August 3, 2015

David Lackie
Long Range Planning Division
County of Santa Barbara
123 E. Anapamu Street
Santa Barbara, CA 93101

Re: APCD Comments on the Draft Environmental Impact Report for the Gaviota Coast Plan,

Dear Mr. Lackie:

The Santa Barbara County Air Pollution Control District (APCD) has reviewed the Draft Environmental Impact Report (EIR) for the Gaviota Coast Plan. The County of Santa Barbara proposes to update the Comprehensive Plan for the Plan Area to address development and land use, public services and facilities, and environmental resources and constraints. The proposed Plan provides protection for and enhancement of the natural resources of the Plan Area, supports agricultural viability, and increases public access throughout the Plan Area while preserving the rural character of Gaviota Coast. As such, proposed changes in land use designations are intended to reflect existing land uses patterns and prevent pockets of small rural residential development from spreading to adjacent agricultural lands. The proposed Plan would not alter the buildout potential in the Plan Area. There are currently 234 single-family residences and 17 agricultural employee housing units within the Plan Area. Plan buildout over the 20-year Plan horizon is estimated to result in development of 167 additional single-family residences and 9 additional agricultural employee housing units within the Plan Area.

The Gaviota Coast Plan area encompasses 158 square miles (101,199 acres) of unincorporated land within the County of Santa Barbara. The Plan area is bounded by Esch Canyon to the East, Jalama Canyon to the West, the crest of the Santa Ynez Mountains to the North, and the Pacific Ocean to the South.

APCD staff has the following comments on the Draft EIR:

1-1 Section 4.5 Air Quality, Page 4.5-1: This page contains a reference noted as "Lorio 2015". Note that the staff member's name is Paulo Lorio. Please correct the spelling of her name in all citations, including the reference listing in Section 8.0 on page 9-10.

1-2 Section 4.5 Air Quality, Page 4.5-22: This paragraph states that, “The 2013 CAP utilized SBCAG’s Regional Growth Forecast 2010-2040, to project population growth and associated air pollutant emissions for all of the Santa Barbara County incorporated and unincorporated areas.” Please note that population growth is not the only activity indicator factored to grow the inventory, other activity indicators include housing and employment.

The spelling of Lorio has been corrected in Sections 4.5 and 8.0.

It has been noted that other activity factors, including housing and employment, were used to project air pollutant emissions in the 2013 CAP.
3. Section 4.5 Air Quality, Page 4.5-25: The Total Emissions presented in Table 4.5-7 do not match the total emissions in the CalEEMod report. In order to calculate total emissions, emissions from the "area", "energy" and "mobility" categories shown in the CalEEMod report should be summed. It appears that Table 4.5-7 has excluded the "energy" emissions. Energy emissions should be included in the total operational emissions as this category of emissions is capturing onsite energy usage/combustion (e.g., natural gas water heaters).

4. Section 4.5 Air Quality, Page 4.5-26: Since the paragraph above Table 4.5-8 references ACPD's guidance for determining the significance of construction impacts (i.e., 25 tons of any pollutant, except carbon monoxide, in a 12-month period), it would be helpful if tons/year of construction emissions were shown as well as pounds/day. Please consider noting the tons/year of ROC, NOx, PM10, and PM2.5 generated as a result of the Plan in this table or a separate table.

5. Section 4.5 Air Quality, Page 4.5-27-28: The last paragraph on this page states that, "Although Highway 1 and 101 in Santa Barbara County do not meet the definition of a high traffic roadway, SBCAPCD considers the Handbook's siting recommendations as applicable to any freeway regardless of its traffic volume (Wilberton, 2015). Thus, SBCAPCD considers the Handbook's recommendations applicable to the siting of new sensitive uses within 500 feet of Highway 1 or 101 in the Plan Area." SBCAPCD does not consider CARB's guidance to apply to Highway 1. Highway 1 is a state route with low traffic volumes. Highway 101 however, is a U.S. highway on which high traffic volumes in excess of 100,000 vehicles per day are observed for certain postmiles in the County. Please correct this in the document. ACPD recommends the discussion be revised to state the following, "Per the guidance provided in the Land Use Handbook, siting recommendations are applicable to any freeway regardless of traffic volume; therefore the Handbook's siting recommendations are applicable to new sensitive uses within 500 feet of Highway 101 in the Plan Area."

6. Section 4.5 Air Quality, Page 4.5-28: The first full paragraph on this page states that, "However, the proposed Plan does not propose any new significant development potential that would cause high traffic volumes on the freeways. This logic does not address the impact being analyzed. The impact at issue is the impact of placing sensitive land uses in close proximity (500 feet) from a freeway (Highway 101). Therefore, it does not matter what amount of traffic the new residential land use will be generating, because it is the status of the existing environment that is the concern. Please revise the discussion to address the impact at hand. If the Plan does not propose to place residential development within 500 feet of Highway 101, this impact could be found to be less than significant.

7. Section 4.5 Air Quality, Page 4.5-28: The second and third paragraphs on this page refer to new sensitive land use as "receivers"; the correct term is "receptors." Please correct the text accordingly.

8. Section 4.5 Air Quality, Page 4.5-29: The last sentence of the first partial paragraph on this page states that, "Therefore, no CO hotspots are located in the Plan Area and impacts to localized air quality from CO emissions as a result of implementation of the proposed Plan would be less than significant." CO hotspots are not necessarily an existing impact; they may occur as a result of an

1-3 Table 4.5-7 has been revised to include energy emissions in the "Total Emissions" calculation.

1-4 Table 4.5-8 has been revised to include maximum daily emissions of PM2.5 and the average annual tons of ROC, NOx, PM10, and PM2.5 have been added to the table for discourse.

1-5 The EIR text has been revised per the recommendation in the comment.

1-6 The distance of buildings from a highway is the most readily identifiable and understandable approach for preventing the residual health risk from traffic pollution exposures for those living closest to the roadways, because as distance increases from the highway, pollution concentrations decrease (CARB 2005). The EIR has been clarified to note that the proposed Plan could result in the placement of a sensitive land use (i.e., new residences) within 500 feet of Highway 101. However, given the limited potential for residential buildout, such impacts would be less than significant. A recommended mitigation measure (MM AQ-1) that would add three new development standards to the Plan has been added to the EIR to address potential residential development within 500 feet of Highway 101, recommending that development standards addressing the issue be added to the proposed Plan.

1-7 Receivers have been changed to receptors on Page 4.5-28.

1-8 The first part of the sentence has been deleted.
GHG emissions associated with buildout of the Gaviota Coast Plan were estimated using the CalEEMod modeling software and the results are presented in Appendix F. However, the EIR prepared for the proposed Plan is a Program EIR which addresses anticipated development associated with buildout and implementation of the proposed Plan. Thus, the impacts associated with GHG emissions, as addressed under Impact AQ-5, are appropriately determined using an analysis of the proposed Plan for consistency with the County's recently adopted Energy and Climate Action Plan (ECAP).

As discussed in the EIR, in May 2015, the County of Santa Barbara adopted the ECAP and certified the accompanying EIR (SCH# 20144021021). The ECAP includes a GHG emissions forecast for unincorporated Santa Barbara County (including the Gaviota Coast Plan Area) to 2035 and otherwise meets the criteria in CEQA Guidelines Section 15183.5(b) for a "plan to reduce greenhouse gas emissions." The ECAP commits the County to reduce community-wide GHG emissions by 15 percent below 2007 levels by 2020 consistent with AB 32 and the related Climate Change Scoping Plan (CARB 2008). Much of the ECAP GHG emission reductions are achieved by implementing existing and new County programs, policies, and development standards ("emission reduction measures"). There are additional ECAP emission reduction measures applicable to individual development applications, which are addressed through the building permit review and approval phase. These include Energy Efficiency and Green Building Standards (BE 8), Efficient Building Design (BE 9), Construction Equipment Operations (BE 10), and Construction and Demolition Waste Recycling (WR 3). As future development under the Plan is proposed, it would need to comply with these measures.
1-11 The EIR text has been clarified.

1-12 This discussion is related to the emission disclosure included in Appendix F. However, as stated in the DEIR, calculating emissions for plan level development is speculative and not informative to decision makers and is therefore not used in the determination of significance. The referenced language has been removed and replaced with language indicating the EIR prepared for the proposed Plan addresses anticipated development associated with buildout and implementation of the proposed Plan. As stated in Section 4.5.3.1, “[t]he ECAP provides the most relevant guidance for assessing the impacts of the proposed Plan. For the purposes of this analysis, the proposed Plan was evaluated for its consistency with the ECAP and state plans, policies, and regulations adopted for the purposes of reducing GHG emissions.” Thus, the impacts associated with GHG emissions are appropriately determined using an analysis of the proposed Plan for consistency with the County’s ECAP. Please also see response to comment DEIR1-9.

1-13 As discussed in the DEIR and response to comment DEIR1-9, the ECAP addresses appropriate GHG emissions forecasts for unincorporated Santa Barbara County (including the Plan Area, where forecasted development and emissions for the Plan Area would be the same under the proposed Plan as for forecasted development and emissions under buildout of existing land use designations) and meets the criteria in CEQA Guidelines Section 15183.5(b). The ECAP commits the County to reduce GHG emissions by 15 percent below baseline levels by 2020 consistent with state’s Climate Change Scoping Plan. The ECAP GHG emission reductions are achieved by implementing emission reduction measures, which are defined in the ECAP as existing and new County programs, policies, as well as development standards. As identified in Section 4.5.3.1, the ECAP allows the County to determine whether a future project’s incremental contribution to climate change is significant or not, which is based upon compliance with requirements of the reduction plan in the ECAP. Thus, emission reduction measures applicable to individual development applications would be addressed through the building permit review and approval phase. See response to comment DEIR1-9 for a list of measures.
August 6, 2015

Mr. David Lackie
Planning and Development
County of Santa Barbara
123 East Anapamu Street
Santa Barbara, CA 93101

Dear Mr. Lackie:

SUBJECT: DEIR Gaviota Coast Plan, SCH #2014011027

The Santa Barbara County Fire Department is listed as a Class III impact to the current version of the plan. I have reviewed the above referenced project and have no comments on the project as presented at this time.

The Fire Department reserves the right as the project moves forward to address concerns in the future.

As always, if you have any questions or require further information, please call 681-5525 or 681-5523.

