

# Coastal Act Consistency Analysis

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County of Ventura  
Energy and Military Land Use Compatibility Roadmap

(Case Nos. PL24-0109 and PL24-0120)

This Exhibit provides an analysis of the proposed project's consistency with the California Coastal Act (Public Resources Code, § 30000 et seq.). The Coastal Act requires local governments to prepare and maintain a Local Coastal Program (LCP) consisting of a land use plan and implementing ordinances to carry out Coastal Act policies at the local level. Once certified by the California Coastal Commission, responsibility for issuance of most coastal development permits is delegated to the local government, provided that actions are consistent with the certified LCP.

Land use and development within the County's unincorporated coastal zone are governed by the County's Coastal Area Plan (CAP), the County's Coastal Zoning Ordinance (CZO), and two adopted Categorical Exclusion Orders ("Order E-83-1" and amendment "E-83-1A"). The CAP serves as the County's coastal land use plan and establishes the type, location, and intensity of land uses, as well as applicable resource protection and development policies. The CAP was certified by the Coastal Commission in June 1982. The CZO implements the CAP through detailed zoning standards and development regulations and was certified by the Coastal Commission in 1983. The Categorical Exclusion Orders are independent documents adopted by the Coastal Commission pursuant to section 30610(e) of the Coastal Act; Ventura County's Categorical Exclusion Order E-83-1 became effective in September 1986 and was amended once in May 1987 (E-83-1A).

Collectively, the proposed project would revise multiple sections of the CZO to implement renewable energy standards, development regulations, and military land use compatibility requirements. The proposed CZO amendments are attached as Exhibit 5a. Revisions to the CAP are proposed as part of this project and are attached as Exhibit 3d.

The proposed Military Land Use Compatibility (MLUC) Overlay Zone includes much of the area mapped by the CAP (Figure 4.1.3-3), and as such, lays within the Santa Monica Mountains (M) Overlay Zone and within areas defined as Environmentally Sensitive Habitat Area (ESHA). That said, it is important to note that no development is proposed as part of the revisions to the LCP. Moreover, the proposed revisions will ensure that future development is sited using best practices to ensure consistency with the County's General Plan and compatibility with military land uses in the South Coast area identified in the CAP.

Table 1 identifies the relevant CAP policies and includes an analysis describing how the proposed amendment(s) are consistent with those policies.

**Table 1: Consistency Analysis for Coastal Area Plan Policies**

Proposed CZO Amendment	Coastal Area Plan (CAP) Policy	Consistency Analysis
<p><b>Sec. 8177-5</b> Military Land Use Compatibility Overlay Zone (MLUC)</p>	<p><b>Coastal Area Plan - Section 4.2.4. Hazards</b></p> <p><b>Hazards Goal 1:</b> To protect public safety and property from naturally occurring and human-induced hazard as provided in County ordinances.</p> <p><b>Policy 2:</b> New development shall be sited and designed to minimize risks to life and property in areas of high geologic, flood, and fire hazards.</p>	<p>The proposed MLUC Overlay Zone establishes development standards designed to ensure compatibility between local land uses and NBVC operations at Pt. Mugu. The overlay includes specific subarea standards that address the following:</p> <ul style="list-style-type: none"> <li>• Height restrictions within Federal Aviation Administration imaginary surfaces limit height for structures that could interfere with aircraft navigation or create aviation hazards.</li> <li>• Property owners within Accident Potential Zones or noise zones designated by the Navy are required to record a risk acknowledgment form prior to the development of dwellings or habitable structures, ensuring that current and future occupants are informed of potential aviation-related risks.</li> <li>• Discretionary entitlement applications that may affect military radio frequency spectrum or involve bird- or wildlife-attracting uses are referred to NBVC for consultation.</li> <li>• Solar photovoltaic energy generation and battery energy storage systems in certain MLUC subareas where such facilities could interfere with military operations or aviation safety are restricted, either through prohibition or the requirement to submit projects for review to the Department of Defense Military Aviation and Installation Assurance Siting Clearinghouse.</li> </ul> <p>Collectively, these provisions ensure land use compatibility with aviation safety and military operations and that potential hazards are identified and addressed prior to project approval. Accordingly, the amendment is consistent with Coastal Area Plan Section 4.2.4, Policy 2 because it promotes the proper siting of potentially hazardous development while minimizing risks to life and property.</p>
<p><b>Secs. 8175-5.11, 8176-2.5, and 8176-9</b></p>	<p>§30253(d) – Minimize energy consumption and vehicle miles traveled. (Coastal Act section incorporated by reference; See</p>	<p>The proposed amendments incorporate several energy efficiency and renewable energy provisions into the CZO, including the requirement to add solar canopies to parking lots associated with new large non-residential developments (See General Plan Program COS-U.) The amendments also include development</p>

