

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST DISTRICT OFFICE
89 SOUTH CALIFORNIA STREET, SUITE 200
VENTURA, CA 93001
(805) 585-1800



W11a

DATE: February 26, 2026

TO: Commissioners and Interested Persons

FROM: Steve Hudson, District Director
Michelle Kubran, Supervisor
Sam Fearer, Coastal Program Analyst

SUBJECT: County of Santa Barbara Local Coastal Program Amendment No. LCP-4-STB-24-0064-2 (SB 423) for March 11, 2026 Commission Meeting

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 incorporate streamlined permit processing (ministerial review) for qualifying housing projects in certain areas of the coastal zone, in conformance with new state housing law, as required by recent updates (Senate Bill 423) to Government Code Section 65913.4. Staff recommends that the Commission, after public hearing, reject proposed County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0064-2 as submitted, and approve the amendment only if modified pursuant to **two suggested modifications**. The suggested modifications are necessary to ensure that the proposed IP/CZO amendment is consistent with and adequate to carry out the policies of the County'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 LUP.

To comply with the requirements of Government Code Section 65913.4, the County proposes to create a new IP/CZO Section (Section 35-144X – Qualifying Housing Streamlined Review) to implement a streamlined application review process for housing projects that meet the requirements of Government Code Section 65913.4. However, the proposed IP/CZO Section relies upon external references to Government Code sections without also including the effective dates for such sections and includes reference to "successor statute[s]". As proposed, the County's language would refer to external code that could be subject to revision or replacement with future updates to state housing laws. Although Government Code Section 65913.4 currently contains safeguards for coastal resources – through siting requirements and through application of objective standards protective of coastal resources – future updates to or successor statutes of Government Code Section 65913.4 could potentially have adverse impacts to coastal resources. Additionally,

the proposed amendment text references Government Code Section 65913.4(a)(6), which describes areas of the coastal zone where housing projects would not qualify for streamlined processing. However, the proposed amendment does not describe these areas, which include the Commission's geographic appeal jurisdiction. The proposed amendment also omits reference to Government Code Section 65913.4 parking requirements where such reference would be appropriate. Therefore, **Suggested Modifications 1 and 2** are necessary to strike reference to "successor statute[s]", to include the effective dates for external Government Code references, and to provide clarification regarding siting eligibility and parking requirements. If modified as suggested, the proposed amendment language would bring the certified LCP into conformance with new state housing law while also retaining the existing safeguards for coastal resources included in Government Code Section 65913.4.

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. The motions and resolutions for Commission action can be found starting on **page 5** of this staff report.

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Exhibits

Exhibit 1 - Proposed Implementation Plan Amendment Text: Ordinance 5222

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))

The standard of review for the proposed amendment to the County's certified IP/CZO, pursuant to Sections 30513 and 30514(b) of the Coastal Act, 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 County'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-24-0064-2 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-24-0064-2 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-24-0064-2 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-24-0064-2, 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 Implementation Plan Amendment may have on the environment.

III. SUGGESTED MODIFICATIONS

Staff recommends the Commission certify the proposed IP/CZO amendment, with two (2) suggested modifications as shown below. Language proposed to be added by the County of Santa Barbara in this amendment is shown underlined. 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

Section 35-144X.1 shall be modified as follows:

- A. Purpose and Intent.** The purpose of this Section is to implement a streamlined application review process for “qualifying streamlined housing projects”, consistent with the requirements of state law. It is intended that the provisions of this Section be interpreted, as needed, to comply with the requirements of Government Code Section 65913.4 or successor statute, as that section read on January 1, 2026.
- B. Applicability.** The provisions of this Section apply to applications deemed complete before January 1, 2036, that meet the criteria for “qualifying streamlined housing projects.” The Department will not accept any application under this Section after January 1, 2036, unless the state extends Government Code Section 65913.4. This Section shall not apply if the state has determined that the County is not subject to the streamlined ministerial approval process based on its housing element annual progress report, or shall apply only to projects with specific affordability restrictions under specific circumstances as described in Government Code Section 65913.4(a)(4). The provisions of this Section 35-144X will become null and void, and are repealed, once the last application deemed complete before January 1, 2036 is fully processed, unless otherwise extended by the State Legislature.
- C. Qualifying Streamlined Housing Projects.** For purposes of this Section, “qualifying streamlined housing projects” means housing development projects that satisfy all of the standards set forth in Government Code Section 65913.4(a). Development projects ~~Qualifying streamlined housing projects are not allowed~~ in some areas of the Coastal Zone as described in Government Code Section 65913.4(a)(6), including the California Coastal Commission’s geographic appeal jurisdiction (Section 35-182.6.3.a-c), are not “qualifying streamlined housing projects.”

