

Ellwood Mesa Coastal Trails and Habitat Restoration Project Request

May 14, 2012



**Santa Barbara
Trails Council**

Mr. Steve Wagner
Ellwood Trails Project Description Letter and Request
May 2012

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Mr. Steve Wagner
Community Services Director
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

CC: Anne Wells, Advance Planning Manager

SUBJECT: Ellwood Mesa Coastal Trails and Habitat Restoration Project

Dear Mr. Wagner,

Santa Barbara Trails Council (SBTC) is pleased to submit this project description letter and formal request to commence City and community review of the implementation phase of the trail improvements and habitat restoration for the Ellwood Mesa, as envisioned and planned for in the *Ellwood-Devereux Coast Open Space & Habitat Management Plan*. We have engaged SUZANNE ELLEDGE PLANNING & PERMITTING SERVICES, INC. (SEPPS) to assist in this effort and to provide planning and project management services in connection with the City's review and entitlement process. SEPPS can provide planning and project management services that will help coordinate the effort between the SBTC and the City and help facilitate the review and implementation of this very important community planning effort. Given that the SBTC has received grants from the California Coastal Conservancy, it is important that we demonstrate progress on the Ellwood Mesa Coastal Trails and Habitat Restoration Project. Thus, a diligent processing timeframe for this project is critical, especially as the Coastal Conservancy grant agreement and funding terminates in September, 2013.

Enclosed in this letter is a summary project description and policy consistency analysis to assist in the City's review of this project. We look forward to working with the City on this important component of the *Ellwood-Devereux Coast Open Space & Habitat Management Plan*.

INTRODUCTION

Ellwood Mesa is one of the most spectacular coastal bluff open space areas anywhere along the Santa Barbara County coastline. It contains many of the most important coastal/marine resources in the area, including the Monarch butterfly, which overwinters in the nearby eucalyptus groves. Despite these valuable resources and the desire the community has expressed to maintain Ellwood Mesa in as natural condition as possible while protecting its environmental resources and sensitive native habitat, the area has gone relatively unmanaged for the past 30 years. Hence, the Santa Barbara Trails Council, with support from the California Coastal Conservancy and the City of Goleta, has prepared this document to commence this effort as detailed in the *Ellwood-Devereux Coast Open Space & Habitat Management Plan*.

The Santa Barbara Trails Council is seeking input and eventual entitlement from the City of Goleta Community Services Department to construct beach access and public trail improvements in the Santa Barbara Shores Park and Ellwood Open Space Area, commonly known as "Ellwood Mesa", in the City of Goleta's Coastal Zone. The Ellwood Mesa Coastal Trails and Habitat Restoration Project includes trail design reconfiguration of existing trails on the Mesa, habitat restoration, and other improvements to the planned trail system as envisioned in the 2004 *Ellwood-Devereux Coast Open Space & Habitat Management Plan*.

BACKGROUND

The Ellwood-Devereux Open Space Plan Area comprises 652 acres of open space and natural reserves/preserve, 235 acres of which lie in the City of Goleta's jurisdictional boundaries. Ellwood Mesa provides one of the largest contiguous open space areas along the South Coast, providing a range of opportunities for extracurricular and outdoor activities. Ellwood Mesa attracts thousands of visitors every year with its spectacular scenery, access to the beach, access to Los Padres National Forest, and the monarch butterfly aggregation sites (Figure 1 Project Location next page).

While this natural resource has been enjoyed for decades, its continued existence was threatened by the impending growth of residential development in the surrounding areas. In order to protect this natural resource, Santa Barbara County and UC Santa Barbara developed a proposal in 2001 that would reduce and relocate residential development away from sensitive coastal resources as a part of a joint effort to establish a 650+ acre open space and natural reserve. The intent behind this joint effort



was to provide for habitat improvements and allow public access consistent with conservation and habitat management needs, while accommodating the population growth and urbanization of the Goleta community.

In 2002, the newly-created City of Goleta joined the process with UCSB and the County of Santa Barbara and the *Ellwood-Devereux Coast Open Space & Habitat Management Plan* was developed. As part of this effort, the City conducted public outreach to solicit feedback and input from the general public from 2001-2003. During this process, four major themes evolved:

- Habitat protection and restoration should be the primary goal.
- Recreation and public access should be secondary to resource protection.
- The area's natural setting should be maintained.
- Historic uses should be maintained unless they create substantial conflicts with resource protection.

These themes carried through the creation of the *Ellwood-Devereux Coast Open Space & Habitat Management Plan* and are incorporated into the proposed project description.

In 2005, an agreement with the City of Goleta for development of a portion of the Ellwood Mesa away from the bluff area in exchange for the bluff top property resulted in the creation of an open space area called the Sperling Preserve, known by locals as Ellwood Mesa. In 2005, the CA Coastal Conservancy provided a grant of \$4 million to the City to help acquire the remainder of the open space.

In 2009, the Santa Barbara Trails Council in partnership with the City of Goleta began restoration efforts of the main coastal access points and trails that had been severely impacted by erosion. The work was completed in 2010 and has provided short-term improvements to reduce the impacts of erosion and safe access to the beach for the thousands of visitors that use Ellwood each year. In order to ensure sustainable use of the area for future generations, long-term solutions are needed to address issues affecting Ellwood Mesa trails, including the California Coastal Trail route, along the mile-long bluff-top.

SETTING

The Open Space Plan Area is characterized by coastal mesas and steep coastal bluffs bisected by Devereux Creek and Devereux Slough. Eucalyptus woodlands form a dense canopy surrounding Devereux Creek. Salt marsh habitat parallels the margin of the slough. Coastal bluff, dune scrub, and foredune habitats dominate the coastal bluffs. Native grassland, non-native annual grassland, and coyote bush scrub dominate

habitats on the mesas. Vernal pools are abundant in topographic depressions on the mesas.

Avian resources are diverse, as woodlands provide perching, nesting, and roosting habitat, and grasslands provide foraging resources for a number of bird species. The eucalyptus woodlands on Ellwood Mesa support the largest overwintering aggregation site for the monarch butterfly in Santa Barbara County (Meade, 1999). The expanse of open grassland supports small mammals and birds, creating prime foraging territory for birds of prey. Reptiles and amphibians are comparatively limited in diversity.

The planned trail system includes two trails of particular significance, the California Coastal Trail and Juan Bautista de Anza Trail.

Juan Bautista de Anza Trail

In 1990, Congress designated the Juan Bautista de Anza a "National Historic Trail" and authorized the National Park Service (NPS) to administer it. This trail commemorates the route Anza took and highlights the Spanish colonial influence on Arizona and California. The NPS works with national, state, and local entities to establish segments of the Anza Trail. When completed, the Anza Trail will stretch from Nogales, Mexico, to San Francisco, California; a distance of over 1,200 miles.

Within Ellwood Mesa, the De Anza Trail was designated to accommodate pedestrians, bicyclists, equestrians, and provides connections to many trails within the Open Space Plan Area. It will also eventually connect with bike routes and trail designations outside of the Open Space Plan Area. (See Figure 2 next page)

California Coastal Trail

In 1976 the Coastal Act was enacted, creating both the California Coastal Commission and the State Coastal Conservancy. The Commission and Conservancy encouraged the 1979 Coastal Public Access Program that calls for "a trail linking state parks, federal recreation areas, and other areas of significance located in coastal areas."

The California Coastal Trail (Coastal Trail) resulted from this program and provides a network of publicly accessible trails for walkers, bikers, equestrians, and other users along the California coast. In 2001, the state legislature passed ACR20 and SB908 that provide a resolution for completing the Coastal Trail, and a mandate for mapping the existing segments and estimating the costs for completing missing segments.

Roughly 80 percent of the trail has been completed. Extending 1,200 miles from the Oregon-California border to the California-Mexico border, the trail hugs the coast, except where prevented by topography or restricted property. The Coastal Trail is

intended to be a network of publicly accessible trails for pedestrians, bikers and equestrians.



In the years since the *Ellwood-Devereux Coast Open Space & Habitat Management Plan* (Ellwood Plan) was drafted, community sentiment appears to favor more modest trail design standards for the mesa area. Initial development of the project description, engineering and public outreach will be critical in determining the scope of the project.

Unmanaged storm water runoff has resulted in bluff failure along mesa's edge, erosion, and deep gulying on the bluff-top and within the riparian areas. Due to poor and uneven trail conditions and severe erosion along the bluff and coastal bluff face, improvements to the Ellwood Mesa segment of the California Coastal Trail (CCT) is a high priority for implementation as existing conditions along the trail system pose significant constraints and public safety concerns for trail users.

PROJECT DESCRIPTION

The Ellwood Mesa Coastal Trails and Habitat Restoration Project ("Project") will improve approximately 2.1 miles of coastal trail (Figure 2 Site Map above). The trail will begin at an existing public trailhead parking lot located at Hollister Avenue, head south over Devereux Creek, and then turn southeast along the bluff where it will eventually connect with the adjacent proposed CCT segment within and north of UCSB's Coal Oil Point Nature Reserve. A portion of the trail will also loop around the western end of the preserve adjacent to Sandpiper Golf Course and then continue along the bluff top. Improvements will also be made at two existing significantly eroded beach access points connecting the bluff-top to the beach.

The project area includes the following parcels:

Assessor Parcel Number	Acreage
079-210-024	105.86
079-210-069	84.21
079-210-015	7.75
079-210-014	8.34
079-210-013	3.07
079-210-072	1.277
079-210-071	1.27
079-210-070	5.3
TOTAL ACREAGE:	223.6

All parcels are zoned REC- Recreation District according to Chapter 35, Article II of the City of Goleta's Coastal Zoning Ordinance. The Recreation District's purpose is "to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have been active and passive recreation potential because of their beauty and natural features". The proposed project and improvements compliment the intent and purpose of the REC zone district as evidenced in this project description.

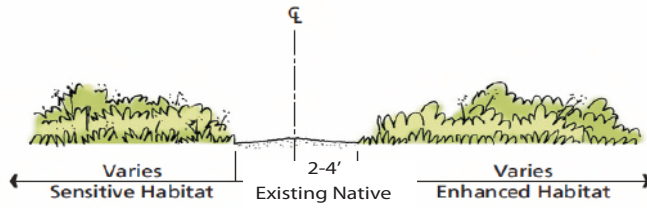
Trail Design Criteria

For ease of description, the project's trails and beach access points have been divided into 14 segments. While the specificity of these trails along with potential prescribed improvements are described in **Appendix A**, the proposed trail improvements will use the trail design criteria established in the Ellwood Plan as an initial starting point. (See Trail Design Standards, Figure 3 next page). These have been adapted from the 2004 Ellwood plan to provide options that help maintain the natural character of the Mesa while at the same time minimizing erosion and protecting the natural resources.

