



August 28, 2026

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

To the Santa Barbara County Board of Supervisors,

The undersigned organizations¹ continue to support the adoption of the Utility-Scale Solar Ordinance recommended by the Planning Commission and appreciate the Board's direction to staff to further evaluate standalone storage. Extending Tier 1 treatment to standalone storage ensures the ordinance fully supports the same resilience and clean energy objectives identified throughout the Planning Commission process and the Board's own findings.²

Staff's revision letter³ demonstrates that extending Tier 1 treatment to standalone storage up to 0.25 acres fits squarely within the analytical framework already established through the Planning Commission process and the Final Program Environmental Impact Report (PEIR). The remaining question before the Board is therefore a narrow policy determination: whether physically comparable standalone storage projects should receive the same Tier 1 treatment as paired solar+storage.

We thank the Board for recognizing the importance of small-scale standalone storage as part of this ordinance process and Staff for preparing a proposed revision letter extending Tier 1 treatment to standalone storage within the existing EIR framework. Including standalone storage of up to 0.25 acres under Tier 1 represents a consistent application of the existing framework:

- The Planning Commission's recommendation establishes 0.25 acres as the threshold for battery storage under Tier 1.
- Staff's EIR Revision Letter confirms the existing Final PEIR already provides the environmental analysis needed to extend Tier 1 treatment to standalone storage.
- The Statement of Overriding Considerations confirms the Ordinance advances important County renewable energy, resilience, and climate objectives.
- The Board can complete the Planning Commission's framework by extending Tier 1 treatment to standalone storage.

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

² See Attachment A: Findings For Approval and Statement Of Overriding Considerations.

³ See Attachment B-1.

Taken together, these findings demonstrate that extending Tier 1 treatment to standalone storage is not a departure from the ordinance considered by the Planning Commission, but rather the consistent application of the framework already established through the County's planning and environmental review process.

The Planning Commission's recommendation established 0.25 acres as the threshold for battery storage under Tier 1

The Planning Commission recommended Tier 1 ground-mounted solar systems on developed or improved land of up to five acres of solar be permitted an additional 0.25 acres for paired battery storage, subject to applicable inland or coastal requirements. The Planning Commission reasoned that battery storage at this scale possesses a limited physical footprint and de minimis land-use impacts that warrant Tier 1 treatment. Extending Tier 1 to standalone storage is the logical next step: paired solar+storage and standalone battery storage up to 0.25 acres both possess a similar footprint and land-use impact. Having already determined that this scale of storage warrants streamlined treatment, the Planning Commission's reasoning applies with equal force to standalone storage systems.

Staff's EIR Revision Letter confirms the existing PEIR already supports this amendment

As explained in Staff's EIR Revision Letter, extending Tier 1 treatment to standalone storage up to 0.25 acres falls within the environmental analysis already completed for the Final PEIR. As a result, no supplemental CEQA review is required. The PEIR's evaluation of battery storage as a component of Tier 1 projects already evaluates the construction, operation, maintenance, and decommissioning of projects containing battery energy storage systems, including the associated physical, hazardous-materials, and fire impacts. Consistent with this analysis, Staff proposes extending Tier 1 treatment to standalone storage up to 0.25 acres through the proposed EIR Revision Letter.

Staff's analysis demonstrates that objective safety standards and consistent permitting are complementary

Beyond confirming that the existing PEIR provides the necessary environmental analysis, Staff also addressed several implementation questions raised during the Board's July hearing. Rather than recommending discretionary planning review as the primary mechanism for addressing battery storage, Staff discusses objective development standards and cites Orange County as an example of how site-specific circumstances can be addressed through objective standards and project-specific modifications where appropriate. This approach is also consistent with the County's broader permitting framework, in which objective development standards, building and fire code review, and other established regulatory processes address project-specific safety considerations independently of discretionary planning review. This allows safety requirements

to be tailored to project-specific circumstances without undermining the consistent permitting framework established by the Planning Commission.

Should the Board elect to incorporate objective standards addressing sensitive receptors, those standards should preserve flexibility for site-specific circumstances where the affected property owner or community supports the project. Where unusual site conditions warrant additional mitigation, those issues can be addressed through existing County review processes rather than mandatory setbacks or discretionary planning review for every project.

Santa Barbara County already has experience with a battery project adjacent to community uses. The Vallecito Energy Storage Resilience (VESR) project in Carpinteria demonstrates that appropriately designed battery storage can operate adjacent to community uses while complying with existing safety requirements. Importantly, the project also received support from nearby property owners, illustrating why any objective standards for sensitive receptors should preserve flexibility where the affected community welcomes a project.

The Board's role is to apply this threshold

The question before the Board is not whether a threshold of 0.25 acres of battery storage is appropriate under Tier 1. The Planning Commission has already established that threshold for paired solar+storage, and Staff has indicated that extending it to standalone storage requires no new analysis within the existing PEIR framework. What remains is a narrow determination: whether standalone storage projects with identical structure, footprint, site conditions, and land-use impacts should receive consistent Tier 1 treatment, regardless of the presence of accompanying solar.

Conclusion

We recommend that the Board complete the Planning Commission's framework by extending Tier 1 treatment to standalone storage up to 0.25 acres, consistent with Staff's analysis and recommendation.

Sincerely,

Ben Schwartz

Policy Director
Clean Coalition

Sigrid Wright

CEO / Executive Director
Community Environmental Council



SIERRA CLUB
SANTA BARBARA - VENTURA



Community
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Bold Climate Action
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