

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
 SOUTH CALIFORNIA ST., SUITE 200
 VENTURA, CA 93001
 (805) 641-0142

Th8b
 August 17, 1998



TO: Commissioners and Interested Persons

FROM: Chuck Damm, Senior Deputy Director
 Gary Timm, District Manager, South Central Coast
 Mark H. Capelli, Coastal Program Analyst

RE: County of Santa Barbara LCP Amendment 2-97-C (Santa Barbara Shores - Ellwood Beach) Time Extension Request for Expiration Date of Certification

Summary

The County of Santa Barbara has requested a one year time extension of the Commission's April 9, 1998 certification with Suggested Modifications of LCP Amendment 2-97-C to the Santa Barbara Shores - Ellwood Beach Specific Plan. (See Exhibits 1 and 2.)

The Commission's certification with suggested modifications expires six months from the date of the Commission's action (14 C.C.R. Section 13537(b)). Thus, if the County has not accepted the Commission's approval by October 9, 1998, the Commission's action will expire unless an extension is granted by the Commission. The Commission may, after consultation with the local government, extend the expiration date for the Commission's certification for a period of up to one year by a majority vote of the Commissioners present, if the Commission determines that there is good cause to do so (14 C.C.R. Section 13535[c]).

The Santa Barbara County Board of Supervisors is not prepared at this time to respond to the Commission's Suggested Modifications and has requested an extension of the expiration date of the Commission's certification. As discussed below, because of the unresolved issues surrounding the Commission's Suggested Modification 1.d (which requires the access road to service the Ellwood Beach property be moved from the Ellwood Beach to the Santa Barbara Shores portion of the Specific Plan Area), the Commission staff recommends that the Commission extend the effective period of the Commission's April 9, 1998 certification with Suggested Modifications of LCP Amendment 2-97-C for a period of up to one year, or until, October 9, 1999.

This extension will give the County an opportunity to pursue a comprehensive environmental analysis of alternative access routes to service the Santa Barbara Shores - Ellwood Beach Specific Plan Area as part of the Master Plan for the Santa Barbara Shores portion of the Specific Plan Area. It will also allow the County to evaluate the suggested access route through the Santa Barbara Shores portion of the Specific Plan Area in relation to the proposed changes to the park facilities on the County owned Santa Barbara Shores property.

Exhibits

1. County of Santa Barbara letter dated July 27, 1997 requesting a Time Extension on LCP Amendment 2-97-C.
2. County of Santa Barbara Staff Report dated July 9, 1998 (with attachments) regarding the County's response options to the Commission's certification with Suggested Modifications of LCP Amendment 2-97-C.

I. Staff Recommendation

Staff recommends that the Commission adopt the following resolution:

The Commission hereby grants, under 14 C.C.R. Section 13535©, an extension of up to one year, or until October 9, 1999, of the Commission's certification with Suggested Modifications of Santa Barbara County LCP Amendment 2-97-C on the grounds that good cause exists for such time extension.

II. Findings

1. Background

On April 9, 1998, the Commission denied the County of Santa Barbara LCP Amendment 2-97-C (Santa Barbara Shores - Ellwood Beach Specific Plan) as submitted. The Commission found that the amendment was inconsistent with the protection of environmentally sensitive habitats, coastal access, and scenic and visual resources. The Commission then certified LCP Amendment 2-97-C with Suggested Modifications which would bring the amendment into compliance with the relevant portions of the Coastal Act. (See Exhibit 1, Attachment A.)

Under the Commission's Administrative Regulations (14 C.C.R. Section 13544), the proposed amendment to the previously certified Santa Barbara Shores - Ellwood Beach Specific Plan will not become effective until the County acknowledges receipt of the Commission's April 9, 1998 action, agrees to the modifications, and takes the necessary formal actions necessary to implement the Suggested Modifications. If the County chooses to accept the Commission's Suggested Modifications, it must do so within six months of the Commission's April 9, 1998 action on LCP Amendment 2-97-C, otherwise the Commission's certification with Suggested Modifications expires pursuant to Section 13537(b) of the Commissions Administrative Regulations.

In the event that the County of Santa Barbara does not agree with the Commission's adopted Suggested Modifications, the County may resubmit an entirely new Land Use Plan amendment pursuant to the Commission's Administrative Regulations Section 13541. At the time of such resubmittal, the Commission's prior certification with Suggested Modifications expires and the resubmittal becomes the means for considering alternative amendments to the Santa Barbara Shores - Ellwood Beach Specific Plan.

On July 21, 1998, the County of Santa Barbara held a local public hearing on the Commission's Suggested Modifications and voted to request a one year extension of time from the October 9, 1998 expiration deadline to allow further consideration of the Commission's Suggested Modifications. (See Exhibit 2.) In requesting the extension of time, the County has indicated that the Suggested Modification #1.d (requiring access to the Ellwood Beach property through the adjacent County owned Santa Barbara Shores property) poses serious policy considerations for the County that will require a comprehensive review and environmental analysis of all the potential access alternatives to the Santa Barbara Shores - Ellwood Beach Specific Plan Area. The Santa Barbara County Board of Supervisors has also directed its staff to address the access issues in the context of the environmental analysis being prepared for the Master Plan for the Santa Barbara Shores County Park property.

2. Good Cause Finding

Under Section 13535(c) of the Commission's Administrative Regulations, the Commission may extend, for a period up to one year, any time limitation contained within Subchapter 2 of Chapter 8, Title 14 of the Commission's Administrative Regulations, for good cause, after consultation with the local government. As noted above, the County of Santa Barbara has requested a one year time extension to address the legitimate policy issues of routing a private access route through the County owned Santa Barbara Shores County Park property. In submitting this request, the County has provided a preliminary analysis of some of the potential conflicts generated by routing a private access route through a proposed County park. The conflicts identified include potential safety hazards associated with commuter vehicular traffic, displacement of park land purchased with state bond monies, blockage of pedestrian access to the park from the adjacent residential neighborhood of Santa Barbara Shores, construction and maintenance responsibilities of the access road, and impacts to environmentally sensitive habitats. (See Exhibit 2.)

To address these issues, the County has directed its staff to include an analysis of alternative access routes to serve both the Santa Barbara Shores and Ellwood Beach portions of the Santa Barbara Shores - Ellwood Beach Specific Plan Area in the environmental document being prepared for the Santa Barbara Shores County Park Master Plan. Because of the complexity of the issues and the time required to complete both the Master Plan and the associated environmental document (including time for public review), the County is requesting that the Commission extend the expiration date of the Commission's certification for a period of up to one year, or until October 9, 1999 to allow the County additional time to consider and respond to the Commission's Suggested Modifications for LCP Amendment 2-97-C.

