Comments to the Goleta City Council on Citygate's Recommendations and Report:

Regarding Open Spaces, Parks, and Recreation

From: Deborah Williams, Commissioner, Goleta Parks and Recreation Commission; Lecturer, UCSB

Date: September 13, 2019

I commend the Goleta City Council for contracting a study of the City Manager and Neighborhood Services & Public Safety Departments with Citygate.

As a result of serving on the Goleta Parks and Recreation Commission, and as a Goleta resident who cares deeply about our Open Spaces and Parks, I have several comments regarding the Recommendations by Citygate and Staff's responses. At the end of these comments I will discuss why adopting one of these recommendations, in particular, is needed to comply with and advance the Goleta General Plan the City's Strategic Plan.

1. *Overarching Purposes of These Comments*: Since Open Spaces and Parks are so important to people who live in Goleta, it is critical that they be managed as effectively and thoughtfully as possible. My comments fall into two categories:

Currently, and unfortunately, **Open Spaces** fall into a **management void**. Reviewing and acting on the Citygate report offers the Council a prime opportunity to address that management void.

Recommendation: The Council should conclude that, effective immediately, all management issues associated with park, recreation, **and Open Spaces** be within the purview of the Parks and Recreation Division of the Neighborhood Services and Public Safety (NSPS) Department. This is consistent with Citygate's recommendations, the General Plan, and the Strategic Plan.

> There are many other excellent recommendations in the Citygate report that deserve to be implemented in the short and long term

2. **Citygate Expertise and Their Correct Baseline Assumption**: As Staff stated in its memo, Citygate's project team included specialists (former executives) in the areas of city management, public safety, and **parks and recreation**. (Memo, p. 1, from Kristy Schmidt to Mayor and Councilmembers ("Memo"). This expertise is greatly appreciated, and deserves to be heeded, where possible.

In terms of one of the key baseline assumptions of the Report, Citygate accurately notes that: "the City (of Goleta) is now seen as integral to protecting the quality of life in Goleta. The City is viewed as

providing for access to a full array of local services, including parks and recreation, libraries, and the resolution of local issues....as well as maintenance of a high-quality of services and lifestyle that the residents have come to enjoy in Goleta. (Citygate Report, p. 39). Indeed, effective City management of parks (including open spaces) and recreation is seen by Goleta residents as a key component of our quality of life and lifestyle.

2. *Open Spaces in Goleta – Current Status and Management Void:* In every poll I have seen regarding what is important to residents of Goleta, protecting and preserving Open Spaces is always among the very highest priorities. The City of Goleta owns and is responsible for managing remarkable public lands -- over 480 acres -- comprised of 16 City parks and eight open space areas. For purposes of these comments, Open Spaces means our major, city-owned natural areas, including Lake Los Carneros and Ellwood Mesa.

Currently, who is responsible for **managing** these Open Space areas? As any manager of natural public lands and waters knows, whether it be the National Park Service, the Fish and Wildlife Service (for National Wildlife Refuges), or the California State Park System, "management" involves far more than mere "maintenance." To manage a special natural public area effectively, you need a comprehensive and current plan that addresses all major aspects of natural resources protection (including birds, native plants, mammals, water resources, invasive plants, and invertebrate populations), signage, interpretation, trails and other passive recreation options, and potential enhancements to the area to achieve its purposes, values, and public benefits (such as re-introduction of native species, improving water quality, and other strategies, if needed).

Who on staff is currently responsible for making sure that Lake Los Carneros, for example, has an up-todate Master Plan that is being effectively implemented? Currently, no one. Comprehensive and needed management responsibility for Lake Los Carneros has "fallen through the crack" between Public Works and Neighborhood Services. The last Management Plan for Lake Los Carneros was completed in 1987 – over 30 years ago. Open Spaces – whether Yosemite, Guadalupe Nipomo Dunes National Wildlife Refuge, or Lake Los Carneros -- require thoughtful management, not simply Public Works maintenance. Management responsibility for Open Spaces needs to be with the Parks and Recreation Division/Parks and Recreation Manager. It needs to be explicitly assigned.

This also makes sense from the perspective of the Council's Resolution creating the Parks and Recreation Commission. Pursuant to Resolution 12-77, the Commission stated that:

The focus of the Commission will be to advance the interests of the community by serving in an advisory capacity to the City Council pertaining to the **acquisition**, **development**, **maintenance**, **and improvement of** the City's public parks, recreational services, and **open spaces**. (emphasis added.)