Suggested Modification No. 2

Section 35-144X.5 shall be modified as follows:

- A. Preliminary Application/Notice of Intent Purpose and Intent.** Before submitting an application for a development subject to this Section, the applicant must: (1) submit a notice of intent in the form of a preliminary application that includes all of the information described in Government Code Section 65941.1, as that section read on January 1, 2020, and (2) receive notice pursuant to Subsection C.1 below.
- ...
- D. Consistency Determination.** After receiving notification pursuant to Subsection C.1. above, the applicant may submit a complete application in accordance with Section 35-57A (Application Preparation and Filing) for development subject to streamlined review. Once submitted, the Director will review the application for consistency with the applicable criteria required for streamlined housing projects and for compliance with applicable objective zoning, subdivision, and design review standards, and the policies and provisions of the Local Coastal Program. If it is determined that the project is in conflict with any of the applicable objective standards, the applicant will

be provided with written documentation of which standard or standards the development conflicts with, and an explanation for the reason or reasons the development conflicts with that standard or standards. This notification will be issued in compliance with the timelines provided by Government Code Section 65913.4 or successor statute, as that section read on January 1, 2026.

...

F. Project Approval. The Director must approve a Coastal Development Permit for a project that meets all the requirements of state law and this Section, complies with all applicable objective standards, and is found consistent with all applicable policies and provisions of the Local Coastal Program within 90 days of a consistent application submittal if the development contains 150 or fewer housing units, or within 180 days of a consistent application submittal if the project contains more than 150 housing units, unless a different timeframe is established under state law. In accordance with Government Code Section 65913.4(t)(3), receipt of any density bonus, concessions, incentives, waivers or reductions of development standards, and parking ratios to which the applicant is entitled under Government Code Section 65915, as that section read on January 1, 2026, shall not constitute a basis to find the project inconsistent with the Local Coastal Program.

...

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 incorporate and streamlined permit processing (ministerial review) for qualifying housing projects in certain areas of the coastal zone, in conformance with new state housing law, as required through recent updates (Senate Bill 423) to Government Code Section 65913.4. The proposed amendment adds a definition for "qualifying streamlined housing projects"; confirms the exclusion of certain geographical areas within the coastal zone; requires streamlined processing of qualifying projects, consistent with the objective standards of the LCP; and describes applicability of the streamlined review process in relation to the County's progress toward meeting its annual pro rata allocation of the Regional Housing Needs Allocation (RHNA), as determined by the California Department of Housing and Community Development (HCD) and recorded in the County's Housing Element Annual Progress Report.

Senate Bill 423 – Streamlined Ministerial Approval Process in the Coastal Zone

As amended through Senate Bill 423, Government Code Section 65913.4 creates a streamlined ministerial approval process for eligible affordable housing development projects located in jurisdictions that have not adopted a housing element that has been found in substantial compliance with state housing element law, or that have not yet made sufficient progress towards their portion of the RHNA (Gov. Code § 65913.4(a)(4)(A)), and applies to eligible sites in the coastal zone beginning January 1, 2025. The provision for a streamlined ministerial approval process only applies to projects that meet specific criteria, including minimum total unit count, minimum lower-income unit count, and urban siting and labor contract requirements. Government Code Section 65913.4 also includes requirements for potential projects considered within the coastal zone. To qualify under Section 65913.4, projects in the coastal zone require Coastal Development Permits (CDPs), and must be located: in an area subject to a certified LCP or certified LUP, within an urban area zoned for multifamily housing, outside of the Commission’s geographic appeal jurisdiction, outside of areas vulnerable to five feet of sea level rise, more than 100 feet from a wetland, outside of prime agricultural land and other protected agricultural lands, and outside of various other statewide exclusion areas.

