

Katherine Douglas *General Public Comment*

From: Otis Calef <crahtac@explore-santa-barbara-county.com>
Sent: Friday, April 17, 2026 4:46 PM
To: PAD SolomonHills
Cc: sbcob; Jeffrey Lindgren; Plowman, Lisa; Teralyn Evans-Gutiérrez; Villalobos, David
Subject: Comment Letter: Proposed Solomon Hills Specific Plan and Notice of Preparation
Attachments: CRAHTAC-Proposed-Solomon-Hills-Specific-Plan-NOP-04-17-26.pdf

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Dear Senior Planners,

The Santa Barbara County Riding and Hiking Trails Advisory Committee (CRAHTAC) is writing regarding the proposed **Solomon Hills Specific Plan and Notice of Preparation**. We greatly appreciate the development team’s presentation to CRAHTAC at our April 13, 2026, meeting. Based on this presentation and available materials, we have a number of comments. Please see the attached letter.

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



April 17, 2026
Submitted via email

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Otis Calef

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Linda Rubenstein
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4th DISTRICT
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County of Santa Barbara
Planning and Development Department
624 W. Foster Road, Suite C
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RE: Proposed Solomon Hills Specific Plan and Notice of Preparation

Dear Senior Planners,

The Santa Barbara County Riding and Hiking Trails Advisory Committee (CRAHTAC) is writing regarding the proposed Solomon Hills Specific Plan and Notice of Preparation. We greatly appreciate the development team’s presentation to CRAHTAC at our April 13, 2026, meeting. Based on this presentation and available materials, we have a number of comments.

CRAHTAC is a standing committee appointed by the Board of Supervisors to advocate for recreational trails and related parks and open space and to advise the County on matters related to these recreational issues. CRAHTAC is composed of three or four members from each supervisorial district and is recognized by the County as having a key role advising on trails and other recreation matters. CRAHTAC members live in the County, including the Santa Maria Valley/Orcutt area, Lompoc Valley, Santa Ynez Valley, and South Coast. We are well-positioned to understand local needs and sentiments regarding trails and recreational needs, as well as potential improvements. Two of our members, Dan Gira and John Karamitsos, conceived of and designed the initial Orcutt Hills Trail Plan. In fact, the JK Trail was named by the County Planning Commission after John Karamitsos, and both members are well aware of trail design issues and environmental conditions in the area.

At our meeting on April 13, 2026, CRAHTAC voted to approve the following suggested issues to be addressed in the DEIR and revised Draft Specific Plan. We remind the County, as the Specific Plan will become part of the County’s Comprehensive Plan, that the County has ownership of the Specific Plan beyond a typical development plan. As this project proceeds through the permit process, we urge the Planning and Development Department to exercise its statutory authority over this plan to ensure that our issues are addressed either in the DEIR or as changes to the Specific Plan.

- **Project Raises Significant Land Use Policy Issues:** CRAHTAC does not typically comment on land use policy issues unrelated to parks, recreation, and trails; however, the enormity of the land use and growth inducement decisions of this project and CRAHTAC’s related trail recommendations requires this discussion to support our recommendations that the County pursue maximum public benefits from this development. As leapfrog development well

outside of established urban-rural boundary lines, no matter how well designed, the project constitutes urban sprawl out of step with clear County policy adopted by the County's 1980 Comprehensive Plan 45 years ago. The Draft Environmental Impact Report (DEIR) must contain a thorough analysis of both the Project's major policy inconsistencies and this potentially precedent-setting action.

The 1980 Comprehensive Plan set in place policies and tools such as the Urban-Rural Boundary Line that strictly prohibit leapfrog development and urban sprawl. The County has strongly resisted such developments for 46 years. These policies and tools were adopted in response to a countywide voter referendum that overturned the Board of Supervisors' approval of a similar new town on the Gaviota Coast in 1975 and to concerns that urban sprawl in Orange County could occur in Santa Barbara County as well. Because of these past decisions, unlike many of the counties to our south, when you leave Orcutt or Goleta or Santa Maria, you are almost immediately in the rural countryside. If the county is to overturn one of its most consequential and effective land use planning decisions in almost 5 decades, the DEIR needs to acknowledge the enormity of this change, its growth-inducing and sprawl implications, and address the following issues:

- The potential for additional future sprawl and growth-inducing impacts in the 3 remainder parcels, which are obviously ripe for future development if this project is approved, especially as oil development phases out together with potential for additional sprawl. The DEIR should thoroughly discuss this potential under cumulative impacts. The Specific Plan could be revised to limit future sprawl by including clear public-benefit standards that ensure it also provides maximum public benefits – such as new public parks, recreation, and trails.
- The DEIR should address the possible precedent set by this project and its related countywide growth-inducing impacts. If the county approves this development, it may be difficult to resist similar proposals at other locations. If this project is approved, the County should consider Comprehensive Plan Amendments to codify the types of public benefits, such as public parks, recreation, and trails required for such a harmful development.
- **Maximize Public Benefits:** Because of these truly consequential land use policy issues and the enormous concession granted the project developer by considering such leap frog development, if the project is approved, the County should ensure that maximum public benefits, such as public parks, recreation and trails, or increased truly affordable housing, are obtained in exchange for such major land use concessions. The revised draft Specific Plan and DEIR must thoroughly discuss how to maximize public benefits to balance the Project's significant conflicts with adopted County policy and what will surely be a wide range of unavoidable and significant environmental impacts. This should include consideration of expanding the trail network as discussed below.
- **Expand the Proposed "Nature Trail" System to 10 miles:** The DEIR and revised Specific Plan should utilize an independent trail design expert and other specialists (e.g., biologists) to

