



**SANTA BARBARA  
AUDUBON SOCIETY**

P.O. Box 6737  
Santa Barbara, CA 93160  
[www.SantaBarbaraAudubon.org](http://www.SantaBarbaraAudubon.org)

City Clerk [cityclerkgroup@cityofgoleta.org](mailto:cityclerkgroup@cityofgoleta.org)  
City of Goleta

November 1, 2022

Re: November 1 Agenda Item C.2, Stow Grove Park Master Plan Project Update

Dear Mayor, City Council Members, and City Staff,

The Santa Barbara Audubon Society (SBAS) takes this opportunity to resubmit our letter of August 16 (attached) regarding the Stow Grove Park Master Plan project. The corresponding agenda item for the August 16 City Council meeting was cancelled and an expanded project update is being presented on November 1. We note that, while the specific Staff Report language cited in our August 16 letter has slightly changed in the November 1 Staff Report, the fundamental issues and concerns we raised are the same. These have to do with current plans continuing to raise the possibility of new development (i.e., new park amenities, facilities, or other elements) partially or wholly located in Environmentally Sensitive Habitat Areas (ESHA) and applicable buffers within the park.

SBAS is glad to see that the updated plan includes a provision for a fourth design concept—an outcome of the September 28 Parks and Recreation Commission meeting—that would embody a “minimalist” approach (designated “Nature Focus”) to park planning and design. SBAS strongly supports this approach, which encompasses needed repairs, reconfiguration, or replacement of existing park amenities and infrastructure, as well as accessibility-related enhancements—assuming this entails no new facilities or amenities development within ESHA or applicable buffers. We further recommend that any proposed new amenity or infrastructure change be evaluated on a case-by-case basis with respect to its implications for compliance with applicable City regulations.”

SBAS also supports the Staff Report’s recommendation to continue the public process for developing a Draft Master Plan for the park. In this regard we would encourage staff to ensure that all mechanisms for gathering public input (further surveys, workshops, etc.) clearly include questions and response options that allow for expression of the “minimalist intervention” viewpoint on potential park features and design options, thereby avoiding a potential bias toward the addition of new (and especially “active-recreation-oriented”) features and amenities.

Thank you for your consideration of our views.

Sincerely,

A handwritten signature in cursive script that reads "Katherine Emery".

Katherine Emery, Ph.D.

Executive Director

Santa Barbara Audubon Society

Attachment: August 16, 2022 SBAS letter to Goleta City Council re August 16th Agenda Item D.1 Stow Grove Park Design Update



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City Clerk [cityclerkgroup@cityofgoleta.org](mailto:cityclerkgroup@cityofgoleta.org)  
City of Goleta

August 16, 2022

Re: August 16th Agenda Item D.1 Stow Grove Park Design Update

Dear Mayor, City Council Members, and City Staff,

Thank you for the opportunity to provide comments on the Stow Grove Park Design update.

Santa Barbara Audubon Society (SBAS) is a chapter of the National Audubon Society with approximately 1100 members in the Santa Barbara area. The mission of SBAS is to protect area birdlife and habitat and connect people with birds through education, conservation, and science. Our members, many of whom reside in Goleta, frequently use the parks, natural areas, and open spaces in and around the City of Goleta for recreational and outreach activities. Stow Grove Park has special significance to our members, not only as it is a great spot for bird watching with 130 different species reported, but also is the location for our annual meeting and picnic.

SBAS understands the usefulness of a Master Plan and agrees that certain elements of Stow Grove Park amenities could be improved and updated. We would be in favor of more accessibility and improvement to trails, better restrooms, and new interpretative signage. We also understand that the City's intent (and charter) is to listen to and be guided by the majority of the public who have clearly stated that they want the natural features of the park (mature trees, redwood grove) to remain unchanged. However, SBAS is very concerned about specific language regarding environmentally sensitive habitat areas (ESHA) used in several sections of the August 16, 2022 Design Update and recommendation.

This language includes the following:

"...with at least one plan designed to minimize impacts to habitat values or sensitive species associated with the Environmentally Sensitive Habitat Areas of the park."

"It is important to note that staff is not asking City Council to approve a particular design currently, but to allow the process of developing a Draft Master Plan for Stow Grove Park to continue, **without restrictions both within and outside of ESHA** (emphasis added).

The crowning jewels of Stow Grove Park, and the main reason why so many people flock there, are the large mature trees. Why should any plan be developed that does not attempt to minimize impacts to these precious resources? SBAS firmly believes that any plan for the park consider all impacts to the ESHA. The City's own guiding policy documents require that developers and members of the public adhere to set standards for ESHA and ESHA buffer zones. Why should the City itself be immune to these requirements?

Moreover, SBAS has grave concerns that asking the City Council to approve the recommendation as written “without restrictions” suggests a carte-blanche, anything goes approach that will set a very bad precedent for city-wide future renovations or development in and near environmentally sensitive areas.

We know that for Stow Grove Park, there is a short list of specific renovations/upgrades that the public has asked for and that could potentially occur without major disruption to the ESHA around them. These include refreshing the parking lot, bathrooms, walking paths and playground equipment. If these are known features, then why ask for a (and what we feel to be dangerous) blanket exception to ESHA considerations? It would seem that a wiser approach would be to make a case-by-case argument for those specific elements that trigger General Plan and zoning review (i.e. renovation of the parking lot changes the footprint, thus counting as new development within ESHA; new bathroom facilities).

The City has taken a strong stance since its inception to protect ESHA and untold hours have been expended by non-governmental organizations, and City staff and elected officials, to ensure that ESHA policies are observed and followed, and these areas are preserved for this and future generations. Given all the time and effort that the City has expended on ensuring that its own environmental policies are observed by developers and others, we find it almost unconscionable that City staff, in contradiction to City policies, would ask for permission to ignore ESHA during planning, and to develop a plan that could impact ESHA.

We urge the City Council to observe their own policies and reject this recommendation as written. The Stow Grove Master Plan process should move forward but in strict adherence to existing City policy.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Katherine Emery".

Katherine Emery, Ph.D.

Executive Director

Santa Barbara Audubon Society