For eligible areas of the coastal zone, Section 65913.4(t)(2) requires a public agency with coastal development permitting authority to approve a CDP for a qualifying streamlined housing project if it determines that the development is consistent with all objective standards of the local government’s certified LCP or – for areas that are not subject to a fully certified LCP – the certified LUP of that area.

Background

The County of Santa Barbara submitted the subject LCP Amendment to the Commission on December 19, 2024. The amendment submittal was deemed complete by Commission staff and filed on February 7, 2025. The time limit to act upon this LCP Amendment is 60 working days (May 6, 2025), unless extended pursuant to Section 30517 of the Coastal Act and California Code of Regulations Section 13535(c). On April 10, 2025, the Commission extended the 60 working day deadline for one full year (April 10, 2026), as provided by the Coastal Act, to allow the subject amendment submittal to be brought to hearing at a later date.

Commission and County staff have coordinated and met to discuss the proposed amendment. The suggested modifications were developed in cooperation with County staff, and County staff have indicated that they are supportive of the suggested modifications.

The full text of the County’s proposed changes to the IP/CZO are included as **Exhibit 1** of this report.

B. Consistency Analysis

Pursuant to Section 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 County LUP as guiding policies pursuant to Policy 1-1 of the LUP.

Section 30240 of the Coastal Act states:

- (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.
- (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Section 30250 of the Coastal Act, in relevant part, states:

Location; existing developed area

- (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

...

Section 30253 of the Coastal Act, in relevant part, states:

New development shall do all of the following:

- (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

...

County of Santa Barbara Coastal Land Use Plan Policy 1-1 states:

The County shall adopt the policies of the Coastal Act (PRC Sections 30210 through 30263) as the guiding policies of the land use plan.

County of Santa Barbara Coastal Land Use Plan Policy 1-3 states:

Where there are conflicts between the policies set forth in the coastal land use plan and those set forth in any element of the County's Comprehensive Plan or existing ordinances, the policies of the coastal land use plan shall take precedence.

The Chapter Three policies of the Coastal Act provide for the protection of coastal resources, requiring that new development minimize impacts to such resources and additionally minimize risks to life and property in areas of known coastal hazards. The County of Santa Barbara LCP incorporates the policies of the Coastal Act by reference, and contains several policies intended to guide balanced development that is protective of coastal resources. In order to ensure that new development is sited in areas able to accommodate it and where it will not have significant cumulative impacts on coastal resources, as required by Section 30250 of the Coastal Act (incorporated by reference into the certified LCP), the siting and design of new development must adhere to the requirements of other applicable policies of the certified LCP. Such policies include, but are not limited to, policies and provisions regarding bluff top development, environmentally sensitive habitat areas, public access, visual resources, and the protection of prime agricultural land and other priority land uses identified through the Coastal Act. Where conflicts arise between local ordinances and the certified land use plan (LUP), the policies of the LUP shall take precedence.

The proposed amendment would incorporate streamlined permit processing (ministerial review) for qualifying housing projects in certain areas of the coastal zone, in conformance with recent updates (Senate Bill 423) to Government Code Section 65913.4. The Streamlined Ministerial Approval Process established through Government Code Section 65913.4, which is in effect in the coastal zone as of January 1, 2025, creates a streamlined ministerial approval process for eligible affordable housing development projects located in jurisdictions that have not met their housing element targets related to regional housing needs or that have not adopted a compliant housing element. Further, Government Code Section 65913.4(t)(2) requires a public agency with coastal development permitting authority to approve a CDP for a qualifying streamlined housing project if it determines that the development is consistent with all objective standards of the local government's certified LCP. The intent of requiring certain projects to only conform to objective standards is to make clear to developers, design professionals, applicants, government staff, decision-makers, and the public what will be used in the review of project submittals in order to encourage the production of multifamily and mixed-use housing.