As it should be, the Commission is responsible for providing advice on far more than maintenance of open spaces – we are responsible for providing advice on improvement, development, and acquisition of open spaces.

Consistent with this, Citygate recommends that only the Parks and Recreation Manager report to the Parks and Recreation Commission (Recommendation 8). This only makes sense, given the Council directed responsibilities of the Parks and Recreation Commission, if the Parks and Recreation Manager is responsible for parks, recreation **and open spaces**.

Furthermore, Citygate offers Recommendation #7 which includes consolidating functions related to Parks and Recreation into the NSPS, including open space functions currently assigned to the Public Works Department. The most important issue here is **management** of Open Spaces. The management of Open Spaces needs to be clearly within Parks and Recreation. While I concur with Citygate that it makes the most sense in the long run for Parks and Recreation to oversee the maintenance of Open Spaces (in addition to all of the other management responsibilities (except capital projects)), the most important thing is to clearly give the overall management responsibility of Open Spaces to Parks and Recreation now.

What should this mean with respect to the new budgeted position? The Council should select one of two options. Option 1: The budgeted position that is currently described as overseeing contract efforts to maintain open spaces needs to report jointly to Public Works and to Parks and Recreation (and, as appropriate, the Parks and Recreation Commission). Option 2: The budgeted position needs to be redefined so that half of the budgeted position should be Open Space maintenance oversight (which reports to Public Works), and the other half should be Open Space management (which reports to Parks and Recreation). This latter option could make the most sense.

In order to manage our Open Spaces thoughtfully, professionally, and comprehensively -- for present and future generations -- the City Council needs to act now to clearly assign management of Open Spaces to Parks and Recreation.

3. Other Recommendations That Deserve to be Implemented: I agree with Citigate and Staff that there are opportunities to: improve the department web page to provide a single portal for the public to find both City and community-based parks, recreation and open spaces information and resources in one place; develop new cooperative relationships with the school district; and elevate the Parks and Recreation Manager's role in working with the Parks & Recreation Commission.

I also agree with Citygate and Staff that there should be a retitled Assistant City Manager (ACM) position and that this new Assistant City Manager provide senior executive support to other department operations (Library, Parks & Recreation). (emphasis added, Memo, p. 5).

With respect to Recommendation #12, I agree with Citygate that this should be implemented now: "Establish a 0.5 FTE Resource Development position to support identification of grant sources, application for grant funding, and monitoring and tracking of grants to support the initiatives identified in the City Council Strategic Plan." After having studied and commented upon the Draft Parks, Facilities & Playgrounds Master Plan, I can attest that it is filled with important recommendations that will require **extensive** resources to implement. At our last meeting, the Parks and Recreation Commission recommended that the City Council adopt the Plan (with certain changes). Implementing the Plan will require, at the very least, a 0.5 FTE Resource Development Position. Regarding Recommendation #13, it is excellent news that the NSPS staff is working with Community Relations staff:

to create a single web presence where the public can access comprehensive information about parks **and open spaces**, and about recreation programs that are held in City parks and facilities, whether these services are provided by the City, contractors or non-profit organizations. As recommended by Citygate, the site will also have information about how to report a maintenance service need. It will provide access to the Parks, Facilities & Playgrounds Master Plan (currently in draft form) and the 2015 Recreation Needs Assessment. There will be links to the agendas and minutes of the Parks and Recreation Commission. (SOR, p. 5)

The website should also include the Master Plans for all of Goleta's Open Spaces, including the outdated, but most recent 1987 Lake Los Carneros Master Plan (currently a link to the plan is not on the website.)

As I noted above, the most pressing issue is giving Parks and Recreation immediate management responsibility over Open Spaces, which can be done now. However, as soon as prudent, and for the reasons set forth by Citigate, I believe that the following recommendation should be adopted by the Council:

Ultimately, Parks and Recreation service delivery can be enhanced if Parks and Recreation services are consolidated into the NSPS Department. This would include transferring personnel management, supervision of park maintenance staff, and outsourced contracts oversight to the Parks and Recreation Manager. The primary Parks and Recreation CIP function should be assigned to the Public Works Department, with continued coordination and communication with the PRM to ensure continuity with the Master Plan, Recreation Needs Assessment, and public involvement/engagement of the Parks and Recreation Commission and citizens. At this stage of the City's growth cycle, the PRM should be focused on building the capacity of the Parks and Recreation function as outlined in the following paragraph. (Report p. 60)

And, finally, Citigate's Recommendation #17 is worth considering:

In the long term, evaluate the potential for the formation of a special district focused solely on parks and recreation, open space, and potentially Library Services, encompassing the adjacent community of Isla Vista and portions of unincorporated Santa Barbara County that lay contiguous to City boundaries.

