. 5244), which the Board adopted on March 18, 2025, or following the Coastal Commission's certification of the subject amendment, whichever date occurs later. The remaining suggested modifications are necessary clarifications to IP/CZO text that further the intent and implementation of the LCP, ensure internal consistency and avoid ambiguity.

For the reasons described in this report, staff recommends that the Commission find that the IP/CZO amendment, only if modified as suggested, conforms with and is adequate to carry out the policies of the certified Land Use Plan. The suggested modifications were developed in cooperation with County staff, and County staff have indicated that they are supportive of the suggested modifications.

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Exhibits

Exhibit 1 – Proposed Implementation Plan/Costal Zoning Ordinance Amendment Text
Changes in ~~Strikethrough~~/Underline

I. PROCEDURAL OVERVIEW

A. Standard of Review

The Coastal Act provides:

The local government shall submit to the Commission the zoning ordinances, zoning district maps, and, where necessary, other implementing actions that are required pursuant to this chapter. (Section 30513)

...The Commission may only reject ordinances, zoning district maps, or other implementing action on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan. If the Commission rejects the zoning ordinances, zoning district maps, or other implementing actions, it shall give written notice of the rejection, specifying the provisions of the land use plan with which the rejected zoning ordinances do not conform, or which it finds will not be adequately carried out, together with its reasons for the action taken. (Section 30513)

The Commission may suggest modifications... (Section 30513)

Any proposed amendments to a certified local coastal program shall be submitted to, and processed by, the commission in accordance with the applicable procedures and time limits specified in Sections 30512 and 30513... (Section 30514(b))

Pursuant to Sections 30513 and 30514(b) of the Coastal Act, the standard of review is whether the proposed amendment is in conformance with, and adequate to carry out, the provisions of the Land Use Plan (LUP) portion of the City's certified LCP. All Chapter 3 policies of the Coastal Act have been incorporated in their entirety in the certified County of Santa Barbara LUP as guiding policies pursuant to Policy 1-1 of the LUP.

B. Procedural Requirements

If the Commission certifies the LCP amendment as submitted, no further Board of Supervisors action will be necessary pursuant to Section 13544(b)(2) of Title 14 of the California Code of Regulations. Should the Commission deny the LCP Amendment, as submitted, without suggested modifications, no further action is required by either the Commission or the Board of Supervisors, and the LCP amendment is not effective, pursuant to Section 13542(f). Should the Commission deny the LCP Amendment, as submitted, but then approve it with suggested modifications, then the Board of Supervisors may consider accepting the suggested modifications and submitting them by resolution to the Executive Director for a determination that the Board of Supervisors' acceptance is consistent with the Commission's action. In that scenario, pursuant to Section 13544(c) of Title 14 of the California Code of Regulations, the modified LCP Amendment will become final at the subsequent Commission meeting when staff provides notice of the Executive Director's Determination that the Board of Supervisors' action in accepting the suggested modifications approved by the Commission for this LCP Amendment is legally adequate. If

the Board of Supervisors does not accept the suggested modifications within six months of the Commission's action, then the LCP amendment remains uncertified and not effective.

C. Public Participation

Section 30503 of the Coastal Act requires the provision of maximum opportunities for public input in preparation, approval, certification and amendment of any LCP. The County held a series of public hearings on this amendment. The hearings were duly noticed consistent with the provisions of Section 13515 of Title 14 of the California Code of Regulations. Notice of the Coastal Commission's consideration of the subject amendment has been distributed to all known interested parties.

II. STAFF RECOMMENDATION, MOTIONS, AND RESOLUTIONS FOR THE IMPLEMENTATION PLAN/COASTAL ZONING ORDINANCE (IP/CZO) AMENDMENT

Following public hearing, staff recommends the Commission adopt the following resolutions and findings. The appropriate motion to introduce each resolution and a staff recommendation is provided.

A. DENIAL OF THE IMPLEMENTATION PLAN/COASTAL ZONING ORDINANCE AMENDMENT AS SUBMITTED

MOTION I:

I move that the Commission reject County of Santa Barbara Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-STB-25-0017-1 Part D as submitted.

