

Public Comment -
County Riding and Hiking Trails Advisory Committee

Sarah Mayer

From: Otis Calef <crahtac@explore-santa-barbara-county.com>
Sent: Friday, February 9, 2024 7:56 AM
To: PAD LRP Housing Element
Cc: sbcob; Villalobos, David
Subject: CRAHTAC Comments | Draft Program Environmental Impact Report (EIR) for the 2023-2031 Housing Element Update
Attachments: CRAHTAC-Housing-Element-EIR-02-09-24.pdf
Follow Up Flag: Follow up
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Dear Ms. Thomas,

I have attached a letter with comments about and recommendations for the Draft Program Environmental Impact Report (EIR) for the 2023-2031 Housing Element Update prepared by the County Riding and Hiking Trails Advisory Committee (CRAHTAC)

Sincerely,



Otis Calef
Chair

CRAHTAC | County Riding and Hiking Trails Advisory Committee

805.708.5009 | [website](#)

The County Riding and Hiking Trails Advisory Committee (CRAHTAC) was established by the Santa Barbara County Board of Supervisors in an advisory capacity to review programs, policies, and procedures affecting county recreational riding and hiking and their use.



CRAHTAC
 COUNTY RIDING AND HIKING TRAILS ADVISORY COMMITTEE



February 9, 2024

CHAIR
 Otis Calef

Submitted via email

VICE CHAIR
 Faith Deeter

Ms. Hannah Thomas, Planner
 Planning and Development Department
 123 E. Anapamu Street
 Santa Barbara, CA 93101

SECRETARY
 Kirk Nordgren

1st DISTRICT
 Kim Fly
 Kevin Snow

RE: Draft Housing Element Environmental Impact Report

2nd DISTRICT
 Jack Bish
 Otis Calef
 Dan Gira

Dear Ms. Thomas:

3rd DISTRICT
 Faith Deeter
 Kirk Nordgren
 Jason Osborne
 Desiree Woodill

The Santa Barbara County Riding and Hiking Trails Advisory Committee (CRAHTAC) wishes to provide the following comments on the adequacy of the public draft Environmental Impact Report (EIR) for the County's Housing Element. CRAHTAC finds that the EIR needs to be improved as it:

4th DISTRICT
 John Karamitsos
 Robin Dunaetz
 Debbie Smith
 Lee Steinmetz

- Lacks adequate discussion of the importance of and analysis of impacts to the County's public trail system.
- Employs narrow thresholds of significance that undervalue the importance of parks, recreation, and trails to public health and welfare.
- Does not appear to discuss the County's Parks, Recreation and Trails Maps (PRT Maps), a primary County land use tool for planning for and acquiring new parks, recreation and trails.
- Does not appear to discuss the land use impacts associated with rezoning sites from the Planned Residential Development designation, the primary tool by which the County has acquired almost all new urban area parks, recreation and trails over the last 30-40 years.
- Does not appear to discuss the impacts of Housing Elements' proposed reductions in Park Development Impact Fees, potentially seriously undermining the County's ability to acquire new parks, recreation, and trails to serve new development.
- Fails to identify and provide adequate mitigation measures to address potentially significant impacts on parks, recreation, and trails.

5th DISTRICT

STAFF
 Jeffery Lindgren

These matters are discussed briefly below.

CRAHTAC is a standing committee appointed by the Board of Supervisors to advocate for recreational trails and advise the County on matters related to recreational trails issues. CRAHTAC is composed of three or four members from each supervisorial district and is recognized by the County as having a key role in advising on issues surrounding trails, particularly projects with impacts to trails and related mitigation measures. Consistent with our role advising the County on trail issues, CRAHTAC believes that the Housing Element EIR requires substantial changes to adequately address project

impacts related to Land Use (Section 3.13) and Public Services (Section 3.13). CRAHTAC would like to emphasize that we understand the need for and importance of affordable housing, and our concerns are not about growth vs no growth. We make these suggested changes to the EIR to ensure that the EIR is made a more useful tool to help the County develop balanced, sustainable, complete communities that provide affordable housing and new parks, recreation, and trails. Such public recreation is a basic social equity and environmental justice issue. It will be essential for the health and welfare of both new residents, particularly low- and moderate-income households, and existing residents as well. Below are specific comments and requested changes to provide a legally adequate analysis of park, recreation, and trail issues.

