



BOARD OF SUPERVISORS  
AGENDA LETTER

Agenda Number:

Clerk of the Board of Supervisors  
105 E. Anapamu Street, Suite 407  
Santa Barbara, CA 93101  
(805) 568-2240

Submitted on:  
(COB Stamp)

Department Name: Planning and Development  
Department No.: 053  
Agenda Date: August 26, 2025  
Placement: Departmental Agenda  
Estimated Time: 1 hour  
Continued Item: Yes  
If Yes, date from: July 15, 2025  
Vote Required: Majority

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TO: Board of Supervisors  
FROM: Department Director: Lisa Plowman, Planning Director  
Contact: Alex Tuttle, Deputy Director  
SUBJECT: Open Space Element Update – Project Scoping and Options

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**County Counsel Concurrence**

As to form: Yes

**Other Concurrence:**

As to form: N/A

**Auditor-Controller Concurrence**

As to form: N/A

**Recommended Actions:**

That the Board of Supervisors:

- a) Receive and file a report from the Planning and Development Department regarding a proposed update and amendment of the Open Space Element of the County Comprehensive Plan and options regarding the scope of the proposed update;
- b) Provide direction to staff regarding the scope of the update; and
- c) Determine that the recommended actions are not a project that is subject to environmental review under the California Environmental Quality Act (CEQA), pursuant to CEQA Guidelines Section 15378(b)(5), finding that the actions consist of administrative activities of government that will not result in direct or indirect physical changes in the environment.

**Summary Text:**

The Planning and Development (P&D) Department is requesting direction from the Board of Supervisors regarding the scope of an update to the Open Space Element of the Santa Barbara County Comprehensive Plan. This update is required to comply with Senate Bill (SB) 1425, which mandates that cities and counties update their open space elements by January 1, 2026, to address equitable access to open space, climate resilience, and rewilding opportunities. In addition, P&D is presenting options that would begin to address Assembly Bill (AB) 1889, the Room to Roam Act, which requires an update to the Conservation Element starting with the next general plan update on or after January 1, 2028, with a focus on habitat and wildlife connectivity.

P&D has developed three scope-of-work options for the Board's consideration.

1. *Low Option*

A foundational update that brings the Open Space Element into compliance with SB 1425. It would include a general rewrite, new goals and policies, and updated maps, including an open space inventory. This option can be completed using current budgeted staff and funding.

2. *Moderate Option*

The moderate option builds on the low option by evaluating barriers to wildlife movement and identifying rewilding opportunities on public and conserved lands. It also would partially address the future requirements of AB 1889 related to wildlife corridors and connectivity. This option would require some additional staffing and funding for consultant services.

3. *High Option*

The high option includes all elements of the low and moderate options, plus a full update of the Conservation Element to fully implement AB 1889. This option would explore combining the Open Space and Conservation elements and would require significantly more staff time and consultant services.

P&D recommends proceeding with either Option 1 (Low) or Option 2 (Moderate) for Fiscal Year 2025-2026, based on available resources. Work on a full Conservation Element update (Option 3) would be considered in future years as funding and capacity allow.

**Discussion:**

**A. *Current Open Space Element***

The California Government Code requires cities and counties to include an open space element as one of the eight required elements of a general plan (Government Code Section 65302). The purpose of an open space element is the comprehensive and long-range preservation and conservation of open-space land within its jurisdiction [Government Code Section 65563]. The Santa Barbara County Open Space Element was adopted in 1979 and has not been substantially updated since then. It describes open space for public health and safety, the managed production of resources, outdoor recreation, and the preservation of natural resources. The text discussion, modeling, and mapping are out of date and in need of modernization. In addition, SB 1425 requires every city and county to review and update its local open space element by January 1, 2026, to address equitable access to open space, climate resilience, and rewilding opportunities (see background for more information on legislative requirements).

**B. *Scope of Work Options for Board of Supervisors Consideration***

P&D recommends the Board of Supervisors consider three options for updating the Open Space Element. Each option builds upon the lower option(s), both in terms of level of effort and anticipated costs. For example, the low option represents the lowest level of effort and lowest costs to comply with SB 1425 and would be included in the moderate and high option work efforts.