STAFF RECOMMENDATION OF REJECTION:

Staff recommends a **YES** vote. Passage of this motion will result in denial of the Implementation Plan/Coastal Zoning Ordinance Amendment as submitted and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

RESOLUTION TO DENY AS SUBMITTED:

The Commission hereby **denies** certification of the Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-STB-25-0017-1 Part D as submitted by the County of Santa Barbara, and adopts the findings set forth below on grounds that the Implementation Plan Amendment, as submitted, does not conform with, and is inadequate to carry out, the provisions of the certified Land Use Plan. Certification of the Implementation Plan amendment would not meet the requirements of the California Environmental Quality Act, as there are feasible alternatives and mitigation measures that would substantially lessen the significant adverse impacts on the environment that will result from certification of the

Implementation Plan Amendment as submitted.

B. CERTIFICATION OF THE IMPLEMENTATION PLAN/COASTAL ZONING ORDINANCE AMENDMENT IF MODIFIED

MOTION II:

I move that the Commission certify County of Santa Barbara Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-STB-25-0017-1 Part D if it is modified as suggested in this staff report.

STAFF RECOMMENDATION TO CERTIFY WITH SUGGESTED MODIFICATIONS:

Staff recommends a **YES** vote. Passage of this motion will result in certification of the amendment with suggested modifications and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

RESOLUTION TO CERTIFY WITH SUGGESTED MODIFICATIONS:

The Commission hereby **certifies** the County of Santa Barbara Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-STB-25-0017-1 Part D, if modified as suggested, and adopts the findings set forth below on grounds that the Implementation Plan Amendment with the suggested modifications conforms with, and is adequate to carry out, the provisions of the certified Land Use Plan. Certification of the Implementation Plan Amendment, if modified as suggested, complies with the California Environmental Quality Act, because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Implementation Plan Amendment on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts which the land use plan amendment may have on the environment.

III. SUGGESTED MODIFICATIONS

Staff recommends the Commission certify the proposed IP/CZO amendment, with four (4) suggested modifications as shown below. Existing language of the certified Implementation Plan/Coastal Zoning Ordinance is shown in straight type. Language proposed to be added by the County of Santa Barbara in this amendment is shown underlined. Language proposed to be deleted by the County of Santa Barbara in this amendment is shown as ~~strikethrough~~. Language recommended by Commission staff to be inserted is shown in double underline. Language recommended by Commission staff to be deleted is shown in ~~double strikethrough~~.

Suggested Modification No. 1

Added Section 35-144U.A.2.f shall be modified as follows:

f. The provisions of ~~this code as specified in~~ Section 35-144U.C.6 (Cannabis Odor Threshold) and 35-144U.C.7 (Odor Abatement Plan) shall become operative for all existing commercial cannabis operations on March 18, 2026, ~~within 12 months of adoption by the Board of Supervisors~~ or upon Coastal Commission's Certification of the Local Coastal Plan Amendment LCP-4-STB-25-0017-1 Part D, ~~adopting Sections 35-144U.C.6 and .7~~ whichever date is later.

- 1) **Implementation.** Existing cannabis cultivation and processing operations shall submit a request to the Department for a minor change to their approved or issued Coastal Development Permit, consistent with Section 35-169.11, to ~~and~~ obtain approval of a revised Odor Abatement Plan and install the Multi-Technology Carbon Filtration systems before March 18, 2026 ~~within the implementation period described above.~~
- 2) **Extensions.** (~~These provisions are~~ only applicable to 35-144U.C.7 – Odor Abatement Plans) A one-time extension ~~of to the 12-month~~ implementation time period ~~described above~~ may be allowed for up to 12 months ~~may be allowed.~~ The request for an extension shall be heard by the Board of Supervisors with a recommendation by the Director. A request for an extension must be submitted 90 days prior to the expiration of the ~~12-month~~ implementation period and approved by the Board of Supervisors. Requests for extensions may include, but not be limited to:

 - a. Supply chain delays
 - b. On-site power supply upgrades
 - c. Off-site power supply upgrades and availability
 - d. Other circumstances as determined by the Director

Suggested Modification No. 2

The following subsections of Section 35-144U.C shall be renumbered as shown below, including: renumbering Subsection 6 to 7; and renumbering Subsection 35-144U.C.7.e.3 to Subsection f. Further, Subsections 35-144U.C.7 f through h shall be renumbered accordingly.

67. Odor Abatement Plan.

...

~~f.3)~~ Vapor phase systems shall not be allowed. Existing operations utilizing vapor phase systems shall transition to Multi-Technology Carbon Filtrations in accordance with the implementation timeframe in Section 35-144U.A.2.f.