- Type 1-Existing Native Trail. Varied width trail from 2-4 feet with native soil tread without compaction. Use for Pedestrian and Pedestrian-Bike connector trails with minimal erosion issues or other existing resource damage.
- Type 2-Improved Native Trail. Width varies from 3-4 feet with native soil tread surface. Use for Pedestrian and Pedestrian-Bike connector trails with erosion issues or other existing resource damage that requires the trail be stabilized, including use of treated wood headers to provide boundaries for the trail, addition of Class II base material to stabilize the subsurface, smoothed, compacted, and crowned.
- Type 3-Improved Main Trail – Pedestrian-Bike Only. Trail width 6 feet. Use for Alternate Section of the Coastal Trail along the bluff-top. Includes use of treated wood headers to provide boundaries for the trail, addition of Class II base material to stabilize the subsurface, smoothed, compacted, and crowned.
- Type 4-Improved Main Trail – Multi-Use. Trail width 6 feet. Use for lower traffic sections of the shared Coastal-De Anza Trail and sections of the Coastal Trail that have lower amounts of traffic. Provides for Pedestrian-Bike-Equestrian use. Includes use of treated wood headers to provide boundaries for the trail, addition of Class II base material to stabilize the subsurface, smoothed,

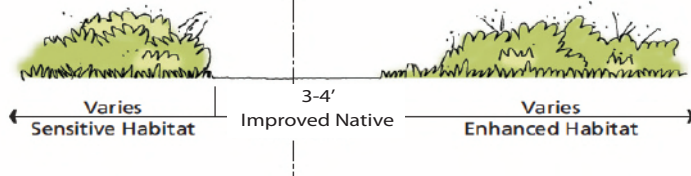
Trail Type 1. Existing Native Trail

Varied width trail from 2-4 feet with native soil tread without compaction.



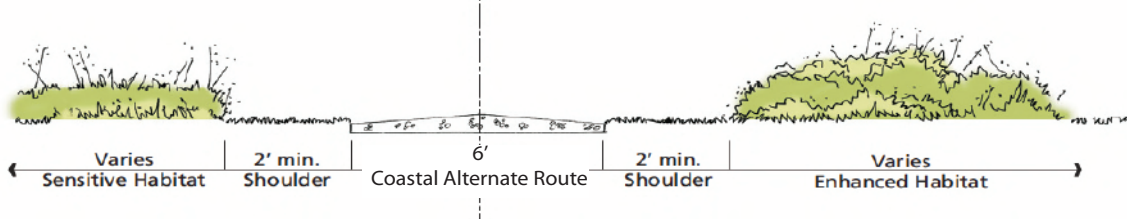
Trail Type 2. Improved Native Trail

Width varies from 3-4 feet with native soil tread surface with erosion issues or other existing resource damage that requires the trail be stabilized.



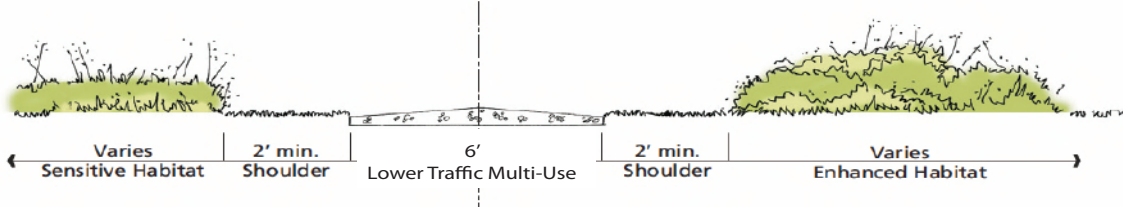
Trail Type 3. Improved Main Trail – Pedestrian-Bike Only.

Trail width 6 feet. Use for Alternate Section of the Coastal Trail along the bluff-top.



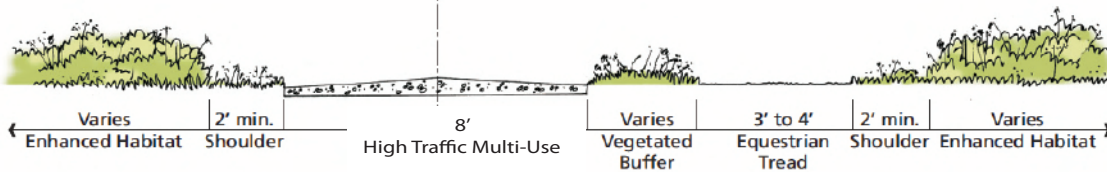
Trail Type 4. Improved Main Trail – Multi-Use.

Trail width 6 feet. Use for lower traffic sections of the shared Coastal-De Anza Trail and sections of the Coastal Trail that have lower amounts of traffic. Provides for Pedestrian-Bike-Equestrian use on shared trail.



Trail Type 5. Improved Main Trail – High Traffic Multi-Use.

Trail width 8 feet. Use for the high traffic section of the Coastal Trail. Provides for Pedestrian-Bike-Equestrian use with equestrians separated from other trail users.



compacted, and crowned along with a 2' shoulder and separate 2-3' wide equestrian trail.

- Type 5-Improved Main Trail – High Traffic Multi-Use. Trail width 8 feet. Use for the high traffic section of the Coastal Trail noted as Section 10 on the Ellwood Mesa Project Map (Figure 2). Provides for Pedestrian-Bike-Equestrian use and includes use of treated wood headers to provide boundaries for the trail, addition of Class II base material to stabilize the subsurface, smoothed, compacted, and crowned along with a 2' shoulder and separate 2-3' wide equestrian trail.

During the creation of the Ellwood Plan, public input indicated that the public favored minimalist trail design options and maintenance of the natural character of Ellwood Mesa. However, in some cases, it appears that this may conflict with resource protection goals, especially along the more sensitive coastal bluffs. These include:

- Increased erosion and braiding of bluff-top trails due to large portions of the tread being below grade.
- Impacts on bluff-top vegetation due to proliferation of edge trails and increase in the potential for bluff-top retreat.
- Impacts on nearby vernal pools and native grasses.

As previously mentioned, the proposed trail improvements and habitat restoration efforts will be further refined through the forthcoming public outreach process and pending input from City Staff, as well as civil engineering and biological consultants.

Trail Themes

While specific trail improvements are a critical component of the proposed project, there are six (6) overarching themes of the project that couch the intent and focus of the project.

- Trail Accessibility. More than 95% of the Coastal and De Anza trails meet accessibility standards in terms of grade. Improvements to the creek/drainage crossings and tread will be needed regardless of the desire for accessibility. The project proposes trail design and engineering be done to meet accessibility requirements along with habitat restoration.
- Multi-Use Design. The shared Coastal-De Anza section from the trailhead parking area south across Devereux Creek to the point where the trails split is designated as Multi-Use. The project proposes that the Coastal Bluff-top Trail also be designed for multi-use as well to provide a much larger loop trail potential for equestrians.

- Coastal Access Trail. As noted in Figure 2, a narrow 18" wide trail on the west side of the Comstock homes leads from Hollister Avenue south to connect with the Coastal-De Anza Trail. Currently the trail is designated as a Pedestrian-Bike route. The project proposes the route be designated to include equestrian use as it eventually could become an important connection to the Coastal Trail west along the Sandpiper Golf Course.
- Pedestrian and Pedestrian-Bike Connector Trails. There are a number of connector trails along the bluff-top and other locations adjacent to the Coastal and De Anza trails that will need to be a part of the design and engineering process. The project proposes they be designed to a standard width of 3-4 feet (either Type 1 or Type 2 depending on condition) and utilize native soils to maintain as natural a feel as possible.
- Coastal and De Anza Trails. Due to the number of trail users, especially along the bluff-top, the project proposes Coastal and De Anza trails be designed as Type 4 or Type 5 "Improved Surface Trails" with widths varying from 6-8 feet, utilizing existing surface where appropriate and areas of imported compacted fines – smoothed, compacted, and crowned – as needed. The project envisions 2 foot shoulders with a 2-foot-wide equestrian path (where appropriate) parallel to the main trail.
- Trails Proposed for Removal. The 2004 *Ellwood-Devereux Coast Open Space & Habitat Management Plan* identified a number of existing trails that should be removed, either because they were not needed for the larger planned trail system or they impacted environmental resources. This is especially true of the many braided and edge trails along the bluff-top portion of the CA Coastal Trail. The project proposes to remove these trails and to re-vegetate these and other disturbed areas to prevent further resource damage, minimize erosion and reduce the conditions that accelerate bluff-top retreat.

Habitat Restoration

In addition to the proposed trail improvements, the project also proposes to restore natural habitats and resources by striking a delicate balance that permits usage and habitat protection. Ellwood Mesa is one of the largest undeveloped open space areas along the Santa Barbara coast and includes a diverse assemblage of plant and wildlife species. As such, it is a remarkable resource that merits careful protection, habitat restoration, and management. To meet these objectives, the Trails Council has developed potential recommendations directed toward protecting that affect these species and resources. These recommendations require input from City Staff and further refinement through the public outreach process as well as input from

professional experts in the related fields. However, the following descriptions provide some context to these biological concerns followed by proposed recommendations.

Biological resources:

Ellwood Mesa, specifically the Open Space Plan Area, is a large undeveloped coastal resource with many native habitats that were once more abundant. The abundance and diversity of plant and wildlife species are high due to the mixture of marine, estuarine, and terrestrial habitats. The Open Space Plan Area includes several biological resources that have regional significance due to their rarity and vulnerability to human disturbances (the monarch butterfly groves, Devereux Slough, vernal pools, and beach dune habitats).



Photo above shows the bluff-top trail proposed for improvements. The trail is below grade and as a result water pools along it. Braided trails have cropped up as a result, widening the trail and impacting the vegetation.

Unfortunately, habitat quality is impaired due to the presence of numerous trails, human and animal usage, historic oil development, and the presence of ornamental and invasive exotic plants. Soil compaction and increased soil erosion are widely evident due in part to previous land uses and ongoing recreation.



Over time, water pooling along the Coastal Trail has resulted in deep depressions and a myriad of braided trails as users go around the water-filled sections.

Bluff-top erosion:

Approximately one-half of the 2.1 mile long segment of the CA Coastal Trail at Ellwood Mesa is located with 100 feet of the bluff-top. Lack of management of the bluff-top portion of the trail has resulted in serious degradation to the trail. This includes gullying, erosion, expansion of the trail width as users route themselves around uneven terrain, thereby damaging surrounding vegetation.

Possible recommendations:

Use of treated wood headers to provide boundaries for the trail, addition of Class II base material to stabilize the subsurface, installation of decomposed granite or natural dirt surface with a path elevation higher than the existing grade. Use of erosion control and re-vegetation with native plants on either side of the trail to mitigate the disturbed areas and establish proper water flow.