1. *Low Option*

The low option level of effort would involve a general Open Space Element update to address the following SB 1425 mandatory components:

- Equitable access to open space, considering social, economic and racial equity
- Climate resilience and other co-benefits of open space coordinated with the Safety Element

- Rewilding opportunities to preserve and enhance natural ecosystems
- Coordinate and align the Open Space Element updates with ongoing policy efforts related to the Environmental Justice Element, Recreation Master Plan, Climate Adaptation Plan, and Safety Element update.
  - Develop supporting goals, policies, and actions.
- Additional Updates:
  - Describe open space categories required by the Government Code but not clearly addressed in the current Open Space Element
  - Open space inventory and map, including identification of existing connections between open spaces
  - New or updated open space maps, where relevant and feasible
  - Modernize the document with an appealing redesign and format
  - Revise dated analyses and text while retaining existing text where relevant

#### *Estimated Staffing/Consultant Estimates*

These tasks could be completed by P&D staff without the assistance of a consultant under contract and are currently included in the Long Range Planning Division’s annual work program and funded in P&D’s adopted budget for FY 2025-2026. Staff anticipate this option could be accomplished with an exemption from CEQA.

<b>Low Option Estimate</b>	
<b>Staffing</b>	0.8 FTE*
<b>Consultant Total</b>	\$0
• <b>Planning/Biologist</b>	N/A
• <b>EIR</b>	N/A

\* Full Time Equivalent. 1.0 FTE means that the work required on the project is equivalent to one full-time employee.

## 2. *Moderate Option*

The moderate option would build on the low option by expanding rewilding efforts on public lands and lands managed for conservation or preservation by non-profit organizations or similar entities.

- Working with land managers, identify opportunities to enhance rewilding of existing open spaces by (a) identifying connections between existing fragmented open space lands on, between, or among public lands and lands managed for conservation or preservation by non-profit organizations or similar entities, and (b) identifying priorities and making recommendations for future study and planning efforts.
- Building on Caltrans’ recent successful US 101 Gaviota Pass Wildlife Connectivity Study:
  - Identify additional potential existing barriers to wildlife migration where US 101 acts as a significant barrier, and potentially other public infrastructure barriers (e.g., State Route 1 between US 101 and the City of Lompoc).
  - Identify priorities and make recommendations for future study and planning efforts (e.g., from Mariposa Reina and points east along the Gaviota Coast, or points north of Gaviota Pass).
  - Compile existing publicly available mapping data to prepare a map depicting general large-scale migration corridors (e.g., Santa Ynez River), which can provide opportunities for rewilding habitat and wildlife connectivity.

The moderate option would recognize there are intersecting requirements of SB 1425 regarding rewilding and AB 1889 requirements for wildlife connectivity but would only partially address AB 1889.

#### *Estimated Staffing/Consultant Estimates*

To assist with this work effort, the moderate option would likely require the services of a consultant experienced in land use and biological/ecological resources and in public outreach and engagement. The moderate option could be accomplished with an exemption from CEQA by carefully developing a scope of work for consultant services that would not cause potential impacts to the environment. P&D estimates an additional 0.3 FTE to complete this effort, which would require shifting a limited amount of staff time away from other assignments because the additional work effort is not currently included in the Long Range Planning Division’s annual work program, nor funded in P&D’s adopted budget for FY 2025-2026. Funding to support a consultant for the moderate option could be reallocated from another project in the work program.

<b>Moderate Option Estimate</b>	
<b>Staffing</b>	1.1 FTE
<b>Consultant Total</b>	\$60,000 - \$80,000
• <b>Planning/Biologist</b>	\$60,000 - \$80,000
• <b>EIR</b>	TBD

### **3. High Option**

The high option would build on the low and moderate options and incorporate the following tasks.

- Additional studies and mapping for rewilding opportunities and for wildlife connectivity in compliance with AB 1889.
- Comprehensive rewrite and update of the Conservation Element incorporating all AB 1889 requirements, achieving full compliance with AB 1889 prior to state mandated deadlines.
- Consider an alternative work product that combines the open space and conservation elements into one document, similar to other jurisdictions.
- Consider identifying and prioritizing locations for additional open space designations or acquisition.