Conclusion

In view of the foregoing, Staff agrees that the Suggested Modifications, particularly Suggested Modification 1.d, do raise significant policy issues with respect the development and operation of the Santa Barbara Shores County Park under the proposed Master Plan (which was not before the Commission as part of LCP Amendment 2-97-C). Careful and detailed analysis will be required before the County will be in a position to respond to the Commission's Suggested Modifications and identify the precise route for accessing the Ellwood Beach portion of the Santa Barbara Shores Specific Plan Area. Staff therefore recommends that the Commission grant the County an extension of time for a period not to exceed one year, or until October 9, 1999, to respond to the Commission's Suggested Modifications for LCP Amendment 2-97-C.

MHC/

COURT HOUSE



NAOMI SCHWARTZ
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Santa Barbara, California 93101
Telephone (805) 568-2190

COUNTY OF SANTA BARBARA

EXHIBIT NO. 1
APPLICATION NO.
S.B. Co. LCP 2-97-C
S.B. Shores-Ellwood

July 27, 1998

California Coastal Commission Members and Staff
South Central Coastal District Office
89 S. California Street, Suite 200
Ventura, CA 93001

RECEIVED

JUL 30 1998

CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

RE: Santa Barbara County Local Coastal Plan Amendment 2-97-C
Monarch Point Reserve Project

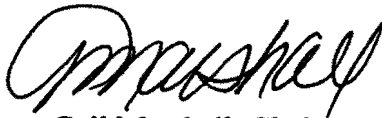
Dear Members of the Coastal Commission:

On April 9, 1998 your Commission certified the above referenced amendment with suggested modifications. Findings for the modifications were finalized by the Commission on June 9, 1998 and transmitted back to the County on July 2, 1998. Under the normal process, the County Board of Supervisors must respond to the Commission's suggested modifications within six months of your action, which would be October 9, 1998.

The suggested modifications were considered by the Board of Supervisors in a public hearing on July 21, 1998. The modification requiring access for the Monarch Point Reserve project through the adjacent County Park property (also located within the Ellwood Beach - Santa Barbara Shores Specific Plan area) poses serious policy considerations for the Board. Therefore, given the implications of this suggested access for development and use of the County Park property, the Board directed our staff to integrate environmental review of the park plan, the Monarch Point Reserve project as modified by the Commission, and road access options to serve both.

Due to the receipt of the final language of the suggested modifications three months subsequent to the Commission's action and because of the time required to conduct the environmental review which would enable the Board to make the difficult policy choices the Commission presented, the Board is requesting a one year extension of the timeline for responding (to October 9, 1999) under Coastal Commission Administrative Regulation Section 13535(c).

Sincerely,



Gail Marshall, Chair
Board of Supervisors

cc: Members, S.B. County Board of Supervisors
Randy Fox, Santa Barbara Development Partnership, 16 East Sola Street, Santa Barbara, CA 93101
Crosby, Mead, Benton Assoc., 6345 Blvd. Suite 140, Encino, CA 91316
League for Coastal Protection, Mel Nutter, 200 Oceangate, #440, Long Beach, CA 90802-4332
Environmental Defense Center, Linda Krop, 906 Garden St., Ste. 2, Santa Barbara, CA 93101
Save Ellwood Shores (SES), Mike Wondolowski, 227 Palo Alto Drive, Goleta, CA 93117
Cynthia Brock, Santa Barbara Shores Homeowners Assoc., P.O. Box 8222, Goleta, CA 93118
Jana Zimmer, League for Coastal Protection, 2640 Las Encinas Lane, Santa Barbara, CA 93105
Peter Kaufman, Esq., Deputy Attorney General, Department of Justice, State of California, 110 W. "A"
Street, Ste 110, San Diego, CA 92186-5266
Chuck Damm, California Coastal Commission, 89 S. California Street, Ventura, CA 93001
Gary Timm, California Coastal Commission, 89 S. California Street, Ventura, CA 93001
Mark Capelli, California Coastal Commission, 89 S. California Street, Ventura, CA 93001
Scott Cooper, UC Natural Reserve System, UCBS, Santa Barbara, CA 93106
Planning Commissioners
Clerk of the Board of Supervisors
Alan Seltzer, Chief Deputy County Counsel
Jennifer Briggs, Director, Park Department
John Patton, Director, P&D
Hearing Support/Board of Supervisors File
Richard Corral, Planning Technician
Case File 89-SP-002 RV02
Case File 96-SP-002

**SANTA BARBARA COUNTY
BOARD AGENDA LETTER**



Clerk of the Board of Supervisors
105 E. Anapamu Street, Suite 407
Santa Barbara, CA 93101
(805) 568-2240

EXHIBIT NO. 2
APPLICATION NO.
S.B. Co. LCP 2-97-C
S.B. Shores-Ellwood

Agenda Number:

Prepared on: 7/9/98
Department Name: P&D
Department No.: 053
Agenda Date: 7/21/98
Placement: Departmental
Estimate Time: Staff 30 min., 2 hours total
Continued Item: YES
If Yes, date from: 5/7/98

1 of 21

TO: Board of Supervisors

FROM: John Patton, Director
Planning and Development

STAFF CONTACT: Dianne Meester, x2520
Patty Miller, x2054

SUBJECT: Consideration of California Coastal Commission Suggested Modifications for LCP Amendment Submittal 2-97-C relating to the Monarch Point Reserve Project (97-GP-003 and 89-SP-002 RV02)

98 JUL -9 PM 5:37
COUNTY OF SANTA BARBARA
CLERK OF SUPERVISORS
BOARD OF SUPERVISORS

Recommendation(s):

That the Board of Supervisors provide staff with direction regarding modifications to the Ellwood Beach - Santa Barbara Shores Specific Plan suggested by the California Coastal Commission. The Board should choose one of three broad approaches outlined below, some of which have sub-options. Staff recommends that if Option 2 or 3 is selected, an extension should be requested (Recommendation 4).

1. **REJECTION:** Decline to accept the Coastal Commission's Suggested Modifications and direct staff to send a letter to the Coastal Commission.

OR

2. **PARTIAL ACCEPTANCE:** Selectively accept and reject the Coastal Commission's suggested modifications, meeting the Coastal Commission's suggested modification requiring access through the County Park property in a manner other than as suggested by the Commission through resubmittal of a revised land use plan.