In the interest of life and fire safety,

Ray Navarro
Fire Marshal

RN: mkb

2A-1 This comment acknowledges review of the DEIR and does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR but reserves the right to make comments in the future. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.
September 3, 2015

To: Brian A. Tetley, Senior Planner
Santa Barbara County Long Range Planning
123 E Anapamu Street
Santa Barbara, CA 93101

Re: Gaviota Coast Plan Draft EIR; SCH #2014011027

The Santa Barbara County Fire Department has had the opportunity to review the Draft Environmental Impact Report for the Gaviota Coast Plan and offers the following:

Santa Barbara County Fire as an agent of Cal Fire agrees with the findings of the Gaviota Coast Plan DEIR that implementation of the Plan would have a less than significant impact on fire protection services. The Plan also provides for enhanced natural resource protection and open space preservation which supports Cal Fire’s mission to protect natural resources including watershed, forest, and range.

The Gaviota Coast has a history of large wildfire fires. The Plan focuses on maintaining and encouraging agriculture with minimal new residential development limits the exposure of people and infrastructure to the impacts of wildfire. The Plan supports the goals and objectives of the California 2010 Strategic Fire Plan and the Santa Barbara County Unit Strategic Fire Plan.

Thank you for allowing us to comment on the Gaviota Coast Plan DEIR.

Sincerely,

Rob Hazard
Fire Captain / Pre-Fire Engineer
Vegetation Management Section
Santa Barbara County Fire
805-896-6350
Rob.hazard@sbfire.com

Serving the cities of Buellton, Guadalupe, and Solvang, and the Communities of Cucamonga, Cayucos, Gaviota, Hope Ranch, Los Alamos, Los Olivos, Mission Canyon, Mission Hills, Orcutt, Santa Maria, Sisquoc, and Vandenberg Village
September 4, 2015

Brian Tetley
County of Santa Barbara
Planning and Development Department
123 E. Anapamu Street
Santa Barbara, CA 93101
gaviotacounplan@countyofsb.org

RE: Draft Environmental Impact Report for the Gaviota Coast Plan

Dear Mr. Tetley,

3-1 Commission staff has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Gaviota Coast Plan (GCP), dated June 2015, and appreciates this opportunity to provide comments. We have previously provided comments to the County related to the Gaviota Coast Plan (dated March 27, 2012, March 1, 2013, November 27, 2013, and February 24, 2014). Due to workload and staffing constraints, we were not able to conduct a comprehensive review of the DEIR and proposed plan as of the date of this letter. As such, the comments provided below are intended to provide broad and preliminary feedback on the DEIR for the proposed plan and issues related to the LCP amendment that will be required to effectuate the plan in the coastal zone. There are GCP issue areas that we were not able to address in this letter (such as Transportation and Circulation); however, we intend to provide more detailed comments at a later date through continued coordination with the County. We will, of course, carry out a more detailed review of the final proposed LCP amendment submittal for the GCP after it has been acted upon by the County and transmitted to us.

We appreciate the County undertaking this planning effort for the Gaviota Coast since it is a very special stretch of rural coastal land in California of local, state, and national importance. We also appreciate the County’s ongoing coordination regarding this important planning document among the various public agencies and interested parties.

3-2 Agricultural Resources

County LCP policies, as well as Coastal Act policies, incorporated into the County’s LCP, require protection and preservation of agricultural land. The DEIR acknowledges that there is the potential for new or expanded agricultural operations and accessory uses and rural recreational uses authorized under the proposed Gaviota Agricultural Tiered Permit Structure/Permit Streamlining to impact agricultural resources. In our previous GCP comment letter to the County, dated February 24, 2014, we identified issues regarding various agriculture-related proposals in the plan and their inconsistency with Coastal Act/Land Use Plan policies. We recognize and appreciate that Alternatives 1 and 2 incorporate policies and ordinance provisions intended to address those issues.

3-3 The DEIR indicates that the Santa Barbara County Environmental Thresholds Manual/Agricultural Resource Guidelines is used during environmental review of projects and establish agricultural viability thresholds to assess impacts. However, it is important to note that the County’s Environmental Thresholds Manual is not certified as part of the County’s LCP and is not a standard of review to

3-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. The local, state, and national importance of the planning of the Gaviota Coast is recognized and reflected in the public record and the ongoing collaboration with the public and local, state and federal agencies during development of the Plan. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

3-2 This comment acknowledges that the DEIR alternatives analysis incorporates policies and ordinance provisions intended to address February 24, 2014 California Coastal Commission staff comments on the Gaviota Coast Plan. The comment does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

3-3 See response to comment DEIR3-16 below regarding the County’s Environmental Thresholds and Guidelines Manual (ETM). As discussed in the EIR, the Weighted Point System is a preliminary screening step for analyzing the impacts of a project on agricultural resources. It considers the area of land that would be taken out of agricultural production, loss of prime soils, adjacent land uses, soil suitability (i.e., what crop types are suitable for the soil on site), water availability, existing and historic land use on the site, land use designation, agricultural preserve potential, and whether the site is part of a combined farming operation. Should this initial screening indicate that a potential impact might occur, further analysis is required. The fact that the ETM is used to assess environmental impacts in compliance with CEQA does not compel decision-makers to approve a project. For a project to be approved in the Coastal Zone, the decision-maker must find the project consistent with the, Comprehensive Plan, Coastal Land Use Plan (CLUP) and Coastal Act.
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RESPONSE

3-4 See response to comment DEIR3-2.

3-5 This comment notes that future programs and ordinances not included as part of the Gaviota Coast Plan would require an LCP amendment that is certified by the Coastal Commission before they can be implemented in the coastal zone. Future action items such as Actions LU-2 through LU-6 will require environmental review and Comprehensive Plan and CLUP policy consistency analysis when they are developed in the future.

3-6 This comment addresses the consistency of Plan action items LU-2 and LU-3 with the development restrictions on ESHA in the Coastal Act and its priorities, and recommends alternatives to these actions be evaluated in the EIR. The LCP Update Guide dated July 31, 2013 was consulted during the preparation of the Plan. Section 4 of this Update Guide discusses ESHA, including the definition of an Environmental Sensitive Area as defined by the Coastal Act Section 30107.5 as “any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.”

Any future ordinances developed under Actions LU-2 and LU-3 would be required to undergo LCP amendment review for consistency with the Coastal Act prior to certification by the California Coastal Commission and implementation by the County. Additionally, the specific provisions of future ordinances developed under Actions LU-2 and LU-3 are separate projects required to undergo additional environmental review for potential impacts requiring mitigation under CEQA.

Therefore, existing LCP amendment procedures and CEQA ensure that any future ordinances developed under actions LU-2 and LU-3 would be reviewed for consistency with the ESHA conversion policies and resource protection priorities of the Coastal Act and no additional review of alternative actions in the EIR are necessitated.

Land Use and Development

In our previous OCP comment letter to the County, dated February 24, 2014, we recommended that an alternative policy to proposed Policy LU-2 (Policy Implementation) be provided in the DEIR in order to address issues where exceptions may be necessary to avoid an unconstitutional taking of private property. A method for this review was identified as part of the Toro Canyon Plan and we recommended similar implementation in the OCP, specifically including a requirement for an Economically Viable Use Determination. We recognize and appreciate that Alternative 1 incorporates an alternative Policy LU-2 for the coastal zone that is intended to address this issue.

The OCP includes implementing actions that direct the County to develop programs and ordinances in the future, such as the Transfer of Development Rights Ordinance (Action LU-2), Rural Clustering Ordinance (Action LU-3), and Land Use Incentive Program (Actions LU-4 through LU-6), and the DEIR indicates that these future ordinances are tools to accomplish certain land use objectives. However, it is important to note that the effectiveness and the environmental impacts of those tools cannot be determined until they are developed, and once they are developed, they will require an LCP amendment that is certified by the Coastal Commission before they can be implemented in the coastal zone.

Further, Actions LU-2 and LU-3 in the OCP imply their intent to balance potential development rights with impacts to coastal resources. However, Section 30240 of the Coastal Act restricts development within ESHA (other than uses dependent upon such ESHA) and approving development would require a legal takings analysis for resolution. The listed “potential public objectives” does not reflect this provision and does not reflect the priorities and protections afforded to other coastal resources under the Coastal Act. Alternatives to Actions LU-2 and LU-3 should be evaluated in light of the Chapter 3 resource protection priorities of the Coastal Act. In addition, we recommend removal of the word “balance” from all proposed GCP policies. The word “balance” has a particular meaning within the Coastal Act and usually connotes that specific findings need to be made balancing the application of one Chapter 3 policy with another Chapter 3 policy where conflicts arise pursuant to Section 30007.5.

Public Access and Recreation

California Coastal Trail (CCT) Policy RFC-6 (Coastal Trail Siting and Design Considerations) and Policy REC-7 (California Coastal Trail) of the OCP do not appear to fully reflect the guidance provided in the joint letter to the County from the Coastal Commission and Coastal Conservancy regarding CCT siting in the Gaviota Coast Plan area, dated March 27, 2012. We recommend evaluation of an alternative
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<td>3-7 The word “balance” is used in the Coastal Act Section 30007.5 to direct that the resolution of conflicts between Coastal Act policies be resolved in a manner which “...on balance is the most protective of significant coastal resources. In this context, the Legislature declares that broader policies which, for example, serve to concentrate development in close proximity to urban and employment centers may be more protective, overall, than specific wildlife habitat and other similar resource policies.” The use of the word “balance” in 30007.5 is clear and does not change the meaning of the word in a manner precluding its use to communicate the intent of decision-makers in the proposed Plan policies. This comment is on the content of the proposed Plan and does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.</td>
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<td>3-8 This comment refers to a letter submitted regarding the draft Plan proposed for initiation, dated March 27, 2012. The Board of Supervisors considered the letter during its hearing regarding the Initiation Draft Plan in 2013. Policies REC-6 and REC-7 reflect guidance received from the March 27, 2012 letter. However, this comment is on the content of the proposed Plan (California Coastal Trail goals and objectives) and does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.</td>
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### LETTER

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The Coastal Commission's preference for a bluff-top alignment for the California Coastal Trail is noted. The comment addresses the merits of the Plan (appropriateness of trail locations) and does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

