



To: Board of Supervisors

Re: Appeal of the Caltrans Culvert Project

August 29, 2020

Citizens Planning Association has been following environmental issues in Santa Barbara County for more than 60 years. CPA supports projects which abide by established policy, such as the Gaviota Coastal Plan. This appeal is asking that established policy be honored.

CPA agrees that this proposal violates some of the sections of existing policy. As part of the Project, five acres of State Park land will be transferred into Caltrans' jurisdiction for construction and maintenance access, including over two acres of the "Gaviota Village" property.

The Gaviota Village property was acquired with funding from the Coastal and Estuarine Land Conservation Program (CELCP), Santa Barbara County Coastal Resource Enhancement Fund (CREF), and the Goleta Valley Land Trust, and is deed restricted for use as open space, habitat restoration and conservation, and passive recreation including trails.

Caltrans has not provided adequate information about the proposed transfer and has not demonstrated that the Project is authorized on the deed restricted portion. Moreover, Caltrans proposes no recreational amenities or Coastal Trail (CCT) segment to mitigate impacts of the 5-acre loss of state parkland.

Land under the control of State Parks must not be transferred to Caltrans without offsetting mitigation such as provision of a California Coastal Trail (CCT) segment. Unless and until State Parks has secured approval to transfer or encumber the Gaviota Village property, the transfer is not permissible and the Project cannot proceed as proposed.

Most importantly, the Project should not be approved as proposed due to conflicts with the Gaviota Coast Plan, including recreation policies requiring that existing and proposed trails be preserved and provided for in discretionary development projects, and policies protecting sensitive wildlife and wildlife corridors.

CPA agrees that the GCC and CRC appeals bring attention to serious flaws in the project design and environmental review. Please support existing policies which were crafted only after intense stakeholder input.

Respectfully, Mary Ellen Brooks, President, Citizens Planning Association