Government Code 65913.4 also includes the criteria to determine a project's eligibility for the streamlined ministerial approval process, which includes the following: the development project is a multifamily housing development that contains two or more residential units; it provides at least 10%, 20%, or 50% of units as affordable for lower-income households, depending on whether the jurisdiction has adopted a compliant housing element as well as the progress the jurisdiction has made on its portion of the regional housing needs allocation (RHNA); is located on a site where at least 75% of the perimeter of the site adjoins parcels developed with "urban uses" (defined as "any current or former residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses"); and the project meets certain labor and wage requirements. In addition, project sites must be located in an urban area zoned for multifamily housing and subject to a certified LCP or certified LUP, and not located in the

Commission's geographic appeal jurisdiction, in areas vulnerable to five feet of sea level rise, within 100 feet of a wetland, on prime agricultural land, or in other statewide exclusion areas. Statewide exclusion areas include very high fire hazard severity zones; hazardous waste sites; delineated earthquake fault zones; FEMA special flood hazard areas or regulatory floodways; lands identified for conservation in an adopted natural resource protection plan; prime farmland or farmland of statewide importance and lands locally designated or zoned for agricultural protection or preservation; habitat for species protected under various provisions of federal or state law; and lands under a conservation easement.

To comply with state law, the County proposes to create a new IP/CZO Section (Section 35-144X – Qualifying Housing Streamlined Review) to establish procedures for streamlined permit processing (ministerial review) of qualifying housing projects. The intent of the proposed amendment is to make the certified LCP consistent with state law by removing discretionary review from eligible projects, thus expediting the creation of new housing units subject to streamlined, ministerial approval under state housing law. On December 12, 2024, the Commission certified an IP/CZO amendment (LCP-4-STB-24-0027-1-Part A) to the County's certified LCP, subject to two suggested modifications, to update the County's provisions relating to objective design standards for multi-unit housing, in conformance with state housing laws. The Commission certified the amendment subject to Suggested Modifications 1 & 2, which (A) clarified that where compliance with only the objective standards of the LCP is required under state housing law and where an applicable coastal resource protection policy contains objective and subjective components, the objective portion(s) shall apply so that adverse impacts to coastal resources will be avoided, and (B) required that the County submit an LCP amendment within three years from the certification date of LCP-4-STB-24-0027-1-Part A to incorporate coastal resource protection and hazard minimization development standards that are objective standards to ensure that qualifying projects subject to only the objective standards of the LCP under state housing laws are consistent with the Coastal Act to the maximum extent feasible. The subject amendment includes reference to the previously certified objective design standards as well as incorporates the requirement for qualifying housing projects to comply with the objective components of coastal resource protection policies and provisions and avoid adverse impacts to coastal resources.

The proposed amendment text mainly relies upon external references to Government Code Section 65913.4 instead of inserting applicable text directly into the LCP. However, the proposed amendment text does not include the effective dates for the external Government Code references (i.e., "as that section read on [date]"), but does include references to "successor statute[s]." As proposed, the County's language would refer to external code that could be subject to revision or replacement with future updates to state housing laws. Although Government Code Section 65913.4 currently contains safeguards for coastal resources – through siting requirements and through application of objective standards protective of coastal resources – future updates to or successor statutes of Government Code Section 65913.4 could potentially have adverse impacts to coastal resources. Additionally, although the proposed amendment text references Government Code Section 65913.4(a)(6), which includes areas of the coastal zone where housing projects would not qualify for streamlined processing, the proposed amendment does not describe these

areas, which include the Commission's geographic appeal jurisdiction. The proposed amendment also omits reference to Government Code Section 65913.4 parking requirements where such reference would be appropriate. Therefore, **Suggested Modifications 1 and 2** are necessary to strike reference to "successor statute[s]", to include the effective dates for external Government Code references, and to provide clarification regarding siting eligibility and parking requirements. If modified as suggested, the proposed amendment language would bring the certified LCP into conformance with new state housing law while also upholding the existing safeguards for coastal resources included in Government Code Section 65913.4.

Therefore, for the reasons discussed above, the Commission finds that only if modified as suggested will the IP/CZO amendment regarding streamlined ministerial review 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 IP/CZO, as amended, does conform with CEQA provisions, including the requirement in CEQA section 21080.5(d)(2)(A) that the amended IP/CZO 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. §§ 13542 and 13544.

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 resources protection policies of the certified LUP. 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.