4. Conclusion – Advancing Goleta's Strategic Plan and Complying with the Goleta General Plan

Under the City's 2019-2021 Strategic Plan, the very first listed strategy is: "Support Environmental Vitality." To do this, the City needs an organizational structure that clearly defines who is responsible for managing (as opposed to merely "maintaining") Open Spaces. The Strategic Plan also calls for: "Revisit(ing) the Lake Los Carneros Master Plan." Parks and Recreation needs to spearhead this effort as soon as possible.

With respect to the Goleta General Plan, Chapter 3 begins by stating: "The Open Space element is one of seven mandatory elements of a general plan...The intent of this law is to ensure that cities recognize that open space land is a limited and valuable resource that must be conserved wherever possible and to require local plans that will accomplish the objectives of a comprehensive open space program." Further, the Plan states:

An essential aspect of Goleta's character and livability is derived from the diverse open space and resource lands within and surrounding the community. These assets include: approximately two miles of Pacific shoreline, beaches, and coastal bluffs; open coastal mesas; Goleta and Devereux Sloughs; ... creeks, riparian areas, ponds, wetlands, and woodlands; diverse wildlife habitats, including eucalyptus groves comprising the largest complex of monarch aggregation sites in southern California; ... Lake Los Carneros and its surrounding open lands; and the scenic backdrops provided by the Santa Ynez Mountains, Pacific Ocean, and Channel Islands. Parks and open space not only serve to protect environmental resources, but they also provide accessible recreational venues for residents, including families, elderly persons, and disabled and lowincome residents. *Preservation* of these resources is integral to maintaining the natural and historical qualities of the area for the benefit of present and future generations. (emphasis added)

"Preservation," as specifically provided for in the Plan, requires thoughtful management (not just maintenance) and clear organizational responsibility.

In fact, the Plan specifically calls for "management" (beyond maintenance) under 3.2 Guiding Principles and Goals:

4. Manage, operate, and maintain park, recreation, and open space facilities (including trails) in a manner that is responsive to the site and adjacent neighborhoods and balances the needs of the community with available funding. (emphasis added)

In conclusion, clearly giving Parks and Recreation the management responsibility over Open Spaces will enable the City to comply with the Goleta General Plan and the Strategic Plan.

Thank you for the opportunity to submit these comments.

September 17, 2019 Citygate Study of City Manager Department

It seems that the Citygate Study is trying to push for more bureaucracy and employees than are needed. I don't think they really understood Goleta. I am also concerned about giving too much authority to the Deputy City Manager.

Under Council Action Needed, there is the creation of an Assistant to the City Manager which seems to me to be the job of the Deputy City Manager. A City Manager and Deputy City Manager are sufficient for a city our size. I know the City Manager is overworked but too many people in charge just leads to problems. The City Manager can always delegate additional responsibility to the Deputy City Manager if necessary.

I don't think it is a good idea to change the title of the Deputy City Manager to Assistant City Manager. If you create an Assistant to the City Manager it will only cause more confusion. The Deputy City Manager is the title everyone is used to and expects. Assistant City Manager gives the impression of just an assistant not the backup for the City Manager.

Regarding Recommendation #6, I am concerned about the "pushing more final decision-making down from the City Manager's Department to the various Department Heads and their management staff". Department Heads and especially their management staff should not be making more final decisions. This is another way to have decisions made without adequate City Council and public involvement. Management and staff are not directly responsible to the public and don't always keep the needs of the City the top priority. For some issues in the past, the staff has failed to act in the best interest of the public they work for.

I have limited my comments to the City Manager's Department because it is the one of most importance. This Study has a lot of recommendation that are more appropriate for a larger city.

Barbara



Santa Barbara Audubon Society

A Chapter of the National Audubon Society

Date: September 16, 2019

To: City of Goleta Council

Re: Citygate Study of City Manager and Neighborhood Services & Public Safety Departments

Dear Council Members,

The purpose of this letter is to briefly comment on the Citygate Study of City Manager and Neighborhood Services & Public Safety Departments that will be presented at your September 17 meeting (agenda item D.2). The Santa Barbara Audubon Society (SBAS) works to connect people with birds and nature through education, science-based projects, and advocacy. SBAS has been a voice for the natural world in the Santa Barbara area for more than 50 years and has over 1100 members, including hundreds in the City of Goleta.