Proliferation of Social Trails:

Being that Ellwood Mesa provides expansive views of the Channel Islands and the coastline, many visitors have visited the site specifically for the view and proximity to the beach for decades. Hence, the bluff-top "corridor" now consists of multiple smaller trails that stem off of the main coastal trail. While these smaller trail patterns provide closer access to the bluff-top and better views, they also have created an increase in bluff-top erosion, and in some cases contribute to bluff-top retreat. The proliferation of social trails has also been harmful to the native vegetation and natural character of the area as many visitors walk over native habitat or other vegetation.

Possible recommendations:

The 2004 *Ellwood-Devereux Coast Open Space & Habitat Management Plan* identified a number of these social trails for removal and for the disturbed areas created by them to be re-vegetated with native plants. In addition, use erosion control methods and stabilization of the tread using similar methods to the main trail to prevent further issues.

Environmentally Sensitive Habitat Areas (ESHAs):

The Open Space Plan Area includes several environmentally sensitive areas. The CA Coastal Act provides specific protection for "environmentally sensitive areas." These are defined as areas 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.

ESHAs are to be protected against any significant disruption of habitat values. Only uses dependent on resources within an ESHA are allowed. Development in areas adjacent to ESHAs and parks and recreation areas must be sited and designed to prevent impacts that would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Riparian Habitats:

Riparian habitat occurs along the drainages in the Open Space Plan Area. Refer to Figure 3 for a map of drainage locations. The major drainage is Devereux Creek, which

traverses the western half of the Open Space Plan Area and Ocean Meadows Golf Course before discharging to Devereux Slough at Venoco Road. The major tributary to Devereux Creek is Phelps Ditch/El Encanto Creek.

Riparian habitats within the Open Space Plan Area include freshwater marsh, riparian scrub, and riparian forest. Freshwater marshes occur along drainages where there is seasonal winter flows and prolonged soil moisture.

The western-most portion of Devereux Creek, from the boundary of Sandpiper Golf Course to the Ellwood Monarch Grove is partially channelized with steep banks and a flat creek bottom and is generally straight. Vegetation is sparse, with small patches of freshwater marsh, riparian scrub, and riparian forest habitats. The surrounding vegetation is mostly grassland and scrub habitats. A dense eucalyptus canopy shades the creek and limits understory vegetation to small patches of freshwater marsh and riparian forest in canopy openings.

Possible recommendations:

Currently, open space visitors walk directly through the riparian areas and across the creeks with no effort to reduce the impacts. Bridges or other structures could be utilized for gully and creek crossings through the riparian areas to avoid damaging the riparian habitats.

Vernal Pools:

The vernal pools of coastal southern Santa Barbara County occur on More Mesa, Isla Vista Mesa, and Ellwood Mesa. Vernal pools form as winter rains fill topographic depressions where layers of underlying clay prevent the water from percolating through to the subsurface. Eventually these pools become dry due to subsurface drainage, evaporation, and plant evapo-transpiration, remaining dry throughout the summer, until late fall and winter rains again initiate pool formation.

Several prior land uses have damaged or destroyed vernal pools, including horse grazing in the Ellwood Mesa/Santa Barbara Shores area and oil development throughout the Open Space Plan Area. Much of the Open Space Plan Area was disturbed from previous remediation activities that left the ground surface uneven and obscured boundaries between the pools.

Trails have also destroyed or significantly modified the natural hydrologic regime of the vernal pool complexes on Ellwood Mesa. Ground disturbances associated with unmanaged trail use contribute to habitat and hydrologic fragmentation. The vernal pools within the Open Space Plan Area are very small and isolated.

Possible recommendations:

A number of vernal pools along the bluff-top portion of the CA Coastal Trail at Ellwood Mesa have been identified. Additional surveys will be conducted to identify additional vernal pools within 100 feet of the proposed trail route. If necessary, mitigation measures will address issues related to the pools and the trail will be sited so that it does not impact the pools.

Native Grassland:

Though Native grasslands have very limited distribution in Santa Barbara County due to the introduction of non-native grasses and herbs, livestock grazing, and modification of the natural fire regime, Ellwood Mesa contains one of the largest stands of native grasslands in Santa Barbara County. Five native grass species occur in the Open Space Plan Area – alkali rye (*Leymus triticoides*), purple needlegrass (*Nassella pulchra*), meadow barley (*Hordeum brachyantherum*), blue wild rye (*Elymus glaucus*), and California brome (*Bromus carinatus*). Purple needlegrass is the most common native grass and generally grows in relatively pure stands, occasionally intermixing with other native grass species, particularly meadow barley.

Possible recommendations:

Natives grasses are to be found along all portions of the CA Coastal Trail south of Devereux Creek. Surveys will identify locations of the grasses along the proposed route and the trail sited to minimize its impacts on the native grasses.

Coastal Sage and Scrub:

Coastal sage scrub, coastal bluff scrub, and dune habitats occur in various locations of the Open Space Plan Area. Small isolated patches of coastal sage scrub frequently intergrade with native and non-native annual grassland and coyote bush. The most characteristic species found within the Open Space Plan Area are coyote brush (*Baccharis pilularis*, ssp. *consanguinea*), California sagebrush (*Artemisia californica*), bush sunflower (*Encelia californica*), and giant rye grass.

Coastal bluff scrub occurs on the exposed coastal bluffs of the Open Space Plan Area. Dominant species include Brewer's saltbush (*Atriplex lentiformis* ssp. *breweri*), lemonade berry (*Rhus integrifolia*), and seashore blight (*Suaeda californica* var. *taxifolia*). Other representative native species of this community include coyote brush, sagebrush, and seacliff buckwheat (*Eriogonum parvifolium* var. *parvifolium*). Disturbed areas support non-native species of which fennel, pampas grass (*Cortaderia jubata*), hottentot fig, and New Zealand spinach are the most common.

Possible recommendations:

Existence of social trails along portions of the bluff-top, especially areas prone to

erosion, have accelerated the impacts on the stability of the bluff-top edge, causing increased erosion and in some cases contributed to the bluff-top retreat. The project proposes to close trails along the bluff-top that impact the Coastal Sage habitat, redirect water away from the bluff-top and to restore degraded sections of the habitat through the planting of native vegetation.

Project Phasing and Permitting

City input and concurrence regarding project phasing and implementation is critical to achieve the desired entitlements and proceed with project implementation. To initiate this effort, we have proposed the following four phases for the project:

Phase I – Public outreach to gather input on initial trail design concepts and further develop the project details.

- Phase I would include meetings with City Staff, professional experts, and design team. A series of meetings with project stakeholders and the community at large would also occur with the goal of obtaining input and recommendations to further the Open Space Management Plan.

Phase II – Preparation of environmental compliance documents, design plans, and permitting application and processes.

- Permitting agencies include:
 - California Coastal Commission
 - City of Goleta Departmental Reviews
 - Advance Planning Department
 - Community Services Department
 - Neighborhood Services & Public Safety Department

Phase III – Construction of Improvements

- Implementation of the improvements will more than likely be phased in accordance with any biological constraints such as butterfly aggregation season, roosting season, etc.

Phase IV – Maintenance

- This could be implemented via a Maintenance Agreement between the Santa Barbara Trails Council and the City of Goleta. The content of this Agreement will be further defined once trail improvements and other habitat restoration efforts have been

confirmed and implemented. However, the intent behind this phase is to insure that said improvements will be maintained for future generations after the project is complete.

As aforementioned, the phasing and permitting of project is subject to City input and approval, as well as other professionals' who expertise is critical in determining the specifics of the improvements and restoration efforts. However, the above phasing schematic assists in formulating a timeline and potential permit path for the project.

POLICY CONSISTENCY

The proposed project is within the jurisdiction of the City of Goleta. The City of Goleta General Plan/Coastal Land Use Plan (GP/CLUP) was adopted in 2006. However, the GP/CLUP has not yet been certified by the California Coastal Commission (CCC). Therefore, the CCC retains primary permit authority for projects in the City of Goleta's Coastal Zone. For the purposes of this project, policy consistency is analyzed using both the CCC's California Coastal Act, the City of Goleta's GP/CLUP, the City of Goleta's Article II - Coastal Zoning Ordinance, and the *Ellwood-Deveraux Coast Open Space & Habitat Management Plan*. The following policy consistency analysis is provided to assist in the City's review of the project.

CCC's California Coastal Act

Coastal Act Finding 30001.5: *"The Legislature further finds and declares that the basic goals of the state for the coastal zone are to:*

(a) Protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources.

(b) Assure orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs of the people of the state.

(c) Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners.

Implementation of the Ellwood Mesa Coastal Trails and Habitat Restoration Project would restore and enhance this coastal resource through long-term restoration and revegetation projects in the Ellwood Mesa. It would also provide safe and sound

public access trails to provide optimum views and recreational experiences to all Ellwood Mesa visitors year round.

Coastal Act Finding 30006: *"The Legislature further finds and declares that the public has a right to fully participate in decisions affecting coastal planning, conservation and development...and that the continuing planning and implementation of programs for coastal conservation and development should include the widest opportunity for public participation."*

As aforementioned, the project will include public outreach through all phases of the project in order to inform the public of project status, as well as to receive input from the community which is critical to the project's success as well as the continued livelihood of Ellwood Mesa.

Coastal Act Finding 30007.5: *"The Legislature further finds and recognizes that conflicts may occur between one or more policies of the division. The Legislature therefore declares that in carrying out the provisions of this division such conflicts be resolved in a manner which on balance is most protective of significant coastal resources"*

There is a delicate balance with habitat restoration and the proposed trail improvements. Both components will be executed in a manner that seeks to balance public access and resource protection by designing the trail improvements around the Trail System and various restoration and preservation projects that are discussed in the Ellwood Plan. Potentially incompatible uses such as motorized vehicles or organized sports would not be permitted in Ellwood Mesa in order to protect the significant resources and sensitive habitats of the mesa.

Public Access Policies:

Section 30210: *"Maximum access, which shall be conspicuously posted and recreational opportunities, shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

Section 30211: *"Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation"*

Section 30212: *“Public access from the nearest public roadway to the shoreline shall be provided in new development projects...”*

The project already includes a 40-space parking area that leads to the CCT and eventually the De Anza trail. The project’s improvements will improve public access to the Ellwood Mesa and beach areas as the project proposes specific trail improvements for fourteen (14) segments (see Appendix A). Said improvements are intended to improve public safety and to increase accessibility for a variety of users, including the elderly and potentially disabled individuals.

Section 30212.5: *“Wherever appropriate and feasible, public facilities, including parking areas or facilities shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area...”*

The existing parking lot located off of Hollister Ave. provides ample parking for the site as it includes forty (40) spaces, three (3) equestrian trailer parking spaces, and two (2) ADA compliant disabled parking spots. However, after the trails have been improved and habitat has been restored, the number of visitors may increase and the existing parking configuration may require expansion.

