

Katherine Douglas

General Public Comment - CRAHTAC



From: Otis Calef <crahtac@explore-santa-barbara-county.com>
Sent: Tuesday, March 11, 2025 4:24 PM
To: Countywide Recreation Master Plan
Cc: Jeffrey Lindgren; sbcob; Villalobos, David; Jesús Armas; Plowman, Lisa; Ethan Bertrand; Erica Reyes; senator.limon@senate.ca.gov
Subject: Comments on Draft Recreation Master Plan | Updated
Attachments: CRAHTAC-Draft-County-Recreation-Master-Plan-Comments-03-10-25.pdf

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Dear Mr. Lindgren,

Please find attached an updated copy of the previously submitted CRAHTAC recommendations and suggested amendments to the draft Recreation Master Plan. Items 26 and 28 contain new information.

Thank you for considering this request.

Sincerely,

Otis Calef
Chair

CRAHTAC | County Riding and Hiking Trails Advisory Committee

805.708.5009 | [website](https://www.sbcob.org/crahtac)

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

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STAFF
Jeffery Lindgren

March 11, 2025
~~February 24, 2025~~
Submitted via email

Mr. Jeff Lindgren, Deputy Director
Santa Barbara County Community Services Department, Parks Division
123 E. Anapamu Street
Santa Barbara, CA 93101

RE: Draft County Recreation Master Plan - Updated

Dear Mr. Lindgren,

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. The program includes the preparation of a Program Environmental Impact Report (PEIR) under the California Environmental Quality Act (CEQA); a key part of the effort is to streamline permitting and construction of recreational improvements, including those associated with pending private developments that include major public recreation. 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. We would like to thank County Park's staff and the consultant team for their extensive work on this program and look forward to working together to refine the Draft Master Plan through the upcoming public process.

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 trail issues. It is composed of three or four members from each supervisorial district and is recognized by the County as having a key role in advising County staff on trail matters. 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, and are well-positioned to understand local needs and sentiments regarding trails, recreational needs, and potential improvements.

The Master Plan is an excellent visioning document and fulfills a key role on this front. However, aside from a detailed overview of the Recreational Benefit Project Program, the Plan could be improved by more *specificity* on particular recreational improvements, land use policy, ordinance amendments, and implementation tools. Where such information is available, it should be provided in the documents or an appendix. Due to financial constraints, proposed improvements will largely depend on land use tools and development projects for the next 5 to 10 years. The Master Plan program proposes 23 new recreation *policies*, which will be central to successful implementation. At present, these are absent and unavailable for public review. For successful implementation, details

matter. Further, the Master Plan appears to ignore the 100+ acres of public parks and open space and 8 miles of trails approved by the Board of Supervisors at the conceptual level as part of the 2024 Housing Element rezones. It also does not describe or discuss pending potential Recreation Benefit Projects such as those along the Santa Ynez River which also include critical public recreation improvements. These pending Housing Element developments and potential Recreational Benefit Projects may constitute the majority of County public recreational facility development in the next 5 or 10 years. They should be addressed in and guided by the Master Plan.

Public use of trails is possibly the most popular form of recreation in the County. The medical profession views such recreational activity as key to public health and welfare. During consideration of potential rezones as part of the County's Housing Element in 2024, the Board of Supervisors acknowledged access to public parks, trails and open space as key community benefit criteria. The Board cited a Trust for Public Land report that "*parks are really good for mental, physical and environmental health*" and that "*spending time in natural areas, whether walking or reflecting in a garden, is a powerful strategy for improved physical and mental health.*" These findings are briefly reflected in the Draft Master Plan but should be expanded upon with specific reference to this Board action and the Trust for Public Lands report.

At our meeting on February 10, 2025, CRAHTAC members voted to approve the recommendations and suggested amendments to draft documents, as discussed further below:

Comments on A Plan for Parks Recreation & Trails:

The Master Plan offers an opportunity to address many longstanding issues which affect trails. This includes strengthening the County's existing Parks, Recreation, and Trail Maps for recreation planning and requiring Technical Trail Studies for development projects that affect existing and planned trails. They should include adopting Thresholds of Significance for trail impacts, such as trailhead safety and parking, the importance of trails designated Historic Landmarks, and public noticing standards for projects that substantially affect public trails. These issues all fall under the purview of the Parks Division and should be addressed in the Master Plan. CRAHTAC correspondence has previously highlighted these issues.

