



C R A H T A C

County Riding and Hiking Trails Advisory Committee

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February 12, 2015

Ms. Janet Wolf, Chair
Santa Barbara County Board of Supervisors
105 East Anapamu Street
Santa Barbara, CA 93101

Re: Las Varas Ranch Development Project

Dear Chair Wolf and Board Members:

The Santa Barbara County Riding and Hiking Trails Advisory Committee (CRAHTAC) is a standing committee appointed by the Board of Supervisors to advise the County on matters related to the planning for and implementation of recreational trails. CRAHTAC is composed of three or four members from each supervisorial district and thus represents a broad range of citizen views on outdoor recreation from throughout the County.

CRAHTAC would like to express our deep concern over the direction of this project regarding trails, recreation and open space protection and the faulty analysis presented the staff report and Final Environmental Impact Report (FEIR). To that end, CRAHTAC requests that the Board of Supervisor support your Planning Commission's recommendation that:

- "The Board of Supervisors not certify the Environmental Impact Report (10EIR-00000-00005) and require additional environmental review in the areas of Aesthetics/Visual Resources, Agricultural Resources, Biological Resources, Cultural Resources, Land Use, Recreation, and Growth Inducement."

CRAHTAC also recommends that the Board find the project inconsistent with:

- Local Coastal Plan (LCP) Policy 7-25, County Parks Recreation and Trails Maps (PRT), the County's draft Gaviota Coast Plan and state policy regarding location of the California Coastal Trail "as close as physically and aesthetically feasible to the shoreline"; LCP Coastal Act Policy 30221 that requires protection of ocean-front land suitable for recreation and County LCP Policy 7-18 the recommends that Edwards Point should be acquired as a Major Coastal Park, and LCP Policy 7-18 which states that public access shall be provided at Edwards Point.

Discussion: We submitted detailed comments to the Planning Commission on the FEIR and staff reports that we request the Board consider also these comments (letter attached). In this new letter to the Board, we focus mainly on the project's major inconsistencies with County LCP and State Coastal Act recreation and trails policies.

CRAHTAC views the location of the California Coastal Trail (CCT) and coastal access on Las Varas Ranch as matters of countywide and statewide importance. The planned Gaviota reach of the CCT is perhaps the most scenic segment of the CCT in all of central and southern California and the Las Varas Ranch is the keystone segment of the Gaviota CCT. Edwards Point is the only Major Coastal Park planned by the County along the entire 40+ mile long Gaviota Coast Planning Area and one of the last such major parcels in the County's entire 200 mile-long Coastal Zone that is planned for public acquisition. CRAHTAC feels that the extraordinary recreational and open space resources present along the shoreline of Las Varas Ranch and at Edwards Point warrant strong action by the County to ensure consistency with adopted County's and State policy. To that end CRAHTAC notes:

State General Plan Law and the County's draft Gaviota Coast Plan (page 1-10) provide clear guidance on policy interpretation:

"Shall indicates an unequivocal directive"; "Should signifies a less rigid directive, to be honored in the absence of compelling or contravening considerations".

With regards to the Las Varas Ranch development project and provision of public access at Edwards Point, County LCP Policy 7-18 states (in part):

LCP Policy 7-18: "In order to maximize access to the beaches, vertical easements connecting the proposed coastal bicycle trail (linking Santa Barbara and Gaviota) to the beach **shall** be acquired by a public agency at the following locations: (3) Edwards (near Gato Canyon). The trails connecting the bicycle path to the beach shall be well-marked and bicycle racks shall be provided."

This "unequivocal directive" does not leave room for interpretations put forth in the EIR and staff report that access at Las Varas Creek satisfies this policy, regardless of the potential feasibility or desirability of that access. The proposed project is clearly inconsistent with the plain intent and letter of this policy. Regardless of the County's ability to potentially exact such a trail, Projects that are inconsistent with LCP policy cannot be approved. Further, as noted in previous communications, CRAHTAC is concerned that the County's planning process has failed to include sufficient initiative in exploring options to acquire access at this location to resolve this obvious policy conflict.