Section 30213: *“Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.”*

The proposed project does not change the fact that Ellwood Mesa is open to the public for passive recreation at no-cost. Additionally, public transportation can be used to access the area.

Section 30214: *(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to the following:*

- (1) Topographic and geologic site characteristics.*
- (2) The capacity of the site to sustain use and at what level of intensity.*
- (3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.*

(4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter...

c) In carrying out the public access policies of this article, the commission...shall consider and encourage the utilization of innovative access management techniques, including, but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.

The project will have to strike a delicate balance to ensure that sensitive coastal resources are protected while providing adequate access to Ellwood Mesa. Certain areas will be roped off or “off-limits” to pedestrians in order to protect and promote future habitat restoration efforts. While the specifics of this balance have not yet been detailed, its necessity is underscored by highlighting the need for input from biologists, engineers, the community, and City Staff.

The project will abandon a portion of the man-made trail to the immediate west of the development, and east of the trailhead parking lot. This abandonment has been incorporated in effort to protect the privacy of adjacent property owners. The existing parking lot area contains trash and recycling receptacles that are available for public use and disposal. The details of the additional improvements along the trail, such as benches, trash receptacles, etc., have not been discussed in detail, but will be discussed further in the forthcoming public outreach process.

Recreation Policies:

The following four policies are closely related and are dealt with as a unit in assessing the consistency of the proposed actions with their provisions:

Section 30220: *Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.*

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

Section 30222: *The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation*

shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

Section 30223: *Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.*

The proposed project will assure the long-term availability of this coastal property for public recreational use. The trail system (as envisioned in the Ellwood Plan) supports passive recreational uses along upland areas, coastal bluffs and beaches. Commercial recreational activities would not be compatible with the rustic, rural nature of the area that the City and general public would like to protect. Through the implementation of the project, visitors of various age groups and abilities will be able to enjoy passive recreation such as hiking, biking, walking, horseback riding, and even sunbathing.

Marine Environment Policies:

Section 30230: *Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance...*

Section 30231: *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

Section 30232: *Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.*

Section 30233: *Diking, filling, or dredging; continued movement of sediment and nutrients*

- a) *The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:*
- 1) *New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.*
 - 2) *Maintaining existing, or restoring previously dredged, depths in existing navigation channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.*
 - 3) *In wetland areas only, entrance channels for new expanded boating facilities; and in a degraded wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities, shall not exceed 25 percent of the degraded wetland.*
 - 4) *In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.*
 - 5) *Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.*
 - 6) *Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.*
 - 7) *Restoration purposes.*
 - 8) *Nature study, aquaculture, or similar resource dependent activities.*
- b) *Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. Dredge spoils suitable for beach replenishment should be transported for such purposes to appropriate beaches or into suitable long shore current systems.*
- c) *In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the function capacity of the wetland or estuary. Any alteration of coastal wetlands identified by the Department of Fish and Game, including, but not limited to, the 19 coastal wetlands identified in its report entitled, "Acquisition Priorities for the Coastal Wetlands of California," shall be limited to very minor incidental public facilities, restorative measures, nature study, commercial fishing facilities in Bodega Bay, and development in already*

developed parts of south San Diego Bay, if otherwise in accordance with this division.

- d) *Erosion control and flood control facilities constructed on water courses can impede the movement of sediment and nutrients which would otherwise be carried by storm runoff into coastal waters. To facilitate the continued delivery of these sediments to the littoral zone, whenever feasible, the material removed from these facilities may be placed at appropriate points on the shoreline in accordance with other applicable provisions of this division, where feasible mitigation measures have been provided to minimize adverse environmental effects. Aspects that shall be considered before issuing a coastal development permit for such purposes are the method of placement, time of year of placement, and sensitivity of the placement*

Construction of the trail improvements and related amenities will employ BMPs to control runoff, erosion and sedimentation. In conjunction with the Ellwood Plan, the project proposes to restore riparian, vernal pool and wetland habitats. These restoration projects include vegetation buffer areas and would be further evolved once professional experts are engaged in the project. While hazardous materials are not foreseen to be utilized in the trail improvements, the project will ensure that should any paints, solvents or other products be utilized, effective construction and clean-up measures will be ensured. Part of the construction specifications would be a requirement that nonhazardous products be substituted where possible.

While diking, filling and dredging are not included in the project description, some of the habitat restoration efforts may include such activities. Any such restoration activities would be carried out in such a way as to avoid disruption to marine and wildlife habitats and water circulation, and would be designed to provide long-term enhancement of the functional capacity of the wetland area(s). Any structures such as footbridges, boardwalks or culverts would be designed so as to avoid alteration of coastal wetlands and not impede the movement of sediment and nutrients which would otherwise be carried by storm runoff into coastal waters.

Land Resource Policies:

Section 30240:

- (a) *Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
- (b) *Development in areas adjacent to environmentally sensitive habitat areas and*

parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

The project focuses on restoration and preservation of sensitive environmental resources in conjunction with the Ellwood Plan Trail System that has been designed to avoid sensitive species and locations. Recreational development would be kept to a minimum, limited to rustic trails, potentially benches and even boardwalks. Existing trails that encroach onto sensitive habitats would be abandoned and/or rerouted to protect these resources.

Development Policies:

Section 30251: *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.*

The project would be consistent with the Trail System as envisioned in the Ellwood Plan. Said trails lead visitors to locations where they can appreciate the coastal and mountain views from the mesa. Upon improvement, the trails would not alter existing landforms and would be natural and rustic in order to be visually compatible with the surrounding area. Scenic views along the trails would be preserved.

Section 30252: *The location and amount of new development should maintain and enhance public access to the coast by 1) facilitating the provision or extension of transit service, 2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, 3) providing non-automobile circulation within the development, 4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, 5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by 6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.*

The existing parking lot located off of Hollister Ave. provides ample parking for the site as it includes forty (40) spaces, three (3) equestrian trailer parking spaces, and two (2) ADA compliant disabled parking spots. Should the City and team feel the project merits additional parking, we can pursue different solutions at that time. The protection, improvement and maintenance of the Ellwood Mesa via the proposed project would ensure that the large contiguous open space area will continue to provide recreation opportunities to both current and future residents in the community.

Section 30253: New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site, or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*
- (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.*

The proposed trail system and improvements along with habitat restoration efforts would comply with applicable geologic, flood, and fire standards. Additionally, the project will be designed to be non-intrusive and to minimize erosion. The improved trails will be set back 30 feet from the bluff edge and areas prone to erosion will be avoided where practical. The project will protect popular visitor destinations such as the monarch grove, the coastal bluffs, and the beaches.

Coastal Act Procedure 30600:

"Any local government...wishing to undertake any development in the coastal zone...shall obtain a coastal development permit".

Coastal Development Permits will be obtained prior to installation of trail improvements including trail construction, access improvements, habitat restoration, soil remediation, and potential debris removal activities.

City of Goleta General Plan/Coastal Land Use Plan:

Policy LU 9: Site #4 – Santa Barbara Shores Park and Sperling Preserve Parcels (Open Space/Passive Recreation). *This group of parcels, with a total of about 229 acres, is owned by the City. These lands are subject o deed restrictions that require the use of*

the property to be restricted in perpetuity to passive recreational activities and habitat protection. The criteria applicable to these parcels are as follows:

- a) *All future actions shall be consistent with the primary purposes of (1) preserving and enhancing the properties' sensitive habitats, including habitats for monarch butterflies, various raptors, and western snowy plovers, as well as vernal pools, riparian areas, native grasslands, coastal scrub, and other sensitive aquatic and terrestrial habitats and (2) preserving or improving the level of access and use by the public.*

The proposed project is consistent with the above policy in that it proposes to rehabilitate and protect the sensitive plant and animal species as noted. Additionally, one of the primary objectives of the project is to improve the level of access and use by the public and hence, is consistent with this policy.

- b) *Any development of structures shall be limited to a public restroom facility to be located at the public parking lot at Hollister Avenue.*

No structures are proposed as part of this project.

- c) *An extensive coastal access trail system shall be maintained [...] The trails shall include segments of the California Coastal Trail and the Juan Bautista Anza Historic Trail.*

As evidenced in our project description, the project proposes to maintain and improve the existing trail system, which includes the California Coastal Trail and the Juan Bautista Anza Historic Trail.

- d) *Any trail improvements shall be designed to maintain the natural, low-impact appearance of the existing informal trails; surfacing materials shall be limited to compacted fines or native soil materials without binders. The widths of trails shall be the minimum necessary to accommodate the planned type of users.*

As previously mentioned, the potential trail improvements will be consistent with those prescribed in the Ellwood Plan, and will be as natural as possible to meet the intent of this policy and to be consistent with public input received during the creation of the Ellwood Plan. Trail widths will be consistent with those proposed in the Ellwood Plan. Please see Appendix A for more information as to how these trail segments could be improved according to the GP/CLUP and Ellwood Plan specifications.

- e) *A public coastal access parking lot, not to exceed 45 spaces, shall be maintained at Santa Barbara Shores Park, with vehicular access from Hollister Avenue.*

While increasing the existing parking lot is not proposed as part of this project, the City may want to consider a potential General Plan Amendment should they believe that the project's improvements would merit increased parking capacity. However, parking improvements are not proposed as part of this project.

- f) *Any ornamental landscaping shall be limited to native species that will maintain the natural appearance of the area and that will not impair or obstruct scenic views from Hollister Avenue to the coastal bluffs, Pacific Ocean, and Channel Islands and preserve views from within the property to the Santa Ynez mountains.*

Ornamental landscaping is not part of the project description. Only native plant species will be part of the project's habitat restoration efforts, and will not impair or obstruct scenic views.

Policy OS 2.3: Preservation of Existing Vertical Access Ways “[...] Existing public vertical coastal access facilities shall be protected and preserved and shall be expanded or enhanced where feasible”.

The proposed project includes the design of improvements to the two existing bluffs and adjacent beach access points (Points E and F in Figure 2), providing expanded access at this popular coastal destination.

Policy OS 4: “[...] designate, preserve, and expand a public trail system that will provide recreation opportunities for multiple types of users in diverse and attractive environmental settings and that will connect various parks and neighborhoods with the regional trail network...”

The proposed project will construct access improvements that will provide additional recreation and access opportunities along the coastline to a wider range of users than the current trail system provides. The project will also provide a connection from the existing public parking lot, surrounding neighborhoods, and trail segments within the beach.

Policy OS 4.3: California Coastal Trail. [...] The following criteria and standards shall apply to the California Coastal Trail:

- a) *The trail shall be sited as close to the ocean as possible, while maintaining an appropriate setback for safety purposes from the edge of the coastal bluff.*

Please see Trail Segments 3-6 and Trail Segments 10-12 in Appendix A that details the location of trails which are closest to the bluff. Appropriate bluff-top setbacks according to the California Coastal Commission and forthcoming geological and engineering analyses will be adhered to.