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<p>Accessory Wind Energy Generation, Solar Structures, and Electric Vehicle Charging Stations</p> <p><b>CZO Sec. 8175-5.24.2.</b></p> <p>Battery Energy Storage System Development Standards,</p> <p><b>CZO Sec. 8175-5.24.3</b></p> <p>Solar Photovoltaic Energy Generation Development Standards</p>	<p>CAP Chapter 2, Summary of Coastal Act Policies)</p>	<p>standards for wind energy structures that allow onsite accessory renewable energy generation and establish development standards for electric vehicle charging stations.</p> <p>The amendments also establish development standards for battery energy storage systems and solar photovoltaic energy generation, including standards related to siting, design, and environmental compatibility.</p> <p>As such, the amendments are consistent with Coastal Act Section 30253(d) because they encourage development that minimizes energy consumption within the Coastal Zone.</p>
<p><b>CZO Sec. 8177-5.2</b></p> <p>Military Land Use Compatibility Overlay Zone MLUC-11 Subarea: Bird/Wildlife Aircraft Strike Hazard (BASH) Radius</p>	<p><b>Coastal Area Plan – Section 4.1.3 Environmentally Sensitive Habitat Areas (ESHA)</b></p> <p><b>ESHA Goal 5:</b> Siting and Design Techniques for Development</p> <p><b>Policy 5.11 Bird Mortalities –</b> Bird mortalities resulting from bird collisions with buildings shall be reduced through application of bird-friendly building standards</p>	<p>The proposed amendments establish consultation requirements for wildlife attracting uses between the County of Ventura and the Department of Defense Military Aviation and Installation Assurance Siting Clearinghouse. Such consultation shall occur after an application is deemed complete and will include discussion of potential safety issues or incompatibility issues with military operations. The project may be conditioned or denied based on the project’s impact on wildlife, as determined by the County decisionmaker. The amendments are consistent with Policy 5.11 because they are intended to reduce mortalities resulting from bird collisions by establishing early coordination procedures with the Navy to ensure best practices are implemented.</p>
<p><b>CZO Article 4 Permitted Uses</b></p>	<p><b>Coastal Area Plan – Section 4.2.5 Energy and Industrial Facilities</b></p>	<p>Staff’s proposal maintains the existing requirement for a CUP for solar energy production facilities in Coastal Open Space and adds a CUP requirement for Accessory Wind Energy Generation in Coastal Open Space. Thus, the project is consistent with CAP Policy 18. The amendments also propose a Planned</p>

