

Katherine Douglas

# General Public Comment



**From:** Otis Calef <crahtac@explore-santa-barbara-county.com>  
**Sent:** Monday, December 1, 2025 12:06 PM  
**To:** Villalobos, David  
**Cc:** sbcob; Plowman, Lisa; Jeffrey Lindgren  
**Subject:** Draft County Recreation Master Plan Workshop of December 3, 2025  
**Attachments:** Draft County Recreation Master Plan Workshop of December-3-2025.pdf

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Hello David,

I attached a comment letter we would like to share with the members of the County of Santa Barbara Planning Commission before the hearing on December 3rd.

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



December 1, 2025

**CHAIR**  
Otis Calef

*Submitted via email*

**VICE CHAIR**  
Faith Deeter

Ms. Kate Ford, Chair  
Santa Barbara County Planning Commission  
123 E. Anapamu Street  
Santa Barbara, CA 93101

**SECRETARY**  
Desiree Woodill

**1st DISTRICT**  
Kim Fly  
Kevin Snow

RE: Draft County Recreation Master Plan Workshop of December 3, 2025

**2nd DISTRICT**  
Otis Calef  
Dan Gira

Dear Chair Ford and Commissioners:

**3rd DISTRICT**  
Faith Deeter  
Linda Rubenstein  
Desiree Woodill

The Santa Barbara County Riding and Hiking Trails Advisory Committee (CRAHTAC) is writing regarding the proposed Draft Recreation Master Plan (Draft Master Plan) and associated potential Comprehensive Plan Land Use Element and Zoning Ordinance amendments. CRAHTAC members are excited about the potential improvements to the County's public trail system, parks, recreation and open space represented by the Draft Master Plan and the importance of these amendments in successful implementation. We would like to thank County Parks, the Planning and Development Department (P&D) staff, and the consultant team for their extensive work on this program, and we look forward to working together to refine the plan through the upcoming public process.

**4th DISTRICT**  
John Karamitsos

**5th DISTRICT**

**STAFF**  
Jeffery Lindgren

As you are aware, CRAHTAC is a standing committee appointed by the Board of Supervisors to advocate for recreational trails and related parks and open space and advise the County on matters related to these recreational issues. CRAHTAC is typically composed of three or four members from each supervisorial district and is recognized by the County as having a key role advising on trail and other recreation matters. As CRAHTAC members live in most of the Recreation Planning Areas (RPAs) identified in the Draft Master Plan, including the Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, and South Coast, we are well-positioned to understand local needs and sentiments regarding trail and recreational needs, and potential improvements.

At our meeting of November 24, 2025, CRAHTAC voted to approve the following suggested amendments to the Recreation Master Plan, the Comprehensive Plan & Ordinance Amendments, including three appendices. These comments first include several overarching themes, followed by detailed suggested track change edits. We have also attached our detailed letter to County Parks dated March 11, 2025:

## **Overarching Comments A-E:**

- A. Streamlining Trail Permitting:** We respectfully request that the Planning Commission to direct County Parks and P&D to ensure that the Draft Master Plan includes all possible actions to streamline trail permitting to avoid or substantially reduce the high costs and extensive delays associated with permitting many trail projects. The proposed ordinance amendments provide several recommendations on how to streamline and ease trail permitting and eventual construction. However, further changes and adjustments are necessary if they are to be effective (as

discussed below). CRAHTAC and the trails community have long requested substantial reductions in the cost and complexity of trail permitting and the Draft Master Plan requires further revisions to address this issue.

