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AGENDA ITEM NO.: 5 (Public Hearing and Action)

PLANNING COMMISSION MEETING DATE: February 28, 2024

SUBJECT: Code Amendment No. 2024-01/ Water Efficient Landscape Ordinance.

EXECUTIVE SUMMARY

Staff has drafted a proposed code amendment to add Chapter 17.04 – Water Efficient Landscape Ordinance to the Inyo County Code. This proposed code amendment will incorporate the State’s Model Efficient Water Landscape Ordinance in its entirety by reference for state mandated implementation, however, it also includes the addition of enforcement and penalty provisions.

PROJECT INFORMATION

Supervisory District: Countywide

Project Applicant: Inyo County

Property Owner: Multiple/Countywide

Site Address/ Multiple/Countywide

Community: Multiple/Countywide

A.P.N. Multiple/Countywide

General Plan: Multiple/Countywide

Zoning: Multiple/Countywide

Recommended Actions:

1. Conduct a public hearing regarding Code Amendment No. 2024-01/Water Efficient Landscape Ordinance. and,
2. Adopt a Resolution recommending that the Board of Supervisors approve Code Amendment No. 2024-

01/Water Efficient Landscape Ordinance and certify that it is Exempt from CEQA.

Project Planner: Danielle Visuaño, Associate Planner.

BACKGROUND

1. State Model Water Efficient Landscape Ordinance (MWELO) Purpose

MWELO is a state mandated regulation designed by the State of California to promote water conservation and efficiency with a focus of preventing water from being wasted on irrigated landscapes. It provides a structure for planning, designing, installing, maintaining and managing landscapes for new construction and rehabilitation projects with a goal to preserve adequate supplies of water for future use. Essentially, MWELO is a water budget tool with lists of required practices. Since the State's MWELO is a mandate, none of its provisions can be ignored or altered below the minimum or foundational requirements. Local agencies can only add to MWELO to make it stricter in application with the adoption of a local water efficient landscape ordinance.

2. State MWELO Legislative History

The background of MWELO begins in 1990 with the creation of the Water Conservation in Landscaping Act (Act) under Assembly Bill (AB) 325. This bill required the Department of Water Resources (DWR) to develop a MWELO. The MWELO became effective on January 1, 1993 requiring all local agencies to adopt a water efficient landscape ordinance unless the local agency could provide findings that it was unnecessary. No evidence of any findings making MWELO an unnecessary application within Inyo County have been identified.

The 1993 enactment was followed by the creation a task force in 2004 to evaluate and recommend improving the efficiency of water use in irrigated landscapes pursuant to the requirement of AB 2717. In 2006, DWR was required to update the MWELO reflecting the recommendations of the task force and public comment pursuant to AB 1881. MWELO was then updated and went into effect January 1, 2010 requiring all local agencies to adopt the State's MWELO or a locally modified ordinance at least as effective in conserving water as MWELO, or else the State's MWELO applied by default. This adoption language is also codified in Government Code section 65595(c)(1). As of January 1, 2010, no State MWELO or a local modified MWELO was approved by the Board of Supervisors for Inyo County resulting in the State's MWELO applying to Inyo County by default.

MWELO was again updated on April 1, 2015 consistent with Executive Order No. B-29-15 stating that after December 1, 2015 the ordinance shall apply to new, rehabilitated and existing landscaping as detailed in Section 490.1 of Title 23, Division 2, Chapter 2.7 of the California Code of Regulations. As of December 1, 2015 no State MWELO or a local modified MWELO was approved by the Board of Supervisors for Inyo County. Local jurisdictions were still required to follow state law in the absence of a local ordinance during this time.

In September 2016, Senate Bill (SB) 1383 was passed to address reducing organic waste and landfill operations. The California Department of Resources Recycling and Recovery (CalRecycle) adopted regulation 14 CCR section 18989.2 in 2020 to implement the requirements of SB 1383. This regulation requires the County to adopt an ordinance involving compliance with MWELO sections 492.6(a)(3)(B), (C), (D), and (G), as amended on September 15, 2015. This regulation requires compliance with a portion of the overall MWELO Landscape Design Plan requirements with a specific focus on soil preparation and mulch standards.