### RESPONSE

| 3-9 | The closed section of the California Coastal Trail is located on California State Parks land between El Capitan and Refugio State Parks. California State Parks has not had the funding available to repair or reroute this trail. Section 4.13.3.2 of the DEIR states that planning for trails within PRT map Segment 3a would take the following into consideration: |
| 3-10 | 2. The County shall work with State Parks to prioritize development of a feasible, long-term solution to repair and then maintain the erosion-damaged Refugio State Beach to El Capitan State Beach bike path. Because this trail segment is on State Parks' property, State Parks would need to take the lead on this effort. |
| 3-11 | Many of the proposed beach access points are adopted on the existing County PRT map. The vertical access locations depicted on the PRT maps are not intended to depict precise coastal access points. Each mapped beach access point represents a general location where a coastal access point is proposed, which allows flexibility to plan and implement coastal access locations considering a variety of issues, and take advantage of opportunities as they arise. West of Arroyo Hondo to Gaviota State Park, with the exception of the Gaviota Marine Terminal, all land is owned by California State Parks and vertical easements would not be required. In the eastern Plan Area, Coastal Trail segments 1 and 2 include proposed trails that would provide vertical trail access to proposed coastal access points. The precise alignment of vertical connectors is a project-level action that would be subject to review for consistency with the LCP and CEQA, as is any crossing of the UPRR. Action REC-X, Railroad Crossings, is proposed under Alternative 2. If it was incorporated into the Plan, it would be a future action item. The comment addresses a preference for the proposed Action under Alternative 2 and does not identify a specific inadequacy in the |
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3-12 Alternative 2: Alternative 2 of the DEIR includes increased provisions for the protection and enhancement of public access in the plan area, including provisions that encourage multi-modal transportation and circulation planning, encourage acquisition of public bluff-top open space and planning for the expansion of the Coastal Trail and expanding visitor serving campground uses; maintain existing public coastal access, both public and private, as an integral part of the County’s overall access program; and require easement dedications for development projects proposed on lands that include a County maintained trail or route. We recognize and appreciate the incorporation of the additional public access and recreation policies included in Alternative 2 to enhance the plan’s consistency with public access, recreation, and Coastal Trail policies of the Coastal Act and Land Use Plan.

3-13 Trails identified as primary and secondary routes may occur in the Coastal Zone or Inland Area. The PRT map depicts the Coastal Zone boundary, which provides the necessary distinction between coastal and inland trails.

3-14 Coastal Hazards

Flood Control. We recommend evaluation of an alternative to incorporate policies into the OCP regarding alteration of streams for flood control purposes that requires that the alteration of streams be allowed only where all other feasible options have been exhausted pursuant to Coastal Act Section 30236. Section 30236 prohibits channelizations or other substantial alterations of streams and existing/dredging projects, except for: 1) necessary water supply projects where no feasible alternative exists; 2) flood protection for existing development where there is no other feasible alternative; or 3) the improvement of fish and wildlife habitat. Any channelization or stream alteration permitted for one of these three purposes shall minimize impacts to coastal resources, including the depletion of groundwaters, and shall include maximum feasible mitigation measures to mitigate unavoidable impacts. Less intrusive measures (e.g., biostructures, vegetation, and soil bioengineering) shall be preferred for flood protection over “hard” solutions such as concrete or riprap channels. Solutions that address existing flood hazards shall be the least environmentally damaging alternative consistent with all applicable policies of the LCP and shall consider routine maintenance or other less intrusive solutions as a first priority over engineering structural solutions. Flood control measures shall not diminish or change stream capacity, percolation rates or habitat values. “Hardbank” measures (e.g., use of concrete, riprap, gabion baskets) or channel redirection may be permitted only if all less intrusive flood control efforts have been considered and have been found to be technically infeasible. Less intrusive measures include, but are not limited to biostructures, vegetation, and soil bioengineering. Where hardbank channelization is required, the material and design used shall be the least environmentally damaging alternative and site restoration and mitigation on or adjacent to the stream channel shall be required, subject to a Restoration Plan. Further, dredging, filling, and grading of a stream and/or other channel improvements should only occur under very limited circumstances and the DEIR should describe and analyze such circumstances.

3-15 Biological Resources

ESHA Determination. For Policy NS-4, we recommend that the existing policies in the certified LCP defining ESHA including Coastal Act Section 30107.5, should be reviewed and updated for incorporation into the OCP. In addition, the OCP should include an updated ESHA overlay map for the

RESPONSE

3-11 (cont.)

analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

3-12 This comment states appreciation for the incorporation of additional public access and recreation policies in Alternative 2 to enhance the plan’s consistency with public access, recreation, and Coastal Trail policies of the Coastal Act and Land Use Plan. This comment does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

3-13 Trails identified as primary and secondary routes may occur in the Coastal Zone or Inland Area. The PRT map depicts the Coastal Zone boundary, which provides the necessary distinction between coastal and inland trails.

3-14 This comment is on the content of the proposed Plan, expressing a preference for alternative policies addressing stream alteration for flood control, and does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

The proposed Plan does not include specific policies addressing flood control along streams. With the exception of a few small areas located at the mouths of only a few creeks, there are no mapped flood hazard areas in the Plan Area (mapped flood hazards follow FEMA mapping of the 100-year floodplain). The policies of the CLUP are adequate to address any potential flood control projects that might be proposed in the future. CLUP Policies 9-38, 9-39, 9-40, and 9-43 provide specific limitations on development in streams, including flood control activities and development, consistent with Coastal Act Section 30236. These policies would still apply pursuant to CLUP Policy 1-2 and MM BIO-1, which would revise Plan Policy LU-1 to incorporate CLUP policy direction that the policies or provisions most protective of coastal resources take precedence. Flood control projects would be reviewed for consistency
3-14 (cont.)

with these policies on a project-specific basis. Additionally, flood control activities require a Coastal Development Permit; to approve a permit, findings of consistency with all applicable policies must be made.

EIR Table 4.6-5 has been revised to include the text of Coastal Act Section 30236. This section is already incorporated into the County’s certified LCP.

3-15

The comment addresses the merits of the Plan and does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

Proposed Plan Policy NS-4 is consistent with existing policies of the certified LCP defining ESHA and incorporates the criteria for determining which habitats warrant the ESHA designation as provided in the certified CLUP (Section 3.9.4). Policy NS-4 is also consistent with Section 30107.5 of the Coastal Act, which states:

"Environmentally sensitive area" means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.

Section 35-97.3 of the certified Article II Coastal Zoning Ordinance already states that the provisions of the ESH Overlay shall apply to any areas not mapped as ESHA, but found to be ESHA during the application review process. This provision is also proposed for the new ESH-GAV Overlay for the Inland Area.

When it can be documented, it is standard County practice that any ESHA mapped, or otherwise identified through historic evidence, shall not be deprived of protection as ESHA, as required by the policies and provisions of the LCP, on the basis that habitat has been illegally removed or degraded, etc. The County considers these circumstances to be a violation of the zoning ordinance, whether documented following a reported zoning violation or when reviewing a development permit application.
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plan area to generally depict the locations of known habitat areas. Policy should be added to the GCP that states that any areas not mapped as ESHA, but found to be ESHA during the application review process, shall be afforded all the protection provided for ESHA in the applicable zoning ordinances and LCP. In addition, any ESHA area mapped, or otherwise identified through historic evidence, shall not be deprived of protection as ESHA, as required by the policies and provisions of the LCP, on the basis that habitat has been illegally removed, degraded, or species that are rare or especially valuable because of their nature or role in an ecosystem have been eliminated.

3-16 Further, proposed development standards NS-3 and NS-4 (included in the DEIR as mitigation measures BIO-2 and BIO-3) are problematic because they require sensitive vegetation plant surveys prior to grading or vegetation removal for a development, and not as part of a permit application for a proposed development. If these surveys are not provided prior to County action on a development proposal, the environmental impacts of the proposal cannot be analyzed and the appropriate regulations cannot be applied consistent with the County’s LCP. Proposed development standards NS-3 and NS-4 (included in the DEIR as mitigation measures BIO-2 and BIO-3) are also problematic because they state that the required surveys shall be conducted in accordance with the County’s Environmental Thresholds and Guidelines Manual. However, the County’s Environmental Thresholds Manual is not certified as part of the County’s LCP and should not be referenced as applying in the coastal zone unless incorporated into the LCP pursuant to an LCP amendment.

3-17 Wetland Protection Policy NS-5 (Wetlands) provides very limited policy guidance for development located near wetland resources. Policy NS-5 states: “The County shall seek opportunities and create incentives for restoration of degraded wetlands.” The County should evaluate an alternative policy to include the basic definition of a wetland, consistent with Section 30121 of the Coastal Act and Section 13577(b) of the California Code of Regulations, the basics of wetland definitions required for making wetland boundary determinations, as well as the minimum wetland buffer standards that are currently certified as part of the County’s LCP. Further, proposed development standard NS-5 (included in the DEIR as mitigation measure BIO-4) is problematic because it does not include enough specificity regarding what constitutes a wetland in the coastal zone, and then details mitigation requirements for wetland impacts without including the specific limitations for wetland impacts that are contained in Section 30253 of the Coastal Act and in the County’s LCP.

3-18 Habitat Buffers. The proposed policies in the GCP reduce existing habitat buffer standards that are required by the certified LCP (e.g., Policy 9-9 and 9-37). To address this issue, the DEIR states that Policy NS-12 has been added to the GCP, which states that, within the coastal zone, if any policy or provision of the GCP conflicts with any policy or provision of the certified LCP, the policy or provision that is most protective of coastal resources shall take precedence. We do not believe this policy will be sufficient to address the issue because in order for the GCP to be implemented in the coastal zone it would need to become part of the LCP pursuant to an LCP amendment and the conflict would become within the LCP itself. For clarity of the public, stakeholders, and decision-makers, we recommend that habitat buffer policies of the GCP be amended to specify the requirement that applies in the coastal zone and the requirement that applies in the inland area. Within the coastal zone, ESHA buffers should generally meet or exceed 100 ft. from the outer edge of an ESHA. A reduction in the minimum buffers from ESHA should generally not be granted because buffers are necessary for the long-term protection of ESHA and the “minimum” setbacks must be assured for implementable design of the LCP.

3-19 Riparian Vegetation Clearing. Policy NS-7 states: “Riparian vegetation shall be protected to the maximum extent feasible. Riparian vegetation shall not be removed except where clearing is necessary

RESPONSE

3-15 (cont.)

Section 4.6 of the EIR determined that impacts to biological resources would be significant and unavoidable. However, the EIR identifies four mitigation measures that provide additional provisions to assess and further reduce potential impacts to biological resources.

3-16 Development Standards NS-3 and NS-4 (Mitigation Measures BIO-2 and BIO-3) have been revised to clarify that the timing of compliance would occur prior to approval of a permit application on a development proposal, rather than prior to grading.