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1. **Importance of Parks and Trails to Public Health and Welfare:** The Master Plan should include clear language and Land Use Element policies that reflect the importance of parks and open space to public health and welfare. The Plan should also link this to the County's Park Development Impact Fee Ordinance. The Trail LOS Section should clearly acknowledge that hiking and trail use are the most frequently engaged public recreation activities.
2. **Add brief summary discussion of other Agency's Pending Recreation Plans:** For example, the El Capitan, Refugio, and Gaviota General Plan Update (EGRG Update) being undertaken by California State Parks could provide major trail opportunities such as improvements to the Bill Wallace Trail system with links to the Los Padres National Forest historic Gato Trail, and repairs to and completion of key segments of the California Coastal Trail. The City of Santa Maria is currently engaged in a recreation/leisure activity update and the City of Lompoc may be considering similar planning. It is not adequate to simply mention such projects in the cumulative impact section of the PEIR where they will receive cursory treatment. They need to be included in the Master Plan as part of the living document. These other pending plans will also be in effect for several decades. This brief addition would facilitate interagency coordination over the coming decades.

3. **Proposed Trail Level of Service Metrics Standards:** We very much appreciate the Master Plan setting a baseline trail service metric of 2.2 miles per 1,000 residents. However, please consider a higher standard or goal of 6.0 miles per 1,000 residents, which reflects the County's best-served communities of Montecito, Toro Canyon, and Summerland. These trails act as regional destinations and serve far more than just nearby residents. Residents from throughout the County, tourists and visitors also hike on these trails. This reflects a greater need for trails than the suggested minimum standard of 2.0 miles per 1,000 residents. It would also warrant consideration of a higher standard than the suggested minimum of 2.2 miles per thousand residents. These metrics should form the basis of one of the proposed thresholds of significance for impacts to trails. *Whatever trail metrics are adopted, they should be enshrined in amendments to the Land Use Element similar to existing park standards.*
4. **Make New Trails More Accessible, Including Via Active Transportation:** Provision of a greater LOS than 2.2 miles per thousand would integrate with the discussion of active transportation and the goal of making parks and trails more accessible via transit, bike, walking or even short drives. South Coast trails in Mission Canyon, Montecito, Toro Canyon or Summerland act as regional destinations and serve more than just those communities. Because they do not exist in the greater Goleta Valley and other communities, many County residents and visitors must drive 15-30 minutes to access high-quality foothill trails. The same is true in the Santa Maria Valley, where residents must also drive some distance to access the expanding Orcutt Hills Trail System. Having access to even short urban trails close to home, such as those proposed along Orcutt Creek, within Union Valley Park, or the former San Marcos and South Patterson Agricultural areas in eastern Goleta Valley, would permit existing and new residents easier access to outdoor recreation. Achieving higher LOS and bringing quality foothill trails closer to population centers in the Goleta Valley makes utilizing active transportation for trail access much more feasible.
5. **Requirements for Technical Trail Studies:** The Master Plan should include requirements for preparing brief technical trail studies for development projects, including important trail components and projects that *adversely* impact existing or planned trails. For planned or proposed trails, these brief reports should address trail characteristics, location and length, changes in proposed easement width due to topography or other factors, connectivity to surrounding trails, and a map of the existing and proposed trail system. For existing trails that may be substantially impacted, the report could summarize the trail's physical characteristics, the types of impacts such as alteration of aesthetic and natural environments along the trail, the level of existing trail use, potential construction-related interference with trail use, resultant impacts and planned mitigation measures. The well-established importance of public trails deserves analysis on par with other key issues (such biological resources) beyond what is currently provided in the planning process.
6. **Develop Thresholds of Significance for Trail Impacts:** The Master Plan briefly acknowledges that trails are the most popular form of recreation in the County and mirrors recent findings by the Board of Supervisors that such outdoor trail-based recreation is important to public health and welfare. Yet trails are one of the few key issues raised in the planning and permitting process that do not have specifically adopted CEQA Thresholds of Significance. The Master Plan is the ideal venue to address this serious oversight and these Thresholds should address issues such as:

- a. *Increased demand for new trails due to population growth using adopted trail LOS metrics of 2.2- 6+ miles of demand for new trails per 1,000 residents, similar to existing standards for demand for new parks of 4.7 acres per 1,000 new residents.*
- b. *Adverse changes in the natural and aesthetic environment along existing established trails through vegetation removal, grading or paving substantially diminishing or altering the trail user's experience.*
- c. *Construction activities causing substantial interference with trail use due to delays, short-term trail closures, or other activities.*
- d. *Failure by a development project to dedicate a planned trail easement designated on the PRT Maps and providing a critical link to an existing or planned trail network.*

The Master Plan should include identifying and adopting new trail thresholds. Why? Because during this process, the issues will receive substantial public interest and review that comports with trails' importance to the general public. This issue should not be postponed to some obscure administrative process years down the road and subject to far less public scrutiny.

7. **Add Discussion of Designated Historic Landmark Trails:** In 1977, the Santa Barbara County Board of Supervisors voted unanimously to designate 6 Front County trails on the south side of the Santa Ynez Mountains as County Historic Landmarks. The Master Plan should identify and describe these trails and the level and types of protection associated with this designation. These trails include the Arroyo Burro, Rattlesnake Canyon, Hot Springs, Romero Canyon, Rincon, and Fremont Trails. This Board action was supported by the Office of County Counsel, which noted that these trails have been subject to damage or destruction and that Board action was warranted to preserve and protect them. CRAHTAC has previously commented that projects like the Goerner Development Project on Hot Springs Creek continue to damage or destroy these historic trails. Meanwhile, some, like the historic Rincon Trail, have been closed to public access for decades. These trails warrant discussion in the Master Plan, along with the identification of standards for their protection. With regard to the Rincon Trail, the Master Plan should identify possible actions to reopen this historic trail for public use. Other trails that connect to historic landmark trails, such as the historic San Antonio Creek Trail, should be considered in the Master Plan for designation as historic landmarks.
8. **Add Discussion of Trailhead Parking and Safety:** Many of our trailheads rely on on-street parking for public access to these trails. Yet such parking is often limited and nearby homeowners sometimes object to such parking in their neighborhoods, although public trail use often predates such homes. Demand for parking for access to public trails frequently exceeds supply at locations such as the Tunnel and Hot Springs Trails. In some instances, trailheads may also present safety hazards to trail users due to issues such as high-speed traffic or limited lines of sight. This is the case at trailheads such as west More Mesa along South Patterson/ Shoreline Drive in Goleta or the Rice Ranch Trailhead in Orcutt where cars traveling at 45 miles per hour interact with trail users, including pedestrians, dogs, children and sometimes equestrians. CRAHTAC has previously commented on this matter. To address such parking and safety issues,

the Master Plan should contain standards or policies to protect and expand trailhead parking and signage to warn motorists of an upcoming trailhead.

9. **Add Discussion of Revised Noticing Standards for Projects Impacting Trails:** Several recent development projects would create significant adverse impacts to the County's existing trail system, including the Valley View Trail in Orcutt and the Hot Springs Trail in Montecito. Yet, the public was not adequately noticed of these pending impacts to their highly valued trails, and sometimes there was no notice to trail organizations or posting of signs along the trail with information to inform the trail-using public. Other agencies, such as the cities of Goleta and Santa Barbara, have typically posted large signs describing the effects of proposed projects on trails, whom to contact regarding concerns, and how to participate in the process. The Master Plan is the ideal time to revamp and upgrade County noticing standards to ensure that community trail organizations and the public are informed *in advance* of any proposals that would adversely affect trails.
10. **Add Housing Element Development Projects with Proposed Public Parks and Trails in the Draft Master Plan:** We believe that the housing development envisioned under the Housing Element offers the most significant single opportunity to acquire new public parks, recreation, and trails over the next decade, particularly given the recreational improvements proposed at a conceptual level as rezone projects approved by the Board of Supervisors. However, these potential improvements can be best achieved and refined through careful follow-up as part of the Draft Master Plan.