- B. Thresholds of Significance for Impacts to Trails:** We urge the Planning Commission to direct County Parks and P&D to include new Thresholds of Significance in the Draft Master Plan and no longer defer such action to an unspecified future process. CRAHTAC and the trails community have repeatedly requested the adoption of new CEQA Thresholds of Significance for impacts to trails as part of the Draft Master Plan, as this is one of the few resource areas where the County does not have adopted Thresholds. Development projects have the potential to adversely impact tens of thousands of trail users, literally through trail closures, rerouting, large-scale vegetation removal, etc., as has occurred at the Valley View Trail in Orcutt and the Hot Springs Trail in Montecito. Pages 4 and 5 of our attached letter of March 11, 2025, provide a suggested threshold that should be adopted as part of the Draft Master Plan.
- C. Noticing for Projects that Impact Trails:** We respectfully request that the Planning Commission direct County Parks and P&D to include new noticing standards in the Draft Master Plan and not endlessly delay and defer such action to an unspecified future process. The County's standards for notifying trail users of projects with potential impacts to trails are sadly deficient. Trail community surveys of trail users about the effects of pending development projects on trails demonstrate that well over 90% of the hundreds of trail users queried had no idea that development was proposed that would threaten both their access to trails and their recreational experience. As discussed on page 6 of our attached letter of March 11, 2025, agencies such as the cities of Goleta and Santa Barbara typically post large signs describing the effects of proposed projects on trails, who to contact regarding concerns, and how to participate in the process (see attachment A for examples of signage).
- D. Recreational Benefit Program Recreation Ombudsman:** We respectfully request that the Planning Commission direct County Parks and P&D to recommend that the Draft Master Plan address and include the new requirement for a high-level Recreation Ombudsman to steward Recreation Benefit Projects through the County's permitting process. Long delays in the Draft Master Plan have discouraged many Recreational Benefit Project proponents and left most unsure if the County can fulfill its commitments to public-private partnerships.
- E. Protect Existing Trails from the Impacts of New Development:** We respectfully request that the Planning Commission ensure that the Draft Master Plan policies protect trails from the adverse impact of new development to the maximum extent feasible. We have suggested edits to Policy 17 below to include "*maximum*," as our experience with "to the extent feasible" alone means virtually nothing in the development permitting process.
- F. Designated Historic Landmark Trails:** The Draft Master Plan appears to lack any discussion of the six trails designated as historic landmarks by the County, or of policies to protect them. This discussion and associated policies should be created.

**Detailed Comments and Suggested Edits:** CRAHTAC respectfully recommends that the Planning Commission direct County Parks and P&D to edit the proposed draft Recreation Master Plan, Comprehensive Plan & Ordinance Amendments, and Attachments as follows:

All suggested text edits are in track changes in red, while comments and discussion are in italics.

1. Introduction; page 4, 3<sup>rd</sup> paragraph, first sentence: To foster successful implementation of the Recreation Master Plan, Parks and Planning & Development (P&D) have jointly created amendments to County policy and regulations to support public parks, ~~and~~ recreation ~~and~~ trails as a key component of sustainable communities and the County's One Climate program, **as essential to the public health and welfare and to promoting environmental justice (add links to appropriate documents).**
2. 1.3 Recreation Benefit Project (RBP) Program, page 3, 1<sup>st</sup> paragraph: Proposed RBPs must receive an eligibility determination from Parks and P&D confirming that their public recreation project component meets specific eligibility criteria. **For projects that include major recreational benefits, Parks and P&D will consult with the County Parks Commission and/or the County Riding and Hiking Trails Advisory Committee, as appropriate, on such determinations early in the process.**

***Comment:** We note that original drafts left the determination of which proposed development projects would qualify as RBPs up to Parks discretion alone. As also reflected in Policy 8, that leaves this authority with "Community Services Department Director or designee", while this draft inserts P&D into this decision. This new text seems to blur lines of authority between Parks and P&D on determining if projects qualify and leaves internal inconsistencies. CRAHTAC supports leaving such recreational decisions wholly under the Parks authority.*

3. Table 1, pages 8 and 9: Proposed Allowed Land Uses:

***Comment:** The Table does not appear to specify trails as allowable uses in the DR or PRD zone districts and should be modified to include these zone districts unless they already specifically allow trails. We note that some of the largest past expansions in the County's trail system have occurred in the PRD zone district (e.g., Orcutt Hills). Areas currently planned for future development within both the PRD and DR zone districts with substantial proposed public trails include More Mesa (8+ miles of planned trails) and former agricultural lands within the Eastern Goleta Valley in the former San Marcos Farms area and the South Patterson area, as well as additional parcels in Orcutt.*

4. Section 2.3.2 Permit Requirements and Development Standards for Allowed Land Uses, page 9: In general, staff recommends that discretionary permits, such as a Conditional Use Permit or Minor Conditional Use Permit, be required for the uses listed above **as some of these types of projects under certain circumstances may have** the potential for controversy, intensity of use, and scale of the development." However, recently completed trail projects have not typically been controversial or exhibited an intensity of use and scale of development that would warrant discretionary permitting. This has been repeatedly demonstrated by recent studies approved for the Baron Ranch Trail System, the Franklin Trail, ~~and the Bodger Trail property in Lompoc.~~ **Further, it should be noted that in inland areas outside of the**

Coastal Zone, construction of public trails on County-owned property, within County-owned easements, and where Offers to Dedicate trails have been created, such trails are already exempt from discretionary permitting. Further, as part of the Recreation Master Plan, the County intends to seek amendments to the Coastal Zoning Ordinance to make trail projects subject to ministerial permits with development standards, although this may require ensuring that low-level Coastal Development Permits are truly ministerial.