OR

3. **ACCEPTANCE:** Conceptually accept the suggested modifications, and provide direction to staff regarding processing of the amendments and the related permits, as follows:

- 3.1. Direct staff to obtain State Parks approval for, and identify the mechanism to allow use of, the Park property road as access to the Monarch Point Reserve project and direct the Park Department and Public Works to work with the MPR applicant on access road design issues and changes to the Park plan which must be made to accommodate the road.
- 3.2. Determine how to process the suggested modifications and the Monarch Point Reserve permits, and either:
 - 3.2.1. Direct staff to process the acceptance of the suggested modifications first and subsequently the permits for the Monarch Point Reserve project and the road through the Park property;
 - or*
 - 3.2.2. Direct staff to concurrently process the acceptance of the suggested modifications with the revised development plan and tract map for the Monarch Point Reserve project and with the development plan for the road through the Park property.
- 3.3. Determine how to process the Specific Plan amendment currently pending for the Santa Barbara Shores Park property and either:
 - 3.3.1. Direct staff to process the pending Specific Plan amendment for the Park Department property concurrently with the acceptance of the suggested modifications;
 - or*
 - 3.3.2. Direct staff to process the acceptance of the suggested modifications in advance of the Specific Plan amendment pending for the Park Department property.
4. **EXTENSION:** Request an extension of the 6 month deadline in which to accept the Coastal Commission's suggested modifications.

Alignment with Board Strategic Plan:

The recommendation(s) are primarily aligned with Goal No. 4. A Community that is Economically Vital and Sustainable.

Executive Summary:

The Coastal Commission has certified the County's August 1997 Coastal Plan amendment package related to the Monarch Point Reserve project subject to suggested modifications which raise difficult policy choices. Under the normal process, the Board of Supervisors must respond to the Coastal Commission's suggested modifications within six months of their action, which was April 9, 1998. Action by the Board of Supervisors would be required by October 9, 1998. However, the Coastal Commission's Administrative Regulations provide for an extension, granted by the Commission, for up to one year to respond to the suggested modifications.

If your Board does anything except a wholesale rejection of the suggested modifications (Recommendation Option 1), the Board should direct staff to request an extension from the Coastal Commission

(Recommendation 4). If your Board is willing to accept all of the suggested modifications, except the a road through the County Park property, then the Board should direct staff to return to the Board with options for alternative access to the Monarch Point Reserve property. Several options have previously been considered by the Planning Commission and the Board, including through the park property, via the extension of Santa Barbara Shores Drive, and via Phelps Road.

If your Board agrees to all of the suggested modifications, including access to the Monarch Point Reserve project through the County Park property, then your Board should provide staff with direction regarding processing the suggested modifications, the Specific Plan amendment for the Park property to incorporate the Master Plan, the development plan and tract map for the Monarch Point Reserve project, and the development plan for the road. The processing options and issues are discussed in the body of this report.

Background:

A Specific Plan was originally proposed for the Ellwood Beach/Santa Barbara Shores properties in 1989. The Specific Plan covered three properties, the Ellwood Beach property (currently known as Monarch Point Reserve), the Santa Barbara Shores property (now owned by the County of Santa Barbara for park and open space uses), and the Doty property (a one acre parcel located in the northeast portion of the site). The County's certified (1982) Coastal Land Use Plan includes a policy which requires the preparation of a specific plan for all three ownerships to ensure that planning of the area would occur as a unit. The original Specific Plan was approved by the Board of Supervisors in June of 1993, and was submitted to the Coastal Commission for certification. After several iterations of the Specific Plan were reviewed by both the Board of Supervisors and the Coastal Commission, the Coastal Commission certified a Specific Plan in July 1995. This plan designated residential use of the Ellwood Beach and Doty properties (up to 162 units) in a development area which encroached into a designated environmentally sensitive habitat, and active and passive park uses for the park property. Save Ellwood Shores and the League for Coastal Protection filed suit against the County of Santa Barbara and the California Coastal Commission, primarily based upon the agencies' approval of a developable area for the Ellwood Beach portion of the Specific Plan within the designated environmentally sensitive habitat area.

In March of 1997, the Board of Supervisors authorized County Counsel to execute a Processing, Standstill and Settlement Agreement in an attempt to resolve the litigation. The settlement agreement provided for processing of a revised Specific Plan, changes to the Goleta Community Plan, related development permits (tract map and development plan) and a Development Agreement on an expedited schedule. The revisions included reduction in the developable area to avoid the designated environmentally sensitive habitat area, changing the housing type from a mix of attached and detached units to all detached units, changing the configuration of trails within the development, and changing a number of development standards in the Specific Plan. Under the Settlement Agreement, Save Ellwood Shores and League for Coastal Protection agreed to support the settlement plan. Although the County agreed to cooperate with the settling parties by processing components of the settlement plan on an expedited basis, the County reserved its police power to make decisions regarding the plan.

The County processed the amendments to the Local Coastal Program, including changes to the project Specific Plan, the Goleta Community Plan, and the Parks, Recreation and Trails maps, and concurrently processed the development permits. The Board of Supervisors approved the amendments, along with the

development permits and a development agreement, in August and September of 1997. The Board made its approval of the development permits and development agreement subject to the Coastal Commission's approving the concurrently processed and required Local Coastal Plan Amendment and Specific Plan Amendment. Although the County's approval process resulted in changes to the proposed settlement plan, the parties did not object to the changes. Therefore, in August 1997 the County submitted the amendments to the Coastal Commission for its certification. By doing so, the County completed its obligations under the settlement agreement.

The Coastal Commission considered the amendments at several hearings and certified the amendments subject to a number of suggested modifications (see specific language in Attachment A, which reflects clarifications approved by the Coastal Commission on June 9, 1998). Without a time extension, the Commission's certification with suggested modifications is valid for six months, until October 9, 1998. During this timeframe (or before October 9, 1999 if the Commission grants a one year time extension), the County must accept the suggested modifications or submit an alternative plan, or the Coastal Commission's certification expires. The major issues associated with the suggested modifications are as follows:

- Vehicular access via the extension of Santa Barbara Shores Drive would be prohibited. Motor vehicle access to the Monarch Point Reserve property would be required to be provided through the Santa Barbara Shores (County Park) property. The 20-space public parking lot would be relocated in the vicinity of the access road on either the park property or the residential development property to provide a trailhead for the coastal trail. (The location of the 20-space lot is currently proposed by the Monarch Point Reserve developer on the County property adjacent to the access road and near the Monarch Point Reserve property line.)
- The public access program would be required to include handicapped access, signage, and availability of the residential streets for public parking, vehicular and pedestrian traffic. Public access to residential streets shall not be restricted by means of gates or other devices.
- An average setback of 100 feet and minimum setback of 50 feet from the eucalyptus grove on the Monarch Point Reserve property would be required for all development.
- The height of residential development on the first row of lots bordering the eucalyptus grove and along the Coastal Trail west of Vernal Pool #1 would be limited to one story (maximum height of 19 feet from average finished grade) and colors would be limited to those subordinate to the natural setting.
- Fire clearance, trail use, fireplaces and drainage adjacent to and within the eucalyptus grove would be limited.