independently assess the impacts of the Project's proposed "nature trails" and the potential design of a total of 10 miles or more of such trails to maximize public benefits. The County cannot simply accept the word of the project development team, no matter how well-intentioned, that only 5.3 miles of trails can be accommodated on over 1,000 acres. The Orcutt Hills Trail system supports roughly 8 miles of trails on something like 600 acres of public open space, compared to 5.3 miles of trail within the project on over 1,000 acres of open space. Environmental constraints north of the Orcutt Hills are not dissimilar to those at this site, and as a key public benefit of this project, the county must ensure that the public trail systems is maximized, consistent with reasonable environmental protection. It is fair to say that CRAHTAC, which includes members with significant trail planning, design, management and construction experience, was not convinced by the development team's presentation that more trails could not be accommodated. In reality, 5.3 miles of trails for such a major development with over 1,000 acres of open space is only a modest benefit given the project scope. Potential expansion of this system to maximize public benefits should be thoroughly explored by independent experts, rather than relying solely on the development team's limited assessment.

- **Nature Trail Phasing:** The project's proposal to spread the development of the already modest 5.3 miles of nature trails over an extended horizon of up to 14 years is unacceptable. The public will begin experiencing this project's impacts immediately, whether from construction and operational traffic on US Hwy 101, loss of open space, impacts to the night sky, and loss of habitat for larger wildlife species such as mountain lions. The modest benefit of 5.3 miles of trails should be front-loaded into Phase I so the public at least receives these benefits as impacts occur. Such natural surface trails are a relatively minor expense compared to the project's vast scope and precedent-setting impacts. The public should receive these benefits as soon as possible.
- **Equestrian Access to Trails:** The project proposes to severely limit equestrian access. While we appreciate and support having bike-free days set aside for equestrians, the county's trail system is multi or multiple use and equestrians are part of that mix. The North County also has a rich equestrian heritage and culture and limiting equestrians would conflict with these North County traditions. CRAHTAC therefore strongly opposes limiting equestrian access. Rather, the trail system should be expanded to at least 10 miles to be attractive to equestrians and horse trailer parking should be provided at key trailheads. The trail system should also be designed with equestrians and families in mind with adequate visibility, measures to slow bikes, and signage related to speeds and equestrian safety. The trail system should not be designed as a bike park, but be for all users.

Requiring equestrians to apply for permits and for trail access conditioned for only when the trail network is closed to other users, is in effect closure to equestrians almost all of the time. When a user group is excluded, the trails should be designated as "shared use" with the users defined, for example as "pedestrian and bike," noting that other uses, such as by equestrians, require applying for a permit or are not allowed.

- **Ownership and Maintenance of Trails:** We understand that the trail system will be owned, operated, and maintained by the HOA and/or the development company. While the HOA and/or development company may own the underlying land, the County would own all trails on the property, which would be public trails under county easements. The HOA and/ or developer being responsible for funding maintenance of these public trails is a reasonable benefit given the major land use concessions granted by the County for such a precedent-setting project. We suggest strong, clear language in the DEIR and/or revised Specific Plan that makes clear that all trails belong to Santa Barbara County and that any and all maintenance must be carried out in accordance with County standards and under the direction of Santa Barbara County Parks. Too often in the past, HOA's or homeowners have attempted to encroach on or even close public trails. Trail ownership and management authority needs to clearly rest with the County. The HOA can enter into an agreement with Santa Barbara County Parks to maintain the trails in accordance with established County Park practices for third-party trail maintenance. We also suggest that the developer contact local trail organizations, such as Santa Maria Valley Open Space, to ascertain their interest in maintaining at least the "nature trails" under an adequately funded agreement.
- **Developed Bike Path Connection to Orcutt:** CRAHTAC supports the development team's proposal to realign Orcutt Community Plan Trail W-1 farther from US Hwy 101 to a more attractive foothill trail location. However, we recommend that W-1 trail remain on the map and that the developer be required to improve this trail to a bike path to link this new community with Orcutt and the Key Site 3 trail system. This bike path could be paved or use surfacing such as road base. Similarly, the Orcutt Creek Bike Trail on key site 3 is proposed as a natural surface trail. This would be consistent with the project's mobility goals, and there should also be an alternative transportation route linking these 2 communities. The cost of this improvement should be fully borne by the project developer as another community benefit.

Thank you for considering this input and request.

Sincerely,



Handwritten signature of Otis Calef in black ink, featuring a stylized 'O' and 'C'.

Otis Calef, Chair
CRAHTAC

Cc: Santa Barbara County Board of Supervisors
 Jeff Lindgren, Deputy Director, Santa Barbara County Parks Division
 Lisa Plowman, Director, Santa Barbara County Planning and Development
 Santa Barbara County Parks Commission
 Santa Barbara County Planning Commission