SBAS commends both the City for commissioning, and Citygate for producing, a highly professional organizational assessment that provides insightful and well-reasoned recommendations for a variety of structural and process improvements within the City Manager and Neighborhood Services & Public Safety (NSPS) functions. Of greatest interest to SBAS are those recommendations that involve or intersect with the Parks and Recreation Manager role and the management of Goleta's open spaces. We touched on such issues in the first part of our July 24 letter to the Parks and Recreation Commission and staff regarding the Goleta Parks, Facilities and Playgrounds Master Plan (attached). We are pleased to see that the Citygate study addresses some of these same concerns.

In particular, the Citygate study makes several recommendations that would provide clearer focus and stronger organizational support for management of the City's open spaces. These include recommendation numbers 7, 8, 13, and 17. For example, recommendation 7 calls for Parks-and-Recreation-related responsibilities (including open space management) currently assigned to the Public Works Department to be consolidated under the Parks and Recreation Manager within NSPS. We urge the City to make every possible effort to expedite the implementation of all of these recommendations.

The preservation of Goleta's unique and irreplaceable open spaces, which include the Lake Los Carneros Natural and Historical Preserve and the Ellwood Mesa/Sperling Preserve complex, has been repeatedly cited by Goleta residents as a top concern and priority in various community surveys. It is also central to the City's current (2019-2021) Strategic Plan, which lists "Support Environmental Vitality" as its first strategy, and to the Goleta General Plan, whose Open Space Element is a law intended "to ensure that cities recognize that open space land is a limited and valuable resource that must be conserved wherever possible and to require local plans that will accomplish the objectives of a comprehensive open space program."

Thank you for your continued attention to and support of issues critical to Goleta's core identity as "The Goodland." Please don't hesitate to contact us if you wish further background or elaboration on any of the above comments.

Sincerely,

Kathaine Eory Katherine Emery, PhD

Katherine Emery, PhD Executive Director Santa Barbara Audubon Society

Attachment: SBAS July 24, 2019 letter to Goleta Parks and Recreation Commission



Santa Barbara Audubon Society

A Chapter of the National Audubon Society

Date: July 24, 2019

To: City of Goleta Parks and Recreation Commission and Staff

Re: Goleta Parks, Facilities and Playgrounds Master Plan

Dear Parks and Recreation Commission members and staff,

The Santa Barbara Audubon Society (SBAS) is writing to offer additional comments on the Goleta Parks, Facilities and Playgrounds Master Plan Draft, preparatory to the Parks and Recreation Commission's August 7 meeting. The SBAS works to connect people with birds and nature through education, science—based projects, and advocacy. We have over 1100 members, including hundreds in the City of Goleta.

We appreciated the opportunity to comment on the draft Parks Master Plan in our letter of June 4. Since that time, we have discussed the plan at a SBAS Conservation Committee meeting and set up a subcommittee, composed primarily of Goleta residents, to re-evaluate the plan. Because the plan is in draft form and will be reconsidered at the Commission's August meeting, we are offering additional comments on the plan in the spirit of contributing to a clear plan that addresses park issues and provides a blueprint for the future of Goleta's parks. As do many Goleta residents, we believe that the Goleta parks system contributes greatly to the quality of life in Goleta and that some open space areas, such as those at Lake Los Carneros and Ellwood, are jewels of the South Coast, unreplicated anywhere else in this region. We believe that Goleta takes great pride in having such environmental amenities in its midst, as evidenced by your survey results.

We appreciate the time and effort that has been expended on this plan and believe that it is a good start for fashioning a Goleta Parks Master Plan. We believe, however, that it is vague and incomplete in its current form, and that it needs to be expanded to act as an effective plan. In many cases, the draft plan lacks the specificity necessary to set clear goals, as well as plans to meet them. The following comments, then, are our attempts to assist the City with creating the best Master Plan that it can.

1. The draft plan contains almost no links to, or discussion of, other City plans and assessments that pertain directly to areas within or adjacent to the City's parks. These other plans and assessments include the 1987 Lake Los Carneros Master Plan, the Lake Los Carneros County Park 1999 Updated Management Plan, the 2009 Lake Los Carneros Trail Management Plan, Rehabilitation and Interpretive Program Review, the 2004 Ellwood-Devereux Coast Open Space and Habitat Management Plan, the 2014 Final Initial Study and Mitigated Negative Declaration for the Ellwood Mesa Coastal Trails and Habitat Restoration Project, and the 2019 Final Ellwood Mesa/Sperling Preserve Open Space Monarch Butterfly Habitat Management Plan. Because all of these plans and assessments are directly relevant to the Parks Master Plan, they should be described and discussed with indications of how they

dovetail with the Master Plan, including possible updates to out-of-date plans. As a point of clarification, the Master Plan should also address the division of labor between the Parks and Open Space Division within the Public Works Department versus Goleta's Planning and Environmental Review Department, and how park plans and actions are developed by both divisions, either jointly or separately.