The thousands of new residents of development planned under the Housing Element, particularly in the Goleta Valley, will substantially increase demand for public hiking trails and recreation. Therefore, we recommend that the Draft Master Plan include *and refine* all public parks and trails identified in the conceptual development plans for these projects as proposed during the County rezone process (aka "the Beauty Contest"). Because of County funding shortages and the lack of available land, these proposed parks, trails, and open spaces included in pending development likely constitute the vast majority of public parks and trails developed over the next 5-10 years. These public parks, open space and trails are effectively "pre-approved" under state mandates, funded by new development, and thus may proceed relatively rapidly. The Master Plan must directly address and, to the extent feasible, help to guide major pending public improvements which, following Board of Supervisors hearings in 2024, included over 8 miles of trails and 100 + acres of parkland or open space, plus:

- a. Orcutt Key Site 11: Conceptual development plans reviewed by Board of Supervisors as part of the Housing Element envisioned approximately ¼ mile of Orcutt Creek Trail and several acres of parkland south of Orcutt Creek including ball fields.
- b. Glen Annie Golf Course: It may include more than 60 acres of public open space and developed parkland, including facilities such as a community pool and pickle ball courts.
- c. San Marcos Hollister Area Parks and Trails: Four pending developments propose roughly 10 acres of parkland and open space in four different parks, including maybe more than a mile of trails. However, the design should be refined through the Master Plan.

- d. South Patterson Community Park: The development proposed by Ron Caird would include 11 acres of public open space and maybe more than a mile of trails. However, the design should be refined through the Master Plan, particularly regarding the intensity of recreational development within airport approach zones. This area may be suitable for more intensive recreational development. This is especially true as the planned development of 1,100 homes immediately to the north proposes high density housing in this restricted area while providing no public parks (at the concept level).
11. **Santa Ynez River Trail**: Please add a brief discussion of the Recreation Benefit Program's relationship to this trail, as all or most of the unincorporated segments of the trail would be wholly reliant on the success of this program. The discussion hints at cooperation with private landowners but should be more specific. Also, to the best of our knowledge, the trail is envisioned on both sides of the Santa Ynez River, and sufficient information needs to be provided to understand both trail design and related private development projects.
12. **Foxen Canyon Wine Trail**: Please briefly discuss the Recreation Benefit Program's relationship to this trail, as all or most of it would be wholly reliant on the success of this program. Add a similar discussion from Santa Ynez River Trail about cooperation with private landowners.
13. **Live Oak Trails and Campgrounds**: CRAHTAC has been discussing and hearing public input on the development and use of the Live Oak area at Lake Cachuma for over two years, particularly regarding continued equestrian use while potentially allowing access for other user groups. CRAHTAC is excited by Master Plan proposals for new campgrounds and increased access. However, in order to balance equestrian access and safety with expansion of use, CRAHTAC supports allowing pedestrian and hiking access to these trails and some camping facilities, while requesting further study of how or whether mountain bike access can be safely allowed to these public lands. Such a study should include more detailed assessment of the feasibility of a separate balance system for mountain bikes, consistent with maintaining a high level of equestrian use and safety. We also support review of a more expansive Cachuma loop trail, but understand that environmental considerations must be balanced with such access.
14. **Jalama Bluff Trail**: Please add more detailed discussion on the length of the trail and any planned features, such as new parking, overlooks, etc. We understand that detailed plans have been prepared for this trail, which should be included in an appendix for the public to review.
15. **Solomon Hills (Bonney) Trails**: Add discussion of connectivity to approved trails on KS 3 and existing trails on Rice Ranch. Include maps of KS 3 trails somewhere in the appendix.
16. **Orcutt Creek Trail and Park**: Needs more specificity. Overlaps with planned KS 10 and 11 approved Housing Element rezones which overlap more than 50% of this trail area. The concept development proposal for KS 11 included a substantial park with ball fields south of Orcutt Creek and should be referenced.
17. **Santa Maria Levee Trail**: This trail would extend for over 4 miles west from the City of Santa Maria's existing Levee Trail to link with the planned Guadalupe Trail. As a pending trail

development with an EIR planned for release in spring of 2025, the proposed major recreational project should be included in the Master Plan.