- b) *The trail shall be connected at appropriate intervals to existing and proposed local trail systems and to vertical access facilities.*

Please see Trail Segments 7-9, and Trail Segments 10-12 in Appendix A that details the connection of the CCT to the De Anza Trail (Segments 8 and 9). Trail segments 13 and 14 are proposed to provide vertical access to the beach (Trail Segments 13 and 14 in Appendix A).

- c) *The trail shall be sited to maximize ocean views and scenic coastal views.*

All proposed trail and access improvements are intended to maintain, encourage and maximize ocean views, coastal views, and passive recreation opportunities for the general public.

- d) *The trail shall be planned primarily as a pedestrian trail, although certain segments, [...] may be planned to accommodate the needs of bicyclists and/or equestrians.*

Certain segments of the CCT are planned to accommodate the needs various users, including bicyclists and/or equestrians. As mentioned in the Trail Design Standards section of this letter, there are five (5) different types of trails per the Ellwood Open Space Plan that will be incorporated into the trail system. The widths and treatments on the various trail segments will vary according to the applicable standard.

- e) *Segments of the trail located along the beach and shoreline that may not be passable at all times shall, where feasible, have an alternate landward or bluff-top route that will allow continuous passage during all seasons and tide conditions.*

There are no beach trails proposed as part of this project, but rather two access points off of the trail segment along the bluff-top as previously discussed. This bluff-top portion of the trail will be improved according to the California Coastal Commission setback requirements and any other additional standards pending geological and engineering analyses.

- f) *The trail shall be sited and designed to minimize impacts to environmentally sensitive habitat areas to the extent feasible. The trail surface shall generally be limited to groomed and/or compacted native soil or sand material, except that segments intended for handicapped access or to beach overlooks may be improved to a higher standard.*

The project will strike a balance between trail improvements and habitat restoration. Impacts to ESHAs and other biologically sensitive species will be minimized to the extent feasible. ADA compliant trails are possible, however the specific segments and locations will need to be discussed and developed with City Staff and the future design team.

Policy OS 4.4: Juan de Anza National Historic Trail.

- b) *Within the City owned Sperling Preserve and Santa Barbara Shores Park, the Anza Trail shall be planned for multiple user types, including pedestrians, bicyclists, and equestrians...*

The portions of the Anza Trail included in this project will be improved to accommodate multiple users as previously described, and in consistency with this General Plan policy requirement. Please see Appendix A for more information regarding specific trail segments and potential locations for these types of trail improvements.

- c) *Within the City-owned open space property the Anza Trail shall generally be designed as follows:*
- 1) *The equestrian path or tread may be separate from or combined with the main trail tread for pedestrians and bicyclists.*
 - 2) *The trail shall be designed to have the minimum width necessary to accommodate the multiple users. The surface may be native soil materials or imported compacted fines (such as decomposed granite) without stabilizer or binder.*

The above requirements are acknowledged and will be incorporated into the Anza Trail improvements. Please see Appendix A for suggested trail improvements along the Anza Trail. The intent behind these proposed trail improvements are to increase accessibility for the variety of visitors that utilize Ellwood Mesa- horseback riders, bicyclists and pedestrians.

Policy OS 1.3: Preservation of Existing Coastal Access and Recreation. [...]existing public beaches, shoreline, parklands, trails, and coastal access facilities shall be protected and preserved and shall be expanded or enhanced where feasible.

The proposed project with its trail and habitat improvements meets the intent of this General Plan policy as said improvements will protect and preserve access to the coast and passive recreation sites located on Ellwood Mesa.

Policy OS 5.3: Public Access and Recreation. [...] *"the Ellwood-Devereux Open Space Area shall be managed to maintain the site's historical public access and recreation uses while managing access ways to protect natural resources such as the monarch butterfly groves, vernal pools, native grasslands, beaches, coastal bluffs, and other environmentally sensitive habitat areas. [...] "the California Coastal Trail segment within the Ellwood-Devereux Open Space Area, the other major east-west trail, is planned to have a bluff-top alignment"*

The project proposes that portions of the CCT be improved in order for it remain a safe and accessible bluff-top trail. The proposed habitat improvements in order to protect Ellwood Mesa's natural resources meet the intent of this General Plan policy as said improvements will enhance and protect the natural biological livelihood of the mesa.

City of Goleta's Article II - Coastal Zoning Ordinance

As mentioned earlier, all parcels are zoned REC- Recreation District according to Chapter 35, Article II of the City of Goleta's Coastal Zoning Ordinance. The Recreation District's purpose is *"to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have been active and passive recreation potential because of their beauty and natural features"*. The proposed project and improvements compliment the intent and purpose of the REC zone district as evidenced in this project description.

The permitted uses in the REC zone district include outdoor public and/or private recreational uses, such as parks, riding, hiking, biking and walking trails. The proposed project fully meets the intent of the applicable zone and all proposed improvements are permitted uses in the REC zone.

Ellwood-Devereux Coast Open Space & Habitat Management Plan

The purpose of the *Ellwood-Devereux Coast Open Space & Habitat Management Plan* is to:

- Reduce the amount of residential development;
- Relocate development to inland locations and away from sensitive coastal resources and to establish a 650+ acre open space and natural reserve;

- Provide for habitat improvements;
- Allow public access consistent with conservation and habitat management needs.

The proposed project would implement the vision embodied in the *2004 Ellwood-Devereux Coast Open Space and Habitat Management Plan* ("the Ellwood Plan") that identified a planned trails network, including the CCT through the open space. Also within the *Ellwood-Devereux Coast Open Space & Habitat Management Plan* is a section entitled *Public Access and Recreation* which was added to provide policy guidance to address any conflicts between access and resource protection.

The section notes:

"In general, the visitors to the Open Space Plan Area are respectful of natural resources and other users. However, increased visitation over the years and unmanaged access have resulted in a proliferation of informal trails and localized trail and bluff erosion, which in turn have adversely affected sensitive habitat and created public safety hazards".

As a result, a number of goals and policies were developed to guide management of recreational use of Ellwood Mesa, including:

Public Access Goal 1. Provide public access and passive recreation opportunities at the Open Space Plan Area compatible with natural resource protection and preservation of undeveloped open space, and with the management programs of existing reserves and preserves

Public Access Goal 2. Maintain the natural, undeveloped, and scenic character of the Open Space Plan Area while protecting coastal resources.

Public Access Goal 3. Maintain the overall historic public access and uses, while providing a variety of passive recreation uses throughout the Open Space Plan Area.

Public Access Goal 4. Maintain a trail system that provides continuous east-west access across the entire Open Space Plan Area and reduces conflicts among multiple uses.

The proposed project will improve access to and along the shoreline from the primary parking lot off of Hollister Avenue by improving the condition of the existing trail and addressing severe erosion problems, including improvements to two coastal access ways connecting the bluff to the beach. The project will also close a number of informal "social" trails currently impacting sensitive habitat areas, and restore them, thereby enhancing visitor experience. The trail and access way improvements along the bluff

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and between bluff and beach will improve public safety, accessibility and the overall visitor experience. The proposed project will also include plans for the future maintenance and management of public access on the site while protecting existing sensitive habitat areas, allowing for long term sustainable use.

□□□

This concludes our summary project description letter and request. Please note the multiple figures, exhibits and photographs included in this document to assist in your review. The Santa Barbara Trails Council is seeking input and direction from the City of Goleta Community Services Department regarding potential permit paths and planning processes that would be involved with the Ellwood Mesa Coastal Trails and Habitat Restoration Project. The SBTC has engaged SEPPS to assist in this effort and provide support to City Staff so that we may achieve timely review. We'd sincerely appreciate an opportunity to meet with you and other City Staff to discuss the City's desired permit path for this project and next steps. Please do not hesitate to contact us if you have any questions or would like to discuss this further. We look forward to meeting with you at some point within the next thirty (30) days.

Sincerely,

Ray Ford
Santa Barbara Trails Council

CC: Maruja Clensay - *SUZANNE ELLEDGE Planning & Permitting Services, Inc.*

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APPENDIX A

TRAIL SEGMENT DESCRIPTIONS AND POSSIBLE RECOMMENDATIONS

5.1 TRAIL SEGMENTS 1-2

Segments 1-2 comprise a 1,800 foot (.34 mile) section of the shared Coastal-De Anza Trail. It extends from the trailhead parking area along Hollister Avenue across several gullies and continues to the south end of the Comstock subdivision where it intersects with east-west trails that head towards Sandpiper Golf Course and Monarch groves.

Issues include impacts to the riparian corridor, need to bridge several gullies that have restricted the trail to a narrow route that not sustainable over time and gullying created by excessive erosion.

5.1.1 Trail Segment 1 – Parking Lot to Gully Crossing

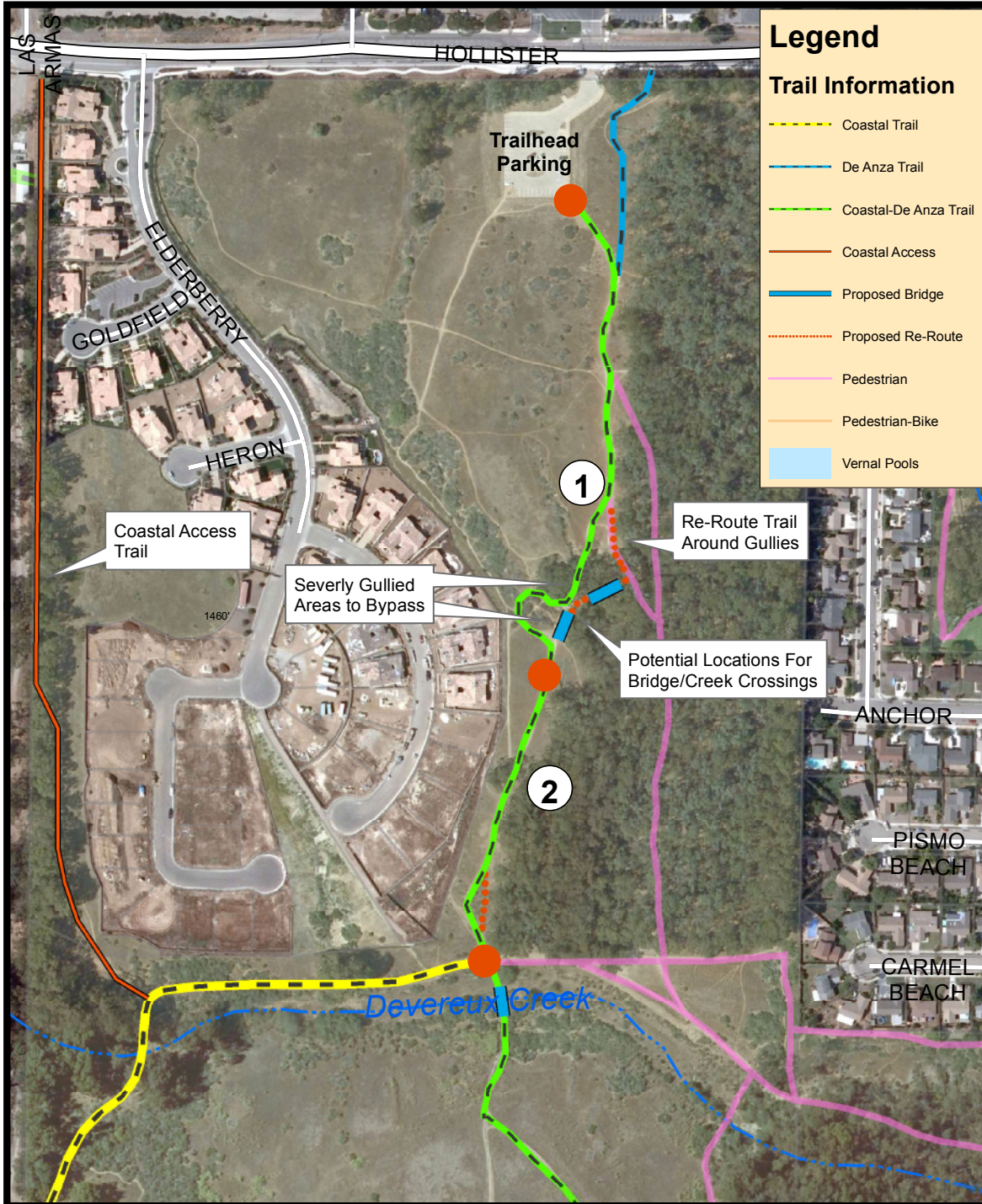
Segment 1 starts at the Trailhead parking area and continues south where it crosses several gullies. Though the length isn't much (550 feet), this section has serious issues that need to be addressed.