A number of the suggested modifications incorporate into the Specific Plan the conditions the County included in the project permits. These include:

- The accepting agency or non-profit entity responsible for managing the public access component is to be identified prior to clearance of the map to establish the residential lots (Coastal Development Permit for map recordation).
- The trails within the eucalyptus grove would be limited to four feet in width (except the trail which follows the Goleta West Sanitary District easement).
- The Coastal Trail would be routed through the development if, at any point in the future, erosion precluded the location of the trail between the coastal bluff and the development.

- If the trail on the UCSB property to the east were ever closed, a comparable beach access trail would be provided on the east end of the Specific Plan area (Monarch Point Reserve property).

The County Park Department is also in the process of updating the land uses in the Specific Plan. The Board of Supervisors, on July 1993, conceptually approved a Master Plan for Santa Barbara Shores County Park for the purposes of environmental review. The land uses would change in the active use portion of the park closest to Hollister Avenue (from a swimming pool, tennis courts, gymnasium and limited equestrian area with no night lighting of any outdoor play areas, to a BMX track, velodrome, larger equestrian facility and night lighting). A Supplemental EIR is under preparation by Planning and Development staff to analyze these proposed changes in uses and the proposal for night lighting.

Discussion:

Threshold issues for decision for the Board: (Recommendation Option 1 and 2)

The suggested modifications, with the exception of the location of project access road and the 20-space parking lot, affect development of the Monarch Point Reserve project only, and would require a number of changes to the development plan and tract map for the project. The property owner, Santa Barbara Development Partnership, agrees to all of the suggested modifications. If your Board wishes to return to the 1995 Specific Plan, which was the subject of litigation, your Board should reject all of the suggested modifications. If your Board does not wish to revive the 1995 Specific Plan, staff recommends that the Board accept the onsite suggested modifications and focus your policy decision on the modifications which affect the County Park property. These include the use of the County Park property as the primary access to the Monarch Point Reserve project and the location of the 20-space parking lot near the access road to serve as a trailhead for beach access.

The Park Department and the Parks Commission have consistently recommended that the Board of Supervisors not provide access to the Monarch Point Reserve property through the County Park property. Park Department concerns with an access road through a County park serving private residential development can be summarized as follows:

- A roadway which crosses Devereux Creek and follows an alignment onto the coastal bluffs would invade passive more native recreational areas. Flow of use between the eucalyptus grove and the park would be severed for neighbors and park users. The road would have to be fenced on both sides in order to restrict vehicle access onto unauthorized areas of the bluff and to control pedestrian circulation on the park to certain access points along the road for safety reasons.
- The primary purpose of the residential road would be to convey vehicles to and from destinations other than the park. This would be incompatible with the purpose of a park road which would be to serve multiple uses including slower park vehicles, pedestrians, bicyclists, and equestrians. Speed limits through parks are 10 - 15 mph and would be posted as such. However, in that vehicular speed through residential areas is typically 25 mph, drivers would likely accelerate speed to a level potentially incompatible with park uses.
- Volumes on the access road would increase from 1040 average daily trips (ADT) for park use to a total of 2590 ADTs with combined residential and park traffic.

- An access road serving a private residential development would have to be open 24 hours a day, thereby impacting normal park security procedures.
- The 24 hour road use and increased volumes and speed would adversely impact wildlife in the area.
- Access to the Monarch Point Reserve project via the extension of Santa Barbara Shores Drive through the grove would impact 600 linear feet of the grove. In contrast, an access through the Park property serving the residential project would create a roadway within 50 feet of the western eucalyptus grove along 1900 linear feet of that grove.
- No other public recreation space in the County shares roadway use with residential development. The County has eliminated similar uses in other parks.

The attached letter (Attachment B) from Parks Director Jennifer Briggs elaborates on the issues of incompatibility of a residential roadway through a public park which support a strong recommendation by the Park Department against providing Monarch Point Reserve's access over park property.

The Board must also consider the appropriateness of allowing access to a private residential development through public park property purchased with Proposition 70 funding. Santa Barbara Shores Park is one of several acquisitions funded through the "Specified Local Agency" Grant program of the 1988 California Wildlife, Coastal and Park Land, a Conservation Bond Act (Proposition 70). Proposition 70 was aimed at providing state monies for "natural and low intensity community recreational resource(s)." In 1993, the State Department of Parks and Recreation opined that some amount of active recreation facilities could be located on the site, but that development of "housing or any other nonrecreational use on the site" would violate the grant agreement and would require legislation to allow such use. Staff believes that a park road providing access to residential streets within the Monarch Point Reserve development area that are open for public parking, pedestrian and vehicle access, as required by the Coastal Commission's suggested modifications, may be found consistent with Proposition 70. The public road could provide access not only to passive recreation areas within Santa Barbara Shores Park, but also a 20-space parking lot and residential streets within the Monarch Point Reserve property that could provide access to an integrated trails network and nature preserve on that property. By requiring the Monarch Point Reserve project developer to enter into an agreement to fund construction and maintenance of the park road, it can be argued that public access to an integrated passive recreation area, encompassing both the Santa Barbara Shores Park and the ungated Monarch Point project, will be enhanced. A final determination by State Parks on access through the park is still required.

Issues for Decision by the Board if all Suggested Modifications are Accepted: (Recommendation 3)

If the Board determines that the suggested modifications are acceptable, a number of process issues must be addressed. These issues are discussed below.

Design of the Road Through the Park Property: As a part of processing revised plans to comply with suggested modifications, the County should consider the design of the road through the Park property. Issues such as the alignment, the setback from the grove, development of a separate road or a multi-use road for both residential and park access, the interface between park uses and the road, width, design of the creek crossing, maintenance of the road, and designation of the road (in the public road system or a park road) must be resolved before the Specific Plan can be modified to reflect the Coastal Commission's suggested

modification for access to Monarch Point Reserve. The provisions of Subdivision Map Act Section 664 guiding off-site improvements and condemnation for such improvements by a local agency do not apply to this case. In order to provide for access through the County property to serve the private development, an agreement is necessary. This agreement would specify the obligations of the developer, which would likely include, at a minimum, funding of the revisions to the Park Master Plan, the construction of the road, including sidewalks, bike paths, fencing, and landscaping and funding the maintenance of the road, Hollister Avenue intersection improvements, and related roadway improvements in perpetuity. The Board of Supervisors may identify other improvements which are necessary to compensate for loss of recreational space and quality of the space resulting from the use of the road to serve private development. The mechanism for allowing use of the road through the County Park property for residential access must be identified and drafted, with the obligation of the developer identified, prior to any application for a development plan for the road.

