

#4

Ramirez, Angelica

Public Comment -

LATE
DIST

From: Kathleen Rosenthal <ksrvaquera@gmail.com>
Sent: Friday, February 11, 2022 9:09 AM
To: sbcob
Cc: Chapjian, George; Menzies, Jon; Lindgren, Jeffrey
Subject: BOS Comment Letter to Departmental Agenda Item A-4 2/17/2022
Attachments: 2 11 22 BOS Letter Rec Plan Update.docx; SYV Regional Trail Policy Recommendations.docx

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please forward the attached letter and attachment to the Board of Supervisor as public comment on item A-4, the Countywide Recreation Master Plan Update.

Thank you for your assistance.

Best Regards,
Kathy Rosenthal

February 11, 2022

To: Honorable Santa Barbara County Board of Supervisors

RE: Departmental Agenda Item A-4

Comments to the Santa Barbara County Recreation Master Plan
(VIA EMAIL TO sbcob@countyofsb.org)

Dear Mr. Chair and Members of the Board:

The Santa Ynez Valley Riders (SYVR) is the longest running equestrian trail riding club in the Santa Ynez Valley and our members, in particular Mr. Bob Crowe who was also founding member of CRAHTAC and led creation of the Live Oak Equestrian Trail on Cachuma Lake's north shore in the 1980's. Our equestrian trail riding traditions live on to this day.

The SYVR supports the Santa Barbara County-wide Recreation Master Plan (Plan) that is currently in development as a strategic planning program for parks, trails, and recreation facilities throughout Santa Barbara County that will guide recreation development for the next 30 years. **The Board of Supervisors initiated the Plan by approving project funding on May 7, 2019, and approved the Contractor (who will undertake the various steps of the Plan) on July 16, 2019¹.** The Plan was presented first at the Countywide Recreation Summit held in June 2019 to bring together park and recreation leadership from agencies and key stakeholders countywide.

The SYVR appreciates the effort and cooperation the Parks Division staff and Consultant have extended to us that enable us to ask our riders about their concerns, wants and needs and to provide a way so they are included in the Plan. We also appreciate the efforts of WeWatch in hosting a public meeting in the Santa Ynez Valley (Los Olivos) on the Plan and providing a record of public comments (July 19, 2021).

The SYVR have process and procedural concerns that we feel require your Board's consideration to complete a valid Countywide Recreation Master Plan:

- 1. Parks Planner – As the Plan will guide Countywide recreational policy and infrastructure development for the next 30-years, the Plan needs the leadership of qualified in-house recreational planning staff (i.e., accountable to the County Board of Supervisors and Constituents).**

The Community Services Department eliminated the Parks Planner position in FY 2018-2019² and the Recreation Master Plan was included in the County's CIP 2020-2025, Page 30³. With the scope, skill and coordination required to develop and process a Plan of this magnitude, we

¹ Countywide Recreation Master Plan initiation and Board appropriations approval, May 7, 2019
<https://santabarbara.legistar.com/View.ashx?M=F&ID=7197019&GUID=27E2E10E-A1DF-4E1E-A222-8E21CD9A087B>
and
Contract approval July 16, 2019
<https://santabarbara.legistar.com/LegislationDetail.aspx?ID=4060265&GUID=A1E992A8-0B04-4862-9E22-D03448503BFA>

² The Community Services Department Budget and Staffing FY 18-19 Report (Page D-319) [FY 18 19 Comm Svcs Assets](#)

³ 2020-2025 Capital Improvement Plan County Of Santa Barbara (Page 30)
<https://www.countyofsb.org/ceo/asset.c/4333#:~:text=In%20FY%202020%2D21%2C%20we,and%20Community%20Services%20Department%20%2D%20Parks.>

suggest that the Parks Division planner position be restored to guide the Plan's development in a transparent and un-biased manner.

2. New Recreational Reality - The Parks Division Recreational staff need to adapt current public demand and practices relevant to the public they serve.

Now that the Plan is on the horizon, we are experiencing explosive demand and changing expectations for recreation and uses on our public lands. Indeed, all public lands managers from the US Forest Service to the National Parks Service are experiencing changes in how the public expects to use public Lands. Recreation is not what was originally envisioned by Gifford Pinchot nor are recreators the same as those in the recent past. The Plan's authors and analysts' focus should strive to incorporate updated issues and practices to assess and address the volume of visitors and the use types of our public lands. These issues include:

- a. Non-Recreational Campers; people who by choice or through homelessness are using public lands to camp in unprecedented ways and periods of time⁴.
- b. The evolution of "speed" sports (i.e., aggressive mountain biking, and more recently E-Bikes) on our trails that have taken precedence over other trail sports over the past 30-years resulting in hiker and equestrian trail rider safety concerns and associated attrition.
- c. Under-funding of recreation in general, but particularly staff and resource shortages which prevent recreation management agencies from enforcing rules intended to provide for safety and allow for all to enjoy their sports.
- d. Associated consequences and long-term cumulative environmental impacts associated with under mitigated, monitored and reported recreation planning actions and the long-term environmental impacts and ineffectiveness of repeated, on-going maintenance decisions.