Section 3.10. Land Use and Planning:

Regulatory Setting

Page 3.10-14; Land Use Element: Please add a discussion of the County's **Parks, Recreation and Trails Maps** (PRT Maps) to the Land Use element discussion, including relevant language from the back of the maps (e.g., trail acquisition and design), to the Comprehensive Plan section. The PRT Maps are an adopted part of the County's Comprehensive Plan and are a key vehicle for acquiring parks, recreation, and especially trails. The lack of discussion is a major oversight of a key recreational planning tool.

Page 3.10-15; Open Space Element Please add the discussion from the open space Element regarding the importance of open space for outdoor recreation, which identifies such open space as a high priority.

Page 3.10-16: Eastern Goleta Valley Community Plan: This discussion fails to identify the high priority placed on providing public parks, recreation, and trails in the Eastern Goleta Valley Community Plan. Such information is critical to support impact analysis as this community is where the Housing Element proposes the majority of new growth (e.g., San Marcos and S. Patterson Agricultural Area rezones) and where demand for parks, recreation, and trails will be the highest. Please add a new sentence near the end of this discussion that states: "The Eastern Goleta Valley Community Plan contains multiple goals and policies related to the provision of public parks, recreation, and trails as part of new development and also includes proposed expansion of the County's public hiking trail system into the Santa Ynez Mountains to address long-standing community needs and increased demand associated with new development."

Page 3.10-16: 1993 Goleta Community Plan: This discussion fails to identify the high priority placed on providing public parks, recreation, and trails in the 1993 Goleta Community Plan. Such information is critical to support impact analysis as the proposed Glen Annie Golf Course rezone is located within this area, which proposes as many as 1,500 or more new homes as well as new growth in or near Isla Vista with associated demand for new public parks, recreation, and trails. Perhaps more importantly, the Glen Annie Golf Course conceptual development plan would provide the only public recreation proposed as part of any new housing rezones or development in the entire County that we are aware of, with a new community park, pool, pickleball courts and 4 miles of public hiking

trails. Please add a new sentence near the end of this discussion, which states: “The 1993 Goleta Community Plan contains multiple goals and policies related to the provision of public parks, recreation, and trails as part of new development. This plan also includes proposed expansion of the County’s public hiking trail system as identified in the Goleta Trails Study into the Santa Ynez Mountains to address long standing community needs and increased demand associated with new development.”

Page 3.10-17: Orcutt Community Plan: This discussion fails to identify the high priority placed on providing public parks, recreation, and trails in the Orcutt Community Plan. Indeed, this plan provides the most comprehensive update to the County’s PRT maps of any community plan with an extensive trail system and multiple new parks. Such information is critical to support impact analysis as several proposed rezone sites are located within this community area with hundreds of potential new homes with associated demand for new public parks, recreation and trails. Please add a new sentence near the end of this discussion that states: “The Orcutt Community Plan contains multiple goals and policies related to the provision of public parks, recreation, and trails as part of new development and includes a detailed PRT Map of extensive new trails as well as proposed public parks, including the Orcutt Creek Trail, trails in urban areas and new Orcutt Hills Trails. “

Page 3.10-20; County Zoning Ordinances Santa Barbara County Land Use and Development Code: Please discuss the details of the Planned Residential Development (PRD) zone district as it relates to open space, parks and recreation, and the County’s recreation overlay. Discussion of the PRD zone is particularly important to support impact analysis of proposed rezones from the PRD to the DR zoning as it has been the primary vehicle by which the County has acquired virtually almost all its urban area open space and parks recreation and trails over the last 30-40 years and rezoning of sites without employing this zone will seriously undermine the provision of public recreation.

Please also add a discussion of the County’s existing Recreation Overlay, which is important as key Housing Element sites, such as the Tatum property within the San Marcos Agricultural area, are designated with this Overlay. Yet, no public recreation has been proposed as part of the development of that site.

In summary, economic and social changes resulting from a project are not treated as “significant effects on the environment” pursuant to CEQA if there is no resulting physical change to the environment. However, they may be considered when determining the significance of a physical change to the environment, and physical changes resulting from the economic and social changes should be evaluated in CEQA environmental documents.