Processing Issues: Staff has identified three sub-options for processing Specific Plan changes resulting from the Master Plan, the development plan and tract map for the Monarch Point Reserve project, and the development plan for the road, should your Board choose to accept the suggested modification providing for to access the Monarch Point Reserve project through the County property. The sub-options vary in the initial level of effort and time necessary to complete, with the first requiring the least time and level of effort, although still substantial, and the last requiring the greatest time and level of effort. The sub-options are keyed to the numbering system in the recommendations for Option 3.

- **Sub-option 1 (Recommendation 3.2.1):** Sequential processing, first with acceptance of the suggested modifications and an agreement to certain parameters under which the revisions to the Monarch Point Reserve project would be reviewed, then the revisions to the Monarch Point Reserve development plan and tract map and the development plan for the road on the County Park property, together with the revisions to the Specific Plan for the Park property as set forth in the Master Plan currently undergoing environmental review.
- **Sub-option 2 (Recommendation 3.2.2):** Concurrent processing of acceptance of the suggested modifications and the permits for Monarch Point Reserve and the road, followed by revisions to the Specific Plan for the Park.
- **Sub-option 3 (Recommendation 3.3.1):** Concurrent processing of the acceptance of the suggested modifications, the Specific Plan amendment for the Park property and the permits necessary for the Monarch Point Reserve project and the road through the County Park property.

Sub-options 1 and 2 would require review of project submittal materials, preparation of an updated environmental document (Addendum to 91-EIR-3) and preparation of revised findings and supporting documents. This process would take approximately 4 - 6 months from the application completeness date. Option 3 would require a longer processing timeframe in that the environmental document required for the Park Master Plan is a Supplemental Environmental Impact Report. The Option 3 work effort is expected to take 8 - 10 months from the application completeness date. These estimates are through Board of Supervisors hearings and do not include the time necessary to complete the Coastal Commission hearing process.

In order to incorporate the access road, Option 1 or 2 would require staff to adjust land uses on the park property which are currently included in the approved Specific Plan, but are not included in the initiated Master Plan approved by the Board for the purpose of environmental review. Since the land uses are proposed to be changed and those changes are currently under review, the first two sub-options above do not reflect the policy preference expressed by the Board at the time of conceptual approval of the Master Plan for environmental review. Additionally, the Goleta Community Plan and Local Coastal Plan specify that the properties within the Specific Plan boundaries are to be planned as a unit. Planning of land uses has been bifurcated for the two properties for the last several years. The focus of coordinated planning for the properties has been on the trail network and Open Space and Habitat Management Plan. While this approach was appropriate when the projects could be developed separately and were not linked by a single access road, it no longer appears appropriate to continue planning for the area separately. Further, since the Park Master Plan was conceptually approved by your Board for purposes of environmental review, and since that environmental review has commenced, an argument could be made that processing the suggested modifications and the Master Plan changes to the Specific Plan would be violating the CEQA principles that the whole of a project should be considered and that environmental review of a project should occur at the earliest point it would be meaningful. Therefore if the Board wishes to accept the road access through the park, staff recommends the Board select processing sub-option 3 to enable full integration of the roadway into a Specific Plan for the Park that is consistent with the initiated Master Plan.

Extension of Time For Acceptance of Suggested Modifications: (Recommendation 3)

In order to do anything but reject all of the suggested modifications, at a minimum the following documents must be revised: the Specific Plan, addendum, and findings. Coastal Commission Administrative Regulations Section 13535(c) allows for the Commission to extend the time in which to accept suggested modifications for one year. In order to provide adequate time for staff to make the necessary changes, the Board should direct staff to request an extension of the time in which the County must act upon the suggested modifications, which is now set to expire on October 9, 1998.

Mandates and Service Levels: The public hearing to consider the Coastal Commission's suggested modifications is required pursuant to the Coastal Zoning Ordinance (Article II, Section 35-180, Section 35-174), County Subdivision Regulations (Section 21-71.3), and the Coastal Commission's Regulations (Section 13515).

Fiscal and Facilities Impacts: The applicant is responsible for funding the processing costs related to amendments to the Ellwood Beach-Santa Barbara Shores Specific Plan and the Monarch Point Reserve project.

Special Instructions: Clerk of the Board shall forward a copy of the Minute Order to Planning and Development, Hearing Support Section, attention Deanna Cox; to County Counsel, attention Alan Seltzer; and to the Park Department, attention Jennifer Briggs.

Concurrence: NA

Attachments:

- A. CCC Suggested Modifications Letter of July 2, 1998
- B. Park Department Letter of July 9, 1998 and Park Commission Letter of June 30, 1998

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 641-0142



July 2, 1998

Gail Marshall, Chair
Santa Barbara County Board of Supervisors
123 East Anapamu Street
Santa Barbara, CA 93101

SUBJECT: SANTA BARBARA COUNTY LCP LAND USE AMENDMENT 2-96-C (Ellwood Beach)

Dear Madame Chair:

On April 9, 1998, the California Coastal Commission took the following action on Local Coastal Program Amendment 2-97-C (Ellwood Beach). By a vote of 12 to 0, the Coastal Commission approved Amendment 2-97-C to the Santa Barbara County Local Coastal Program (LCP) Land Use Plan with suggested modifications. At its June 9, 1998 meeting, the Commission clarified the language of several of the suggested modifications and adopted revised findings in support of its decision. This letter, therefore, supersedes my previous letter of April 29, 1998.

Section 13544 of the Commission's Administrative Regulations requires that after certification the Executive Director of the Commission shall transmit a copy of the suggested modifications to the local government that submitted the Local Coastal Program. Further, the Regulations state that the certification "shall not be deemed final and effective until all of the following occur":

- (a) The local government with jurisdiction over the area governed by the local coastal program, by action of its governing body, acknowledges receipt of the Commission's resolution of certification, including any terms or modifications suggested for the final certification; accepts and agrees to any such terms and modifications and takes whatever formal action is required to satisfy the terms and modifications (e.g. implementation of ordinances); and agrees to issue coastal development permits for the total area included in the certified local coastal program;
- (b) The Executive Director of the Commission determines in writing that the local government's action and the notification procedures for appealable development required pursuant to Article 17, Section 2 are legally adequate to satisfy any specific requirements set forth in the Commission's certification order;
- (c) The Executive Director reports the determination to the Commission at its next regularly scheduled public meeting and the Commission does not object to the Executive Director's determination. If a majority of the Commissioners present object to the Executive Director's determination and find that the local government action does not conform to the provisions of the Commission's action to certify the LCP, the Commission shall review the local government's action and notification procedures pursuant to Articles 9-12 as if it were a resubmittal; and

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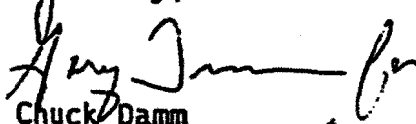
(d) Notice of the certification of a Local Coastal Program shall be filed with the Secretary of the Resources Agency for posting and inspection as provided in Public resources Code Section 21080.5(d)(2)(v).