From the inception of the enactment of the State's MWELO through the present, Inyo County has not adopted the State's MWELO or a local modified MWELO. As a result, the State's MWELO is in effect in Inyo County by default. Although the County is operating under State's MWELO by default, pursuant to Government Code Section 65595(c)(1) local agencies are authorized to create a local water efficient landscape ordinance (WELo) that is at least as effective in conserving water as the updated State's MWELO.

3. State MWELO Project Review Process

The State's MWELO is triggered and applicable to any single-family or multi-family residential, public, institutional, or commercial project that requires a permit, plan review, or plan check and meets one of these area thresholds: 1) a new construction project with a total landscape area 500 square feet or greater; or 2) a rehabilitation of existing landscape with a total landscape area 2,500 square feet or greater.

Once MWELO is triggered there is one of two processes a landscape application can be reviewed: the prescriptive pathway; or the performance pathway.

Prescriptive Pathway

The prescriptive pathway is the least restrictive/streamlined approach and is available as a compliance option for projects under 2500 square feet. This prescriptive review includes standards such as incorporating compost, limiting plant water use, adding mulch, limiting turf area, and irrigation system requirements.

Performance Pathway

Unlike the less restrictive review prescriptive review process for projects under 2500 square feet, the performance pathway applies to landscape projects 2500 square feet or greater. The performance pathway is much more complex. It not only includes the requirements found under the less restrictive prescriptive pathway, it also has additional requirements that include a water budget/calculator table, a soil management report, an irrigation design plan, a hydrozone plan and a grading design plan.

4. State MWELO Compliance

The State's MWELO requires verification of compliance with the use of signatures and a certificate of completion package.

Applicant Submission Signature Verifications

One required verifying signature of compliance is required to be provided by the applicant as part of the documentation submission package (the application) which states "I agree to comply with the requirements of the water efficient landscape ordinance and submit a complete Landscape Documentation Package." Another verifying signature of compliance is to be provided by either the signer of the landscape design plan, the signer of the irrigation design plan, the licensed landscape contractor, or an unlicensed individual (only for single-family residential projects) stating: "I have complied with the criteria of the ordinance and applied them for the efficient use of water in the landscape design plan." Essentially, at the beginning of the process with landscape plan review there is certification that MWELO will be complied with by signature of the applicant and the landscape plan designer (or other authorized individual). This certification is reviewed during the plan review process.

Applicant Submission of Certificate of Completion Package

The second type of verification of compliance is based on the certificate of completion package once the project has been installed, and inspected if inspection is necessary. There must be certification by either the signer of the landscape design plan, the signer of the irrigation design plan, or the licensed landscape contractor that the landscape project has been installed per the approved Landscape Documentation Package. Under the complex performance pathway, certificate of completion packages are to be provided to the Planning Department at the completion of the landscaping inspection. Under the less restrictive prescriptive pathway, certificate of completion packages are to be provided directly to the owner of the project without any review or approval by the Planning Department, or any other County department.

Inyo County Compliance Requirements

Under the State's MWELO requirements, Inyo County is required to implement and enforce MWELO, and provide annual reporting. Staff has recently been implementing and attempting to enforce the requirements of MWELO with the delay in implementation being having adequate staff to address these measures. Although implementation and enforcement has only recently been pursued, staff has been providing the required annual reporting since 2015.

With the current implementation of MWELO, staff have identified problematic issues in implementing MWELO that are likely to lead to the County's noncompliance with MWELO. These issues are related to the lack of adequate enforcement measures, a matter which is discussed in the below Analysis section.

ANALYSIS

1. Concerns

Under the current State MWELO process, the Planning Department only reviews and approves certificate of completion packages for the MWELO performance pathway, the complex application process, and that is only if the applicant follows the requirements to submit the certificate of completion package for review and approval. Prior to landscape installation/construction, once landscape plans are approved there is no guarantee an applicant will follow the approved plans or even provide a certificate of completion package to the Planning Department.

There is no Planning Department certificate of completion package review required for the prescriptive less restrictive pathway. The applicant only needs to provide the owner with the completion package. Under this process, there is no guarantee an applicant will follow the approved landscape plans, and there is no guarantee the applicant will provide a certificate of completion package to an owner as required under the State's MWELO law.

