## Sarah Mayer General Public Comment - CRAHTAC

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From: Otis Calef <crahtac@explore-santa-barbara-county.com>

Sent:Friday, May 24, 2024 2:25 PMTo:Seawards, Travis; Jeffrey Lindgren

Cc: sbcob; Villalobos, David

**Subject:** Proposed Goerner Project and Impacts to Hot Springs Trail

Attachments: CRAHTAC-Goerner-Project-05-14-24.pdf

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Dear Messrs. Seaward and Lindgren:

The Santa Barbara County Riding and Hiking Trails Advisory Committee (CRAHTAC) is writing to express our strong concerns regarding the impacts of the Goerner Project on the Hot Springs Trail and to request that the County require preparation of a focused Environmental Impact Report (EIR) for this destructive Project. See the attached letter for more details.

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

May 14, 2024 Submitted via email

CHAIR Otis Calef

VICE CHAIR Faith Deeter

SECRETARY Kirk Nordgren

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5th DISTRICT

**STAFF**Jeffery Lindgren

Mr. Travis Seaward, Deputy Director Planning and Development Department

Mr. Jeff Lindgren, Assistant Director Community Services Department, Parks Division

123 E. Anapamu Street Santa Barbara, CA 93101

RE: Proposed Goerner Project and Impacts to Hot Springs Trail

Dear Messrs. Seaward and Lindgren:

The Santa Barbara County Riding and Hiking Trails Advisory Committee (CRAHTAC) is writing to express our strong concerns regarding the impacts of the Goerner Project on the Hot Springs Trail and to request that the County require preparation of a focused Environmental Impact Report (EIR) for this destructive Project. CRAHTAC feels strongly that converting as much as 1,000 feet of scenic natural surface trail to a wide paved road backed by retaining walls and accompanied by extensive native vegetation removal are significant impacts to a scenic resource that cannot be mitigated and would cause a significant deterioration in the recreational trail user experience. As such, we believe that this project's new paved road would cause unavoidable and significant impacts to both scenic resources and recreation that can only be adequately addressed in an EIR. These impacts are made all the more severe as this project site and its heavily used trail are a major gateway to our public lands within the Los Padres National Forest (LPNF), which is used by tens of thousands of hikers annually. We are also concerned about impacts to the Cold Springs Ridge Trail scenic overlook where the proposed Goerner residence would disrupt highly scenic views across the Carpinteria Valley to the east.

We respectfully request the County Planning and Development Department (P&D) and Community Services Department, Parks Division (County Parks) work cooperatively with community trail organizations to develop mitigations for these significant and unavoidable impacts to highly valued public recreational resources as well as to explore alternatives to the proposed project that can only be developed in focused EIR. CRAHTAC understands that these community trail organizations with unmatched expertise in trail construction have explored the potential for a natural surface bypass trail upslope and west of the proposed wide paved road and have found that such a trail is potentially feasible with minimal environmental impacts, especially compared with the proposed project. However, more work is required to ensure that such a trail is feasible. Their expert opinion must be explored in any environmental document.

As you are aware, CRAHTAC is a standing committee appointed by the Board of Supervisors (Board) to advocate for recreational trails and advise the County on matters related to recreational trails issues. The Board's resolution establishing CRAHTAC instructs the Director of P&D to consult with CRAHTAC on projects with impacts to trails and required mitigation measures. Consistent with our role advising the County on trail issues, CRAHTAC believes that the Goerner Project would impact tens of thousands of recreation trail users through both trail closures and disruption during 3 or more years of construction and long-term irreversible change to trail character, aesthetics, and the recreational user experience and should be considered as significant impact to public recreation. We are particularly concerned that these impacts would occur at a major public access gateway to LPNF. We are also concerned about cumulative impacts to our Front Country trail system during a period when many important segments of the Front County trail system are closed (i.e., upper segments of Romero Canyon, San Ysidro, and Franklin), damaged (e.g., Jesusita, Baron Ranch) or are proposed for extended closure and damage (i.e., Mission Canyon). This cumulative setting of Front Country trail closures and damage increases the severity of such trail impacts, and we believe that the recreational impacts of the proposed Goerner Project would be cumulatively considerable. In summary, CRAHTAC recommends that the County require:

- 1. Preparation of a focused EIR to identify project impacts, develop mitigation measures for impacts to recreation and scenic resources to reduce the severity of these impacts to the extent feasible, and explore alternatives that may wholly avoid such impacts. Additional key impacts to be addressed should include biological resources and Environmentally Sensitive Habitats, as well as wildfire hazards.
- 2. Preparation of a visual resource analysis including photo simulations of impacted trail segments before and after construction (i.e., immediately post-construction, 5 years, 20 years) as well as those of the proposed Goerner residence on views from the Cold Springs Ridge Trail scenic overlook.
- 3. Completion of several full days of trail user surveys in order to establish an adequate environmental baseline to determine roughly how many trail users would be impacted similar to the type of studies that would be required for any other important resource.
- 4. Notice the trailhead with large signs in plainly worded language so the trail users are adequately informed about the project and how to participate. P&D's typically handwritten small signs lack adequate information and fail to provide adequate guidance on public participation for such an important project.
- 5. Hold a well-noticed evening public hearing on the project's environmental document.
- 6. The project applicant to fund the construction of a permanent long-term bypass trail west of the proposed new paved road, including a footbridge across Hot Springs Creek, to be implemented by community trail organizations. CRAHTAC believes that a property survey and more detailed route analysis must be completed as part of any environmental review to determine the feasibility of these mitigation measures.
- 7. The project applicant to fund additional trail improvement work as specified by community trail organizations along the Hot Springs Trail to partially compensate for project impacts.

CRAHTAC believes that even with such mitigation measures, project impacts would remain unavoidable and significant and that, as such, the County must require preparation of a focused EIR. We understand the community trail and environmental organizations are also deeply concerned about this project and we hope that the County will look to the public interest in this matter and also avoid what will certainly become a very controversial project. We hope the County will stand up and protect a treasured community resource. We are concerned that failure to do so will seriously undermine public confidence in the County government's interest in protecting public resources from development impacts.

Thank you for considering this input.

Sincerely,

Otis Calef

Chair

CC: County Board of Supervisors

Montecito Planning Commission

County Planning Commission