Page 3.10-20; Section 3.10.4.1: Thresholds of Significance: We note that the discussion here regarding quality-of-life thresholds appears to use outdated standards. In 2020, it appears that the Planning Commission (7/29/2020) and Board of Supervisors 9/15/2020) adopted amended quality-of-life thresholds as summarized in this excerpt below:

“Quality of life impacts should be addressed on a case-by-case basis, depending on the unique circumstances of a given project. Quality of life impacts may not be relevant to all projects

and may not be applicable to all environmental analyses. However, when quality of life impacts are considered, the environmental document should clearly state the causal relationship between the change to quality of life and the corresponding physical impact, and the significance of the physical impact. Furthermore, if changes to quality of life are used to assess the significance of a physical impact to the environment, the environmental document should clearly identify the physical impact, the resulting change to quality of life, and the severity of the change to quality of life (ideally using a quantitative method, if available). In all cases, the analysis must be supported by substantial evidence set forth in the environmental document.”

If this standard is indeed in effect, the EIR should thoroughly discuss the physical environmental impacts of the proposed project related to quality-of-life issues, including physical impacts to public health and welfare from lack of recreation and the physical deterioration of public parks, recreation, and trail due to increased overcrowding and deterioration of the physical quality of parks and trails. We note that the Board of Supervisors has recently recognized that the provision of public parks and trails is essential to public health and welfare (existing and future residents are part of the environment) and that the provision of such public recreation has been selected as one of the rezone site selection criteria to be used by the County in rezone site selection.

Impact LU-2: Please discuss the impact associated with increased demand for trails within this impact as they relate to adopted County policies and the County’s Parks Recreation and Trails Maps, part of the County’s adopted Comprehensive Plan. Please see our comments on Pages 3.13-21: Existing Recreation Service Levels, where CRAHTAC recommends that the County adopt a minimum trail service standard of 2.0 miles per 1,000 new residents with a goal of providing 6.4 miles of trails per 1,000 new residents and add such discussion throughout this impact. Please incorporate this or other available trail service standards into this analysis.

Pages 3.10-28-3.10.60; Table 3.10-3.

Policy LUA-EGV-1.6: Please identify the project as potentially inconsistent with the recreation planning sections of this policy. The lack of any recreation planning for these areas will make it extremely challenging to acquire new public parks, recreation, and trails as required by this policy.

Land Use Development Policy 4: Please amend the text to address how the County will ensure the provision of adequate public services for parks, recreation, and trails, particularly given the proposed reductions in open space requirements, fee reductions, and lack of any recreation planning for any of the rezone sites. The County simply does not have plans in place to provide roughly 84 to 180 acres of new parks and perhaps 36 to 108 miles of new trails (see comments in public services for service metrics for parks and trails). Further, while the County could potentially provide such facilities with good community planning, the EIR’s mitigation measure for parks, recreation, and trail impacts is utterly lacking in specificity or requirements for the County to take well-planned action to create such facilities, fundamentally undermining the conclusions of the EIR. Therefore, the project would appear to be potentially inconsistent with Land Use Development Policy 4.

Please add the following policies to this table and discuss potential project inconsistency:

Policy PRT-EGV-1.2: To enhance overall public health and well-being, recreation facilities shall be located, designed, and constructed, as needed, to increase opportunities to play and exercise in Eastern Goleta Valley.

Policy PRT-EGV-1.3: New public recreational resources shall be prioritized for underserved locations to increase equitable access to a range of recreation opportunities.

Policy PRT-EGV-1.4: The County shall prioritize locating recreational resources in areas within walking or biking distance of residential and educational land uses.

Page 3.10-61-63; Impact LU-3: If the above referenced new quality of life threshold is indeed in effect, please revise and update Impact LU-3 to comport with this new threshold, in particularly by thoroughly addressing physical impacts to public health and welfare and the effect of deterioration of public recreation facilities on existing and future residents.