Basically, the State's MWELO does not require enough specific action or timing for submission of certificate of completion packages under either of the landscape review pathways. As a result, this leaves both the required performance and prescriptive pathways with little to no oversight and no enforcement of actual compliance as required under MWELO. Applicants may submit certificate of completion packages post construction/installation which could very well end up being after the certificate of occupancy has been issued. Once a certificate of occupancy is issued, the Planning Department is left without any ability, influence or power to require landscape inspection or the correction of landscaping that is not compliant with the State's MWELO. The results are in contradiction to the following State's MWELO requirements:

- The local agency is responsible for the enforcement of MWELO which is not limited to approval of a permit as required under Section 491(oo), stating that the "local agency ... is responsible for adopting and implementing the ordinance ... [and] responsible for the enforcement of this ordinance..."
- "Local agencies shall report on implementation and enforcement ... [and] describe enforcement measures." (Section 495(a)(10))
- MWELO shall apply to all of the landscapes listed in Section 490.1(a) discussing new construction, rehabilitated landscape projects, existing landscapes and cemeteries.

In the research and training conducted by staff, it has been determined that requiring submission of a landscape certificate of completion package for review and approval prior to the issuance of certificate of occupancy reinforces that landscape project comply with the requirements of MWELO. This would be required under both the performance and prescriptive pathways. The requirement of review and approval of a certificate of completion package, including an inspection if required, prior to the issuance of a certificate of occupancy is not included in the State's

MWELo. To compound the problems with enforcement, there are no specific penalties allowed under the State's MWELo.

2. Proposed Solution

The State has provided options for local agencies to build in enforcement and penalties. Pursuant to Government Code Section 65595(c), a local agency shall adopt the State's MWELo or local WELo that is at least as effective in conserving water as the State's MWELo, and a pursuant to section 492.2 of MWELo a local agency may establish and administer penalties to the project applicant for non-compliance with the ordinance to the extent permitted by law.

Staff is proposing the adoption of the proposed WELo code amendment for incorporating the State's MWELo by reference and adding enforcement measures and penalties. The proposed enforcement measure would require an applicant to submit a certificate of completion package, under both the prescriptive and performance pathways, for review and approval prior to the issuance of a certificate of occupancy from the Building and Safety Department. The proposed penalties would allow staff to penalize applicants primarily by not granting certificates of occupancy for non-compliance with the WELo. These proposed new local additions to the State's MWELo would make the County's local WELo more effective than the State's MWELo in gaining compliance.

Planning staff recommend the landscape application review processes remain the same as the State's MWELo prescriptive and performance pathways and to be incorporated by reference into the proposed Inyo County WELo.

FINDINGS

California Environmental Quality Act (CEQA)

The proposed code amendment to adopt and incorporate MWELo by reference is exempt from the California Environmental Quality Act (CEQA) because the ordinance adoption is ministerial in that it is required by State regulation and is therefore not a "project" pursuant to CEQA. The proposed code amendment is also covered by the "common sense" rule under California Code of Regulations, Title 14, section 15061(b)(3). Under the common sense rule exemption, projects which have no potential for causing a significant effect on the environment are exempt. This proposed amendment has no possibility of having a significant effect on the environment.

General Plan Consistency

The General Plan has a goal and policy that reflect a strong desire to adopt regulations that further water conservation efforts. The following goal and policy from the General Plan align with the adoption of the proposed WELo:

- A. Goal PSU-3 To ensure that there will be safe and reliable water supply sufficient to meet the future needs of the County.

B. Policy PSU-3.1 **Efficient Water Use.** The County shall promote efficient water use and reduced water demand by:

- i. Requiring water-conserving design and equipment in new construction;
- ii. Encouraging water-conserving landscaping and other conservation measures;
- iii. Encouraging the retrofitting of existing development with water-conserving devices;
- iv. Providing public education programs;
- v. Distributing outdoor lawn watering guidelines;
- vi. Promoting water audit and leak detection programs; and
- vii. Enforcing water conservation programs.

The Inyo County goal and policy are consistent with the requirements under the State MWELo in that they encourage water conservation and efficient use of water through landscaping. These County objectives will be supported by the adoption of a WELO code amendment and as a result will be consistent with the County's General Plan.

Zoning Ordinance Consistency

None of the proposed changes are in conflict with the County's zoning code. The code amendment is being proposed to implement and bring the County code into compliance with the State's MWELo mandate. The adoption of a local WELO will not affect the intent of Title 18 to direct certain types of land uses in specific areas of the County.