With regards to the location of the California Coastal Trail, the 2003 State Coastal Conservancy Guidelines for Designing the California Coastal Trail state that:

Objective 1: "Provide a continuous trail as close to the ocean as possible with connections to the shoreline..."

Definitions & Siting and Design Standards Goals and Objectives: "It is intended that the CCT system shall be designed and implemented to achieve the following goals and objectives:

a. Provide a continuous walking and hiking trail as close to the ocean as possible"

Siting and Design Standards: "The trail should be sited and designed to be located along or as close to the shoreline as physically and aesthetically feasible."

The Board of Supervisors effectively accepted these Guidelines in the draft Gaviota Coast Plan by identifying a nearshore location for the CCT across Las Varas Ranch as the preferred trail location and by endorsing policies that state the CCT shall be near the shoreline. Despite this clear Board direction, the staff report and EIR try to explain these clear directives away; however, the County's draft Gaviota Coastal Plan and the Coastal Conservancy Guidelines make this policy goal abundantly clear. The Coastal Conservancy Guidelines specifically state that where existing development or other major physical constraints preclude a nearshore location, then the trail can be sited in a more inland location. In this instance, there is no physical impediment (e.g., existing homes) and ample room for both two new homes at Edwards Point and the proposed Coastal Trail. Therefore, based on State and County's policy that require "should" policies to be honored in the absence of compelling or contravening considerations", the project is also inconsistent with

these state guideless and the County's PRT Maps as so recently interpreted by the Board as part of the draft Gaviota Coast Plan. CRAHTAC believes that the EIR and staff report do not adequately explore options to acquire a nearshore Coastal Trail location as required by State and County policy. CRAHTAC recommends that the Board find the project inconsistent with County LCP policy 7-25, County PRT Maps and State Coastal Conservancy Guidelines.

With regards the County's long planned acquisition of a Major Coastal Park at Edwards Point as set forth in the County's certified LCP:

LCP Policy 7-18: "Expanded opportunities for access and recreation shall be provided in the Gaviota coast planning area." " b. In order to increase opportunities for coastal dependent and related recreational uses, the following areas, which have recreational potential, should be acquired by a public agency: Edwards – Parking, restrooms, picnic tables, bike racks, store, low-intensity camping." We note that LCP table 3-5 also list Edwards Point as a priority acquisition area for a "Major Coastal Park"


Coastal Act Policy 30221: "Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area."

The lack of initiative and leadership on exploring options to acquire this key planned Major Coastal Park that is clearly "oceanfront land suitable for recreational use" as part of this development project and the draft Gaviota Coast Plan has been surprising. The acquisition of this long planned public park at Edwards Point is central to successful recreational and open space protection planning along the Gaviota Coast. We note that Edwards Point is one of only two properties countywide identified for public acquisition as a "Coastal Park" defined as a major destination for locals and visitors (refer to LCP Table 3-5). Approval of the project as recommended by staff will seriously undermine planning for and attainment of the 32 year old goal in the County's LCP for acquisition of Edwards Point. Construction of two mansions on top of the bluffs at Edwards Point will forever preclude this option. The County clearly has tested planning tools that have been successfully used at other locations which could facilitate this acquisition, yet the EIR and staff simply fail to fully explore or utilize such tools. Based on state and County's policy that require "should" policies to be honored in the absence of compelling or contravening considerations", the project is also inconsistent with Policy 7-18 regarding this key parkland acquisition. Further, it is also inconsistent with Coastal Act Policy 30221.

We thank the Board for considering our comments. Development of Las Varas Ranch, acquisition of Edwards Point and requiring a nearshore alignment of the California Coastal Trail are major planning issues for the Gaviota Coast. Failure to fully explore all reasonable options that can provide reasonable levels of development in exchange for these public benefits does a disservice to the applicant, the residents of the County and State and future generations. The project must not proceed further in the process until these issues have been addressed.

Thank you again for considering our input.

Sincerely,


Art Najera, Chair
CRAHTAC

cc. Glenn Russell, Director, Planning and Development Department