3. Baseline for Environmental Analysis - The environmental baseline for environmental analysis for the Plan's environmental review is the date of Plan initiation by the Board on May 7, 2019. Plan initiation (BOS funding and/or approval) has been the trigger for baseline analysis for all other Land Use Plans and programs in the County in the past.

Over the past year the SYVR have been in contact with the Board for issues stemming from the Live Oak Trail Expansion Project (Pilot Project) began on **April 15, 2021**, initiated **AFTER** the Plan's initiation (May 2019) when the allowed trail uses were expanded from an equestrian trail to include hikers.

The Live Oak Trail at the time of the Plan's initiation was an equestrian only trail, the last of its kind in the Cachuma Recreation Area and the County. Therefore, the Live Oak Equestrian Trail represents and is part of the **baseline** recreation activities and facilities for analysis in the Plan's project description and environmental and policy analysis of the Environmental Impact Statement (EIR).

4. Multi-use Trail Policy – Both the County Parks Commission and the County Riding and Hiking Trails Advisory Committee (CRAHTAC) will take up discussions to formulate a County-wide "Multi-Use Trail" policy in 2022 for inclusion in the Plan.

Trail users and the public at large need additional opportunities to provide input to this critical policy. Currently, the public is limited to a three-minute comment on staff and advisory committee proposals. The public and trail users need a seat at the table and need to be more involved with developing this critical policy as described in the attached document.

⁴ Non-recreational Camping on National Forests. <https://www.fs.fed.us/pnw/science/scifi242.pdf>

The Parks Commission and CRAHTAC can direct Parks staff and advise the Board, but the recommendations often do not recognize existing trail uses, nor have they contacted or noticed interested trail groups about existing and appropriate trail uses. Often, recommendations are made on less than a complete picture of the existing setting and situation.

A Multi-Use Trail Policy has never been codified County-wide but has been mis-stated and mis-applied for planning policy formulations and decisions for the past 30-years. Certain Community Plans do have the requirement that define "Multi-Use" trails in urban areas, but there is no requirement for rural unincorporated areas. However, with the Plan's development, the County has opportunity to review scientific literature that considers 30-years of mechanized travel on our trails and effects on wildlife, other trail users and the ability to recreate safely on our trails.

A blanket multi-use trail policy has the potential to reduce environmental review (i.e., public review and comment) and result in significant mitigation requirements. Additionally, policy development must not be in conflict with the other Elements of the County's Comprehensive Plan (i.e., Land Use Plan).

The SYVR suggest the County consider a community-based (rather than political appointee) trail working group to enforce rules, maintain trails and protect other land uses and resources on trails of interest.

5. Relationship of the Plan to the Existing Comprehensive Plan - Will the Plan take precedent over existing Land Use Plan?

Our concern that the Plan's proposed recreation activities and facilities will take precedent and become the "tail wagging the dog". Shouldn't the Land Use Plan that has policies in place to protect natural resources and serves the County's blueprint, be updated first? Should recreational plans supersede environmental protections?

6. How will the Rec Plan work w/existing Recreation Area Master Plans? What document will take precedent? How will new information through the Plan impact existing Recreational Master or Trail Plans? For example - Cachuma Recreation Area, Baron Ranch, the newly acquired Foothill Preserve.

7. Are other jurisdictions (i.e., City of Solvang) conducting their own surveys, particular to one park (i.e., Hans Christen Andersen) for particular activities (Mountain bike pump track)? We assume individual jurisdiction are doing their own surveys but how can the public be informed and know they can participate in these community-based surveys? Is anyone keeping a comprehensive list and contact information?

Also, we have noticed recently there are surveys from outside the County (i.e., People for Bikes – located in Colorado) being circulated via Facebook⁵. Will this data be considered? If so, are comments from a nationwide audience being considered?

8. Finally, our equestrian trail riders continue to question why was the Live Oak Trail separated off from the Plan (since the Plan has been "in the works" since 2018) and why is the Live Oak Trail "Pilot Project" continuing ahead of the Plan, prior to any analysis?