Page 3.10-63; Section 3.10.4.3: Cumulative Impacts: Please discuss the cumulative impacts on County parks, recreation, and trails, including quality of life and policy consistency issues discussed above, of planned development of 20,000 new homes with 60,000 residents in the County's eight cities. Parks such as Orcutt Community Park are regional facilities that could suffer physical deterioration from increased use associated with cumulative development as well as quality of life impacts to County residents. In particular, most recreation trails are located in County unincorporated areas and as such will be disproportionately impacted by such cumulative development. **Page 3.10-64-65; Section 3.10.4.4 Proposed Mitigation; MM LU-1. Additional Allowed Uses in Design Residential (DR) Zoning.** This mitigation measure is completely inconsistent with requirements as set forth in CEQA Section 15126.4 as well as those mitigation measures provided in other EIR Sections. The mitigation measure does not commit the County as Lead Agency to any specific actions and uses the term may, never applied in mitigation measures under CEQA and completely inconsistent with the CEQA standards discussed below. Mitigation measures for potentially significant effects are required to use the term "*shall*" to commit the responsible party to implementation. This measure requires no set actions of the County to address impacts to public recreation. Mitigation measures for significant impacts throughout the EIR typically use the term shall and not the term "*may*." This measure needs to be completely rewritten to comport with the requirements of CEQA Section 15126.4 and to make it explicit that the County shall amend the DR zone district to **require** the provision of public parks, recreation, and trails and/ or employ the PRD zone district to achieve the same performance standard. The measure does nothing to mitigate the increased demand for roughly 85 acres of new public parks under existing outdated 44-year-old County standards of 4.7 acres/ 1,000 residents or the modern National Parks and Recreation Association recommended standard of 10.7 acres of developed parkland / 1,000 residents (or roughly 193 acres of new parks). The measure also does nothing to address the substantially increased demand for new public trails (the most popular form of recreation in the County), which CRAHTAC recommends be based on minimum trail service levels in Orcutt of 2 miles per 1,000 residents (or roughly 36 miles of new trails) or under the "gold

standard” of trail service ratios in Montecito -Summerland of 6 miles per 1,000 residents (or 108 miles of new trails). We note that CEQA Section 15126.4 requires that the agency:

1. Commit itself to mitigation.
2. Adopts specific performance standards the mitigation measure will achieve
3. Identifies the type(s) of potential actions (s) that can feasibly achieve the performance standard...

The existing mitigation measure meets none of the legally required tests, commits the County to nothing, and leaves these significant impacts unmitigated even though it is well within the County’s ability to wholly or partially mitigate such impacts through required development exactions, changes to zone districts, or other measures.

We suggest rewording this mitigation measure as follows:

The County shall amend section 35.23.020 – Purposes of the Residential Zones for the DR Zone District to read: “This zone is intended to ensure comprehensively planned and well-designed residential development **to ensure the provision of affordable housing as well as public parks, recreation and trails**, while allowing flexibility and encouraging innovation and diverse design to ensure provision of affordable housing, and requiring that substantial open space be maintained within new residential developments, **particularly for provision of new public parks, recreation and trails in order to provide recreational opportunities for use by both the residents of the site and the public (bolded font indicates new language).**

Further, this measure should specify that no further reductions in required open space beyond the reduction to 30% already permitted would be permitted absent the dedication of significant onsite public recreation facilities. See also other recommended mitigation measures in the public services section comments.

If the DR zone District is to replace the PRD zone district as the planning tool for most new housing development, CRAHTAC also recommends that this mitigation measure require major amendments to the DR Zone District to include details on the provision of public open space, parks, recreation, and trails.

Please include a new mitigation measure that requires updating the county’s PRT Maps as part of the rezone process as follows: Recommended new Land Use Mitigation Measure MM LU-2: *Concurrent with any proposed Housing Element rezones, the County shall amend the PRT maps to include new proposed parks, recreation and trails on such sites to improve the consistency of the Housing Element with adopted County policies and to partially mitigate the impacts of the increased demand for public recreation from new residents.* To ensure implementation under “by right” or builders remedy projects, the County shall amend the zoning ordinance to include the PRT map revision recommendations described as quantified objective standards, utilizing the Recreation Overlay or inserting site-specific development standards into the zoning ordinance.

CRAHTAC also recommends the addition of an amended Land Use Impact as follows: Impact LU-2: The proposed project would create potentially significant land use impacts due to inconsistencies with County policies such as Land Use Development Policy 4 and Policy PRT-EGV-1.2, PRT-EGV-1.3, and PRT-EGV-1.4, with associated adverse impacts to the public health and welfare.