**Comment:** *We recommend that natural surface trails NOT be subject to discretionary permitting such as CUPs. Such permitting costs can exceed the costs of actual trail development, lead to unacceptable delays, and discourage trail development. This has been clearly demonstrated by the extraordinary costs and delays associated with the Franklin Trail in Carpinteria, the Baron Ranch Trail, each (well over \$150,000 each in permitting costs) on the Gaviota Coast, and the Bodger Trail property in Lompoc. The record demonstrates that trails generally have very limited potential for controversy, and an unacceptable or impactful intensity of use, which somehow constitutes a scale of development requiring such discretionary permitting. We note that for over 4 years, the trails community and CRAHTAC have advocated for downshifting the permitting of trails to a ministerial permit with development standards. The current language does not appear to fully reflect this consistent public input and could pose a major continued barrier to the development of low-impact natural surface trails. The Planning Commission should also consider if private trails that are open to the public (even if for a fee) should be subject to such onerous discretionary permitting. CRAHTAC believes that all natural surface trails, accompanied by reasonable, tailored development standards such as protecting sensitive biological and cultural resources, can be built with minimal impacts. For example, we understand from the Trails Council that almost 16 miles of trails on Baron Ranch and the Franklin Trail were constructed without removing a single oak tree and did not impact any cultural resource sites.*

5. Table 2: Trail Development Standards and Permit Thresholds and pages 10-12: The proposed trail development standards would substantially impede trail development while providing no substantial environmental benefits. The County should not be applying urban development standards to trails. For example, the standards cite a trail passing through Environmentally Sensitive Habitats as justification for a CUP requirement, which is emblematic of this problem. First, it is unclear if this standard only applies to mapped ESH (which only occur in some communities, thereby resulting in differential standards between communities for often similar habitats). Second, many existing trails already pass through ESH areas, and the Local Coastal Plan specifically allows trails within ESH areas. Because trails typically result in minimal vegetation clearance, a development standard that requires preparation of a biological technical study with habitat protection measures would satisfy the goal of protecting habitat without the huge expense and extended delays of a CUP while still protecting habitat.

Another example is the 200-foot setback for trails from active or historic crop land, which appears drawn from urban development standards for pesticide drift. ADD an Ag land example. A flexible development standard that protects such active cropland through a range of techniques, such as siting a trail across a drainage from the

cropland to provide a buffer, installation of fencing, or other measures that could prohibit new trails, should be investigated.

***Comment:** These permit and development standards require reworking beyond what can be achieved in a brief review window and a single Planning Commission workshop. We suggest that the Planning Commission send projects forward for environmental review while directing P&D and Parks to hold workshops with CRAHTAC to refine these proposals.*

6. Suggested New Land Use Element Goal: Recreation: The County recognizes that provision of public parks, recreation, and trails is essential to public health and welfare, is an essential part of community identity, and provides an important contribution to the county's economy. Expansion and maintenance of high-quality public recreational amenities are therefore recognized as essential and should be promoted wherever feasible.

***Comment:** We recommend that an overarching Recreation Goal be added to the Land Use Element, enshrined alongside the four other existing overarching goals related to Urbanization, Environment, Agriculture and Open Lands. This would ensure that future users and reviewers understand that the County views recreation as being of equal value to those other issues.*

7. Exhibit A, page A-2; Land Use Element Text Insert Suggested New Paragraph 4: Recreational trails provide a spontaneous, no-cost form of public recreation available to all members of the community with the associated health and welfare benefits described above. Trails within natural, undeveloped open spaces provide users with access to scenic natural beauty, views of woodlands, grasslands, chaparral, and sage scrub, ocean, and mountain views, which enhance the recreational trail user experience. Such experiences form an important part of community identity and are a major contributor to the quality of life for county residents and visitors. Trails are therefore considered scenic resources deserving of protection, along with the views they provide.

***Comment:** This new text would support policies to protect and expand the trail system and clarifies that trails in natural open spaces in and of themselves should be considered scenic resources or as providing the public with access to such scenery with its attendant benefits.*

8. Exhibit A, page A-2; Suggested edits: Focus on the Benefits of Recreation. Public Parks, Recreation and Trails are essential for public health and welfare and community vitality. Recreation often has the added benefit of preserving natural resources and open space, but the first purpose of the provision of recreation land uses is not resource conservation. Recreation is essential for its own purpose in both urban and rural communities.
9. Exhibit A, page A-2; Suggested edits: Theme #3.; Make Trails Easier to Build. Hiking, biking, and horseback riding are extremely popular in Santa Barbara County and such outdoor recreation has been found to be essential to public health and welfare. Trails projects are relatively low-impact and should be easy to design, permit,

and build. Support for trails should be clearly discernible, fast, easy, and affordable to foster trail implementation by County Parks, trail organizations, and private property owners.