The Plan's Steering Committee Meeting Agenda Packet⁶ dated Thursday, September 17, 2020, Figure 4, Santa Ynez Valley Recreation Facilities (Attached) indicates that the Live Oak Camp and Live Oak Trail area (northeast shore of Cachuma Lake) will be considered in the Plan. The Live Oak Camp of the Cachuma Recreation Area and Live Oak Equestrian Trail is included in

⁵ Recent Facebook Cycling survey at: https://survey.alchemer.com/s3/6332336/commsvy21?fbclid=IwAR2XHxwvxRJYM2tsxSYEvprLZC-3cQB6otLp_hNdq_qrGzukhXI-PkV9c4

⁶ Steering Committee Meeting Agenda Packet dated Thursday, September 17, 2020, Figure 4. <https://www.countyofsb.org/parks/asset.c/1298>

the Plan as anticipated and indicated on Figure 4 of the above-described documents, will be included in the review, analysis, and public participation as part of the Plan. Only then, the appropriate analysis, public comments and impact evaluation can be fully assessed.

Please see the attached framework for Trail Policy Development, and in particular, formation of a stakeholders working group outside politically appointed bodies (CRAHTAC and Parks Commission) to develop the new Trail Policy.

9. Equity: Above all, the County should strive to provide recreational facilities for all recreational users, but in no other area has equity for all trail users been ignored as on our County, City, and National Forest Trails for equestrian trail riders.

We encourage staff to analyze the equity of recreational opportunities for equestrian trail riders and hikers given the safety concerns with high speed and aggressive trail users (i.e., Mountain bikes, E-Bikes, and dogs) on trails.

Many trail visitors, including hikers and equestrian trail riders are well into their 50's, 60's and 70's (and on up) and represent a significant change from past generations that may have enjoyed more passive outdoor and recreational activities.

For example, women trail riders from 40 to 60 are the fastest growing demographic in equestrian trail riding and endurance riding. In addition, we have multiple ethnicities and generations represented in our equestrian rider numbers. Because we are more active, more ethnically diverse and represent significant a significant portion of the recreation population, the question of equity and safety, that is, where we can ride safely and securely by ourselves, with our friends and family, kids and grandkids, needs recognition, acknowledgement and accommodation in this Plan. The Plan must acknowledge all trail sports, consider trail user safety, available County funding and provide EQUITY for all trail users on the local trail systems.

Thank you for the opportunity to bring these issues to your Board's attention. We look forward to working with Parks staff and the Board as the environmental review for the Recreation Master Plan proceeds and the Plan is developed.

Best Regards,

Kathy Rosenthal
2021 President
Santa Ynez Valley Riders

Attachment: Framework for the Santa Barbara County-Wide Recreation Master Plan Trail Policy Development

Cc: George Chapian, Director, Community Services Department (gchapjian@co.santa-barbara.ca.us)

Jeff Lindgren, Parks Superintendent, County Parks Division, Community Services Department (JLindgren@sbparks.org)

Mr. Jon Menzies Santa Barbara County Parks Division, Community Services Department (jmenzies@sbparks.org)

Framework for Santa Barbara County

Recreation Master Plan Trail Policy Development

February 2022

A number of trail policy recommendations that have been received via the Santa Ynez Valley County-wide Recreation Master Plan Sub-Committee, and community meetings. Recommendations for trail policy development for the Santa Barbara County-Wide Recreation Master Plan are described below:

1. The effort on the “Multi-Use Trail” Policy should be revised to focus on “Trail Policy”. The title and term of use should be changed as well. As we heard from Jeff Lindgren at the SB Co Park Commission at the January Parks Commission Meeting, not all trails in SB County are anticipated to be “multi-use trails” in the future. Some will be dual use, some only suitable for one user (i.e. Hikers at Foothills Preserve, etc.). Revising the title is appropriate and will reduce the confrontational nature of the term “Multi-use trail” in inappropriate contexts.

Trail Policy is also the term of the future. For example, at the American Trails Webinar entitled Wheels and Legs: Reducing Nonmotorized Trails Conflicts last Friday (12/10/21), the presenters stressed that due to the increased visitor use, increased repetitive and expanding trail damage – braiding, trenching, banking, “cups”, downhill damage, speed, aggression and increasing conflicts – that all had built into their regulations, the flexibility to combine or separate trail user groups, that is define one, two, three or sometimes even more (ATVs) where appropriate on their respective trails. The idea is to provide equity to all trail visitors and provide the outdoor experience each is hoping to enjoy. This will become the focus and goal of the County’s Trail Policy.

2. Trail users and the public at large (stakeholders) need opportunity to provide input to this critical policy, especially the Objectives as described below. A community stakeholder group of interested individuals, rather than an elected-appointed Trail Advisory Commission/Committee, is necessary to develop the policy. This is critical. Past experience has shown that the current model is not working for the recreators in the Santa Ynez Valley.