CRAHTAC would like to note that the proposed project could create substantial conflicts with adopted County policies regarding public services and recreation without any updated planning for providing parks, recreation, and trails. Public parks, recreation, and trails are clearly an essential public service under Land Use Development Policy 4, and multiple County policies require new public parks, recreation, and trails, such as those from the Eastern Goleta Valley Community Plan. The existing County Park Development Impact Fee ordinance identifies parks, recreation, and trails as essential for public health and welfare. In addition, the recent presentation from the Office of the County Executive for the Board of Supervisors Housing Element hearing of 1/9/2024 cites the Trust for Public Lands detailing the known public health and welfare and social equity benefits of public parks, recreation, and trails. CRAHTAC is concerned that in rejecting the use of the PRD zone district, potentially lowering open space and park fee requirements, the Housing Element would significantly undermine key County tools for acquiring parks, recreation, and trails, with associated land use policy and public health and welfare impacts. Such new planning can certainly be accomplished within the context of the housing Element and thus constitutes a feasible mitigation measure that must be considered by the County.

Section 3.13 Parks and Recreation: The Parks and Recreation section periodically mentions trails as almost an afterthought, as opposed to being an essential form of public recreation. In fact, based on over 7,000 surveys performed as part of the County's Recreation Master Plan, it is CRAHTAC's understanding that hiking is the most popular form of recreation in the County. Further, the EIR fails to provide any detailed descriptions of major hiking trail systems or their estimated mileage in the various planning areas. This is particularly important in communities such as the Eastern Goleta Valley that lack foothill hiking trails, particularly those that provide access into the public's nearby National Forest, requiring residents to drive long distances such as to Montecito or Gaviota for such hiking opportunities. Finally, the EIR does not discuss the importance of trails and other forms of recreation from a public health, safety, and welfare perspective, despite the fact that the County's own Ordinance #4317 states that based upon the principles and standards of the recreation element of the Santa Barbara County general plan, that provision of public parks, recreation, and trails are essential to "*the public interest, convenience, health, welfare, and safety.*" The importance of parks and trails to public health and welfare has been recently reaffirmed by the Board of Supervisors as part of its hearings on Housing Element rezone site selection criteria, which must also be discussed and described here. This is a major oversight that requires correction (Please see the discussion under the proposed revised Impact LU-2 above).

To better address these issues, please provide the following specific amendments to this section:

Section 3.13.2.2, page 3.13-16: If hiking is the most popular form of recreation in the County, it should be mentioned with other recreation types- Add a new section to this page:

Public Trails: *The County currently owns over 150 miles of public hiking trails that are free and openly accessible to the public. Public hiking trails can be located within County-owned or other agency public open spaces, on conservation or other open spaces managed by private non-profit agencies, or across privately owned lands traversing easements granted to the County. Such trails provide popular free recreation to all residents of the County, including disadvantaged community members.*

Page 3.13-16: Please change the subtitle to **Local Parks, Trails, and Recreation Facilities** to reflect the importance of trails to the public.

Page 3.13-16: Under County Parks discussion, please add an additional discussion regarding trails or consider a new section on trails as follows:

County Public Hiking Trails: The County owns or has easements for approximately 150 miles of public trails, with trails often traversing through different jurisdictions or from publicly owned land within easements across private lands. The County's trail systems are typically maintained by community trail organizations such as the Montecito Trails Foundation or Santa Maria Valley Open Space. While County-owned trails exist in many communities, major trail systems open to the public include approximately 90 miles in Montecito and Summerland, more than 6 miles in the Orcutt Hills, 2 miles on More Mesa, 2.5 miles on the San Marcos Foothills Preserve and 1.5 miles within Tuckers Grove County Park. Communities such as the Eastern Goleta Valley currently lack a foothill trail system such as that found in Montecito, while residents of Santa Ynez Valley lack accessible developed public trails in close proximity to Ballard, Los Olivos, and Santa Ynez. Residents must drive to the National Forest, Midland School, or Lake Cachuma to access trails.

Please consider adding new tables on pages 3.17-3.19 identifying major trail systems or amending tables 3.13-6 and 3.13-7 to add details on trails, including estimated mileage. Again, if trails are the most popular form of recreation in the County, the EIR needs to disclose and discuss these facilities in more detail and not simply ignore the issue. If precise data on all mileage of trails is unavailable, use estimates to provide full disclosure to the public.

Page 3.13-20- **Summary of Public Parks, Trails, and Public Open Space by Region.** Please add trails to this title and add a summary overview of trails similar to that for parks and open spaces. Please modify Table 3.13-8 to include trails or include a separate table for trails. If precise data is not available for trails, then discuss generally with as much data as is available. Again, if trails are the most popular form of recreation in the County, the EIR needs to disclose and discuss these facilities in more detail.