From the trailhead parking area along Hollister the Coastal-De Anza Trail follows a shared 12 foot wide partially decomposed granite trail for 300 feet to a point where the trail splits. The Coastal-De Anza Trail veers right, crossing a 60-foot-wide gully (shown below left) then circling west along a very narrow trail to bypass a 15-foot-deep gully.

The path leading to the Monarch Groves diagonals to the left and continues to Devereux Creek where it turns east to the Groves.

The gully sections have become a serious problem due to the amount of erosion, impacts on the riparian area and is difficult to use during the wet, winter months. At the current point the trail crosses them also poses a problem since they are extremely wide and in the winter months may be very wet.

Other issues include lack of a separate equestrian path from the trailhead, erosion to the decomposed granite portions of the trail and large amount of disturbed area soils due to the current use of an inappropriate location for the trail crossing.



Legend

Trail Information

- Coastal Trail
- De Anza Trail
- Coastal-De Anza Trail
- Coastal Access
- Proposed Bridge
- ... Proposed Re-Route
- Pedestrian
- Pedestrian-Bike
- Vernal Pools

The project proposes a number of improvements, including:

Re-configuring the trail from the parking area to the gully area to an 8 foot wide Type 5 Improved Surface Trail using imported compacted fines – smoothed, compacted and crowned – to raise tread above the surrounding area.

Addition of a 2' wide shoulder and 2-3' wide equestrian path parallel to the main trail.

Re-routing the trail where it nears the gully so that it veers left for 200 feet on the trail leading to the Monarch Groves and at that point add a 25' bridge across the gully at a much narrower point that meets accessible and equestrian standards.

Add a second 25' bridge across the second, deeper gully.

Re-vegetate the disturbed areas created by the gully trail to restore the gully area and close the old trail.

5.1.2 Trail Segment 2 – Gully to Devereux Creek

From gully area south to intersection of Coastal Alternative and Monarch Grove trails just before crossing Devereux Creek. Length 1220 feet.

The existing trail is approximately 4' wide and in reasonably good condition. The grade is almost level with slight 2-3% ups and downs.

Proposed Improvements:

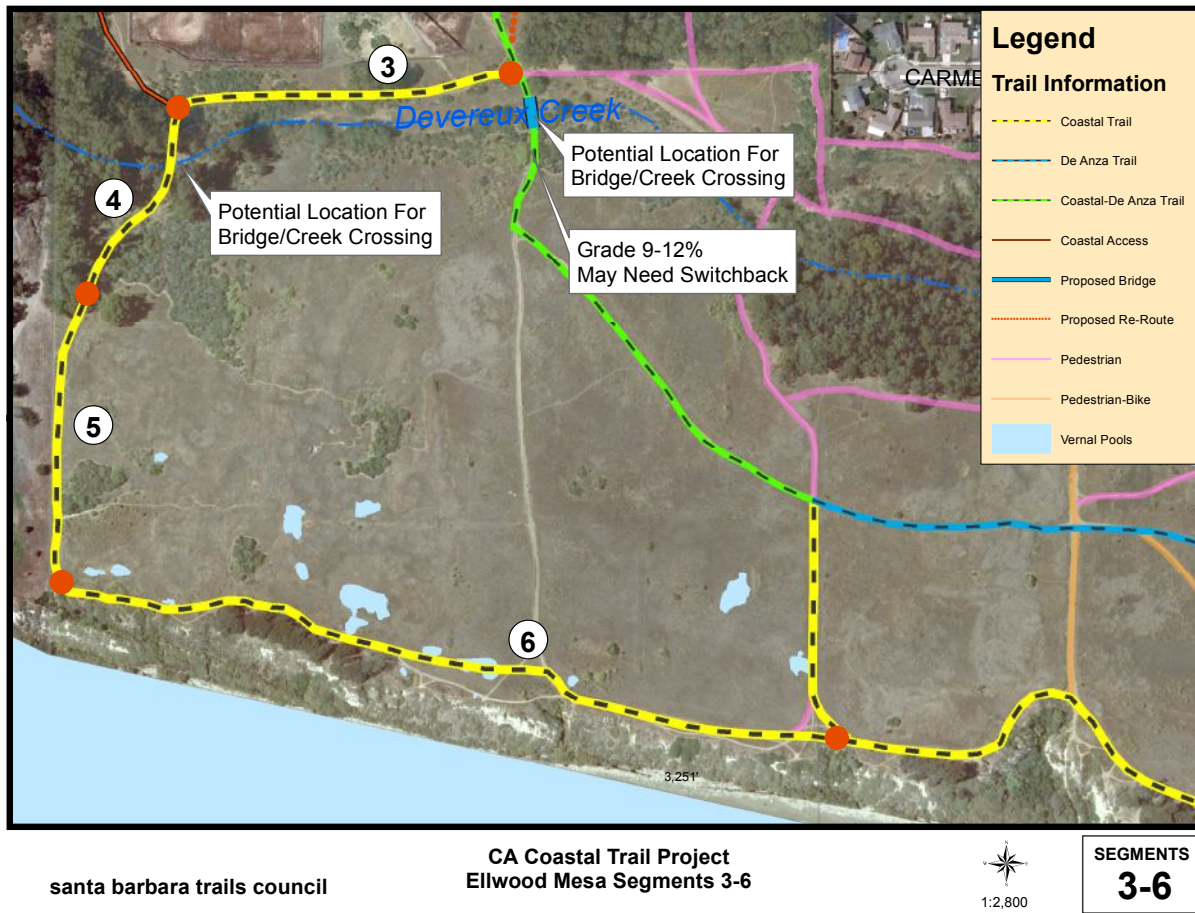
Re-configure width of main trail to 6' and add a 2' shoulder and 2' equestrian path.

Reroute the trail for 100 feet near the south end of the segment to reduce the grade for accessibility.

5.2 TRAIL SEGMENTS 3-6

Segments 3-6 comprise a 3,926 foot "secondary" part of the CA Coastal Trail that follows the north side of Devereux Creek to the Sandpiper Golf Course boundary, crosses the creek, climbs a 9-12% grade to the mesa top and follows the golf course boundary to the bluff-top. From this point the trail turns east and follows the bluffs for 2,100' to its intersection with the main Coastal Trail.

Issues include the riparian crossing and impacts on the creek, need for a switchback or routing of the trail as it climbs out of the creekbed to reduce the grade and bluff-top issues, including trail braiding, erosion damage and bluff-top damage.



As a secondary part of the Coastal Trail through Ellwood Mesa, the trail is primarily designated for Pedestrian-Bike access. The proposal would continue this designation and add improvements to control erosion, lessen grade, mitigate bluff-top issues and repair the riparian creek crossing.

5.2.1 Trail Segment 3 – Alternate Coastal Trail to Creek Crossing

From the intersection of the main Coastal-De Anza Trail, Segment 3 parallels the north side of Devereux Creek for 700' to the Sandpiper boundary where it turns south to cross the creek.

Most of the route is 4- 6' in width but it has an uneven tread due to the impacts of erosion as it climbs over several knolls and descends through two side drainages. In places the trail becomes a double track as users have avoided muddy places.

Improvements include:

- Maintain the segment as a natural surface trail
- Outslope the trail and add dips to drain water off the trail.
- Widening the trail to 6'
- Re-vegetate as needed to restore disturbed areas.

5.2.2 Trail Segment 4 – Creek to Mesa Top

Segment 4 is 317' in length and includes the Devereux Creek crossing and 9-12% grade climb up onto the mesa proper.

Issues relating to Segment 4 include the impacts on the riparian area at the creek crossing, potential for erosion due to the 9-12% grade south of the creek crossing and brush and dead tree material choking the creek and impacting water flow.

Proposed improvements include:

- Clearing brush in the channel to restore water flow.
- Adding a switchback or adjusting the path as it climbs to reduce the grade.
- Design bridge or crossing to avoid direct creek crossing.
- Re-vegetate as needed to restore disturbed areas.

5.2.3 Trail Segment 5 – Sandpiper Boundary

After the climb out of the Devereux Creek riparian area, Segment 5 (731' in length) is almost level, following the fence line marking the boundary with Sandpiper Golf Course to the bluffs. Though it has enough of a gradient to erode the trail and cause it to be slightly below grade. Over time the entrenchment will only get worse.

Improvements include:

- Widening the tread to 6'
- Utilize native soil and imported compacted fines – smoothed, compacted, and crowned – as needed to stabilize the trail.
- Removal of non-native species(anise and mustard) within 100 feet of the trail corridor.

5.2.4 Trail Segment 6 – Alternate Coastal Trail Blufftop

At the bluffs, the trail turns east and follows the bluff-tops for over 2,000' where it intersects with the main Coastal Trail. The trail is almost level for the entire distance and varies in distance from the bluff edge from 20-100 feet.

Issues include tread that is below grade, creating mud holes, uneven tread and

braided trail created when users by pass the problem areas. The trail width varies from 4-12', with areas nearer the golf course narrower and others further to the east much wider. In places the trail may need to be relocated a small distance to move it away from the bluff edge but there are also a number of vernal pools in the area that may complicate relocation.

