

RESOLUTION NO. 2026-04

A RESOLUTION OF THE PLANNING COMMISSION OF THE COUNTY OF INYO, STATE OF CALIFORNIA, RECOMMENDING THAT THE BOARD OF SUPERVISORS ADOPT AN ORDINANCE AMENDING TITLE 18 (ZONING) OF THE INYO COUNTY CODE RELATING TO RESIDENTIAL INFILL DEVELOPMENT, ACCESSORY DWELLING UNITS, ACCESSORY BUILDINGS, AND PARKING, AND APPROVING ZONE TEXT AMENDMENT NO. 2026-01.

WHEREAS, the County's 6th Cycle Housing Element identified governmental constraints to housing development, including outdated zoning and General Plan requirements that may limit infill housing opportunities in the unincorporated County; and

WHEREAS, on May 15, 2024, the County of Inyo was awarded a Regional Early Action Planning (REAP) 2.0 grant to review and remove governmental constraints to housing development as identified in the 6th Cycle Housing Element and to accelerate infill housing; and

WHEREAS, on December 31, 2025, the County entered into a contract with Precision Civil Engineering, Inc. (PCE) to provide planning services to evaluate residential design standards and their relationship to current code requirements, and to identify zoning and General Plan design and density standards that could be inhibiting infill development, including second units and accessory dwelling units (ADUs), using the communities of Big Pine, Independence, and Lone Pine as primary evaluation areas; and

WHEREAS, as part of this REAP 2.0-funded work program, PCE prepared a Development and Design Standards Review, a Vacant and Underutilized Lands Inventory, an Infill Residential Capacity Study, an ADU review, a Parking Regulations Memorandum, an Adaptive Reuse Memorandum, and a Countywide Evaluation of Proposed R-1/R-2 Text Amendments Memorandum, all of which identify regulatory constraints and opportunities related to setbacks, density determination, parking, ADUs, and adaptive reuse; and

WHEREAS, Inyo County Planning staff and PCE conducted six public meetings and two mailed/online surveys to collect community input regarding preferred housing types and infill housing opportunities in Big Pine, Independence, and Lone Pine, and through this outreach, second units and ADUs were identified as highly preferred infill housing options; and

WHEREAS, based on the technical analysis and public input, staff and PCE refined key infill development issues and opportunities, including setbacks, how housing density is determined, flexibility in parking requirements, ADUs, and adaptive reuse; and

WHEREAS, several iterations of setback, parking, and density examples were presented and discussed at workshops with the Planning Commission and the Board of Supervisors; and

WHEREAS, on February 3, 2026, the Board of Supervisors provided direction to staff to prepare amendments to the Inyo County Code addressing: (1) alignment of zoning-permitted

dwelling units with General Plan density requirements; (2) reduced front and rear yard setbacks; (3) clarification and encouragement of ADU development by updating the code to clarify where ADUs are allowed and how they are defined; and (4) relaxation of certain residential parking requirements where appropriate; and

WHEREAS, the Countywide Evaluation of Proposed R-1/R-2 Text Amendments Memorandum concluded that proposed R-1 and R-2 text amendments, specifically, alignment of permitted unit types with General Plan residential density and reductions in front and rear yard setbacks, are appropriate for application countywide, can remain within applicable General Plan density ranges, and can increase buildable area and residential opportunities without changing maximum density allowances, provided that parcels meet applicable physical and legal constraints including wastewater, access, fire protection, and related development standards; and

WHEREAS, staff has prepared a proposed ordinance (Zone Text Amendment No. 2026-01) attached hereto as Exhibit A, amending multiple sections of Title 18 (Zoning) of the Inyo County Code, including but not limited to Chapters 18.06, 18.30, 18.33, 18.34, 18.44, 18.45, 18.48, 18.49, 18.51, 18.54, and Section 18.78.150 and 18.78.340, to: (1) align the number of dwelling units permitted on R-1 and R-2 parcels with applicable General Plan density ranges; (2) reduce front and rear yard setbacks in the R-1 and R-2 districts; (3) codify limited parking flexibility based on site-specific conditions; (4) clarify and expand ADU provisions and permitted use listings; and (5) update accessory building standards; and

WHEREAS, the proposed zoning text amendments do not change General Plan land use designations or adopted General Plan density ranges but instead clarify how existing General Plan densities may be realized on individual parcels, provide limited flexibility in applying development standards, and better align zoning regulations with State housing law and the County's housing goals; and

WHEREAS, the Planning Commission conducted a duly noticed public hearing on July 22, 2026, at which time all interested persons were given the opportunity to be heard and the Commission considered the staff report, draft ordinance, technical memoranda, and all oral and written testimony submitted regarding the proposed amendment;

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission of the County of Inyo hereby finds and determines as follows:

1. The proposed ordinance is exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Section 15061(b)(3), because it can be seen with certainty that there is no possibility that the proposed zoning text amendment may have a significant effect on the environment. The proposed amendments do not change General Plan land use designations or adopted General Plan density ranges, do not authorize development beyond the intensity already contemplated by the General Plan, and do not expand the geographic extent of urban development.
2. Based on substantial evidence in the record, the proposed Zone Text Amendment No. 2026-01 is consistent with the goals and policies of the Inyo County General Plan. The

amendments are intended to reduce regulatory barriers, improve consistency between the zoning code and the General Plan, and allow housing opportunities to occur within the land use designations and density ranges already established by the General Plan.

3. Based on substantial evidence in the record, the proposed Zone Text Amendment No. 2026-01 is consistent with Title 18 (Zoning Ordinance of Inyo County Code). The amendments update and clarify existing provisions relating to residential uses, setbacks, accessory buildings, parking, ADUs, and related definitions, and do not conflict with other sections of the County's zoning code.

BE IT FURTHER RESOLVED that the Planning Commission of the County of Inyo hereby recommends that the Board of Supervisors of the County of Inyo:

1. Find that Zone Text Amendment No. 2026-01 is exempt from the California Environmental Quality Act pursuant to State CEQA Guidelines Section 15061(b)(3); and
2. Adopt the ordinance attached hereto as Exhibit A, entitled an ordinance amending Title 18 (Zoning) of the Inyo County Code relating to residential infill development, accessory dwelling units, accessory buildings, and parking, thereby approving Zone Text Amendment No. 2026-01.

PASSED AND ADOPTED this 22nd day of July, 2026 by the following vote of the Inyo County Planning Commission:

AYES: 3
NOES: 0
ABSTAIN: 0
ABSENT: 2


Caitlan Morley, Chairperson

ATTEST: Cathreen Richards

By: 
Sally Faircloth, Planning Commission Clerk