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Honorable Peter Adam, Chair County of Santa Barbara Board of Supervisors 123 East Anapamu Street Santa Barbara, CA 93101

Transmitted Via Email: sbcob@co.santa-barbara.ca.us

Re: The Gaviota Coast Plan

November 1, 2016

Dear Chair Adam and Members of the Board,

I am writing to ask you to reinstate and adopt the original Gaviota Plan as proposed by the GavPAC, Gaviota coast stakeholders and community.

Over four years of deliberations were spent in earnest, thoughtful, careful work by landowners, recreational development advocates, and representatives from State Parks, Cal-Trans, the Coastal Conservancy, the Environmental Defense Center, the Gaviota Conservancy, Cachuma Resource Conservation District, CRAHTAC and local NGOs. The result, the GavPAC's original Gaviota Plan, which was forged from these meetings deserves recognition and adoption by the Board of Supervisors. Not only does the original plan reflect the hard compromises made among the stakeholders, but it upholds the democratic process.

As a GavPAC member, a member of the GavPAC Trails Subcommittee, a member of the Visual Resources Subcommittee, as well as a member of the Trails Siting and Design Guidelines Working Groups, I have spend a substantial amount of time and effort to ensure a positive outcome for the Gaviota Plan.

Unfortunately, the Gaviota Plan, as presented by County staff does not reflect the hard work or vision of the community. The chapter on Parks, Recreation and Trails, in particular, has been substantially altered. For example:

1) Respectful, careful effort was made to forge agreements among stakeholders to begin to open trails on lands of willing landowners as soon as possible, while work on more challenging trail options continued. This approach has been removed from the revised Plan and replaced with far reaching unilateral recreational dictates on private, as well as State Park and federal

- lands, disregarding the time and effort spent on reaching community consensus.
- 2) The potentially tremendous and exponentially increasing impact on environmentally sensitive habitat areas (ESHA) by pubic trails and recreational development has been disregarded. Either ESHA is important to protect or it's not. We need to acknowledge that public recreational development will have the biggest impact on ESHA in the Gaviota area and we need to address that threat in ways that allows for both recreation and fosters greater appreciation, and protection of, the Gaviota coast's resources.
- 3) The staffs' plan introduces new concepts for trail development that the GavPAC either considered and rejected, or were so unrealistic and impractical that the proposals never got traction. For example, the staffs' new idea that *lateral* trails be located along the Union Pacific Railroad right-of-way (Action REC-8) was never discussed and is unrealistic. The staff also unilaterally changed the concept of loop trails to vertical trails following the conclusion of public deliberations. The Trails Subcommittee and the GavPAC spent considerable time carefully developing the loop trail concept and locations.

If it is not possible to reject the staffs' revised Gaviota Plan and adopt the GavPAC's original Plan, especially the GavPAC's hard earned Chapter 4: Parks, Recreation and Trails, please adopt the following essential changes:

- Reinstate "To prioritize trail locations on public lands or on private lands of willing property owners." (Chapter 4, page 4-7)
- Remove all of staffs' additional language requiring that the coastal trail be located on the bluff tops. In many cases this encroaches on very sensitive habitat (ESHA) and geologically unstable areas. Specific trail alignments should be made on a case by case basis, and not mandated in areas known to be environmentally, culturally and geologically sensitive.
- Either apply the same ESHA standards and set backs to recreational development, including trails, as are applied to agricultural and residential development, or add language which states that:
  - "Appropriate public recreational trails may be allowed within setbacks or buffer areas, only if accompanied by a managed access plan developed and implemented by the entity holding the trail easement, which provides for regular monitoring of the effects on habitat and species and restricts or suspends access if negative impacts are found."
- Remove staffs' new additions and changes in Chapter 4 as follows:
  - o Goal REC-1,
  - o Policy REC-1,
  - o Policy Rec-2,
  - o Policy REC-8.
  - o Policy REC-9,

- o Policy REC-13,
- o Policy REC-14,
- o Action REC-4,
- o Action REC-6,
- o Action REC-7,
- o Action REC-8,
- o Dev Std REC-1,
- o Policy REC-17.

All of these goals, policies, action items and development standards were added subsequent to GavPAC's deliberations and in many cases are contrary to GavPAC's and stakeholders' hard won compromises and shared, negotiated vision.

On the positive side, staff is presenting the Gaviota Design Guidelines almost completely as written by the Design Guidelines Working Group for which the Working Group and GavPAC members are thankful. There is one small wording change, which may seem insignificant now, but which may have major impacts upon implementation in the future. That change is to adopt the following sentence as written by the Design Guidelines Working Group on page 18 of the Design Guidelines, as follows:

"For screening or windbreaks, trees and shrubs shall be planted in small groupings slowing decreasing in density and size with distance to avoid an unnatural appearance."

Please remove staffs' alteration that reads:

"For screening or windbreaks, trees and shrubs shall be planted in small groupings slowly decreasing in density and size with distance <u>from the structure(s)</u> to avoid an unnatural appearance."

On the rural Gaviota coast many windbreaks, or plantings to screen objects (water tanks, fences, etc.), may not be planted in association with structures. The Design Guidelines Working Group's language was crafted to promote group plantings which slowly decrease in density and size regardless of their association with a structure, such as a stand alone windbreak.

Thank you in advance for considering these requests and for your efforts to uphold the GavPAC's work and the community consensus reached in the PAC's Plan.

Sincerely,

Beverly Boise-Cossart,

GavPAC Member