Suggested Modification No. 3

Added Section 35-144U.J shall be renumbered and modified as follows:

I J. Odor abatement and compliance monitoring. Facilities that require an Odor Abatement Plan or installation of an odor control system shall comply with Section 35-144U.C.6 (Cannabis Odor Threshold) and Section 35-144U.C.7 (Odor Abatement Plan) and the following:

1. The applicant shall allow the Department access to the facility at all times, without notice, for the purpose of inspecting odor mitigation practices, odor source(s), and complaint tracking system records.
2. Upon installation, ~~Department permit compliance~~ staff shall conduct an inspection of the odor control system to assess its compliance with the requirements of this section and the approved Odor Abatement Plan quarterly for the first year and annually thereafter for the life of the project for which an Odor Abatement Plan is required.

Suggested Modification No. 4

Added Section 35-169.20 shall be modified as follows:

Section 35-169. ~~20~~ 11 Minor Changes to Coastal Development Permits for Commercial Cannabis Cultivation.

Minor changes to an approved or issued Coastal Development Permit for commercial cannabis cultivation (outdoor, mixed-light, indoor, and nursery) in the AG-I, AG-II, and M-RP zones may be allowed provided that the changes materially conform with the approved or issued permit. Such requests shall be processed as follows:

1. The Director may approve a minor change (e.g., Odor Abatement Plan and odor control systems) to an approved or issued Coastal Development Permit where the Director determines:

...
2. Where a minor change of an approved or issued Coastal Development Permit is approved, the permit shall have the same effective and expiration dates as the original permit and no additional public notice shall be required.

...
5. The determination to allow a minor change to an approved Coastal Development Permit for commercial cannabis cultivation is final and not subject to appeal ~~except~~ ~~accept~~ in accordance with Section 30625 of the Coastal Act.

IV. FINDINGS FOR DENIAL AS SUBMITTED AND APPROVAL OF THE AMENDMENT, IF MODIFIED AS SUGGESTED

The following findings support the Commission's denial of the proposed Implementation Plan/Coastal Zoning Ordinance (IP/CZO) Amendment as submitted and approval of the IP/CZO Amendment if modified as suggested in Section III (Suggested Modifications) above. The Commission hereby finds and declares as follows:

A. Amendment Description

The County of Santa Barbara is requesting an amendment to the Implementation Plan/Coastal Zoning Ordinance (IP/CZO) component of its certified Local Coastal Program (LCP) to update cannabis regulations related to odor control, including new odor thresholds, Odor Abatement Plan requirements, compliance timelines, and procedures for minor permit changes in order to address longstanding community concerns regarding cannabis odor within the County.

In October 2018, the California Coastal Commission certified Local Coastal Program Amendment No. LCP-4-STB-18-0039-1-Part C, which established the IP/CZO provisions and development standards for the development and regulation of cannabis operations within the Coastal Zone of unincorporated Santa Barbara County. This prior amendment was intended to bring the County's zoning regulations into alignment with the State's legalization of commercial cannabis activities and to provide clear permitting pathways for cultivation, manufacturing, testing, distribution, microbusinesses, and retail operations. Currently, outdoor, indoor, and mixed-light cannabis cultivation and nurseries are allowed in the agricultural zones and indoor cultivation and nurseries are allowed in the Industrial Research Park zone districts. The LCP contains existing development standards related to cultural resource protection, habitat protection, security and screening, noise, odor abatement, visual resource protection, public access, minimum distances that cannabis activities can be located from residential zones and schools, and development standards for manufacturing and distribution. The CZO contains requirements for applicants for cannabis operations to develop and implement an odor abatement plan that includes the design of an odor control system and designation of a local contact to receive and address odor complaints. However, the LCP does not contain enforceable odor control standards.

The proposed amendment would update the County's existing cannabis development standards and provisions by establishing detailed and enforceable odor standards. The amendment is being proposed, in part, in response to community and neighborhood complaints regarding strong cannabis odors affecting residential areas adjacent to cannabis operations. Specifically, the amendment introduces provisions requiring that cannabis odor not be detectable beyond established thresholds at property lines, providing a measurable standard for enforcement. The proposed ordinance requires that cannabis odor not exceed 4 Dilution-to-Threshold (D/T) for the duration of a consecutive three-minute period as measured at the property line of a cannabis operation. This introduces an objective and enforceable standard that can be monitored and verified.