A robust public outreach process is necessary before and new trails or change in use at any trail. Trail. The trail development process is well-defined in the California State Parks Trail Handbook found at:

<https://www.parks.ca.gov/pages/1324/files/Chapter%203%20-%20Planning%20and%20Environmental%20Compliance.FINAL.01.28.19.pdf>

3. The Trail Policy discussion should begin with a clear definition and declaration of Objectives –

For example:

- a. Provide trails that meet the Trail Management Objectives, consistent with the County’s Comprehensive and Coastal management plans, provide equitable opportunities for satisfying recreation experiences for all genders, ages, and trail sports, harmonize with and provide opportunities for enjoyment of the natural setting, and minimize enforcement and maintenance costs.

For example, statistics show mountain biking is the fastest growing sport and is dominated by middle aged affluent males who generally want speed and distance. However, there must be consideration for other ages, genders and sports (hiking and equestrian riding) that maximizes safety, enhanced outdoor nature enjoyment and minimizes natural resource impacts and user conflict. For example, the fastest growing equestrian sport is Trail Riding among 40-60 year old women who want safety, quiet and the ability to socialize and enjoy nature.

- b. Design, construct, and maintain sustainable trails, that is, trails that withstand the wear and tear of normal traffic and reasonable user behavior based on the criteria of
 - i. Soil type,
 - ii. Slope,
 - iii. Trail user
 - iv. Considers repetitive damage and resulting trail damage (braiding and off trail as examples)
 - v. Effects on other natural resources, especially wildlife
 - vi. Effects on land uses, especially in rural, agricultural areas of the County, and others.

Recognize that it isn't just the trail itself; it is human intrusion, mechanized, fast moving bikes and trail runners, dogs and irresponsible owners, and the inability of the public to police themselves that are the causes of disastrous impacts. How can we mitigate these conflicts and safety concerns? A Stakeholders group would be a platform to discuss ideas.

- c. Connections between existing trails are necessary for safety and to allow connected transportation corridors.

Following Objectives development, develop the Trail Policy. Our recommendations and would include:

- d. Trails must be monitored by the land managing agency (County, City) via a standardized system. This is nothing less than State and Federal (Forest Service) are charged with as a responsibility. Monitoring over time and is integral to the question whether changes to use, types of users or to monitor damage over time are appropriate and if the use is appropriate to the trail, conditions and the surround natural resources and land uses. Such measures have been proposed MANY times over the last 30 years but HAS NEVER BEEN IMPLEMENTED.
- e. A Trail Management Plan MUST be developed PRIOR to the ant trail's use being changed or a new trail opened. Further, the Trails Management Plan for each trail must have a standardized process for public review. For example there was an official Trail Management Plan public review period and meetings to vet the Baron Ranch Master Plan. For the Live Oak Trail changes, an incomplete Trail Management Plan from Parks staff was distributed with NO Public review or input.
- f. Recognize that adequate funding is a must before adding to or changing use on a trail. Funding is necessary to implement mitigation measures, provide staff to monitor, maintain, and provide patrol/rule enforcement prior to any burden is placed on the Park Division. There is woefully inadequate staffing to remove the payment envelopes at Live Oak Trail at present.
- g. Establish partnerships with non-profits on trails for maintenance, improvements, and patrol on specific trails. Create an adopt-a-trail program with local non-profits.
- h. In more rural areas - on agricultural land, where there are other land uses by right (such as grazing leases) – recognize invoking a multi-use trail concept is NOT appropriate as this action

would expand high speed trail uses (i.e. mountain and E-bikes) to stock and grazing land and adversely impact the agricultural business the land is providing.

- i. The policy will also consider urban and rural locations and take into account existing land uses (agricultural grazing) and impacts on natural resources (wildlife and their habitats). The true environmental damage with new human intrusion, promoting sports with speed, and the failed attempts of long-term trail maintenance with intense, repeated, aggressive user abuse has already had significant adverse impacts on our trails and is also inconsistent with the County's policies to protect agricultural lands.

Alternatively, in more urban areas, trail uses such as equestrian trails (think downtown Orcutt) may not be appropriate, but in the Santa Ynez Community Plan area, where horseback riding still occurs regularly, the use of road shoulders for equestrian riding is appropriate. Visit the local community and talk to non-profits (i.e. historical societies), sports clubs (i.e. equestrian riding) and local Cattlemen's/Cattlewomen's Organizations. Urban values may not be appropriate in all agricultural areas of the County. This is another reason a Stakeholders Trail Group would be beneficial.

- j. A blanket multi-use trail Policy has the potential to reduce the opportunity for environmental review (public comment) and eliminate critical mitigation requirements. Such oversight is significant and in conflict with the other Elements of the County's Comprehensive and Coastal Plans.