**Comment:** *The proposed trail permitting standards list in Table 1 and the draft development standards would appear to be potentially inconsistent with this goal or theme. As currently worded, these trail permitting standards would not facilitate some types of trails and would continue to create barriers for new trails, as evidenced by the high permitting costs and extended delays of recently completed major trails such as the Franklin Trail, Bodger Trail, and Baron Ranch Trail. Further, by applying urban-style development standards to trails, they would appear to create potential new barriers for planned new trails in the Orcutt Hills and the Santa Ynez River Trail. These standards require careful review and further revisions to be consistent with this goal or theme to make trails easier to build.*

10. Exhibit A, page A-3; Suggested edits: **Strengthen Coordination with other Agencies and Organizations.** Recreation planning must inherently consider regional demands and needs. Residents typically recreate at a mix of parks, trails, and facilities managed by cities, the County, and private organizations. The County should serve as a leader for interagency coordination and partnering with community organizations and foster ongoing communication, monitoring, planning, and funding for recreation countywide.

**Comment:** *Community trail organizations currently provide the majority of trail maintenance, construction and permitting activities and funding for the County's trails as well as for the US forest Service and California State Parks and such organizations should be recognized.*

11. Exhibit A, page A-3; Suggested new theme: **Theme 10 Manage County Rights of Way and Easements to Protect and Expand the Trail System.** County-owned and -managed road rights of way and road and trail easements that support existing, planned or potential future trails should be managed in a way to preserve and protect public use and enjoyment of the trail system. Permitted or unpermitted private encroachment into these public rights-of-way and easements should be carefully managed to preserve their beneficial public use and enjoyment.

**Comment:** *CRAHTAC has been monitoring past and ongoing encroachments into public rights-of-way and easements, which have created serious problems with the use and enjoyment of existing and future public trails in some communities. In Santa Ynez, trail use has been impeded and safety hazards created through private improvements in these public rights-of-way and easements, sometimes forcing users of on-road trails into traffic lanes, sometimes with high speeds. Similar problems have occurred in Montecito and other communities. CRAHTAC has worked closely with a very cooperative Public Works Department to begin addressing some of these concerns, but limited funding prevents expanding these efforts. In Montecito, the Bucket Brigade has managed to create a series of relatively narrow road shoulder pathways in cooperation with landowners to permit pedestrian passage and create an attractive on-road trail network. However, the issue of*

*encroachment into public rights-of-way and easements requires greater attention.*

12. Exhibit B, page B-1, Policy 4; Suggested edits: To the maximum extent feasible, public and private campgrounds shall include a mix of lower-cost accommodations such as tent sites, as well as RV sites, cabins, and other recreational facilities.

13.

**Comment:** *The draft Recreation Master Plan rightfully supports the provision of new public and private campgrounds as important recreation improvements. However, careful balancing is required to ensure that high-cost/ high-revenue uses, such as full-service RV spaces and cabins, are provided in balance with lower-cost tent spaces or “dry” RV spaces to increase affordability to a broad range of user groups.*

14. Exhibit B, page B-1, Policy 7; Suggested edits: New residential development shall incorporate, onsite public recreation improvements to the maximum extent feasible, and the County shall provide a mix of incentives and exactions to achieve this goal. Where not feasible, such development may include private recreation or offsite improvements to meet the recreation demands generated by the development, consistent with the recommendations of the Countywide Recreation Master Plan, County Comprehensive Plan, Community Plans, Active Transportation Plan or other adopted County plans or programs.

**Comment:** *We have suggested edits to Policy 7 to include “maximum extent feasible” as based on our experience “to the extent feasible” alone means virtually nothing in the development permitting process. Our suggested edits stress the importance of provision of onsite public recreation as the County has created or acquired many (or even a majority) of its new public parks, open space and trails over the last 30 years from new development, particularly through the use of the Planned Residential Development Zone District and negotiations with developers. These include areas such as the initial 200-acre San Marcos Foothills Preserve and trail system, the Orcutt Hills Open Space and trail system, and the Ellwood Mesa and West Devereux open Spaces and trail systems now within the City of Goleta and UCSB, as well as Girsh Park in Goleta. County policy should carefully preserve and strengthen these tools to ensure that both existing and new residents benefit from newly created recreational opportunities.*

15. Exhibit B, page B-1, Policy 14; Suggested edits: Opportunities for public trails within the general corridors adopted as part of the PRT maps of the County Comprehensive Plan and/or the Countywide Recreation Master Plan shall be protected, preserved, and provided for upon approval of any general plan amendments and/or zoning change. Opportunities for public trails within the general corridors adopted as part of the PRT maps of the County Comprehensive Plan and/or the Countywide Recreation Master Plan shall be protected, preserved, and provided for upon approval of development, subdivision, and/or permit requiring discretionary review or approval, to the maximum extent feasible, subject to constitutional limitations and applicable policies and regulations.