18. **Union Valley Community Park:** This area currently supports public trails, and providing more trails would seem appropriate as part of any park development. Please add a brief discussion. Also, please consider and briefly discuss if this is the right location for intensive recreational facilities, given airport flight path restrictions (if appropriate). If such intensive recreation may not be allowed, consider an area further west with development shared between County-owned land, such as Pioneer Park, and airport lands to the west.
19. **Point Sal Trails and Coastal Access Improvements:** Add State Parks to the discussion as they have authority over Point Sal itself and the north end of Point Sal Beach. Include an appendix with more detailed maps and discussion of land ownership as an important consideration for facility location and success. The County appears to own land for potential parking and coastal access improvements to Point Sal Beach, while California State Parks owns segments of existing trails such as those at Point Sal. Please include details on the ownership, planned trails, parking, access stairs, etc. in an appendix. We understand the importance of improving coastal access in the North County and that Point Sal Beach is one of the few not constrained by snowy plover habitat. We recommend that the Master Plan address how to improved walking and biking access from the existing vehicular staging area and maintain attractive hiking and bicycling access if Point Sal Road is reopened to vehicles.
20. **Mariposa Reina Trailhead and Trails:** This area north of US Hwy 101 supports the old oil processing and support facilities for the Gaviota Marine Terminal and has substantial open space suitable for trails and provision of a trailhead for these and potentially offsite trails. The County is in negotiations to purchase this property, so it makes sense to include it within the Master Plan. If the purchase is successful, trails could be provided on future public land within the next 5-10 years.
21. **Las Flores and Corral Canyons Regional Park and Trails:** Las Flores and Corral Canyons on the Gaviota Coast currently support a major oil processing facility which, regardless of decisions on the Sable oil pipeline, will be phased out and decommissioned over the next 20-25 years. When decommissioned, this canyon would support major opportunities for eventual acquisition by the County for public recreation, similar to what is being considered at the former Gaviota Marine Terminal Sites, both south and north of US Hwy 101. After cleanup of any contamination, the major graded pads that support oil operations could be repurposed to regional park facilities and a campground. Because this property borders the LPNF, both Las Flores Creek and Corral Creek Canyons should be identified for trails leading into the LPNF and West Camino Cielo. Please add this project into the Master Plan and amend the PRT maps to reflect this potential park and trails.
22. **Bill Wallace Trail Improvements:** This proposed project would involve realignment of the existing Bill Wallace Trail which tends to follow legacy dirt roads with grades that do not meet accepted trail design standards. The trail does not connect through to areas east of the El Capitan Canyon or into the Los Padres National Forest (LPNF). We recommend that the Master Plan address the realignment of this trail on state owned and private lands east, west, and north of El Capitan

Canyon Resort. As illustrated on this map, improvements would include new switchbacks traversing both public and private land west of the canyon, opening a new trail segment across State and/or private land on the Mesa east of the Canyon to provide a loop trail system, including a small public parking lot east of the Canyon. Finally, a connector trail into the LPNF to link the Bill Wallace Trail to the historic Gato Canyon Trail should be studied to provide public access to the LPNF. Because of pending development and the preparation of a new General Plan for El Capitan State Park this project could happen within the next five years. This project would also represent the best chance of completing a new foothill trail in the near term to serve residents of the Goleta Valley.

23. **California Coastal Trail and Coastal Access Improvements:** From Goleta to El Capitan State Park, a 6-mile-long segment of the coastal trail may most likely be built within the next 5 years. It would likely be managed by the County and therefore should be added to the Master Plan. This trail segment could provide coastal access at Deadman's Surf Break (Eagle Canyon), Tomate Canyon West (Naples Surf Break), at Naples and at Dos Pueblos Canyon, and at Las Varas Ranch. The Santa Barbara County Trails Council is currently designing 1.1 miles of the California Coastal Trail, a public parking lot, and a new pedestrian bridge across the UPRR, with the submittal of County permits anticipated in late 2025, while UPRR and the State are currently reviewing 30% design plans for the UPRR bridge. The 8501 Hollister project immediately to the east between this site and Goleta previously proposed dedicating and building more than ½ mile of the coastal trail, providing public parking and beach access. While that project was unfortunately withdrawn due to excessive permitting delays, the property owner was open to providing the trail. In addition, the DMF Seaside Residence project currently proposes dedicating lateral access easement for the California Coastal Trail on this portion of the proposed Naples Development. Further west, the owner of Dos Pueblos Ranch has expressed interest in a Recreation Benefit Project that could provide several miles of the coastal trail and a public coastal park in exchange for visitor-serving uses. Finally, consistent with clear direction from the State Legislature, over 2 miles of this segment are already under public ownership by the University of California and offer an opportunity to use public land for the coastal trail and access. Please include this trail and coastal access points in the Master Plan.
24. **Glen Annie to Los Padres National Forest Trail:** This proposed road shoulder trail may be a worthy project, but the text is inaccurate and should be amended. As discussed below, there are no "existing foothills trails in the Los Padres National Forest" north of the Goleta Valley.
25. **Goleta Foothill Trails:** There are currently no trails that extend into the LPNF to serve the greater Goleta Valley's 80,000 residents, although a trail to access Slippery Rock is planned at the end of Fairview Road in the North Patterson Neighborhood, and also a continuation of the San Antonio Creek Trail into the National Forest (closed in the 1980s due to litigation.) Although the Glen Annie Golf Course development would provide 4 miles of trails, these would not provide access into the public lands of the LPNF. The Master Plan should clearly acknowledge this lack of trails, identify and briefly discuss planned trails, and pursue opportunistic trails in the Goleta foothills in the coming years with willing landowners through the Recreation Benefit Program or other evolving land use programs. This proposal is clearly in alignment with the Master Plan's emphasis