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<p>Energy Facilities, Including Energy Production From Renewable Sources</p> <p><b>CZO Sec. 8171-4.5</b></p> <p>Implementation of General Plan Program HAZ-O (Solar Concentration Restriction)</p>	<p><b>Policy 18:</b> Experimental uses that provide energy from alternative sources, such as wind or solar, may be permitted by Conditional use Permit in areas designated “Open Space”.</p> <p>§30250 (a), (b) – Location; Existing Developed Area; §30253 (a) – Minimization of Adverse Impacts (Incorporated by reference; See CAP Chapter 2, Summary of Coastal Act Policies)</p>	<p>Development (PD) Permit requirement for Accessory Wind Energy Generation in agricultural zones. This reflects a prior Director’s Determination interpreting accessory wind energy generation as an allowable accessory agricultural use under a PD Permit.</p> <p>The proposal also establishes that solar concentration facilities are prohibited within the Coastal Zone. This implements <b>General Plan Program HAZ-O</b>, which directs the County to modify the CZO, as necessary, to prohibit solar concentration facilities that could generate glare and interfere with aviation operations at Naval Base Ventura County (NBVC). Solar concentration facilities are industrial energy uses that may conflict with coastal land uses, particularly where glare or reflective surfaces could affect aviation safety. By prohibiting this use within the Coastal Zone, the amendment helps ensure that development is appropriately sited and avoids introducing uses that could create hazards or adverse effects within the Coastal Zone. To that end, the amendment is consistent with Coastal Act Sections 30250(a)(b) and 30253(a).</p>
<p><b>CZO Sec. 8175-5.24.2.1 (v)(w)</b></p> <p>Battery Energy Storage System Development Standards, General Standards and Requirements, Viewshed Analysis and Outdoor Lighting</p>	<p><b>Coastal Area Plan – Section 4.1.7 Visual Resources</b></p> <p><b>Visual Resource Goal 1:</b> Maintain and enhance the County’s scenic and visual resources for the current and future enjoyment of its residents and visitors.</p> <p><b>Policy 7:</b> New development shall be sited and designed to protect public views to and from the shoreline and public recreational</p>	<p>The proposed Battery Energy Storage System development standards include requirements for a viewshed analysis and compliance with outdoor lighting standards to ensure that new development is sited and designed to minimize visual impacts. The viewshed analysis requires an assessment that all proposed development using consistent, measurable visual data to compare all feasible on-site locations and configurations. Additionally, outdoor lighting must comply with established standards found in CZO Sec. 8177-4.1.11.</p> <p>These provisions implement CAP Policies 7 and 8 by ensuring that development is appropriately sited to protect scenic resources, avoid visually prominent locations such as ridgelines and hilltops to reduce impacts to public views and the surrounding landscape. Therefore, the proposed amendments are consistent with CAP Policies 7 and 8.</p>

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	<p>areas. Where feasible, development on sloped terrain shall be set below road grade.</p> <p><b>Policy 8:</b> Development shall not be sited on ridgelines or hilltops when alternative sites on the parcel are available and shall not be sited on the crest of major ridgelines.</p> <p>§30251 Scenic and Visual Qualities (Incorporated by reference; See CAP Chapter 2, Summary of Coastal Act Policies)</p>	
<p><b>CZO Sec. 8175-5.24.3</b></p> <p>Solar Photovoltaic Energy Generation Development Standards</p>	<p><b>Coastal Area Plan – Section 4.1.3 Environmentally Sensitive Habitat Areas (ESHA)</b></p> <p><b>ESHA Goal 1: ESHA Protection</b></p> <p><b>Policy 1.1</b> Environmentally Sensitive Habitat Areas (ESHA). ESHA shall be protected against any significant disruption of habitat values, and only uses dependent upon those resources shall be allowed within those areas.</p>	<p>The proposed amendment adds that solar photovoltaic energy generation systems are subject to applicable requirements of the Coastal Zoning Ordinance, including Section 8178-2.5 governing Environmentally Sensitive Habitat Areas (ESHA) or buffer zones.</p> <p>By explicitly applying ESHA protections to solar photovoltaic energy generation, the amendment ensures that such development avoids significant disruption of habitat values and only uses dependent upon those resources shall be allowed.</p> <p>Therefore, the proposed amendment is consistent with Coastal Area Plan ESHA Goal 1 and Policy 1.1.</p>