The County acknowledges the Coastal Commission’s concern regarding references to documents that are not part of the certified LCP, such as the County’s ETM. Although not certified as an implementing document of the LCP, the ETM was adopted to assist in the County’s compliance with CEQA. The ETM is not intended to implement the LCP, but to implement CEQA. The ETM provides standardized methodologies for assessing environmental impacts for a wide range of environmental issues, and is therefore, a useful tool for County staff and the public. The methods identified and used to assess environmental impacts provide guidance for the assessment of environmental impacts. They do not change or supersede policies of the Coastal Act or the CLUP. Regardless of the outcome of environmental review, the fact that the ETM is used to assess environmental impacts in compliance with CEQA does not compel decision-makers to approve a project. For a project to be approved in the Coastal Zone, the decision-maker must find the project consistent with the Comprehensive Plan, CLUP and Coastal Act.

3-17 Policy NS-5 is not intended to provide policy guidance for development located near wetlands, nor does it regulate the restoration of wetlands that may be impacted as part of a development project. Policy NS-5 expresses a desire to seek opportunities and create incentives to restore degraded wetlands. MM BIO-1.1 of the EIR proposes to revise Development Standard NS-2 to incorporate the minimum 100-foot buffer from wetlands, consistent with CLUP Policy 9-9. However, policy guidance for development located near wetlands is addressed by the County’s certified LCP, including CLUP policies and the existing ESH Overlay provisions of the Article II Coastal Zoning Ordinance. These policies and provisions would continue to apply within the Coastal Zone of Gaviota Coast Plan Area.
3-17 (cont.)

Proposed Development Standard NS-5 (pursuant to EIR MM BIO-4) does not include a definition of wetland for the Coastal Zone because the definition is already provided in CLUP Policy 9-9. Development Standard NS-5 also requires a formal wetlands delineation, pursuant to the US Army Corps of Engineers Wetlands Delineation Manual; the manual provides a widely accepted standardized method for delineating wetlands in the field. In addition, the development standard requires restoration. Coastal Act Section 30233 provides detailed direction and limitations addressing ports, energy and coastal-dependent industry, commercial fishing facilities, navigational channels, vessel berthing and mooring areas, boating facilities, among others. These uses are not proposed in the Plan and most are unlikely given the geography of the coast and the primarily agriculture and recreation uses in the Plan Area. Thus, the specific limitations of Section 30233 are not included. However, in the event any of these uses are proposed in the future, such a project must still comply with Section 30233 and CLUP policies protecting wetlands.

3-18 MM BIO-1 has been revised. First, proposed Policy NS-12 has been replaced by revised Policy LU-1 to incorporate language clarifying that the policies and provisions most protective of coastal resources shall take precedence. Second, MM BIO-1.1 revises Development Standard NS-2 to provide more specificity in the Coastal Zone. For the Coastal Zone Dev Std NS-2 incorporates the minimum buffers for wetlands and butterfly trees, consistent with CLUP Policies 9-9 and 9-23, respectively. No adjustment downward would be allowed. The buffer for streams is proposed to remain the same, at 100 feet. Allowance for an adjustment of only the stream buffer, upward or downward, would be allowed consistent CLUP Policy 9-37 and pursuant to the same and enhanced criteria. All other buffers would be determined case-by-case.

3-19 The comment addresses the merits of the Plan and does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

See response to comment DEIR3-14 regarding flood control. Proposed Plan Policy NS-7 has been revised to add clarity that the activities described in the policy shall be conducted in compliance with ESHA
and resource protection policies. As clarified by MM BIO-1, revised Policy LU-1 states that the policy that is most protective of coastal resources takes precedence.

3-20 In assessing the impacts of the proposed Plan on biological resources, including ESHA, the EIR considers the impacts of fuel/vegetation management (modification), which is typically within 100 feet of structures. Section 4.6.3.2 and Section 4.9.2.3 have been revised to provide additional information regarding fuel management (modification) and ESHA. Recommended mitigation MM SERV-1, which would require new development to be sited to minimize exposure to fire hazards and reduce the need for fuel modification and clearance of native vegetation, is proposed to reduce impacts to both wildland fire hazards and biological resources.

For the maintenance of existing roads and/or free flowing channel conditions, the removal of invasive exotic species, stream/creek restoration, or the provision of essential public services.” This policy was adapted from the Goleta Community Plan and incorporates exceptions to allow “clearing” of riparian ESHA for flood control/channel maintenance projects, allows removal of riparian vegetation when associated with the removal of invasive exotic species, allows removal for “essential public services,” and allows impacts or removal of riparian ESHA to allow for a “reasonable use of a parcel.” We recommend that the County evaluate alternatives to this policy language, as follows:

• Channel Maintenance/Flood Control. We recommend that the policy incorporate the protection of riparian and other ESHA resources and require mitigation and restoration where impacts are unavoidable from maintenance activities or other “essential public services.” “Essential public services” should be listed and defined.” The specific alternative policy language we recommend for flood control is identified above.

• Invasive Species Removal. Policy NS-7 allows riparian vegetation to be removed where clearing is necessary for the removal of invasive exotic species. The County should evaluate an alternative to include specific policy guidance to ensure that riparian ESHA is protected during invasive species removal or creek restoration efforts to the maximum extent feasible.

• The County should evaluate alternative policy language to clarify that where riparian vegetation constitutes ESHA, Policy NS-2 shall apply.

3-20 Fuel Modification in or Adjacent to ESHA. The County should evaluate an alternative to include a policy for setbacks to protect ESHA and ESHA buffers from the impacts of fuel modification. Policies should differentiate between new development in contrast with existing legal development. Vegetation fuel management implemented in association with existing development should be permitted where, subject to a coastal development permit, findings are made that fuel modification in ESHA or ESHA buffer is minimized to the maximum extent feasible. We recommend in such cases that the coastal development permit be required to include a Fuel Management Plan approved by Planning and Development (P&D) and the local fire protection agency. P&D may require that the Fuel Management Plan be prepared by a qualified biologist to ensure vegetation clearance/trimming minimizes the impacts to ESHA. Due to the clear protection afforded to ESHA under the Coastal Act, new development, including development requiring vegetation fuel management within ESHA areas, can only be permitted where it is found that, subject to a formal Economically Viable Use Determination, the application of these provisions would constitute a taking of private property and where such new development will be designed and located in a manner to minimize adverse impacts to ESHA to the maximum extent feasible. In either such case, findings must be made that, pursuant to a coastal development permit, the proposed development has been designed and located in a manner that minimizes fuel modification impacts to ESHA to the maximum extent feasible, including a finding that the fuel modification is the minimum amount necessary to protect the structure(s). Additionally, the approving body must find that all feasible measures including reduction in scale of development, use of alternative materials, and siting have been implemented to minimize encroachment into ESHA and ESHA buffer. In these cases, the coastal development permit must include a Fuel Management Plan approved by Planning and Development and the local fire protection agency. P&D may require that the Fuel Management Plan be prepared by a qualified biologist to ensure vegetation clearance/trimming minimizes the impacts to ESHA.
The County is aware that a LCP Amendment must be certified by the Coastal Commission before the Gaviota Coast Plan would take effect in the Coastal Zone.

See response to comment DEIR3-16 regarding reference to the County’s ETM. Policies and development standards that reference non-LCP documents are few and include the following:

- Development Standard AG-2 directs recordation of a Notice to Property Owner consistent with the County’s Right to Farm Ordinance. The Right to Farm Ordinance does not regulate agriculture or development. It simply allows for a notice to be provided to property owners adjacent to agriculture that there may be certain nuisances and inconveniences associated with normal agricultural operation and that these are allowed.
- The County Fire Department has Private Road and Driveway Standards. New development must comply with these for safety and to allow access to a site by firefighting apparatus. Development Standard TEI-1 requires new road and driveways to residential development meet these standards for safety. Action TEI-5 refers to these standards in context with proposing methods to site development in ways to reduce impacts that might result from compliance with these standards.

Considering the context in which these non-LCP documents are referenced and utilized, incorporation of them into the proposed Plan is unnecessary.

The comment does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.
3-22 The EIR has been clarified regarding certain land use ordinances and their applicability in the Coastal Zone. However, other ordinances referenced in the EIR are implemented by other County agencies (and adopted by the Board of Supervisors) to comply with other state or federal regulations. For example, the Flood Control District implements the Floodplain Management Ordinance. These ordinances are discussed in the EIR to provide a complete discussion of the existing regulatory setting, which is broader than the LCP, which regulates land use in the Coastal Zone.

3-23 This comment provides a concluding statement and does not identify a specific inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.
LETTER

September 4, 2015

County of Santa Barbara
Planning and Development Department
123 East Anapamu Street
Santa Barbara, California 93101
Attn: David Lackie, Long Range Planning Division
Re: Draft Gaviota Coast Plan Environmental Impact Report

Dear Mr. Lackie:

The State Coastal Conservancy wishes to provide general comments on the Gaviota Coast Plan (GCP) and associated Draft Environmental Impact Report (DEIR) dated June 15, 2015. Our comments relate primarily to sections of the GCP and DEIR regarding future planning and implementation of the California Coastal Trail (CCT). In 2001, the Conservancy and the Coastal Commission were jointly tasked per SB 908 with the mission of completing the CCT through a variety of means. Toward this end, we have promoted planning and construction of the trail in cooperation with other state agencies, such as the California Department of Parks and Recreation and Caltrans, as well through collaborations with regional and local governments particularly as those efforts relate to Local Coastal Programs (LCPs). We commend Santa Barbara County in its efforts to Plan for the future completion of the CCT and expand related public access and recreational opportunities, along the beautiful coastline which is so vital to local tourism economy and the quality of life that County citizens enjoy.

In 2003, we prepared the report Completing the California Coastal Trail pursuant to SB 908. This report emphasizes the economic, public health and environmental benefits of a coastal trail system. It goes on to state that the vision for the CCT is a continuous interconnected public trail system along the State’s shoreline that is designed to foster appreciation and stewardship of the scenic and natural resources of the coast. Moreover, the CCT serves to implement aspects of Coastal Act policies that promote non-motorized transportation. While primarily designed for pedestrians, the CCT accommodates a variety of additional user groups, such as bicyclists, wheelchair users, equestrians, and others as opportunities allow; accordingly, the CCT often consists of one or more parallel alignments.

As described in our March 27, 2012 joint letter with the Coastal Commission, the CCT system is intended to be designed and implemented in a manner that achieves the following goals and objectives:

RESPONSE

4-1 Thank you for your support of the completion of the California Coastal Trail through the Gaviota Coast Plan Area and sharing the goals and objectives of the California State Coastal Conservancy. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
• Provide a continuous walking and hiking trail as close to the ocean as possible;
• Provide maximum access for a variety of non-motorized uses by utilizing parallel trail segments where feasible;
• Maximize connections to existing and proposed local trail systems;
• Ensure that the trail has connections to trailheads, parking areas, transit stops, inland trail segments, etc. at reasonable intervals;
• Maximize ocean views and scenic coastal vistas; and,
• Provide an educational experience where feasible through interpretive programs, kiosks, and other facilities.