Page 3.13-20: Please delete the statement: "However, these public open spaces do not provide existing neighborhood and regional parks or other recreational facilities that are subject to public use that may deteriorate the facility's physical condition per CEQA (i.e., playgrounds, sports fields and courts, public restrooms, BBQs, picnic tables)." This statement is wholly inaccurate and unsubstantiated. Trails within open spaces and elsewhere are subject to severe deterioration and physical environmental impacts (e.g., trail cutting, erosion, habitat degradation) with overuse and

overcrowding, which can also include increased user conflicts with public safety implications (e.g., mountain bike-equestrian interactions). In addition, limited parking at rural trailheads can quickly be fully subscribed during peak periods, depriving existing residents of trail access. Please also see the comments on inadequate and artificially narrow thresholds below.

Please also delete or modify the statement that public parkland is located within urban communities and is “reasonably accessible to existing residential neighborhoods via active transportation modes, such as walking and biking and transit.” This does not reflect the reality in the Eastern Goleta Valley or central and north Orcutt, where public parks are typically not easily accessible by walking, biking, or even transit. This is even more true for hiking trails, where residents of these communities typically drive relatively long distances to access the Montecito foothill trails or those in the Orcutt Hills, where transit is often of limited or no utility.

Page 3.13-21: Existing Recreation Service Levels: This section cites only the County’s 44-year-old standard for parkland of 4.7 acres per 1,000 residents. The EIR should discuss and disclose that the National Parks and Recreation Association (NRPA), a national body recognized as authoritative on recreation issues, updated this old standard to 10.7 acres per 1,000 residents long ago. As the County’s standard is clearly outdated, the EIR must disclose the County standard, but is not required to use it for impact analysis. At a minimum, the EIR should disclose the updated NRPA standard of 10.7 acres per 1,000 residents and describe how that would affect parkland demand from planned growth. Further, while neither the county nor NRPA has adopted standards for miles of trails per 1,000 residents, this does not excuse the EIR from providing at least a general description of service levels for trails. This is particularly important as some communities, such as the Eastern Goleta Valley, are particularly deficient in trails, especially those with access to the National Forest. It should be noted that many states have a high ratio of trails per 1,000 residents that could provide a metric for measuring demand, including (source- <https://www.destinationhikers.com/trailmiles-by-states/>;))

- Maine: 39.4 miles per 1,000 people
- Vermont: 29.5 miles per 1,000 people
- Colorado: 27.7 miles per 1,000 people
- Alaska: 26.1 miles per 1,000 people
- Wyoming: 25.8 miles per 1,000 people

Using a rough average of 30 miles per 1,000 residents in these five states could provide a useful metric for measuring increased demand for trails. Regardless, as reportedly the most popular form of recreation in the County, the EIR must make at least some attempt to disclose existing trail service levels, which vary widely by planning area. However, these rural states may only partially reflect conditions in the County, so CRAHTAC recommends new trail service standards as discussed below.

CRAHTAC recommends a trail service metric using the County’s own trail system for various communities and the related ratio of miles of trails per thousand residents. For example, the Montecito Trails Foundation maintains roughly 90 miles of trails to serve the approximately 14,000 residents of the communities of Montecito and Summerland, a ratio of approximately 6.4 miles of trails per 1,000 residents. In the community of Orcutt, the County provides roughly 8 miles of existing

trails in the Orcutt Hills and along Orcutt Creek, with more than 8.5 miles of approved new trails on Key Site 3 and recently purchased county-owned land in the Orcutt Hills. These 16.5 miles of existing and approved trails would result in a ratio of roughly 2 miles of trails per 1,000 residents. Thus, to serve roughly 18,000 new residents allowed under the Housing Element with trail systems equivalent to these two areas would require roughly 36 to 115 new miles of trails. CRAHTAC requests that the EIR use these metrics as more relevant or employ other relevant trail metrics to address impacts to public trails.

Table 3.13-11: Please add details on trails and trail mileage to this table where relevant for each park facility. Use estimates where precise mileage is not available.