**Comment:** *The County retains the ultimate discretion with any request for general plan amendments or rezones and thus can have an iron-clad policy requirement for trail acquisition for such actions. We have also suggested edits to Policy 14 to include “maximum extent feasible” for other types of approvals, as based on our experience, “to the extent feasible” alone means virtually nothing in the development permitting process.*

16. Exhibit B, page B-2, Policy 17; Suggested edits: New development shall be sited and designed to protect the recreational, aesthetic, and natural resource values along public trails, to the maximum extent feasible.

**Comment:** *We have suggested edits to Policy 17 to change the wording from “should” to “shall” and include “maximum extent feasible” as based on our experience combining “should” with “to the extent feasible” means virtually nothing in the development permitting process and would allow future planners or developers maximum latitude to ignore trail protection.*

17. Exhibit B, Goal 2, pages B-2-3, Suggested new policy 19: The County shall impose conditions of approval requiring dedication of planned trails whenever a nexus exists, and when considering permits from requesting organizations and agencies, particularly for permits with broad County discretion such as Conditional Use Permits.

**Comment:** *Acquisition of new trails through exactions from new permits requires clear direction, particularly from flexible permits such as CUPs, where the County retains a high degree of discretion.*

18. Exhibit B, Goal 2, pages B-2-3, Suggested edits to existing Policy 20: The County shall work cooperatively with other agencies (including cities, districts, and other organizations. In particular, smaller cities with high proportions of environmental justice populations such as Guadalupe) to site, acquire, and implement public parks, recreation facilities, and regional trail connections, corridors, and facilities.

19. Exhibit B, Goal 2, page B-3, Suggested new policy 20: In order to complete development of the California Coastal Trail from the City of Goleta to Jalama Beach County Park, the County shall employ a mix of exactions and incentives, including requiring dedication of easements from all permits, particularly CUPs and CDPs requested by landowners, to the maximum extent feasible and through incentives as provided under the County's Recreation Benefit Program or other relevant programs.

**Comment:** *Successful completion of the California Coastal Trail, one of the most important trails in the State and a priority of the State Legislature, requires clear, strong policy direction to be successful.*

20. Exhibit B, Goal 3, page B-3, Suggested edits to Policy 22: The County shall facilitate and promote public-private partnerships under the direction of the Recreation Ombudsman, who will oversee and advocate for the implementation of the Recreation Benefit Program, which provides incentives to projects that provide significant public recreation facilities.

**Comment:** CRAHTAC recommends embedding the Recreation Ombudsman position in policy. Without such a position of authority, the RBP program may not succeed.

21. Exhibit B, page B-3, Suggested New Policy 25: The County should foster and develop partnerships with private non-profit community trail organizations that assist the County with development and maintenance of its trail system.

**Comment:** We suggest specifically naming the private non-profit community trail organizations, as the County is largely dependent upon these groups for trail work.

22. Exhibit B, page B-3, Suggested New Policy 26: The County shall actively coordinate with the Los Padres National Forest, California State Parks, University of California, the Land Trust for Santa Barbara County, and the Nature Conservancy to promote and develop trails on major open lands.

- a. **Comment:** We suggest specifically naming these major organizations as they control hundreds of thousands of acres in the County with essential existing trails and high potential for new trails.

23. Exhibit B, page B-4, Suggested New Goal 5: Manage the County's existing public rights of way and easements that support existing, planned or potential future trails in a manner that protects and expands public use and enjoyment of such trails.

24. Exhibit B, page B-3, Suggested New Policy 33: As funding becomes available, the County shall institute a phased program for inventorying all existing permitted or unpermitted encroachments into public rights of way or easements. The goal of this program shall be to ensure safe public use and enjoyment of all existing, planned and potential future trails within these areas. This program may entail removing private improvements that interfere with such public uses, which should be carried out in as cooperative a manner as possible with private owners.

25. Exhibit B, page B-3, Suggested New Policy 33: For all permits for new homes, major remodels or additions bordering on public rights of way or easements which accommodate existing, planned or potential future trails, the County shall ensure that all unpermitted encroachments that interfere with public use and enjoyment of such trails are removed prior to approval of such permits.

Thank you for considering this input and request.

Sincerely,

  
Otis Calef, Chair  
CRAHTAC

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