Attached is a copy of the Coastal Commission's adopted suggested modifications language. Because the County is scheduled to consider the Commission's action at its July 21, 1998 meeting, we are transmitting the revised suggested modifications now so that they will be available for the Board's deliberations. The revised findings will be transmitted as soon as they are available, which is expected to be within the next several weeks.

Should the Board choose not to accept all of the Coastal Commission's adopted suggested modifications, then LCP amendment 2-97-C will not become effective. The Board, however, does have the option of resubmitting alternative language for the Commission's consideration at a de novo hearing on a new resubmittal.

If there are any questions regarding this matter, please feel free to contact either Mark Capelli or me at the Commission's Ventura office. The telephone number is (805) 641-0142. The Commission and staff greatly appreciate the County's cooperation and assistance.

Sincerely,



Chuck Damm
Senior Deputy District Director

Attachment
cc: Diane Meester
Randy Fox
Gary Timm

B433A

LCP Amendment 2-97-C (Ellwood Beach)
Suggested Modifications to Land Use Plan

On April 9, 1998, the California Coastal Commission adopted the following suggested modifications to the Ellwood Beach - Santa Barbara Shores Specific Plan (LCP Amendment 2-97-C), with further clarifications at its June 9, 1998 hearing on the related findings by adding the following policy and development standard language:

Specific Plan Common Elements (Chapter II of the Specific Plan)

Section F: Coastal Access and Public Use Element

1. The design, implementation, and maintenance of a comprehensive public access program shall be required as a condition of approval of coastal development permits for development within the Specific Plan Area. The required public access program shall include, at a minimum, each of the elements set forth below:

a. The public access program shall provide for handicap access, to the maximum extent feasible, to the major recreation areas within the Specific Plan Area, including but not limited to, access to and along the coastal bluff, to the native grassland/vernal pool area, and to other habitat areas.

b. A signage program shall be designed, implemented, and maintained as part of the issuance of coastal development permits for development in the Specific Plan Area which clearly identifies the location of all public access trails. Signage shall be located in areas visible to members of the public using major public roads in the vicinity of the Specific Plan Area, including Hollister Avenue, Santa Barbara Shores Drive, Coronado Drive, and Entrance Road.

c. Except where necessary for traffic sight lines, disabled parking and other public safety reasons as determined by the County Public Works Department, all residential streets within the Specific Plan Area shall be open for public parking, pedestrian and vehicular access. Public access to the streets shall not be restricted by means of gates or other similar devices. Prior to recordation of the final tract map for residential development, the applicant shall be given the option of dedicating the residential streets within the Specific Plan Area to the public if they meet County standards for dedicated public streets or of making those streets private but subject to easement for public use consistent with the terms of this suggested modification.

d. Santa Barbara Shores Drive shall not be extended to provide motor vehicle access. Motor vehicle access to the Ellwood Beach property shall be via the Santa Barbara Shores (County Park) property. As part of the access system, a twenty space parking lot shall be provided within the vicinity of the access road for the purpose of providing a viable trailhead for the coastal trail. Figure II-2 of the Ellwood Beach - Santa Barbara Shores Specific Plan shall be modified to reflect these access requirements.

e. The trail system shall be in substantial conformance with that shown on Figure II-2. (See Exhibit 9.)

f. The accepting public agency or private non-profit association that will accept easement or fee title to property for public access and with responsibility for maintenance of all trails and access signage, along with the related funding source, shall be identified as part of the coastal permitting process (prior to approval of the Coastal Development Permit to record the final tract map) for residential development.

Section H: Architectural Design Element

Height and Size.

2. All residential development on the first row of any lots bordering the Eucalyptus tree grove, and all residential development on the first row of any lots bordering the Coastal trail west of Vernal Pool No. 1 shall be limited to one story in height, with a maximum height of nineteen feet from average finished grade of the building pad to the highest point of the roof. (See Exhibit 7.)

Materials and Colors

3. Exterior building materials shall be limited to colors which are subordinate to the natural setting. Bright colors shall be avoided.

Ellwood Beach Property (Chapter III of the Specific Plan)

Section A: Land Use Element

4. The Specific Plan for the Ellwood Beach portion of the Specific Plan area property may include a maximum of 161 residential units, consistent with the protection of natural resources and public recreational and access opportunities of the site. (Note: This language replaces the 3rd paragraph of Page III-2 of the Specific Plan.)

Section E: Natural Resources Preservation Element

1. Public Open Space Area (Nature Preserve)

5. The final Open Space Habitat Management Plan (OSHMP) shall be approved prior to approval of the Coastal Development Permit for recordation of the Tract Map for residential development within the Specific Plan Area, and shall include, at a minimum, provisions for:

a. Fire suppression as approved by the fire chief, including measures for brush clearance; however, the fire suppression plan shall not include any pruning or removal of healthy Eucalyptus trees unless authorized under the OSHMP as necessary for the long term health of the Eucalyptus grove.

b. Trail management, including trail width and appropriate use (control of mountain bikes, and equestrian use) where impacts to environmentally sensitive habitats could occur, and maintenance of trails;

Santa Bararba County LCP Amend. 2-97-C

Page 5

c. Maintenance of drainage control measures to ensure that the Eucalyptus tree grove is not adversely affected by altered runoff and subsurface drainage from developed areas;

d. Supplemental irrigation of the Eucalyptus tree grove to ensure that the residential development will not adversely affect the amount and availability of soil moisture within the grove.

e. Eucalyptus Groves

6. All development on the Ellwood Beach property, including grading, residences, or ancillary structures such as fences or yard areas shall be set back an average of 100 feet from the Eucalyptus Grove, but in no case encroach closer than 50 feet to any portion of the Eucalyptus Grove. The setback shall be designed to maximize the protection of the Monarch butterfly. This set-back shall be measured from the outermost extent of the canopy of the Eucalyptus trees as the canopy exists at the time of commencement of construction of such development.

Mowing of vegetation within the Eucalyptus Grove setback area for fire supression shall only be allowed when the Monarch Butterfly is not utilizing the Eucalyptus Grove for over-wintering habitat.

Section F: Coastal Access and Public Use Element

7. All public trails located within the Eucalyptus Grove, except along the existing Goleta Sanitary District maintenance easement, shall be limited to four feet in width within the larger trail easements.

8. The development envelope shall be configured to ensure that coastal erosion shall not preclude the continuity and useability of the full width of the multiple-use Coastal Trail seaward of the development envelope. Should erosion ever extend landward to a point where there is not room for the coastal trail seaward of the development envelope, then the coastal trail shall be routed through the development. The seaward extent of the development envelope for residential development on the Ellwood Beach property shall be as shown in Exhibit 13 to the March 25, 1998 Coastal Commission staff report for the County of Santa Barbara LCP Amendment 2-97-C.