With these goals and objectives in mind we offer the following comments on the GCP DEIR:

4-2 1) Policy REC-6 (Coastal Trail Siting and Design Considerations) and Policy REC-7 (California Coastal Trail) of the GCP do not appear to fully reflect the guidance provided in the above mentioned letter. We recommend evaluation of an alternative to update the FCT section to reflect that the CCT system be designed and implemented in a manner that achieves the above goals and objectives.

We believe that the appropriate location for the CCT along the Gaviota coast is as close to the shoreline as possible, sparing the existing trail segments to each other and anticipating the adaptive relocation of certain segments as conditions change and opportunities arise in the future. Evaluation of an alternative in which the CCT primary alignment for each map section is situated as close to the bluff as reasonably possible, taking into consideration bluff retreat rates and safety considerations. We recognize that there are topographical, sensitive resource management and private property issues that may require a more inland location for the trail at certain points, at least for the interim; however, maintaining a long-term coastal orientation of the trail is critical. Locating a portion of the CCT as far inland as the northern Highway 101 corridor, such as along Calle Real, should only be considered when it is a strand that is determined to be the most appropriate thoroughfare bicycle route or when such a location is the only possible interim connection for bridging gaps between trail segments.

Examples of where the CCT should be relocated closer to the shoreline, include:

• El Capitan: the current trail alignment at the eastern end is inland of Highway One.
  * While this is the only location that is currently feasible, the GCP should also allow for a future alignment seaward of the Highway, should conditions change in the future.
• Gaviota Marine Terminal: the trail alignment should be relocated from adjacent to Highway 101 to a more seaward location, such as the alignment depicted by California State Parks in 2007 linking the State park with the Marine Terminal. We recognize that conditions may have changed since then, thus new information may guide the final trail location.

4-3 2) The State Park trail between El Capitan and Refugio State Beaches shown on Figure 4.13-3 identifies the long term break in the trail. The GCP should include a policy to prioritize repair of this break so that the CCT segment is repaired.

4-4 3) Beach Access: The GCP identifies future beach access points; however, the trail network does not include a vertical trail to connect from the lateral trail to those beach access points. Therefore, the trail plan should include the necessary vertical connectors. Alternative 2 of the DEIR includes Action REC-X.

4-2  See responses to comments DEIR3-8 and DEIR3-9.

4-3  See response to comment DEIR3-10.

4-4  See response to comment DEIR3-11.
LETTER

(Railroad Crossings) which will provide a mechanism for the County to provide for any trails which may cross the railroad.

4-5 4) Alternative 2: This alternative of the DEIR includes increased provisions for the protection and enhancement of public access in the plan area, including provisions that encourage multi-modal transportation and circulation planning, encourage acquisition of public bluff-top open space and planning for the expansion of the Coastal Trail and expanding visitor serving campground use, maintain existing public coastal access, both public and private, as an integral part of the County's overall access program; and require easement dedications for development projects proposed on lands that include a County maintained trail or route. We recognize and appreciate the incorporation of the additional public access and recreation policies included in Alternative 2 to enhance the plan's consistency with public access, recreation, and Coastal Trail policies of the Coastal Act and Land Use Plan.

4-6 5) Recreation Impacts: The draft EIR needs to more adequately address impacts to or loss of existing informal coastal access, the location of the CCT and acquisition of bluff-top public open space, which have been key issues of public concern for the draft GCP, and other recent development project proposals in the area. Aside from an analysis of increased demand from future plan area residents, the Recreation section does not analyze potential impacts to existing or planned public recreation or the draft Plan's major inconsistencies with recreational policies. The EIR should be revised to address the following issues:

a) Impacts to existing informal access: The EIR must address potential loss of existing informal coastal access trails and parking under the land use designations and policies of the draft Plan. Residential development permitted under the draft Plan has a reasonably foreseeable potential to result in closing existing informal public access points. The draft Plan should include sufficient policies, mechanisms (e.g., incentives) and programs sufficient to acquire or protect such access. Loss of such coastal access in a major issue of public concern and should be addressed, particularly given its importance in the County's Local Coastal Plan (LCP). The EIR should identify mitigation measures such as stronger policies and incentives that can actually mitigate such impacts.

b) Impacts to planned recreational facilities: The proposed Plan identifies a shoreline Coastal Trail as a priority yet contains insufficient policies requiring dedication of such lands or strong incentives to facilitate acquisition of planned park sites. The draft Plan should include policies and mechanisms to guarantee acquisition of key planned public improvements and a mix of stronger policies and mechanisms such as incentives identified to mitigate such impacts is needed.

c) Address national and statewide recreational needs: Gaviota is one of the last remaining undeveloped stretches of coastline in Southern California and has rightfully been identified as a recreational resource of national and statewide importance. Yet, the EIR fails to discuss this issue at all, instead providing a brief discussion of local recreational needs. While such needs are important, Gaviota is much more than a local community and deserves attention to statewide and national needs. Given major overcrowding of coastal state parks and demand for public coastal open space, the draft Plan should identify new campgrounds in places such as the Gaviota Marine Terminal and effective mechanisms to

RESPONSE

4-5 See response to comment DEIR3-12.

4-6 The Gaviota Coast Plan Program EIR adequately assesses potential impacts to recreation at the program level (see response to comment DEIR4-9).

Regarding the comment about impacts to existing informal access, future development projects must be found consistent with the County's LCP, and with the Gaviota Coast Plan once adopted by the Board of Supervisors and certified by the Coastal Commission. Consistency review includes assessing opportunities for providing vertical and lateral access to and along the coast while considering locations of adopted, proposed trail corridors, environmentally sensitive habitats, cultural resources, and nexus for easement dedication. The existing adopted LCP already includes policies and proposed trail corridors. The Gaviota Coast Plan would expand and enhance these policies and trail corridors, including, for example, Policy REC-19, which expands CLUP Policy 7-18, along with additional policies and actions that would increase opportunities for acquiring trails, new Coastal Trail Alignment General Principles in the Plan, new Trail Siting Guidelines, and three additional proposed beach access points.

Although it is possible that a future development project has the potential to lead to closure of an informal beach access point, it is speculative that implementation of the Gaviota Coast Plan would result in closure of informal access. An analysis of potential impacts of a closure in a Program EIR would be speculative for several reasons. First, it would depend upon the project- and site-specific details of any given proposal. Second, all opportunities for retaining an informal access point and acquiring it as a formal, dedicated access easement would be assessed during individual project review, as required by the existing LCP and the proposed Gaviota Coast Plan. Third, the timing and location of any future development application submittal is uncertain; whether an informal access point could be formally dedicated and developed depends on several factors including those listed above. Finally, the Gaviota Coast Plan includes new and enhanced policies and actions, including development incentives, to encourage dedication of easements and increase opportunities for easement acquisition.
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<th>LETTER</th>
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<td>4-7</td>
<td>There are no currently planned recreational facilities in the Plan Area except for the Baron Ranch Trail extension through federal lands of the Los Padres National Forest, which is currently under construction. The Coastal Trail is not considered a “planned recreational facility” because easements have not been acquired. In addition to the proposed policies and actions of the Plan, which would mitigate potential impacts associated with Plan buildout, Alternative 2 provides additional and revised recreation policies intended to increase opportunities for coastal land conservation and acquisition, coastal trail easement acquisition, and open space protection, among others. Alternative 3 includes additional landowner incentives for trail easement dedication along the Coastal Trail Primary route alignment. These alternatives will be presented to the County Planning Commission and Board of Supervisors for their consideration. The decision-makers are not bound to select either the proposed project or a given alternative in its entirety, and may choose to modify the proposed project and incorporate facets of one or more alternatives in their final decision.</td>
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<td>4-8</td>
<td>The comment addresses the merits of proposed Plan policies and does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.</td>
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See response to comment DEIR3-1 regarding the importance of the Gaviota Coast on a local, statewide, and national basis. In addition, Section 6.1.1, National Park Alternative, discusses the extensive national and local public process that was undertaken in consideration of the creation of a National Park along the Gaviota Coast. This land use and planning alternative was studied and ultimately abandoned by the U.S. National Park Service. California State Parks undergoes a separate planning process for the land under its ownership along the Gaviota Coast that addresses campgrounds.

Page 4-26 of the Plan states that re-use plans for the Gaviota Marine Terminal property, the PXP property, and adjoining State Parks lands should be prepared and that future use of these properties should be planned cohesively with respect to recreation, trails, and coastal access.
The program level of analysis is appropriate as are the conclusions that there are potentially significant and unavoidable impacts associated with the construction of trails within the Plan Area. The Program EIR considers the whole of the project in its analysis of potential environmental effects.

As discussed in Section 1.5 of the EIR, the Gaviota Coast Plan EIR is a Program EIR prepared in accordance with CEQA Guidelines Section 15168, and presents a program level analysis of the potential impacts of buildout and implementation of the proposed Gaviota Coast Plan. The intent of this Program EIR is to consider impacts from cumulative development under the proposed Plan, and to allow the lead agency to consider program-wide mitigation measures and policy alternatives. This EIR does not intend to describe impacts that may be generated by every future project under the proposed Plan. Further environmental review and detailed analysis may be required for subsequent development projects. The need and scope for such environmental review would be determined on a case-by-case basis and in accordance with the permit process.

As a Program EIR, the level of detail included in the project description and the methodology for impact analysis is general, as individual development project details are not available or would be considered too speculative for analysis. Methodologies utilized for environmental analysis represent either anticipated cumulative development under the proposed Plan, or a reasonable worst-case scenario for a particular resource area. The methodologies utilized under the EIR are in accordance with CEQA Guidelines Section 15144, which states, "While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can." For example, this EIR analyzed available data including permit history data and development trends, and developed reasonable assumptions resulting in the 20-year buildout scenario. While other outcomes under the proposed Plan are entirely possible, the assumptions used in this EIR represent a reasonable expectation of buildout under the proposed Plan over the next 20 years, using the County’s best efforts and disclosing what can be reasonably determined from available data.

Alternatively, where assumptions regarding potential future development under other aspects of the proposed Plan cannot be easily foreseen, such as the number of landowners who would take advantage of new uses allowed under the proposed Gaviota Agriculture
Tiered Permit Structure, or the precise location, opportunities, or timing of trail easement acquisition and development, this EIR assumes a worst-case scenario to analyze impacts for particular resource areas.