on active transportation to access recreation and would fulfill a longstanding County promise to the community.

26. **New Carpinteria Valley/Toro Canyon Trails:** The very popular Franklin Trail is the only trail currently serving the Carpinteria Valley with access into the LPNF, though there are limited trails in unincorporated areas. The Master Plan should:
 - a. Opportunistic Trail Creation: propose using land use tools to provide an additional trail either through reopening historic LPNF trails or exploring new trail opportunities in watersheds such as Santa Monica Creek, by connecting the Toro Canyon Park Trail to the Toro Ridge Trail, exploring opportunities off of Lillingston Canyon Road, along Arroyo Paredon Creek and completing the California Coastal Trail from the Carpinteria Bluffs through Rincon Beach County Park to the Ventura County line.
 - b. Reopen Rincon Trail: The Rincon Trail is a county-designated Historic Landmark within the LPNF that was formerly accessed across private lands south of the forest. Unfortunately, due to development patterns, the private segments of this trail have been closed to public use for decades. The Master Plan should clearly acknowledge the need for new foothill trails, identify and briefly discuss this historic trail, and pursue it with willing landowners through the Recreation Benefit Program or other evolving land use changes.
27. **Add New Tunnel Loop Trail:** Proposed first by the Los Padres Forest Association during the closure of the Tunnel Trail. The Tunnel Loop Trail ([see map](#)) would offer expanded recreation in this scenic area.
28. **Santa Ynez Valley Floor Trails:** Include completion of new, planned, and proposed trails, including road shoulder trails such as the Refugio Road Trail, to improve community connectivity, public safety and equestrian access in the Santa Ynez Valley. Provide for the restoration of all existing Santa Ynez Valley trails.
29. **Pathways to Implementation Section:** This section should include a brief discussion of the Land Use Tools as these tools will be the main pathway to implementation until major new funding sources are identified and adopted. *This should include a discussion of the Parks, Recreation, and Trails Maps (PRT Maps), which have been the County's primary tool for trail acquisition for the last 45 years and still play a role in identifying trails for smaller development projects and acquiring trails from mid to large sized developments.* Proposed Housing Element developments and pending Recreational Benefit Projects with public parks, recreation and trail should also be acknowledged. Trail construction costs for natural surface trails of \$50,000-\$100,000 per mile may be overstated based on local experience, especially excluding excessive permitting costs. The Trails Council and Los Padres Forest Association should be consulted on this issue. FYI, the Trails Council also oversaw the permitting and construction of the 8-mile-long Baron Ranch Trail System and is overseeing design and permitting of 1.1 miles of the California Coastal Trail on the Gaviota Coast, including a new pedestrian bridge over the UPRR and public parking. *Community trail organizations perform almost all construction and maintenance of the County's trail system.*