RECOMMENDATION

Staff is recommending that the Planning Commission make certain findings and adopt the Resolution recommending the Board of Supervisors adopt Code Amendment No. 2024-01/Water Efficient Landscape Ordinance.

ATTACHMENTS

1. Ordinance
2. Resolution

REFERENCE

1. The State of California's Model Water Efficient Landscape Ordinance can be found at: <https://www.inyocounty.us/services/planning-department/current-projects> under Code Amendment 2024-01/Water Efficient Landscape Ordinance.

ORDINANCE NO.

**AN ORDINANCE OF THE BOARD OF SUPERVISORS OF THE COUNTY OF INYO,
STATE OF CALIFORNIA, AMENDING TITLE 17 OF THE INYO COUNTY CODE TO
ADOPT THE CALIFORNIA WATER-EFFICIENT LANDSCAPING ORDINANCE
PURSUANT TO THE CALIFORNIA WATER CONSERVATION
IN LANDSCAPING ACT**

WHEREAS, in 1990 the State of California adopted the Water Conservation in Landscaping Act, codified at sections 65590 et seq. of the Government Code, which required the State Department of Water Resources (DWR) to adopt a model water efficient landscape ordinance (MWELo) to improve state water conservation efforts by reducing the waste associated with outdoor landscaping irrigation; and

WHEREAS, pursuant to the Act, the State’s MWELo adopted by DWR would take effect and be enforced by any local agency that did not adopt its own model water efficient landscape ordinance (or findings that such ordinance was unnecessary) by January 1, 1993; and

WHEREAS, in 2006 the State repealed the Water Conservation in Landscaping Act and adopted a new Water Conservation in Landscaping Act (Act), codified at Government Code sections 65591 et seq. The new Act required DWR to update the previously adopted MWELo to include new provisions for more extensive water-efficient landscaping, plant and soil selection, and irrigation considerations; and

WHEREAS, pursuant to Government Code section 65595, the State’s updated MWELo would take effect and be enforced by any local jurisdiction that did not adopt its own model water efficient landscape ordinance by January 1, 2010; and

WHEREAS, in 2015 Executive Order No. B-29-15 directed DWR to again update the State’s MWELo to extend its application to new, rehabilitated, and existing landscaping as detailed in Title 23, Division 2, Chapter 2.7 of the California Code of Regulations, and pursuant to Government Code section 65596.5, DWR is required to update its MWELo at least every three years; and

WHEREAS, pursuant to 14 CCR section 18989.2, a “jurisdiction shall adopt an ordinance or other enforceable requirement that requires compliance with Sections 492.6(a)(3)(B), (C), (D) and (G) of the Model Water Efficient Landscape Ordinance ... as amended September 15, 2015.”; and

WHEREAS, since 1993, the State’s MWELo has applied to Inyo County by default as the County has not previously formally adopted the State’s MWELo or a local water efficient landscape ordinance; and

WHEREAS, pursuant to Government Code Section 65595, a local government may adopt a water efficient landscape ordinance to implement the State MWELo requirements; and

WHEREAS, the purpose of a water efficient landscaping ordinance is to promote the conservation and efficient use of water, and prevent its waste, while recognizing the values and benefits of landscapes as essential to the quality of life in California; and

WHEREAS, incorporating the State MWELO by reference into the County’s water efficient landscape ordinance will ensure the County remains in compliance with state regulations as they may be amended from time to time, and will improve clarity for County residents and businesses regarding the applicable water efficient landscaping requirements; and

WHEREAS, staff now recommends Inyo County amend Title 17 of the Inyo County Code to adopt the State MWELO and additional requirements specific to Inyo County; and

WHEREAS, on February 28, 2024 the Inyo County Planning Commission held a duly noticed public hearing on the adoption of the proposed ordinance and recommended it for adoption by the Board via Resolution **XXXXXX**.

NOW, THEREFORE, the Board of Supervisors, County of Inyo affirms and adopts the findings of the Inyo County Planning Commission pursuant to **Resolution number XXXX** and based on the evidence before it, independently FINDS and DETERMINES, for the reasons set forth below and elsewhere in the record as follows:

SECTION I. The recitals above are incorporated herein as findings.