As a Program EIR, the preparation of this document does not relieve future development projects under the proposed Plan from compliance with the requirements of CEQA, as summarized in Section 1.5. Individual projects may require a more precise, project-level analysis to fulfill CEQA requirements. The lead agency responsible for reviewing these projects shall determine the level of review needed, and the scope of that analysis will depend on the specifics of the particular project. These projects may, however, rely on the discussion of impacts in this EIR as a basis of assessment of these regional, communitywide, or cumulative impacts.

Regarding the Class I impacts to biological, cultural and agricultural resources identified as a result of recreational trail development, significant biological, cultural and agricultural resources are located throughout the Plan Area; however, specific locations of sensitive resources are not known. As depicted on the proposed PRT maps, the locations of the proposed Coastal Trail Alignment, other proposed trail corridors and other trail components (e.g., trailhead parking), are approximate and not intended to depict precise trail locations. Instead, each line represents a general corridor within which a trail could be proposed. The large scale of the maps makes it difficult to show precise trail routes. More important, flexibility is required to plan and implement exact trail locations in order to site a trail in a location that avoids or minimizes impacts to sensitive biological, cultural, and agricultural resources, and to consider site-specific terrain, geology, and trail safety in trail design. Because the future precise trail alignments within the general trail corridors are unknown at this time, it cannot be determined whether the Coastal Trail Alignment General Principles and Trail Siting Guidelines will be able to mitigate potential impacts to less than significant. As specific development proposals are submitted to the County, and acquisition of easements, planning, siting, and construction of trail corridors move forward, site-specific environmental assessments can be completed using the Coastal Trail Alignment General Principles, Trail Siting Guidelines, and other direction in the Plan to minimize
potential impacts. Conversely, several recent project-specific environmental documents mentioned by the commenter were able to reach a different conclusion regarding significant impacts precisely because site-specific information and trail alignments were available. Without site-specific information at the program level, as with this EIR, a determination of less than significant impacts cannot be made.

4-10 The Draft Gaviota Coast Plan Trail Siting Guidelines were presented in Appendix C of the EIR. The guidelines have been revised to greater align with similar guidelines adopted for other community and area plans, to remove elements that do not pertain to trail siting, and to provide flexibility for future siting efforts. The guidelines are not intended to be a policy document or provide specific development standards. The revised guidelines have been incorporated into Appendix C of the draft final Plan forwarded to the Planning Commission and Board of Supervisors for consideration.

4-11 The level of detail and the specificity requested regarding buildout of recreational facilities under the Plan are not appropriate for a program level CEQA document. The impacts of trail and coastal access construction are to be addressed at a project level as individual easements are acquired and specific siting, design, and construction are proposed. Please see response to comment DEIR4-9 regarding the purpose and content of a Program EIR.

4-12 Existing CLUP Policies 7-1 and 7-2 provide policy direction enabling the County to protect and defend the public’s right of access to and along the shoreline and mechanisms for acquiring easements to allow vertical access to the mean high tide line.

4-13 Anticipated residential growth for the Gaviota Plan Area is described in EIR Section 2.5.3.1. The buildout analysis is based on a review of past permit data and was completed to identify the anticipated growth rate over the 20-year planning horizon as established through the permit history and trends in specific development areas within the proposed Plan Area. A 20-year planning horizon is typically used to assess impacts related to buildout of comprehensive planning documents. Through this process, different areas within the Plan Area were identified that are expected to grow at different rates due to differences in character and history. These areas include Cojo-Jalama, Hollister Ranch, Naples, and the rest of the proposed Plan Area.
4-13 (cont.)
The maximum theoretical buildout is described and discussed in EIR Section 2.5.3.6 and explains why it was not used for the EIR analysis. As discussed therein, the maximum theoretical buildout has no planning horizon, and based on development trends, regulatory and physical constraints, and foreseeable market conditions, it is highly unlikely to be realized in the proposed Plan Area, especially within the 20-year planning horizon. Buildout methodologies for urbanized areas like the City of Santa Barbara are inappropriate for assessing the development potential for areas designated as rural in the 1982 Comprehensive Plan. Therefore, the EIR determined buildout projections on development trends (rates) within the Plan Area. The Plan and DEIR appropriately describe at a programmatic level the continuation of development trends in the rural areas of the Plan where rural residential and agricultural uses will continue to develop.

As discussed in Section 4.13, the recreational elements of the Plan represent the most significant change that would occur under Plan implementation. Parks, recreation, and trails (PRT) became a significant focus during public workshops and hearings on the draft Plan. As a result, this EIR provides a consolidated analysis of the impacts associated with proposed California Coastal Trail alignments and other recreational amenities. Conversely to residential development, which has a history of development trends that can be incorporated into a buildout scenario, no timeline or planning horizon is proposed for buildout of proposed trail corridors, coastal access points, and other recreation amenities. Future trail development would occur as opportunities for acquisition of recreation and trail easements and development arise. As discussed under response to comment DEIR4-9, any number of potential trail alignments could result in potential impacts due to presence of sensitive biological and cultural resources. Thus, due to uncertainties regarding both timing of trail acquisition and development and unknown locations of biological and cultural resources, a 20-year planning horizon was not used for the PRT impact analysis.

4-14 It is acknowledged that it is best that a collaborative approach that utilizes forward thinking trails practices is used for project planning of specific trails on the Gaviota Coast. The comment does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.
interpretation and management, and the need to avoid foreclosing options for longer term coastal trail planning efforts. The County is fortunate to have the experience and resources of community trail individuals and organizations to assist in these endeavors and we encourage continued collaboration to avail staff of these resources in the creation of a visionary Gaviota Coast Trail plan.

Thank you for this opportunity to comment on the Gaviota Coast Plan and DEIR. Please feel free to contact me at (805)845-8853 if I can answer any questions or offer further assistance.

Sincerely,

Rachel Couch
Project Manager
LETTER

September 4, 2015

David Lackie, Senior Planner
Santa Barbara County Planning Department
123 East Anapamu, Suite #3
Santa Barbara, California 93101

Re: Comments on Gaviota Coast Plan Draft EIR

Dear Mr. Lackie,

On behalf of the California Department of Parks and Recreation (State Parks), I am writing to provide comments on the Gaviota Coast Plan Draft Environmental Impact Report (DEIR) that was prepared by the County of Santa Barbara Planning and Development Department, Long Range Planning Division (County). Our mission is to manage park lands in a manner that protects the valuable natural and cultural resources while balancing the public's desire to recreate on those park lands. It's this mission that guides us to preserve California's extraordinary biodiversity while also providing opportunities for high-quality outdoor recreation.

Each State Park unit that we manage has a corresponding General Plan document that provides the architecture for fulfillment of our mission by describing the appropriate land use and facility development. As directed by the Public Resources Code, the General Plan for a State Park unit will also direct what type of interpretive and recreational programs will be provided and that are compatible with the land uses identified.

The Santa Barbara/Ventura Coastal State Park System General Plan (1979) addresses the development of park facilities and appropriate uses for Gaviota State Park, Refugio State Beach, and El Capitan State Beach. All three parks are also within Gaviota Coast Plan area. This General Plan is over 35 years old and in many cases lacks current data to support its recommendations. Specifically, since 1979, the region has seen significant population growth, new endangered species designations, oil extraction development, and considerable changes to the intensity of use of Hwy 101 and the Union Pacific railroad which bisects each of these park units. Furthermore, the availability of water needs to be an important part of any evaluation for future land use within these three parks. Climate Change, sea level rise and increased coastal erosion are new but significant issues not considered in the General Plan.

RESPONSE

5-1 This comment is introductory in nature and provides background information regarding California State Parks, including their mission and General Plan process. It does not raise a significant environmental issue for which a response is required. In addition, the importance of addressing water, climate change, sea level rise, and coastal erosion is noted. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.
5-2 The Coastal Trail remains a high priority for California State Parks. However, we desire an alignment that is realistic and considers recreational desires of all park visitors not just a few special interests. Avoidance of impacts associated with a Coastal Trail alignment is in the best interest of the natural and cultural resources of the Gaviota Coast and the State Parks in the region.

California State Parks fully participated in the GAVPAC process and our recommendations/comments focused on the need to fully evaluate various alternatives for a California Coastal Trail along the Gaviota Coast. We desire a trail alignment that complements the land and is sustainable, safe and avoids those sensitive resources we are mandated to protect. We believe a Coastal Trail alignment needs to anticipate the future plans for Hwy 101, rail road corridor and not eliminate existing public use.

We also informed GAVPAC and the County that under certain tide conditions, the public today can hike the entire Gaviota Coast without the need to construct one foot of trail. Equally as important, the Camino Cielo route offers a through hiker the opportunity to travel the spine of the Front Range with spectacular views of the ocean and the Channel Islands along its entire route. The Camino Cielo alignment from Gaviota State Park to Carpinteria State Beach is almost entirely on public land and would require minimal trail improvement in a few areas which are less sensitive than the coastal bluff alignment proposed.

While we respect the County’s desire to choose a preferred alternative for the Coastal Trail through State Park property, we believe updating our General Plan for these three park units will allow State Park professionals to fully evaluate the work you have completed as well as address the issues identified above in much greater detail. This effort will also include considerable surveying of our visitors and ground level analysis of the various alignments. The goal for our future planning efforts for the California Coastal Trail through State Park property along the Gaviota Coast will be much more comprehensive and detailed than the analyses provided by the County. We are currently seeking funding for this effort and look forward with working with the County as we begin to develop an updated General Plan.

Please consider these additional comments on the DEIR:

5-3 4.13-22 Segment 3(a): #4: The DEIR calls for new parking area adjacent to the entrance at Refugio State Beach. This area will undoubtedly be used by beach goers to access Refugio State Beach. We propose this lot, or any other within this proximity to a paid facility, be a paid lot. A portion of the fee could be used to offset the impact to those affected facilities.

5-4 4.13-23 Segment 3(a): #5: The DEIR proposes future re-alignment of the railroad corridor. This is a significant consideration that is way outside the scope of the current plan. Moving the corridor would significantly change the setting along the coast and

5-2 It is understood that California State Parks must take the lead on the completion of the California Coastal Trail where it crosses State Parks property. It is appreciated that the California Coastal Trail and the protection of natural and cultural resources in the region remains a high priority for State Parks, as is continued participation in the planning process for the Gaviota Coast Plan.