There are also a number of edge trails along the bluffs that may need to be removed if determined to be damaging to the bluff-top or vegetation.

Recommendations for Segment 6 include:

- Re-configuring the trail width (which varies) to 6 feet

- Use imported compacted fines – smoothed, compacted and crowned – to raise tread above the surrounding area

- Add erosion control features to minimize bluff-top erosion

- As needed, relocate the trail slightly to move it away from the bluff edge.

- Identify sensitive habitat and site relocated trail to minimize impacts

- Remove edge trails that impact vegetation or contribute to erosion and bluff-top retreat

- Removal of non-native species (anise and mustard) within 100 feet of the trail corridor.

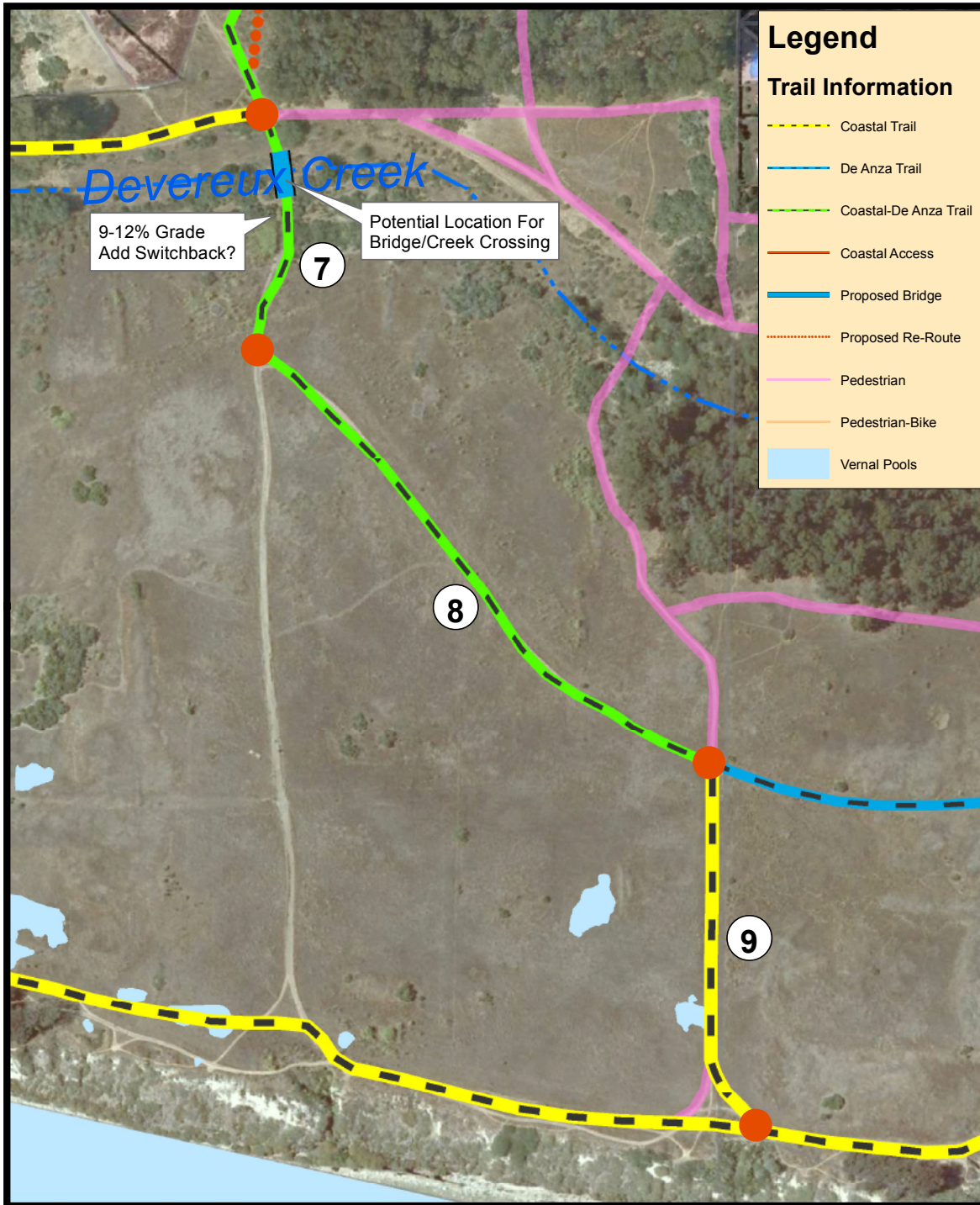
5.3 TRAIL SEGMENTS 7-9

Trail segments 7-9 follow a 2,000' long section that crosses Devereux Creek, climbs up onto Ellwood Mesa and ends at the intersection of the main bluff-top trail. The first part of the section is shared between the CA Coastal and De Anza trails. At the south end of Segment 8 the trails split, with the De Anza Trail heading almost due east until it reaches the boundary between Ellwood Mesa and UCSB property. The Coastal Trail continues south until it intersects with the bluff-top trail.

The primary issues along this section include the Devereux Creek crossing and a 9-12% grade south of the creek that may require a relocation of a short section of the trail to lessen the grade.

5.3.1 Trail Segment 7 – Devereux Creek to Mesa Top

Trail Segment 7 leads south from the intersection with the Alternate Coastal Trail, crosses Devereux Creek and then climbs steeply uphill to Ellwood Mesa proper. The main concern is the Devereux Creek crossing. The riparian area in the vicinity of the crossing has been heavily impacted by users as they cross Devereux Creek. Impacts are even greater during the rainy winter season.



Improvements proposed for Trail Segment 7 include:

Addition of a 25-30' bridge to minimize impacts on the riparian area that is designed to accessible and equestrian standards.

Relocating trail slightly to the east to lessen the grade to meet accessible standards for several hundred feet.

Re-vegetation with native plants to restore disturbed areas.

5.3.2 Trail Segment 8 – Blufftop Segment to De Anza-Coastal Trail Split

Segment 8 meanders through just under 1,000 feet of grass-covered meadow to its intersection with the main part of the De Anza Trail. At this point it turns south and heads towards the bluffs. The trail follows an old jeep road and the ruts are still visible. Much of the tread is also covered with low-lying grass. The grade for this segment is less than 5%, well within accessible standards.

Improvements include:

Narrowing the tread to 6' wide

Use of imported compacted fines – smoothed, compacted and crowned – to raise tread above the surrounding area

Addition of a 2' shoulder and 2' wide equestrian trail.

Re-vegetation as needed for disturbed areas.

Removal of non-native species such as anise and mustard within 100 feet of the trail corridor.

5.3.3 Trail Segment 9 – Coastal Trail Mesa Top to Bluffs

At the intersection with the main De Anza Trail, the Coastal Trail turns south and heads directly to the bluff-top. The route is similar to Segment 8, except the trail corridor is further below grade and for its entire length, the only path for water to flow is down it in a northern direction.

The impact of wet, muddy sections along it during the winter months is clearly evident as users bypass the wet or muddy sections.

Improvements are similar to Trail Segment 8:

Include equestrians along pedestrian and bicycle use to enlarge their loop opportunities.

Narrow the main tread to 6' wide

Use imported compacted fines – smoothed, compacted and crowned – to raise

tread above the surrounding area

Add a 2' shoulder and 2' wide equestrian trail.

Re-vegetation as needed for disturbed areas.

Remove of non-native species such as anise and mustard within 100 feet of the trail corridor.

Provide a gentle curvilinear flow for the trail to provide opportunities for water to flow off either side of the trail.

5.4 TRAIL SEGMENTS 10-12

Trail Segments 10 and 11, the bluff-top Coastal Trail and De Anza Trail respectively, cut through the heart of Ellwood Mesa, the De Anza Trail meandering through lush green fields of grass and other vegetation; the Coastal Trail along the edge of the bluffs, with more than 3,200' of expansive beach and island views attracting hundreds of visitors a day.

The major issues in this section are focused on the coastal bluffs and are similar to those in the Alternate part of the Coastal Trail along the western bluffs. However they are more pronounced on the bluffs further east. The eastern part of Ellwood Mesa can be accessed easily from Coronado Drive near the Monarch Groves, Ellwood Beach Drive on the northeast, the Canon Green neighborhood and Isla Vista on the east. In addition the two main beach access points (E and F) are located along the eastern part of the mesa and provides the major route down to the beach.

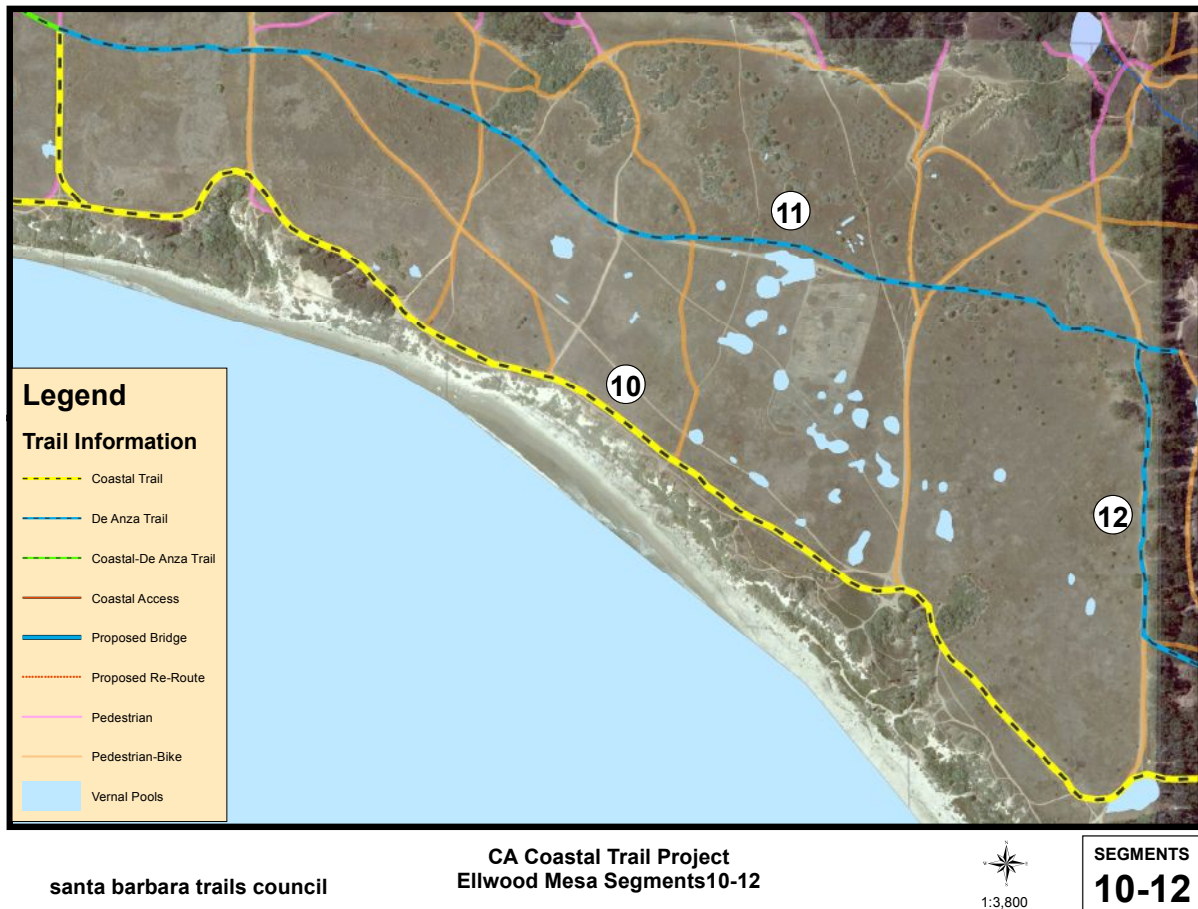
Along with the high visitor use, there are a number of environmental issues that need to be addressed in making improvements to Segments 10-12: a large number of vernal pools that could make relocating the trail more difficult; more pronounced erosion and vegetation disturbance; an abundance of social trails that contribute to the erosion; and increased numbers of other sensitive species such as the native grasses and nesting bird populations.