SECTION II. Title 17 of the Inyo County Code is hereby amended to read as follows:

Title 17 – WATER AND LANDSCAPE EFFICIENCY

Chapter 17.04 WATER EFFICIENT LANDSCAPE ORDINANCE

17.04.010 Purpose and Intent.

The purpose of this Chapter is to ensure the design, construction, installation, and maintenance of landscapes within Inyo County meet the requirements of the California Model Water Efficient Landscape Ordinance as out lined in Title 23, Division 2, Chapter 2.7 of the California Code of Regulations and Government Code Section 65595.

17.04.020 Adoption of the California Model Water Efficient Landscape Ordinance.

- A. The California Model Water Efficient Landscape Ordinance adopted by the California Department of Water Resources and as set forth in Chapter 2.7 of Division 2, Title 23, of the California Code of Regulations, (the “MWELO”), and as may be amended from time to time, is hereby adopted and incorporated into this Title by reference as though it were fully set forth herein. In addition to those requirements set forth in the MWELO, an applicant must meet the requirements of this Chapter.

B. At least one copy of the MWELO is on file with the Inyo County Clerk's Office.

17.04.030 Enforcement.

- A. No building permit shall be issued unless the statement of compliance required by Title 23, Division 2, Chapter 2.7 of the California Code of Regulations has been included on the final landscape design plan submitted for plan check approval.
- B. No building permit shall be given a final landscape inspection or issued any certificate of occupancy until the Planning Director receives and approves the Certificate of Completion as required by Title 23, Division 2, Chapter 2.7 of the California Code of Regulations.

17.04.40 Violations.

- A. It is unlawful for any person to remove or cause removal of water-conserving irrigation or equipment contrary to the provisions of this Chapter.
- B. It is unlawful for any person to violate any provision or to fail to comply with any of the requirements of this Chapter. Any person violating any provision of this Chapter or failing to comply with any of its requirements is guilty of a misdemeanor.
- C. This Chapter may be enforced by any remedy allowed under this code, including Chapter 22, and by any other remedy allowed by law.

SECTION III. Environmental Determination. The proposed code amendment to adopt and incorporate MWELO by reference is exempt from the California Environmental Quality Act (CEQA) because the ordinance adoption is ministerial in that it is required by State regulation and is therefore not a "project" pursuant to CEQA. The proposed code amendment is also covered by the "common sense" rule under California Code of Regulations, Title 14, section 15061(b)(3). Under the common sense rule exemption, projects which have no potential for causing a significant effect on the environment are exempt. This proposed amendment has no possibility of having a significant effect on the environment.

SECTION IV. Severability. If any provision or clause of this ordinance or the application thereof to any person or circumstances is held to be unconstitutional or otherwise invalid by any court of competent jurisdiction, such invalidity shall not affect other provision or clauses or application of this ordinance which can be implemented without the invalid provision, clause or application; and to this end, the provisions of this ordinance are declared to be severable.

SECTION V. This ordinance shall become effective thirty (30) days from the date of its adoption and final passage, which appears immediately below. The Clerk of the Board of Supervisors shall post this ordinance and also publish the ordinance in the manner prescribed by Government Code Section 25124 no later than fifteen (15) days after the date of its adoption and final passage. If the Clerk fails to publish this ordinance within said fifteen (15) day-period, then the ordinance shall not take effect until thirty (30) days after the date of publication.

PASSED, APPROVED and ADOPTED this _____ day of _____, 2024, by the following vote, to wit:

AYES:

NOES:

ABSENT:

ABSTAIN:

Matt Kingsley, Chair
Inyo County Board of Supervisors

ATTEST:

Nate Greenberg, Clerk of the Board

Darcy Ellis, Assistant Clerk of the Board

RESOLUTION NO.

A RESOLUTION OF THE PLANNING COMMISSION OF THE COUNTY OF INYO, STATE OF CALIFORNIA, RECOMMENDING THAT THE BOARD OF SUPERVISORS FIND THE PROPOSED PROJECT EXEMPT FROM THE REQUIREMENTS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, MAKE CERTAIN FINDINGS WITH RESPECT TO AND APPROVE ORDINANCE AMENDING TITLE 17 OF THE INYO COUNTY CODE TO ADOPT THE CALIFORNIA WATER-EFFICIENT LANDSCAPING ORDINANCE PURSUANT TO STATE LAW