It is acknowledged that under certain extreme low tide conditions one can hike the entire Gaviota Coast along the beach, although not at one time, and that the Camino Cielo route offers spectacular views of the ocean. But neither serves as a substitute for the California Coastal Trail, an approximately 1,200 mile network of public trails along the California coastline, from Oregon to Mexico, for walkers, bikers, equestrians, and others.

The County looks forward to participating in the General Plan Update for the California State Parks properties on the Gaviota Coast. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

5-3 The recommendation that this parking area be designated as a paid lot will be forwarded to the Board of Supervisors. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

5-4 The County is not proposing the realignment of the UPRR railroad corridor. MM TC-1 calls for the preparation of a comprehensive corridor plan for the Highway 101 Corridor that could include the possible long-term realignment of Highway 101 and the UPRR to address bluff retreat and to avoid the need for new coastal protection structures. The Highway 101 corridor and the UPRR railroad are not under the jurisdiction of the County. The County will continue to meet and coordinate with Caltrans, the UPRR, and California State Parks regarding any future changes within the Highway 101 corridor. It would be speculative to try to predict when and where these facilities would be realigned, if ever.
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| **Gaviota Coast Plan DEIR**  
*September 4, 2015*  
*Page 3* | **5-5** The comment states California State Parks’ preference for trailhead parking facilities on the abandoned Gaviota Marine Terminal site due to the pre-existing disturbance associated with past industrial land use, as opposed to development of such a facility on adjacent undeveloped State Park property. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process. |
<p>| | <strong>5-6</strong> Impact LU-2: Construction-Related Compatibility Impacts does not state that the impacts would be temporary. Impact LU-2 states that construction of recreational amenities including restrooms and parking lots in Segments 1, 3 and 5 would have the highest potential for land use related construction compatibility impacts. Operation and maintenance considerations for trailhead amenities such as parking lots and restrooms will be addressed as part of any future trail/trailhead feasibility assessment. |
| | <strong>5-7</strong> The precise location of trails has not been determined and the precise locations of many cultural resources are not known. During potential easement acquisition and trail siting, site specific assessments would be conducted to determine presence/absence of cultural resources (DevStd CS-1 and CS-2), pursuant to PRT Action REC-4 and trail siting guidelines, to avoid cultural resources, if feasible. However, significant cultural resources can be encountered anywhere during construction in areas where none were previously recorded. Therefore, the potential impacts to cultural resources would be Class I at the program level. Pursuant to DevStd CS-3 of the Plan consultation with Designated Tribal Representatives from State and Federally Recognized bands of Chumash would occur during the planning process to understand the true value of these cultural resources. |
| | <strong>5-8</strong> See responses to comments DEIR2A-1 and DEIR2B-1. The Santa Barbara County Fire Department concurred with the Class III impact conclusion for Impact SERV-2: Wildland Fires, and stated the Fire Department’s support of the Gaviota Coast Plan. The risk of fire in the plan area is very real and many areas of the Plan Area have been designated a High Fire Hazard Area. There are currently trails and recreational uses within the Plan Area, including State Park lands and National Forest lands that are used for recreational purposes. |
| <strong>4.13-26 Segment 5 (Principle #2):</strong> The DEIR calls for the re-use of the Gaviota Marine Terminal. The Gaviota State Park General Plan (1979) shows a coastal access trail and parking area east of the Gaviota Marine Terminal at San Onofre beach whereas the DEIR prepared by the County does not show this trailhead and parking area. However, the DEIR does state that trailhead parking should be provided in close proximity to the Mariposa Reina interchange. We prefer consideration for trailhead parking facilities on abandoned the Marine Terminal site due to the pre-existing disturbance associated with past industrial land use as opposed to on adjacent undeveloped State Park property. | <strong>5-5</strong> The comment states California State Parks’ preference for trailhead parking facilities on the abandoned Gaviota Marine Terminal site due to the pre-existing disturbance associated with past industrial land use, as opposed to development of such a facility on adjacent undeveloped State Park property. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process. |
| <strong>4.13-30 (LU-2):</strong> The DEIR states construction of parking lots and restrooms on segments 1, 3, and 5 will only have temporary impacts. Installation of such types of facilities will create a concentrated visitation area and there will be a need for trash receptacles/service as well as restroom maintenance. Both of these services are a considerable financial impact to whoever will be expected to manage them. | <strong>5-6</strong> Impact LU-2: Construction-Related Compatibility Impacts does not state that the impacts would be temporary. Impact LU-2 states that construction of recreational amenities including restrooms and parking lots in Segments 1, 3 and 5 would have the highest potential for land use related construction compatibility impacts. Operation and maintenance considerations for trailhead amenities such as parking lots and restrooms will be addressed as part of any future trail/trailhead feasibility assessment. |
| <strong>4.13-44 (CR-1):</strong> The DEIR states impacts to cultural resources associated with the PRT would be significant and unavoidable. Class I unmitigated cultural impacts are unacceptable. Trail alignments should be chosen so as to avoid class 1 impacts to cultural resources. Additionally, consultation with Designated Tribal Representatives from State and Federally Recognized bands of Chumash should be integrated in every step of the process to best understand the true value of these resources. | <strong>5-7</strong> The precise location of trails has not been determined and the precise locations of many cultural resources are not known. During potential easement acquisition and trail siting, site specific assessments would be conducted to determine presence/absence of cultural resources (DevStd CS-1 and CS-2), pursuant to PRT Action REC-4 and trail siting guidelines, to avoid cultural resources, if feasible. However, significant cultural resources can be encountered anywhere during construction in areas where none were previously recorded. Therefore, the potential impacts to cultural resources would be Class I at the program level. Pursuant to DevStd CS-3 of the Plan consultation with Designated Tribal Representatives from State and Federally Recognized bands of Chumash would occur during the planning process to understand the true value of these cultural resources. |
| <strong>4.13-45 (SERV-2):</strong> The DEIR states potential wildfire impacts within each segment would be less than significant. This impact assessment is woefully presumptive. According to statistics compiled by the National Fire Protection Association (NFPA), 20% of wildfires are intentionally lit annually. The plan states that smoking is not a typical activity for a hiker. It fails to acknowledge, however, that many potential users of coastal trail will utilize it for the purpose of day use beach access. This demographic of open space recreation user is much more likely to be a smoker than a traditional hiker. Therefore we believe the likelihood for increase in human caused wildfires resulting from coastal trail segment built out is grossly underestimated. The NFPA cites 47% of brush, grass, and forest fires are started by discarded smoking materials. And finally, NFPA sites 35% of brush, grass, or forest fires occur in open lands or fields. This is the exact type of terrain under consideration in this impact report. Although the report notes there is little to be lost in the way of property or life in the proposed area of trail development, individual land owners impacted would surely disagree. | <strong>5-8</strong> See responses to comments DEIR2A-1 and DEIR2B-1. The Santa Barbara County Fire Department concurred with the Class III impact conclusion for Impact SERV-2: Wildland Fires, and stated the Fire Department’s support of the Gaviota Coast Plan. The risk of fire in the plan area is very real and many areas of the Plan Area have been designated a High Fire Hazard Area. There are currently trails and recreational uses within the Plan Area, including State Park lands and National Forest lands that are used for recreational purposes. |
| <strong>4.13-45 (SERV-3):</strong> The DEIR states additional fire and police services will not be needed because service ratios are based on resident population. | |</p>
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| **5-8 (cont.)**

The thresholds of significance are if the Gaviota Coast Plan would expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands; and/or if the Gaviota Coast Plan would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. These thresholds would not be exceeded.

See Section 4.9.2 of the Draft EIR for a more detailed discussion of fire protection in the Plan Area.

**5-9**

Thank you for the information regarding visitation of State Park facilities and the cost of State Parks Law Enforcement for responding to panga landings and illicit drug importation on the Gaviota Coast.
The resident population is not an adequate measure of use the proposed segments will garner. In 2014 California State Parks hosted 295,608 thousand out of the area campers. This statistic shows a 2.5% growth from statistics gathered in 2012. These visitors will likely be taking advantage of the recreation opportunities provided by this trail system and should be considered in the service ratio. Therefore, the question now becomes, which law enforcement agency will be tasked to respond to calls for service along the trail. Due to remoteness of the area, additional public safety resources will need to be identified.

Over the past several years the use of the Gaviota Coast for illicit pangas drug boat landings has boomed. By creating more parking and navigable access from the highway to the beach, there is an opportunity for expanded operation of these activities. In 2014 California State Parks Law Enforcement staff spent a total of 201 overtime hours, amounting to $66,656.00 dollars, in time and equipment, carrying out duties related to panga landings and illicit drug importation on the Gaviota Coast.

5-10 Water Supplies: The DEIR states water impact in restroom facilities will be less than significant. Restroom facilities use a significant amount of water, not to mention logistics of plumbing them and servicing them. In the best circumstance a CTX style restroom facility would not offer flushing toilets, yet would still require regular pumping and cleaning which both require water use. Additionally, how far do we expect visitors to hike without a place to fill their water bottles or wash their hands? A more cautious and realistic investigation of existing water sources and their impacts from this trail use needs to be explored.

5-11 Mitigation for Geology: The DEIR states implementation of Action REC-4 and the Trail Siting Guidelines will sufficiently reduce impacts to less than significant. Any set of guidelines, no matter how well written and intentioned cannot be applied unilaterally across a trail system and accurately address any geological obstacle that may arise. This coastline in specific is highly erosive and it will be difficult to sustain such a trail. The existing bike path between El Capitan and Refugio State Beaches illustrates the dilemma well. The space available for trail alignment along this length is so severely constricted that coastal erosion just over the past 20 years has rendered it unsafe to pass and impossible to repair without encroaching onto adjacent property. Furthermore, although the Trail Siting Guidelines in Appendix C may be adequate in some areas, they do differ from State Park trail building and maintenance guidelines in some instances. Any segment that is to be constructed on State Park property must be built and maintained to meet State Parks specifications in every aspect.

5-12 Impact PR-2: The DEIR states large portion of public park land is inaccessible due to location in remote areas without any access in the Los Padres National Forest. This is an inaccurate statement. The Los Padres National Forest is accessible via West Camino Cielo and Forest Route 5N19 which run across the ridge laterally. This ridge trail can be accessed a variety of ways from Gaviota State Park, Santa Ynez and Private Property. There are at least 5 trails that lead onto this lateral

5-10 The EIR is a program level document. It is understood that fresh water is a very limited resource on the Gaviota Coast and that the availability of water and the ability to install a septic system are important considerations in the location, construction, and operation of restroom facilities. CTX is a known leader in the construction of prefabricated concrete restrooms and the use of such a facility with a pit toilet may be the appropriate solution. However, that level of project-level design has not been conducted and is not appropriate for a program-level environmental document.