5.4.1 Trail Segment 10 – Coastal Trail Blufftops

Trail Segment 10 includes the main portion of the Coastal Trail along the bluff-tops and other than the Monarch Butterfly Groves, receives the highest amount of use. Distance of the trail from the bluff edge ranges from 20-100 feet along the 3,250' length of the segment.

Issues relating to this part of the trail are similar to those in Segment 6 but more pronounced. The trail width varies from 4-15' in width. Trail braiding has developed due to erosion that has left large parts of the trail below grade and numerous social trails have been created, especially in the vicinity of Beach Access Point E and to the east

towards the UCSB boundary.



As a result, there have been major impacts to the vegetation within 50-100' of the bluff edge and to the bluff faces where inappropriate trails have been created by beach goers and bicyclists.

Recommendations for Segment 10 include:

- Re-configuring the trail width (which varies) to 8 feet to accommodate high visitor use.

- Use of imported compacted fines – smoothed, compacted and crowned – to raise tread above the surrounding area

- Adding erosion control features to minimize bluff-top erosion

- As needed, relocating the trail slightly to move it away from the bluff edge.

- Identify sensitive habitat (native grasses, vernal pools) and relocating the trail to minimize impacts

Removing edge trails that impact vegetation or contribute to erosion and bluff-top retreat

Removal of non-native species (anise and mustard) within 100 feet of the trail corridor.

5.4.2 Trail Segment 11 – De Anza to UCSB Boundary

Trail Segment 11 encompasses a 3,628' section of the De Anza Trail. The segment is relatively flat, with gentle undulations. Near the middle portion of the segment the trail has been relocated slightly to accommodate a large vernal pool and several vegetation rehabilitation projects.

Issues relating to Segment 11 include the potential need to relocate short sections of the trail to minimize impacts on the native grasses, vernal pools and other sensitive species.

Recommendations for Segment 11 include:

Re-configuring the main tread to a width of 6' wide

Use imported compacted fines – smoothed, compacted and crowned – to raise tread above the surrounding area

Adding a 2' shoulder and 2' wide equestrian trail.

Adding a gentle curvilinear flow for the trail to provide opportunities for water to flow off either side of the trail.

Re-vegetation as needed for disturbed areas.

Remove of non-native species (anise and mustard) within 100 feet of the trail corridor.

5.4.3 Trail Segment 12 – De Anza UCSB Boundary to Blufftop

Trail Segment 12 parallels the boundary between Ellwood Mesa and UCSB property for 900'. The trail flows gently uphill towards the coast, with rises over a series of small knolls that have caused major erosion to the trail and created an uneven tread. The trail is extremely wide along much of it and is braided in places where users have diverted around the rougher sections.

Issues not only include erosion, large areas of disturbed and compacted soil, vegetation damage but potential impacts to nesting birds and potentially the Monarch Butterfly, which may utilize the long stand of eucalyptus trees during the winter months.

Recommendations include:

Re-configuring the trail width (which is extremely wide) to 6'

Use imported compacted fines – smoothed, compacted and crowned – to raise tread above the surrounding area

Add a curvilinear flow to the trail to help sheet water off either side

Relocate short sections of the trail to either side of the existing tread to improve erosion control

Identify sensitive habitat (native grasses, vernal pools, butterflies) and relocate the trail where needed to minimize impacts

Removing non-native species such as anise and mustard within 100 feet of the trail corridor.

5.5 BEACH ACCESS SEGMENTS 13-14

There are two access points to the beach at Ellwood Mesa, Beach Access E and F. In 2009, supported by a grant from the UCSB Coastal Fund, the Trails Council made short term improvements to both access points. However, both are in need of long-term solutions.

5.5.1 Segment 13 - Beach Access F

Access Point F is the furthest west of the two means to reach the beach. Once a steep dirt road leading directly down to the beach for access to oil-related facilities, erosion from the mesa top has carved out a deep gully and prior to 2009 was almost impassable for most beach goers. In places the gully was less than a foot wide and more than 3' deep.

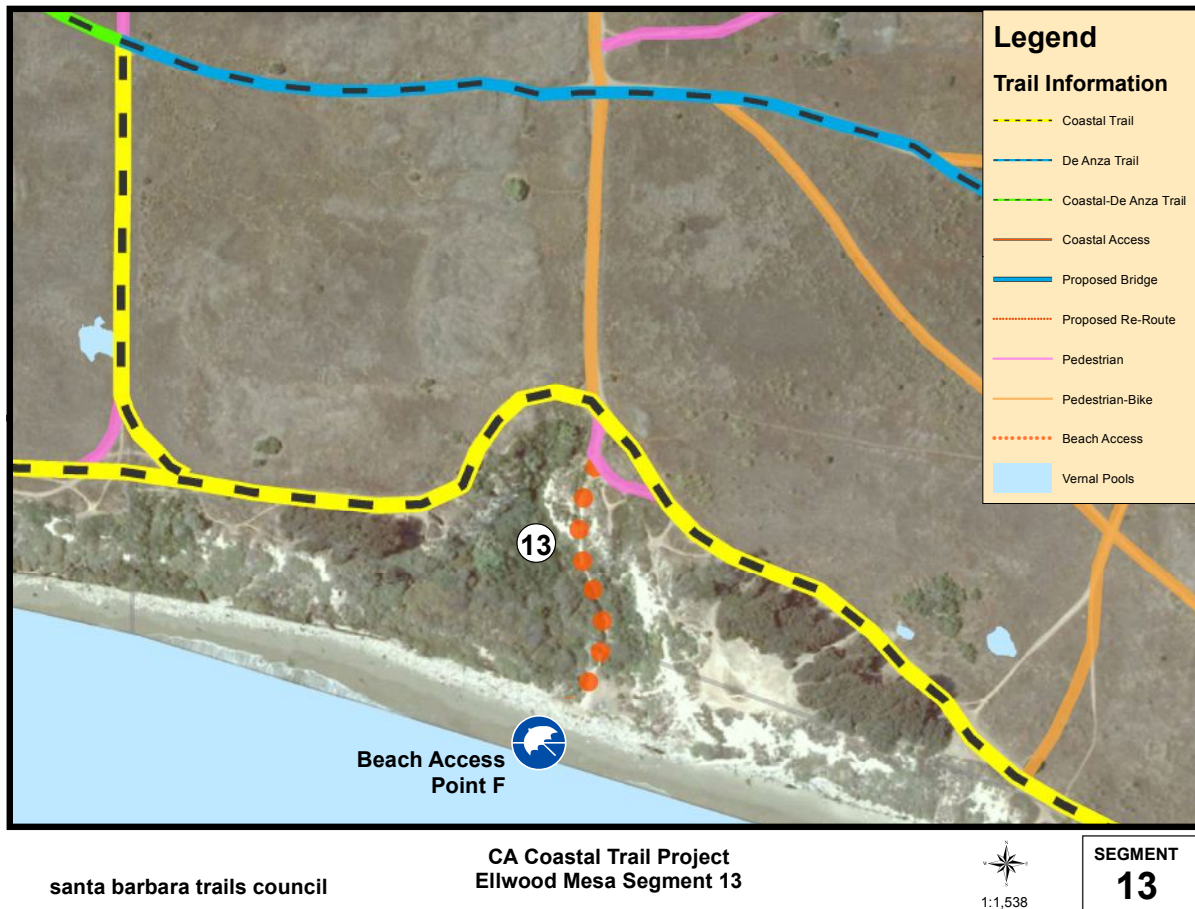
Complicating this, more severe erosion on either side of the gully makes it almost impossible for sections of the trail to be relocated to make the grade less steep. The 2009 rehabilitation work focused on widening the gully and creating a series of "s" curves so that those heading down to the beach could do so safely.

Despite these efforts, erosion continues to take its toll. The immediate cause of this is water flow off the bluff-top trail and mesa area and this needs to be dealt with but once the water has been diverted away from the gully area, a "engineered" solution such as a stairway or treated railroad tie type steps that also act to hold the soil in place will be required. The proposed project will provide funding to design a permanent solution.

Recommendation:

Add erosion control measures along the bluff-top to keep water from flowing down into the series of gullies on either side of the access trail as well as the trail itself.

Construct stairway or steps that stabilize the trail and banks on either side.
Relocate trail along the lower half of the access way where it levels out to minimize erosion and sheet water off it.



5.5.2 Segment 14 - Beach Access E

Beach Access Point E once included a well maintained asphalt road that led down to a BBQ area for Santa Barbara Shore residents after the housing tract was built in the 1960s. Eventually the amenities were abandoned and over time deteriorated to the point that the BBQ pit no longer remains and the road became impassable. All that remain are the red brick columns that mark the upper entry point and sections of the asphalt leading off the bluffs.

Major concerns at Beach Access Point E include water flow off the mesa and down the asphalt that has severely eroded the beach cliffs, a proliferation of social trails that have impacted the cliff face and created additional erosion and the poor condition of the lower trail leading gently west to the beach.

Recommendations include:

Removal of all asphalt, red brick and other remnants and return the area to a more natural state.

Re-configuring the trail width to 8 feet to accommodate high visitor use.

Use of imported compacted fines – smoothed, compacted and crowned – to raise tread above the surrounding area.

Adding erosion control features, especially along the steeper upper part of the trail to minimize to the beach cliffs below.

Removing social and other edge trails that impact vegetation, the cliff faces or contribute to erosion.

Removal of non-native species such as anise and mustard within 100 feet of the trail corridor.