30. **Fire Management:** The Master Plan should include existing policies and programs to aid fire hazard reduction in parks, trails and open spaces, perhaps through grant funding.
31. **Land Use Element and Ordinance Amendments:** The Plan for Parks, Recreation & Trails Section should state the importance of the proposed Land Use Element, Ordinance Amendments, as well as Park Development Impact Fees, for achieving the vision set forth in this section. These should also be referenced in the Implementation Section. Without these land use tools and adequate Park Development Impact Fees, this vision will be extremely difficult to implement absent major changes in funding sources.
32. **Land Use Element Text Amendments:** Adequate supporting text in the Land Use Element is critical to supporting trail maintenance, protection and development, including detailed information, analysis and links to the Master Plan. If the Master Plan's trail visions are to be achieved largely through using land use tools, then such background text and analysis within the Land Use Element is essential to support regulatory decisions because the Master Plan itself does not appear to enable any regulatory actions. Unfortunately, the text is not currently available for review, but CRAHTAC looks forward to reviewing and providing comments when available.
33. **Policies:** Implementation of planned and potential future recreational improvements will be guided by and sometimes dependent upon a strong set of guiding policies within the County's adopted Land Use Element. Unfortunately, neither the draft policies nor proposed text amendments have been provided for public review, hampering the ability to provide informed comments. CRAHTAC has drafted and re-drafted a multi-use trail policy or ordinance amendment and submitted this to the County which does not appear to be referenced (perhaps it lives in the ordinance section, also incomplete). Policies regarding management and maintenance also need to be included, along with how decisions are made about what to fund, supported by at least some general-level policy. A decision tree and/or policy on how priorities are to be decided should be included. However, in general, CRAHTAC recommends strong policies that use wording that commits the County to actions through the use of the word shall (as in "the County shall"). In addition, specific policy recommendations include revisions to proposed Goal 2 as follows:
- a. **Proposed Goal 2:** Build, maintain and protect a network of attractive regional and local trails that provide users with convenient access and high quality to both urban and rural lands and beautiful natural areas.
 - i. The County shall strive to protect existing and future trails from damage from wildfires and flooding, exacerbated by climate change, through seeking funds to improve trail resiliency to reduce impacts from such events, in coordination with community trail organizations.
 - ii. New development shall be sited and designed to protect the recreational, aesthetic and natural resource values along existing and planned trail corridors from substantial adverse impacts to such values from new development.

- iii. The County should foster and develop partnerships with private non-profit community organizations that assist the County with development and maintenance of its trail system.
 - iv. 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.
 - v. 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.
- b. **Proposed General Plan Amendments (GPA) for Public Parks, Recreation, and Trails:** As set forth in this section of the Scoping Document, this section should be amended to discuss two key County tools for recreation planning.
- i. Discuss and amend The Parks, Recreation and Trail Maps (PRT Maps): The PRT Maps are the key planning tool used by the County for trail planning and acquisition for more than 40 years and this section does not appear to even discuss this key tool. Will this tool continue to be used? This section should explore how to strengthen this tool and what policy changes should be made to support this existing tool. Amendments to the PRT Maps should be proposed to reflect those improvements with the Master Plan and any additions. Most of the PRT maps are out of date while some in the Lompoc Valley have not been updated in over 40 years. *The master Plan offers the unique opportunity for a comprehensive update of the PRT Maps.*
 - ii. Recreation Overlay: This section should also discuss the use of Recreation Overlays or other programs that can identify current privately owned or other agency land proposed for recreation improvements (e.g., Las Flores Canyon discussed above). Alternately, the PRT maps could be amended to reflect proposed improvements, but some strong connection between land use tools and the Master Plan should be provided to help guide implementation.

The Master Plan itself is not a land use regulatory document. It is too general to support programs such as trail planning and acquisition, and continues to rely upon the PRT Maps, which are not discussed. The Master Plan must be supported by strong policies, amended PRT maps, and other land use tools such as recreation overlays. These are not currently identified to be successfully implemented. This section identifies 23 proposed policies, but for some reason does not make these available for public review, leaving the public in the dark about the effectiveness of such tools. *These appear to have been already drafted and should be made immediately available for public review.*

- c. **Recreation Benefit Program:** The initial Recreation Benefit Project Program Overview & Guidelines (Appendix 8) provides a good *overview* but lacks *details* on key elements, including a detailed discussion of, or standards for, the ratio of public and private

benefits. The shared *benefit* between private and public interests is a strong incentive for program participants to collaborate. It will be difficult for the public to ascertain the environmental and other costs of the program versus its public recreational benefits. Better definition of this issue will be central to the program's effectiveness and its ability to provide the program's benefits. Without it both the public and decision makers will be unable to weigh the tradeoffs implicit in this program. In addition, the future administration and implementation of this program is not discussed. The County's permit process is notoriously onerous, and while this program sets forth a bold vision, an administration section should be added that clarifies how the County's planning process will actually live up to these commitments. Finally, the known Recreational Benefit Projects currently pending and their proposed public improvements (e.g., Santa Ynez River Trail) should be described in the Master Plan to enable detailed assessment in the PEIR. Merely discussing such projects in the PEIR cumulative section will not sufficiently streamline the permitting process to the maximum extent feasible. The Recreational Benefit Program is put forth as a public private partnership, which should start now as part of the Master Plan and PEIR.