Operation and maintenance considerations for trailhead and trail amenities will be addressed as part of any future trail/trailhead feasibility assessment.

5-11 The EIR is a program-level document. It is acknowledged that the Trail Siting Guidelines cannot anticipate every geologic obstacle that may be encountered. It is also acknowledged that coastal erosion, and erosion in general, are very real concerns regarding the construction and maintenance of trails. Trail/trailhead feasibility studies and project specific environmental analysis will be required if and when individual trail segments are pursued and project-specific mitigation will be required to avoid or minimize potential impacts. Based on the thresholds of significance for geology and soils, the EIR concluded that the impacts to geologic resources would be less than significant.

It is acknowledged that any segment that is to be constructed on State Park property must be built and maintained to meet State Parks specifications in every aspect.

5-12 It is acknowledged that the Los Padres National Forest is accessible from West Camino Cielo and Forest Route 5N19. It is also accessible from Forest Route 5N12, Refugio Road, Alisal Road, and various trails. However, a large portion of the Los Padres National Forest within the Plan Area is difficult to access, even with the presence of existing roads and trails.
Gaviota Coast Plan DEIR
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Page 5

access from public property. Additionally, requirements of the Quimbly Act shall not
 supersede the ability of a public resource agency, at its own discretion, to determine
 what percentage of park land shall be preserved as undeveloped open space. State
 Parks frequently preserves large swaths of our park units as wilderness and this is
 appropriate, provided the visitor has recreation opportunity in the developed portions.
 This is certainly the case for Gaviota State Park, Refugio State Beach and El Capitan
 State Beach.

Thank you for the opportunity to comment.

Sincerely,

[Signature]

Richard Rozzelle
District Superintendent
LETTER

September 8, 2015

Mr. David Lackie
Santa Barbara County Planning Department
123 Anapamu Street
Santa Barbara, CA 93101

COMMENTS ON THE GAVIOTA COAST PLAN DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

Dear Mr. Lackie:

6A-1 We would like to thank Santa Barbara County Planning staff for involving Caltrans early in the development of the Draft Gaviota Coast Plan. The Plan plays an important role in promoting the safety of travelers on US 101. We also believe that the Plan can help resolve conflicts between land use and transportation that may emerge along the Gaviota Coast.

US 101 serves as the major north-south interregional transportation corridor on the California central coast. As the approving agency for land use, the County is a key partner in helping to protect the safety and viability of the US 101 transportation corridor along the Gaviota coast. Caltrans will continue to collaborate with the County in an effort to improve access to the state highway by seeking opportunities to enhance and optimize a network of frontage roads and grade separations. With that, Caltrans has the following specific comments on the DEIR:

6A-2

1. Page S-10. Impact TC-1 states that Gaviota Coast Plan policies, actions and development will generally protect the integrity of US 101, enhance transportation safety, and encourage coordination between agencies, but that “comprehensive planning efforts would need to be in place to ensure that all modes of transportation are balanced. Therefore, impacts would be potentially significant.” As mitigation, the DEIR proposes to prepare a Comprehensive Corridor Plan that would address the operational and safety improvements to US 101. Caltrans supports corridor planning and we encourage the County to be creative in exploring all potential funding opportunities for such a study. However, the degree to which a future corridor study may be considered a mitigation measure is questionable. An issue for Caltrans is that the current Plan does not address the potential unmitigated impacts of buildout on US 101. For all proposed developments along US 101 in the Plan area, Caltrans does not support any intensification of use of at-grade intersections due to the operational and safety concerns which they pose. The mitigation for Impact TC-1 needs to be addressed in the DEIR rather than a subsequent study. Also, the DEIR should reference the existing freeway agreements which detail locations along US 101 for consolidating driveway access to grade separated access in the future.

RESPONSE

6A-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

6A-2 It is acknowledged that Caltrans does not support any intensification of use of at-grade intersections due to the operational and safety concerns which they pose.

The proposed Plan does not include any policies that promote new driveway access to Highways 1 and 101. Rather, the proposed Plan includes policies that direct the County to minimize new at-grade crossings over Highway 101 (Policy TEI-2) and minimize potential operational conflicts (Policy TEI-7). Mitigation Measure TC-2 addresses hazards due to a design feature by modifying Policy TEI-7 to require that uses proposing at-grade access to submit the projects to Caltrans for review and comment and that confirmation of compliance with any applicable safety requirements must be verified prior to zoning clearance.

This level of mitigation is appropriate for the programmatic level of review provided by the EIR (see response to comment DEIR4-9).
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<td></td>
<td>6A-3 Caltrans' support of Policy TEI-7 and MM TC-2 will be forwarded to the County Planning Commission and Board of Supervisors, who will consider all comments and suggestions during the decision-making process.</td>
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<td></td>
<td>6A-4 The paragraph quoted by the commenter has been deleted from the EIR because it incorrectly states that Policy REC-1, Policy REC-5 and Action TEI-1 would ensure safe ingress and egress from driveways to state highways. The Plan does not include any policies that allow or promote new driveway access to Highways 1 and 101; thus, no policies warrant removal pursuant to this comment.</td>
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<td>6A-5 It is acknowledged that Highway 1 and US 101 do not include bicycle lanes in the Plan Area, but that they do include shoulders that are open for bicycle use. This has been corrected throughout the Gaviota Coast Plan and Final EIR. It has also been added that both are portions of the Pacific Coast Bicycle Route, which is a Class III Bikeway designation by the legislature.</td>
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<td>6A-6 It is acknowledged that Caltrans endeavors to maintain a target LOS at the transition between C and D and that LOS D is an unacceptable minimum threshold. Therefore, this fact has been corrected throughout the Gaviota Coast Plan and Final EIR.</td>
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<td>6A-7 This comment does not raise a significant environmental issue for which a response is required. The County has coordinated with Caltrans to participate in the Coastal Resiliency Project.</td>
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<td>6A-8</td>
<td>6A-8 Class III bike path has been corrected to Class III bikeway throughout the FEIR.</td>
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<td>6A-9 At-grade interchange has been corrected to at-grade intersection throughout the FEIR.</td>
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<td>6A-10</td>
<td>6A-10 The definitions of Class I, Class II, and Class III bike facilities have been added to the FEIR from the California Streets and Highways Code (Section 890.4).</td>
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<td>6A-11</td>
<td>6A-11 References to the Caltrans 101 Transportation Concept Report and existing Highway 101 Freeway Agreements between Caltrans and the County have been added to Section 4.2.2 of the FEIR.</td>
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<td>6A-12</td>
<td>6A-12 The FEIR has been revised to differentiate between the SBCAG Congestion Management Program minimum operating standard of LOS D and that Caltrans endeavors to maintain a target LOS at the transition between C and D on all state facilities, with LOS D being unacceptable.</td>
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Mr. David Lackie
Page 4

Sincerely,

[Signature]

Adam Fukushima, PTP
Caltrans District 5
Development Review

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."

County of Santa Barbara
LETTER

CRAHTAC
County Riding and Hiking Trails Advisory Committee

Chair
Art Najarra
Vice Chair
Archibald Mitchell
Secretary
Kevin Snow
1st DISTRICT
Kalon Kelley
Art Najarra
Kevin Snow
Shelia Snow
2nd DISTRICT
Jack Blake
Orin Cadle
Ray Ford
Dan Gira
3rd DISTRICT
Curt Craig
Jim Mills
Wanda Weir
4th DISTRICT
John McCloy
Archibald Mitchell
Ruth Schuyler
5th DISTRICT
Luis Escobar
Frank Fritzen
Doug Kich
Barry Stotts
STAFF
Claude Garcia
Si County Parks
Joe Davis
US Forest Service

CRAHTAC
County Riding and Hiking Trails Advisory Committee

September 4, 2015

Dear Mr. Lackie:

The Santa Barbara County Riding and Hiking Trails Advisory Committee (CRAHTAC) is a standing committee appointed by the Board of Supervisors (Board) 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 supervisory district and is recognized in the County’s Local Coastal Plan (LCP) as having a role advising on trail matters. CRAHTAC is writing to provide feedback on the draft Environmental Impact Report (EIR) for this project as follows:

1. Impacts to Recreation: Provision of improved trails and creation is a major priority of the draft Gaviota Plan; yet, the EIR fails to consider any impacts to existing or planned recreational facilities or uses. CRAHTAC is concerned that the draft EIR lacks any analysis of impacts to recreation, including existing informal coastal access trails and parking from residential development or expansion of US Hwy 101 that appears to be accommodated by the Park’s TC designation. The EIR needs to assess impacts to planned recreational facilities (e.g., Edwards Point major Coastal Park), planned coastal access and trails as well as consistency with all relevant Local Coastal Plan recreation and coastal access policies.

2. Impacts of Trail Siting Guidelines: CRAHTAC is deeply concerned with the impacts of the many anti trail provisions of these Guidelines and request that the EIR provide detailed analysis of potential impacts to provision of trails. The Guidelines need to be substantially rewritten to promote trail development.

3. Fragmented Impacts of Trails: The EIR greatly overstates potential impacts associated with trail construction and must be revised to provide a more detailed and realistic analysis of potential impacts. We are unaware of any past County project or community plan EIR that identified any Class I impacts of trails and request that this analysis be revised.

4. In closing, we appreciate the Board considering our comments and respectfully request that the Board uphold the Planning Commission’s denial of this proposed development project.

Sincerely,

Art Najarra, Chair
CRAHTAC

RESPONSE

6B-1 See response to comment DEIR7-16 Transportation Corridor (TC) designation.

6B-2 The Draft Gaviota Coast Plan Trail Siting Guidelines (presented in Appendix C of the EIR) have been revised to greater align with similar guidelines adopted for other community and area plans, to remove elements that do not pertain to trail siting, and to provide flexibility for future siting efforts. The guidelines are not intended to be a policy document or provide specific development standards. The revised Trail Siting Guidelines are attached to the draft final Plan forwarded to the County Planning Commission and Board of Supervisors for consideration.

6B-3 See response to comment DEIR4-6 regarding impacts to existing informal coastal access.

6B-4 This is a comment on the policy merits of the EIR alternatives. The comment does not identify an inadequacy in the analysis, conclusions, or mitigation measures in the EIR. The County Planning Commission and Board of Supervisors will consider all comments and suggestions during the decision-making process.

6B-5 The comment will be forwarded to the County Planning Commission and Board of Supervisors.