Regulatory Setting Section

Please be sure to carry key elements of the regulatory setting section into the impact analysis for parks, recreation and trails. For example, Land Use Development Policy 4 requires a finding that “adequate public or private services” are available to serve new development, which would include public parks, recreation, and trails. Within the Eastern Goleta Valley, several policies discussed below are directly related to development within areas such as the San Marcos and South Patterson agricultural areas. They should be integrated into the impact analysis:

Policy PRT-EGV-1.2: To enhance overall public health and well-being, recreation facilities shall be located, designed, and constructed, as needed, to increase opportunities to play and exercise in Eastern Goleta Valley.

Policy PRT-EGV-1.3: New public recreational resources shall be prioritized for underserved locations to increase equitable access to a range of recreation opportunities.

Policy PRT-EGV-1.4: The County shall prioritize locating recreational resources in areas within walking or biking distance of residential and educational land uses

Section 3.13.3.3 Local: Please add a discussion of the County’s **Parks, Recreation and Trails Maps (PRT Maps)** to the Land Use Element discussion including relevant language from the back of the maps, to the Comprehensive Plan section. The PRT Maps are an adopted part of the County’s Comprehensive Plan and are a key vehicle for acquiring parks, recreation, and especially trails.

Policy PRT-EGV-4.2: Properties with the potential for maximum public use shall be considered a high priority in park acquisition decisions. Public use is maximized when the park locations:

- Are highly accessible to many people (e.g., park along the bike path, at a trailhead, or on a heavily used transportation corridor).
- Could be connected to a network of multimodal transportation options and/or trails.
- Provide a mix of recreational resources to serve a wide range of visitor demands (e.g., playgrounds near playing fields or a dog park, etc.).

Page 3.13.39: Santa Barbara County Land Use and Development Code: Please also include a discussion of the County's existing Recreation Overlay in this section, as such an overlay is in place over the Tatum property within the San Marcos agricultural area.

Please add a discussion of the Planned Residential Development zone district to this section, as over the last 30 + years, most of the County's new urban area parks and trails have been acquired using this zone district. The Housing element proposes to rezone several sites out of this zone, and the EIR needs to provide information on this district to support impact analysis.

Section 3.13.4.1 Thresholds of Significance: the discussion should note that CEQA Appendix G provides examples of thresholds and is not ironclad. Agencies are permitted to adopt their own thresholds as the County has done or add thresholds as deemed appropriate within an EIR.

We recommend the addition of the following threshold: *Would substantially increase demand for parks, recreation, and trails within a community or neighborhood underserved by such facilities.*

Impact PSR-5: Please add a discussion on impacts to trails, including increased overcrowding, physical deterioration, and lack of easy access. Trails are a major recreational resource, and this impact mostly overlooks this issue. Please also weave the above-referenced policy discussion into the impact analysis to ensure that such policies are addressed in the analysis. This impact should also discuss the impacts of proposed reductions in Park Development Impact Fees. When combined with reductions in open space requirements and rezone from the PRD zone district, such measures could fundamentally undermine the County's ability to provide new parks, recreation and trails to service new development. Please also discuss here or in land use the impacts of rezone from PRD to DR as the PRD zone district has been a primary tool for trail acquisition.

Mitigation Measures: Please consider adding a new mitigation measure to amend the PRT maps concurrent with rezones for sites that have not been planned for development or that are proposed for increased density, increasing demand for public recreation. The PRT maps are a primary County tool for trail acquisition. For sites such as the San Marcos and South Paterson Agricultural areas or Glen Annie Golf Course, which were never planned for development, updated PRT maps would provide a vehicle to address such planning and ensure the provision of adequate public services. This is also applicable to sites such as northern Orcutt lands within the flight approach zone, which could provide public trails in a neighborhood underserved by trails. Similarly, sites such as St. Vincent's East, which are proposed for increased density and have not been planned since 1980, could host a new trail along Atascadero Creek to provide neighborhood access to San Marcos Park and the Preserve. Please also add language requiring accompanying zoning ordinance amendments to provide objective, quantified language to ensure implementation of PRT map recommendations for "by right" or builder's remedy projects.

Cumulative Impacts: Please add trails to the cumulative impact discussion. Because most trails lie within County unincorporated communities such as Montecito and the Orcutt Hills, increased growth within the cities will substantially increase demand for such trails with adverse effects of trail conditions, including physical deterioration and overcrowding.

Thank you for considering this input!

Sincerely,

A handwritten signature in black ink, appearing to read "Otis Calef". The signature is stylized and written over the printed name.

Otis Calef, Chair
CRAHTAC

CC: County Board of Supervisors
County Planning Commission