#### *Estimated Staffing/Consultant Estimates*

The high option would require consultant services to assist with studies and mapping, a broader and more comprehensive outreach effort regarding the update of both elements, and drafting an update to the Conservation Element to satisfy the requirements of AB 1889. P&D anticipates needing to shift additional staff away from other assignments to cover an additional 1.0 FTE to complete this effort. In addition, this high level of effort would likely require additional consultant services to prepare an environmental document for compliance with CEQA. Due to the scope of the high option, some of the estimated FTE, along with a portion of the consultant work and the costs estimated below, would likely carry over into the following fiscal year.

<b>High Option Estimate</b>	
<b>Staffing</b>	1.8 FTE
<b>Consultant Total</b>	\$450,000 – 550,000
• <b>Planning/Biologist</b>	\$250,000 – 300,000
• <b>EIR</b>	\$200,000 – 250,000

### **C. Summary of Options and Recommendation**

While the feasibility of some of the options is limited given the current fiscal constraints, P&D is presenting the options to ensure the Board has relevant information to provide informed direction. Each option has its pros and cons. Option 1 would satisfy the state law (SB 1425) and update an out-of-date element of the Comprehensive Plan. Staffing and costs align with the approved Long Range Planning work program. Option 2 would expand the update to include an examination of potential wildlife corridors and open space connectivity on public lands and those under conservation easements and identify options to further remove barriers along Highway 101 in coordination with Caltrans. This option would slightly increase staffing requirements and includes consultant costs. P&D could slightly delay one of the zoning ordinance amendment packages identified in the Long Range Planning Division's FY 2025-2026 Work Program to free up staffing resources. P&D has identified funds that can be reallocated, which could cover the consultant costs. Option 3, while it presents an intriguing opportunity to combine the Open Space and Conservation Elements, which have overlapping content, would require a significant reallocation of staffing resources and significant funding for consultants. Therefore, P&D is recommending either Option 1 or 2 for FY 2025-2026 and postponing work on the Conservation Element until future fiscal years.

### **D. Environmental Review**

CEQA Guidelines Section 15060(c)(3) states that an activity is not subject to CEQA if it is not a project as defined in CEQA Guidelines Section 15378. CEQA Guidelines Section 15378(b)(5) states that a project does not include organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment. The Board's actions to receive and file a report and to provide direction to staff regarding the proposed scope of work for a project are administrative activities that would not create physical changes to the environment. Therefore, the Board's actions are not a project pursuant to CEQA Guidelines Section 15378(b)(5) and environmental review is not required.

#### **Background:**

P&D developed these options after researching state legislation requirements, reviewing the current Open Space Element and its relationship with the other elements of the County Comprehensive Plan, and reviewing open space elements from various counties and cities that were adopted within the past 10 years. Although most had not directly addressed SB 1425 as they were adopted prior to this legislation, many offered policy concepts that partially address SB 1425, and provided relevant information that assisted staff in formulating the options presented in this Board Letter. Staff are unaware of any jurisdictions that have adopted Conservation Element amendments in compliance with AB 1889 since the legislation is relatively recent.

#### **1. State Legislative Requirements**

##### **Senate Bill (SB) 1425**

The current update of the Open Space Element is directed by state legislation. SB 1425, enacted on September 30, 2022, requires every city and county to review and update its local open space element by January 1, 2026. Pursuant to SB 1425, Government Code section 65565.5:

- (a) ... The update shall include plans and an action program, as required by Section 65564, that address all of the following:*

1. *Access to open space for all residents in a manner that considers social, economic, and racial equity, correlated with the environmental justice element or environmental justice policies in the general plan, as applicable.*
2. *Climate resilience and other cobenefits of open space, correlated with the safety element.*
3. *Rewilding opportunities, correlated with the land use element.*

*(b) For purposes of this section, “rewilding opportunities” may include but are not limited to, the following:*

1. *Opportunities to preserve, enhance, and expand an integrated network of open space to support beneficial uses, such as habitat, recreation, natural resources, historic and tribal resources, water management, and aesthetics.*
2. *Establishing a natural communities conservation plan to provide for coordinated mitigation of the impacts of new development.*