To implement and ensure compliance with these new odor standards, the amendment

further requires applicants to prepare and submit an Odor Abatement Plan for Department approval. The Odor Abatement Plan must be implemented prior to the issuance of final building and/or grading inspection and/or throughout operation of the project, as applicable, and must include the following: (1) floor plans showing the location of all odor-emitting areas; (2) a description of cannabis activities and phases associated with odor emissions; (3) engineering specifications for odor control equipment; (4) certification by a registered professional engineer that the system meets best available industry technology; and (5) operational details including equipment run-time meters, greenhouse venting (“burping”) protocols, and schedules for odor system use. The proposed LCPA also modifies the type of odor control system that can be approved. Vapor-phase systems alone are not permitted; rather, operators must use carbon filtration or other multi-technology systems capable of meeting the performance standard. Operators are also required to designate a local contact person available 24 hours a day, seven days a week, and must include a complaint response and tracking system to ensure that any verified odor incidents are addressed promptly. This provision mandates that operators promptly report and address odor complaints and maintain detailed records of all complaints and corrective actions for County review and compliance verification.

The amendment also updates compliance monitoring requirements and requires facilities subject to an Odor Abatement Plan to provide the Department with unrestricted access to the project site for inspections of odor mitigation practices, odor sources, and complaint tracking records. Compliance inspections are required quarterly for the first year after installation and annually thereafter for the life of the project. Operators will be required to submit documentation annually, including updated contact information, system downtime data, complaint records, and maintenance logs for odor control equipment such as carbon filters or neutralizing solutions.

The proposed amendment requires all existing commercial cannabis operators to comply with the updated odor thresholds and odor abatement plan requirements within one year of adoption by the Santa Barbara County Board of Supervisors or upon Coastal Commission certification, whichever occurs later. Existing cannabis cultivation and processing operations would be required to obtain approval of a revised Odor Abatement Plan and install the required Multi-Technology Carbon Filtration systems within the one-year implementation period described above. The amendment also adds a new Section 35-169.20, which allows minor changes to an approved or issued coastal development permit for commercial cannabis cultivation that may be approved by the Director provided the change does not require additional environmental review, does not substantially deviate from the approved plans, and does not change the use or scope of the development. Approved minor changes will retain the same effective and expiration dates as the original permit and shall be final and not subject to appeal except as allowed under Coastal Act Section 30625.

The County submitted the subject LCP Amendment to the Commission on April 7, 2025; it was deemed complete and filed by Commission staff on June 10, 2025. Under Section 30517 of the Coastal Act and California Code of Regulations Section

13535(c), the Commission has 60 working days to act on the amendment unless the time period is extended. A time extension request of up to one year was approved by the Commission at its August 14, 2025 Commission hearing. Commission and County staff have coordinated and met to discuss the proposed amendment, and suggested modifications were developed in cooperation with County staff, who have indicated support for these suggested modifications. The full text of the County's proposed changes to the IP/CZO is included as **Exhibit 1** of this report.

B. Consistency Analysis

Pursuant to Sections 30513 and 30514 of the Coastal Act, the standard of review for the proposed amendment to the Implementation Plan/Coastal Zoning Ordinance (IP/CZO) portion of the certified LCP is whether the proposed amendment would be in conformance with, and adequate to carry out, the provisions of the certified Land Use Plan (LUP) component of the certified LCP, including the Chapter 3 policies of the Coastal Act which have been incorporated in their entirety in the certified LUP as guiding policies pursuant to Policy 1-1 of the LUP.

1. Cannabis Odor Regulations and LCP Implementation

The proposed amendment updates existing development standards and introduces a new section that allows for minor changes to previously approved or issued coastal development permits for commercial cannabis operations. The Commission previously certified LCP Amendment No. LCP-4-STB-18-0039-1-Part C, which added IP/CZO provisions pertaining to the permitting of commercial cannabis activities. The subject amendment aims to modify existing standards related to odor control, providing the County with an objective and enforceable standard that can be monitored and verified. This enforcement tool will help address the longstanding community concerns regarding cannabis odor in the County. Specifically, the amendment includes new provisions requiring that cannabis odor not be detectable beyond established thresholds at the property lines of an approved facility, updates Odor Abatement Plan requirements, procedures for minor permit changes to previously approved CDPs for commercial cannabis activities, and includes an implementation period that requires existing cannabis operators to comply with the new odor threshold standards.

Additionally, the proposed amendment maintains the commercial cannabis activities development standards related to cultural resource protection, habitat protection, security and screening, noise, odor abatement, visual resource protection, public access, minimum distances that cannabis activities can be located from residential zones and schools, and development standards for manufacturing and distribution. Therefore, the updated development standards related to odor control will continue to require that commercial cannabis activities are sited and designed to avoid adverse impacts to coastal resources, including public views, environmentally sensitive habitat areas (ESHAs), and public access. Further, the proposed specific odor thresholds, abatement procedures, and enforcement mechanisms help ensure that new cannabis cultivation projects adequately minimize land use conflicts between agricultural cannabis operations and adjacent residential or urban uses.