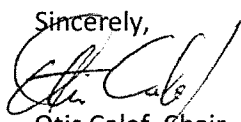
- d. **Ordinance Amendments:** An overview of draft ordinance amendments is provided, but details are lacking. One major concern is that these amendments do not appear to downshift trail construction permitting. It would still remain onerous, time consuming, and expensive, making the permit process for building a public trail similar to that for a shopping mall. The Ordinance amendments should propose making trail construction subject to a non-discretionary land use or grading permit similar to that allowed for agriculture. Installing a 500-acre vineyard with miles of agricultural roads requires a substantially less expensive and time-consuming process than a minimal-impact 5-mile trail! A set of development standards should be drafted to address issues such as tree protection, but a permit for 4-foot-wide dirt trails should be easy, even when it involves some vegetation clearing and minor grading.
34. **Discuss Role of CRAHTAC and the Parks Commission:** CRAHTAC and the Parks Commission both have long-established roles in the County's parks, recreation and trail planning, as established by the Board of Supervisors. Please include a brief discussion of the roles and responsibilities that Board-appointed advisory bodies will assume when reviewing proposed Master Plan improvement projects. This should include those projects identified in the draft Master Plan, pending Housing Element developments with substantial public recreation, known pending Recreational Benefit Projects, and future projects that involve substantial public recreational components. The resolutions establishing these Board appointed bodies should also be included in an appendix to make these easily accessible to interested parties.
 35. **Implementation and Finances:** Finances - there seems to be a significant funding shortfall for both implementation (acquisition, construction) and maintenance. While there are some possible funding sources outlined (districts, grants, bigger County budget) there aren't any specific recommendations or an implementation plan. Right now, it reads like a wish list of projects with no real way of getting there. The Master Plan should contain at least an outline of a financial plan as well as an improved discussion of the master planning process. Scheduling

assumptions for improvements should be described in more detail and refined where possible. Specific amendments to the County's PRT Maps or other long range planning tools should be identified.

- a. Park Development Impact Fees: The County's existing Park Development Impact Fee Program should be described in detail as it is a primary source of park, recreation, and trail development funding. A summary should be provided of revenue generated over the last decade, or improvements provided through fee discounts. The existing program of permit fee discounts, especially for private recreation, should be described and discussed with examples of permit modifications that focus on public recreation. The Park Development Impact fees are the most reliable source of funding for recreational capital improvements and will be critical for Master Plan implementation. For example, for the pending (plus or minus) 5,000 units of new housing allowed under the Housing Element, such fees could generate tens of millions of dollars for recreational development over the coming decades. Please also provide projected revenues from these fees based on pending projects.

36. **New Appendix with Detailed Trail and Campground Plans**: We understand that detailed conceptual plans have been developed for many improvements such as the campgrounds near Guadalupe and in Guadalupe Dunes, Jalama Beach, and at Gaviota Marine Terminal, as well as trails at Jalama Beach, Point Sal and along the Santa Ynez River. These should be included in an appendix to facilitate public understanding, even if labeled conceptual. These details matter and are required to support the PEIR review of these projects.
37. **NOP Scoping Document**: The EIR should build upon existing trail documents. The Gaviota Coast Plan EIR provides a detailed, if wildly overblown, analysis of trail impacts. The EIR can build upon this analysis but also include more specific analysis found in the Franklin Trail Mitigated Negative Declaration (MND), the Baron Ranch MND, and the Baron Ranch EA. These documents provide a much more realistic worst-case analysis of the impacts of trail development and use. The PEIR must also discuss the details of, and impacts associated with, known pending Recreational Benefit Projects. These projects with public recreation are allowed under the Housing element but require site-specific review.

Thank you for considering this request.

Sincerely,

Otis Calef, Chair
CRAHTAC

cc: Santa Barbara County Board of Supervisors
Santa Barbara County Planning Commission
Jesús Armas, Director, Santa Barbara County Community Services
Lisa Plowman, Director, Santa Barbara County Planning and Development
Gregg Hart, Assemblymember, 37th District
Monique Limón, Senator, District 21
Salud Carbajal, Congressman, District 24