#### Other Recent Legislation – Assembly Bill (AB) 1889

Among the options for the Board of Supervisors’ consideration is an additional state-mandated comprehensive plan update. Enacted on September 27, 2024, AB 1889 (the Room to Roam Act) requires an update of the Conservation Element upon the next update of one or more elements on or after January 1, 2028. Although AB 1889 does not require commencement of an update before 2028, there appear to be aligning planning objectives that intersect with the SB 1425 requirement to address rewilding opportunities. Some of these aligning objectives include the following:

- Identify and analyze wildlife connectivity areas, permeability, natural landscape areas within the county, and existing or planned wildlife passage features.
- Consider the impacts of development and barriers caused by development to wildlife and habitat connectivity.
- Avoid, minimize, or mitigate impacts and barriers to wildlife movement to the extent feasible.
- Analyze and consider opportunities to remediate existing barriers to wildlife connectivity and restore degraded habitat and open space.

#### 2. *Associated County Planning Efforts*

The County is working on several planning efforts related to the requirements of SB 1425. This update to the Open Space Element can take advantage of these efforts and comprehensively integrate the update by coordinating with, referring to, and supplementing, where necessary, the relevant planning documents where they would address one or more requirements of SB 1425.

First, P&D is developing an Environmental Justice Element in compliance with SB 1000 (Government Code Section 65302(h)), which will include the promotion of access to physical activity within disadvantaged unincorporated communities, among other legislative requirements. The Department anticipates Planning Commission and Board of Supervisors adoption hearings will commence in summer 2025. The Open Space Element update would look to and reference the Environmental Justice Element, where applicable to address SB 1425’s requirement to address access to open space for all residents in a manner that considers social, economic, and racial equity.

Second, County Parks Division is preparing a Recreation Master Plan to comprehensively plan for recreational opportunities across the county, which dovetails with state requirements to plan for open space for outdoor recreation. As a part of this effort, new parks and recreation policies are proposed to be added to the Land Use Element. These efforts also can support, at least in part, the requirement of SB 1425 to address equitable access to open space.

Last, P&D is preparing a climate adaptation plan in concert with an update to the Safety Element. The Department anticipates a draft of the climate adaptation plan to be available for public review in winter 2025-2026. The Open Space Element update would likely refer to applicable measures in the adaptation plan, and potentially the 2030 Climate Action Plan (adopted by the Board of Supervisors on August 27, 2024), to demonstrate climate resilience and other co-benefits of open space.

**Fiscal and Facilities Impacts:**

The time and costs associated with the low option (Option 1) have been anticipated and included in the Planning and Development Department’s Long Range Planning Division FY 2025-2026 annual work program, which was approved by the Board of Supervisors on April 8, 2025. The County Adopted Budget FY 2025-2026, page 311-312, includes funding for Comprehensive Plan elements and policies as part of the Long Range Planning Division Budget Program; the costs for Option 1 would not exceed the budget. There are no facilities impacts.

Estimated Staffing Needs and Consultant Costs			
	1. Low Option	2. Moderate Option	3. High Option
<b>FTE</b>	0.8	1.1	1.8
<b>Consultant Total</b>	\$0	\$60,000 - \$80,000	\$450,000 – 550,000
• <b>Planning/Biologist</b>	N/A	\$60,000 - \$80,000	\$250,000 – 300,000
• <b>EIR</b>	N/A	N/A	\$200,000 – 250,000

The moderate and high options are not currently included in the FY 2025-2026 Adopted Budget. With an increase of only 0.3 FTE, staffing for the moderate option could be accomplished by some limited delay to one of the zoning ordinance amendment packages identified in the annual work program, along with reallocation of existing funds for consultant services. However, the high option would require a significant reallocation of staffing resources and significant funding for consultants.

**Special Instructions:**

Planning and Development staff will fulfill noticing requirements.

The Clerk of the Board shall forward a copy of the minute order to Planning and Development, attention Julie Harris.

**Contact Information:**

Julie L. Harris  
Senior Planner, Long Range Planning  
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