9. In the event that the primary beach access trail located on the adjacent UCSB property immediately east of the Specific Plan Area is ever closed, comparable beach access shall be provided on the east end of the Ellwood Beach property.

10. No public or private trails, other than those specifically identified in the public access program approved as part of the Specific Plan, shall traverse the native grassland or vernal pool preserve areas, except as provided in Suggested Modifications #8 and #9.

Development Standards (Chapter VI of the Specific Plan)

Terrestrial and Wetland Biology

Eucalyptus Grove

11. Modify Development Standard #17 to reflect suggested modifications #5 and #6 above.

12. Only non wood burning fireplaces, or fireplace appliances designated as EPA phase 1 or phase 2 shall be permitted. These EPA designated fireplaces must meet the following criteria and emit no black smoke:

Phase I - 5.5 grams per hour catalytic

8.5 grams per hour noncatalytic

Phase II - 4.1 grams per hour catalytic

7.5 grams per hour noncatalytic

Monarch Butterfly Aggregation Sites

13. Modify Development Standards #20, #21 and #22 to reflect suggested modifications #5 and #6 above.

Native Grasslands

14. Modify Development Standard #24 to reflect suggested modification #10 above.

Vernal Pools

15. Modify Development Standard #32 to reflect suggested modification #10 above.

Aesthetics

16. Modify Development Standards #55, #57, and #58 to reflect suggested modification #2 and #3 above.

Recreation

17. Modify development standard 61 to reflect suggested modifications #1 and #7 through #10 above. Delete Development Standard 61.g regarding the potential approval of residential development as a gated community.

Modify the following Development Standards of the Goleta Community Plan element of the County of Santa Barbara Local Coastal Program Land Use Plan:

18. Modify development standard DevStd LUDS-GV-3.5 to reflect suggested modifications #1, and #7 through #10 above.

19. Modify development standard DevStd LUDS-GV-3.6 to reflect suggested modifications #5 and #6 above.

20. Modify development standard DevStd LUDS-GV-3.7 to reflect suggested modifications #2 and #3 above.

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21. Modify development standard DevStd LUDS-GV-3.8 to reflect suggested modification #5 above.

22. Modify development standard DevStd LUDS-GV-.311 to reflect suggested modification #1.d. above.

8433A

JENNIFER BRIGGS
DIRECTOR OF PARKS
(805) 568 2461

MICHAEL GIBSON
Business Manager
(805) 568 2477



RICK WHEELER
South County Deputy Director
(805) 681 5653

JEFF STONE
North County Deputy Director
(805) 934 6145

July 9, 1998

Honorable Board of Supervisors
105 E. Anapamu Street
Santa Barbara, CA 93101

RE: Recommendation to Reject Coastal Commission Suggested Modification to Relocate
Monarch Point Reserve Access Through Santa Barbara Shores County Park.

RECOMMENDATION:

Reject Coastal Commission's suggested modification to require the primary access to Monarch Point Reserve Project to occur through Santa Barbara Shores County Park.

DISCUSSION

In July 1993, the Board of Supervisors conceptually approved, for purposes of environmental review, the Master Plan for Santa Barbara Shores County Park. Prior to this, in 1990, the Board adopted a resolution which declared the intent to purchase this property "... for all the uses and purposes of a public park." The Board at that time, was ready to enter into condemnation if necessary to acquire this 118 parcel. Santa Barbara Shores County Park is also identified as a public park in the 1980 County Comprehensive Plan. The intent of the use of this parcel, without further explanation, is clear.

Your Board has continually recognized the importance of the public's right to recreation, be it passive or active, and relies on the County Park Department to move forward to meet the ever growing demand for more sites for the public to recreate. You have consistently supported the development of parks through your acceptance and approval of park Master Plans as they come before your Board for approval. Master Plans approved by your Board in the past include those for Ocean Park, Waller Park, Lake Los Carneros, Burton Mesa Reserve, Oak Knolls Park, Rancho Guadalupe Dunes, as well as the Santa Barbara Shores County Park Master Plan. This approval process not only recognizes your concerns about recreation demand in Santa Barbara County, but acknowledges that your County Park Department has the experience, knowledge, professional staffing and resources to best recognize these demands and the ability to analyze how to address those demands. We ask that you now continue to recognize the expertise that you have in the field of park development and agree that a road going through a public park that will serve a residential housing development is *incompatible and unprecedented*.

Providing Places for People and Nature

Honorable Board of Supervisors
July 9, 1998
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Incompatibility

Speed limits through county parks are posted 10-15 mph. Roads within parks are used by vehicles as well as pedestrians, equestrians and bicyclists not only to search for their preferred picnic site or other use area, but as a means of travel from one point to another within the park. Park roads are designed to be part of the park experience and to safely and efficiently convey vehicles to internal parking areas.

Residential streets allow public travel at a minimum average speed of 25 mph. Travel on residential streets is for the commuting traffic as well as the vehicles providing various services to the residential development - newspaper, postal and merchandise delivery. None of these types of users are traveling to "enjoy the park experience" as their destination.

This argument can be quantified in the traffic studies for both projects, 1,550 ADT for the Monarch Point Reserve project and 1,040 ADT for the park at peak hours and/or peak use and specifically relates to what is before you today, the construction of a road through a public park whose primary purpose will be to serve residential development. Use of the road as designed in the Master Plan for primary park purposes now becomes secondary for park purposes. Whether your Board decides in the upcoming future to allow full development under the Master Plan with ballfields, soccer fields, children's play areas, equestrian and bicycle facilities, or whether you approve something less active, a road serving residential development will unavoidably impact the park by more than doubling traffic volumes.

No active uses are planned south of Devereux Creek on the coastal bluffs. Now a road, carrying 1,550 residential traffic trips per day would invade this open space area. The road would be fenced on both sides to restrict unlawful vehicle access onto the bluff. Picnic sites on both sides of the park road allow park visitors to pick the environment in which they want to enjoy, inviting park users back and forth across the park road. An existing trail leading through the eastern Eucalyptus Grove over to a neighborhood cul-de-sac encourages pedestrian access to the park for neighboring homes. Now a road handling 1,550 residential vehicles per day would require that both sides of the entire road be fenced and pedestrian users of the park to be restricted to certain access points to ensure their safety. The park road within the Master Plan is designed to allow people who desire active uses to exit off of the park road quickly into parking areas such that the majority of users that travel further into the park on the roadway are those who are exploring their park surroundings. This is human nature, seen over and over again within our County parks. To be tailgated by a vehicle waiting to get home or get to work or school drop off or pick up points is not compatible with nor encouraging the park visitors' use of the park.