WHEREAS, in 1990 the State of California adopted the Water Conservation in Landscaping Act, codified at sections 65590 et seq. of the Government Code, which required the State Department of Water Resources (DWR) to adopt a model water efficient landscape ordinance (MWELO) to improve state water conservation efforts by reducing the waste associated with outdoor landscaping irrigation; and

WHEREAS, pursuant to the Act, the State's MWELO adopted by DWR would take effect and be enforced by any local agency that did not adopt its own model water efficient landscape ordinance (or findings that such ordinance was unnecessary) by January 1, 1993; and

WHEREAS, in 2006 the State repealed the Water Conservation in Landscaping Act and adopted a new Water Conservation in Landscaping Act, codified at Government Code sections 65591 et seq. The new Act required DWR to update the previously adopted MWELO to include new provisions for more extensive water-efficient landscaping, plant and soil selection, and irrigation considerations; and

WHEREAS, pursuant to Government Code section 65595, the State's updated MWELO would take effect and be enforced by any local jurisdiction that did not adopt its own model water efficient landscape ordinance by January 1, 2010; and

WHEREAS, in 2015 Executive Order No. B-29-15 directed DWR to again update the State's MWELO to extend its application to new, rehabilitated, and existing landscaping as detailed in Title 23, Division 2, Chapter 2.7 of the California Code of Regulations, and pursuant to Government Code section 65596.5, DWR is required to update its MWELO at least every three years; and

WHEREAS, pursuant to 14 CCR section 18989.2 filed November 3, 2020, a "jurisdiction shall adopt an ordinance or other enforceable requirement that requires compliance with Sections 492.6(a)(3)(B), (C), (D) and (G) of the Model Water Efficient Landscape Ordinance ... as amended September 15, 2015."; and

WHEREAS, pursuant to Government Code Section 65595, a local government may adopt a water efficient landscape ordinance to implement the State MWELO requirements; and

WHEREAS, the purpose of a water efficient landscaping ordinance is to promote the conservation and efficient use of water, and prevent its waste, while recognizing the values and benefits of landscapes as essential to the quality of life in California; and

WHEREAS, incorporating the State MWELO by reference into the County's water efficient landscape ordinance will ensure the County remains in compliance with state regulations

as they may be amended from time to time, and will improve clarity for County residents and businesses regarding the applicable water efficient landscaping requirements; and

WHEREAS, staff now recommends Inyo County amend Title 17 of the Inyo County Code to adopt the State MWELo and additional requirements specific to Inyo County; and

WHEREAS, the Inyo County Planning Commission held a duly noticed public hearing on February 28, 2024, to review and consider amending Title 17 of the Inyo County Code to adopt the State MWELo along with additional requirements specific to Inyo County, and at which time the Planning Commission considered all written and oral comments and input from staff and the public; and

WHEREAS, the proposed amendments to Title 17 of the Inyo County Code are internally consistent with the goals, objectives, and elements of the County’s General Plan and Zoning Code.

NOW, THEREFORE, THE INYO COUNTY PLANNING COMMISSION HEREBY FINDS, RESOLVES, AND RECOMMENDS AS FOLLOWS:

SECTION ONE: The recitals above are incorporated herein as findings.

SECTION TWO: The Planning Commission finds that the proposed amendments are exempt from the California Environmental Quality Act (CEQA) because the activity is covered by the common-sense rule under California Code of Regulations, Title 14, section 15061(b)(3). Under the common-sense rule exemption, projects which have no potential for causing a significant effect on the environment are exempt. This project activity has no possibility of having a significant effect on the environment, and in fact, could result in improvements to the environment by requiring better managed water use.

SECTION THREE: The Planning Commission further finds that the proposed amendments are consistent with the state-mandated program established under MWELo Title 23, Division 2, Chapter 2.7 of the California Code of Regulations.

SECTION FOUR: The Planning Commission recommends that the Inyo County Board of Supervisors approve the proposed ordinance amending Title 17 of the Inyo County Code to adopt the California Water-Efficient Landscaping Ordinance along with additional requirements specific to Inyo County pursuant to state law.

PASSED AND ADOPTED this 28th day of February 2024, by the following vote of the Inyo County Planning Commission:

- AYES:
- NOES:
- ABSTAIN:
- ABSENT:

Todd Vogel, Chair
Inyo County Planning Commission

ATTEST:
Cathreen Richards, Planning Director

By _____
Sally Faircloth, Secretary of the Commission