To ensure that all existing commercial cannabis operators comply with the updated

odor thresholds, odor abatement plan requirements, and requirement to install a Multi-Technology Carbon Filtration System, the County has mandated that the new provisions related to odor threshold and odor abatement plans (Sections 35-144U.C.6 and Sections 35-144-U.C.7) become operative for all existing commercial cannabis operations within one year of adoption by the Santa Barbara County Board of Supervisors or upon Coastal Commission certification, whichever occurs later. However, the County's proposed implementation timeline of one year following the Board's adoption or upon Commission certification is vague and does not clearly define a compliance deadline for existing cannabis operators. Therefore, **Suggested Modification One (1)** is necessary to establish a specific implementation deadline for existing commercial cannabis operators to be in compliance. Specifically, **Suggested Modification One (1)** incorporates a deadline of March 18, 2026, which aligns with the County's suggested timeline of one year after the Board of Supervisor's approval of the proposed ordinance (Ordinance No. 5244), which the Board adopted on March 18, 2025, or following the Coastal Commission's certification of the subject amendment, whichever date occurs later.

Additionally, the proposed amendment requires existing cannabis cultivation and processing operations to obtain approval of a revised Odor Abatement Plan and install the required Multi-Technology Carbon Filtration systems. However, the amendment does not provide a clear mechanism for implementing this requirement for existing cannabis operators who already have approved or issued coastal development permits. Therefore, **Suggested Modification One (1)** is necessary to require cannabis operators to submit a request for a minor change to their approved or issued coastal development permit to obtain approval of a revised odor abatement plan and to install new Multi-Technology Carbon Filtration systems within a specific timeframe.

Suggested Modifications Two (2), Three (3), and Four (4) include minor modifications to the proposed amendment language necessary to ensure consistency with the LCP, such as correcting typographical errors, minor formatting adjustments, and making minor clarifications that further the intent and implementation of the LCP and avoid ambiguity. These modifications do not change the meaning or substantive provisions of the amendment.

Therefore, for the reasons discussed above, the Commission finds that only if modified as suggested will the IP/CZO amendment regarding cannabis odor regulations conform with and be adequate to carry out the applicable policies of the certified Land Use Plan.

C. California Environmental Quality Act

Section 21080.9 of the California Public Resources Code—within the California Environmental Quality Act (CEQA)—exempts a local government from the requirement of preparing an environmental impact report (EIR) in connection with its activities and approvals necessary for the preparation and adoption of a local coastal program. Instead, the CEQA responsibilities are assigned to the Coastal Commission; however, the Commission's LCP review and approval program has been found by the Resources Agency to be functionally equivalent to the EIR process. Thus, under CEQA Section 21080.5, the Commission is relieved of the responsibility to prepare an EIR for each LCP action.

Nevertheless, the Commission is required, in approving an LCP submittal, to find that the approval of the proposed LCP, as amended, does conform with CEQA provisions, including the requirement in CEQA section 21080.5(d)(2)(A) that the amended LCP will not be approved or adopted as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. 14 C.C.R. §§ 13540(f) and 13555(b).

As discussed above, the County's IP/CZO amendment as originally submitted does not conform with, and is not adequate to carry out, the policies of the Land Use Plan (LUP). The Commission has, therefore, suggested modifications to the proposed IP/CZO to include all feasible measures to ensure that potentially significant environmental impacts of new development are minimized to the maximum extent feasible consistent with the requirements of the Coastal Act and CEQA. For the reasons discussed in this report, the LCP amendment, as suggested to be modified, conforms with and is adequate to carry out the coastal resource protection policies of the certified LUP. These modifications represent the Commission's analysis and thoughtful consideration of all significant environmental issues raised in public comments received, including with regard to potential direct and cumulative impacts of the proposed IP/CZO amendment, as well as potential alternatives to the proposed amendment. As discussed in the preceding sections, the Commission's suggested modifications represent the most environmentally protective alternative to bring the proposed IP/CZO amendment into conformity with the LUP consistent with the requirements of the Coastal Act. Therefore, the Commission finds that the proposed LCP amendment, as suggested to be modified, is consistent with CEQA.