All parks, with the exception of Goleta Beach County park (due to the night pier fishing and Beachside Cafe operations) and Arroyo Burro Beach (for the Brown Pelican restaurant business), are closed at night. A 24 hour road serving both the park and residential housing will impact the security of the park. The residential development road up onto the bluffs is, at this time, not proposed to be lit. Park Department staff are not peace officers and as such, are not on a 24 hour work clock.

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Santa Barbara Shores County Park is unique in that the design of the Master Plan allows for active uses to occur in the disturbed areas and passive uses to occur in the eucalyptus groves and grassland areas.

These same passive areas also provide habitat for wildlife. Wildlife that forages during both the day and night. Wildlife that seeks to find shelter to produce and raise their young. Park roads that limit travel at 10 mph. generally do not impact scurrying wildlife. Park roads that are closed at night generally do not impact wildlife forage and travel. A residential development road at 25 mph. allowing travel 24 hours per day will have an impact on foraging wildlife.

Take time to review the proposed Monarch Point Reserve access road as an extension of Santa Barbara Shores Drive, traveling through 600 lineal feet of Eucalyptus grove. Review the proposed road to the Monarch Point Reserve project through the park that is perceived by many to have the least impact to the park and how it travels within 50' feet of the entire 1900 lineal feet of Eucalyptus grove within the park. It appears that the greater impact is to the Eucalyptus grove within the park.

The park Master Plan proposes that the coastal bikeway extend through the park and cross Devereux Creek by means of a small 10 - 12' wide bridge. A private development road serving residential housing and a bikeway will require a minimum 32' wide free span bridge as confirmed by Public Works and Planning and Development. The private development road serving the Monarch Point Reserve project would not only cut through the area proposed for park user parking but would also eliminate the space planned for an interpretive center, group picnic areas, children's playground and open meadow area.

Unprecedented

All roads through existing county parks serve only those uses within the park. In the past and even recently, where development threatened to impose its uses upon park roads, County Parks through your Board's support, has successfully denied this use. San Antonio Road, a county road, once traveled through Tucker's Grove County Park to access the neighborhoods above the park. County Parks, with the Board's support, was successful in abandoning that road for public use. An existing road easement through Los Alamos park, while undeveloped, allowed an adjacent property owner to develop the road at such a time that the private property was subdivided for development. In 1993, the County acquired the easement from the private property owner and now the potential for a roadway through the park no longer exists.

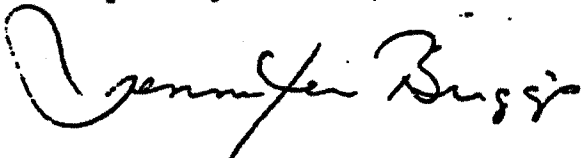
Allowing a road through a public park to serve residential development is unprecedented and goes against what County Parks has sought to protect in the public's right to maintain exclusive use of the public's recreation land for recreation. County Park's Mission Statement is; "To provide for the health, inspiration and education of the residents and visitors of Santa Barbara County by preserving the county's most valued natural and cultural resources, and by providing opportunities for passive recreational experiences." The objectives to meeting this Mission Statement are: "To protect the natural and cultural resources of the Santa Barbara County Park System unimpaired for present and future generations"; and "To develop and maintain facilities and programs designed to provide

Honorable Board of Supervisors
July 9, 1998
Page 4

recreational and cultural experiences for County Park visitors." Further, County Ordinances for park uses have been adopted by your Board "...to provide for regulations, as required, for the safe, healthful, and orderly use of recreation areas; to prevent the misuse of such areas; and to protect the peace, health, safety and welfare of the general public and park resources as the Director and staff of the Park Department determine to be necessary."

I encourage your Board to stand firm on your commitment to preserving parkland in the public trust and support the recommendation of your County Park Department and for reasons stated previously, and reject the Coastal Commission's suggested modification to allow the construction of a road through the park to serve the Monarch Point Reserve development project. This recommendation is also supported by your appointed Park Commissioners, who at their June 25, 1998 meeting, through a response to public comment, elected to urge your Board to deny this modification request. Their letter indicating this action is attached.

Respectfully Submitted,



Jennifer Briggs
Director of Parks

attach.



Santa Barbara County Park Commission

610 Mission Canyon Road Santa Barbara, California 93105 (805) 568-24

June 30, 1998

Honorable Board of Supervisors
105 E. Anapamu St.
Santa Barbara, CA 93101

RE: Monarch Point Reserve Development Road through Santa Barbara Shores
County Park

Dear Supervisors,

At the June 25, 1998 Park Commission meeting, members of the public provided comment on the California Coastal Commission's suggested modification to the Ellwood Beach \ Santa Barbara Shores Specific Plan related to the access road to the Monarch Point Reserve project. The Park Director, at previous Park Commission meetings had apprised the Commission of the modification's requirement that the access road to the Monarch Point Reserve project be provided through Santa Barbara Shores County Park.

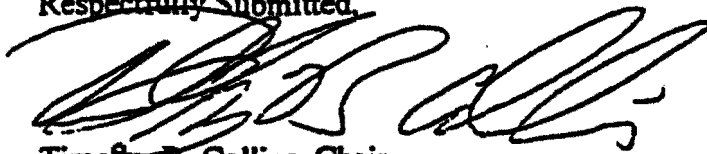
The Park Commission deliberated on the subject and voted unanimously by those members present, to send this letter to your Board urging you to reject this modification to realign the road through the park. Several current Park Commissioners were present when the Park Commission held numerous public workshops and hearings on the Master Plan for Santa Barbara Shores Park. While there were varying views as to what the development of the park should look like, it was unanimous that the Santa Barbara Shores County Park be open to the public for recreation and beach access. There is a great appreciation in the community of the Board's fortitude in 1991 in acquiring this valuable property. This property should be retained as a public park - not split or shared by a private development roadway that will intrude into the public's ability to recreate on the property.

Numerous requests have been before the Park Commission for easements for varying reasons through County parks and open spaces such as for underground utilities, encroachments for a neighboring property's development, or as a means of egress and ingress into adjacent properties. The Park Commission reviews each request for its impacts to the recreation space that the easement or encroachment proposes to encumber. Where there is an impact to the public recreation space or to the public's right to use the public open space or park, such as what is proposed for Santa Barbara Shores, the request for the easement is denied.

Monarch Point Reserve Development Road
June 30, 1998
Page 2

We encourage your Board to consider the impacts of a private development road through the Santa Barbara Shores County Park and recommend that your Board deny the Coastal Commission's modification to align the Monarch Point Reserve development road through Santa Barbara Shores County Park.

Respectfully Submitted,



Timothy B. Collins, Chair
Santa Barbara County Park Commission

cc: Jennifer Briggs, Director of Parks