Master Plans are usually intended to lay out visions for the future, as well as coherent steps for achieving these visions. As a consequence, they should anticipate and address possible actions or proposals pertinent to the parks and indicate how they will deal with these initiatives. As an example, the management plan for Lake Los Carneros should address such possible issues as the implications of the recently renewed South Coast Railroad Museum (SCRM) contract that significantly expanded the land area under SCRM control, as well as the Rancho La Patera Improvements project.

- 2. The plan should list, at least as an appendix, all of the City of Goleta's General Plan and Local Coastal Plan policies, as well as all City ordinances, pertinent to parks. Although a few General Plan policies are listed, the plan does not provide a comprehensive list of relevant policies and ordinances. Of particular importance is insuring that all park plans follow the City's environmental policies and ordinances, such as protection of ESHAs, streamside protection areas, wetlands, and monarch and raptor roosts.
- 3. No data on current use patterns in individual parks. Park needs in the draft Park Master Plan were identified using citizen input and surveys; however, a direct measure of demand, and hence needs, would be to measure or quantify current human use of individual parks. Such monitoring would indicate the parks that are heavily versus little used, as well as indicate those amenities that promote citizen use. Judging from survey responses it does appear that open natural spaces and trails are heavily used and must be a priority for planning purposes.
- 4. Although the draft plan laudably considers cooperative agreements with area schools to meet recreational needs, there is inadequate consideration of outside recreational resources for both assessing true citizen needs and developing a plan to meet these needs (section 5.2.6). All Goleta citizens pay taxes that support City, County, and State (e.g., university) facilities, beaches, and playing grounds, so these outside resources need to be considered when evaluating the true needs of Goleta citizens. Many Goleta citizens already heavily use County (e.g., Tucker's Grove, Goleta Beach) parks and UCSB and public school playing fields and outdoor courts, so these need to be considered when evaluating levels of service (LOS) for Goleta's citizens. The draft plan treats Goleta as an isolated island that must provide all of its own services, without considering the context of surrounding recreational amenities.
- 5. Many issues relevant to the plans for, and the management of, neighborhood and regional open space parks are not addressed. The public surveys for this plan indicate that top citizen priorities are to protect open space and provide adequate trail systems. The plan accurately identifies that open spaces must be managed to protect natural resources and provide public access (including ADA compliance). Although many existing policies or ordinances provide safeguards for sustaining natural resources, many of these are not consistently observed or

enforced. Here are some of the problems that diminish the protection of natural resources or public access to open areas:

- a. **Off- leash dogs**. Covered in our previous letter (of June 4). Also, as indicated before, dog parks are not compatible with regional open space areas.
- b. **Drones**. FAA regulations prohibit drone use within five miles of the Airport without Airport permission, affecting many Goleta parks. Goleta City Ordinance 02-01 § 1 prohibits drones in any city recreation area, and General Plan policy OS 5.5 specifically prohibits drones within the Ellwood Open Space/Sperling Preserve. Despite this policy and ordinance, drones are frequently observed in the Ellwood Open Space/Sperling Preserve.
- c. **Motorized vehicles and open fires** are, of course, prohibited in our open space parks, but infractions are regularly observed at Ellwood. Such infractions pose a severe risk for park users and local residents.
- d. **Horses.** Equestrian use of open space areas should be addressed because horses can damage trails and spread seeds of exotic plants. Also, the compatibility of bicyclists, walkers, and equestrians in open space areas should be addressed.
- e. **Trail deterioration.** The plan should address the condition of existing trails and include plans for their long-term maintenance (a priority indicated by surveys). Some trail segments are fast deteriorating, owing to coastal erosion and verge trampling during rains, both inhibiting public access and degrading park habitat. As indicated above, trail plans exist for both the Lake Los Carneros and Ellwood parks, but the status, future, and integration of these plans into the Parks Master Plan are not addressed.
- f. **Restoration.** Particularly for open space areas, the draft Master Plan should include visions and plans for removing exotic plant species and restoring native plant species to protect and enhance natural resources (expand section 5.5.2 and Objective 12.1)
- g. **Maintenance.** The draft plan does devote considerable space to evaluating maintenance plans and actions (section 5.9). We concur that mowing needs to be timed and executed so as not to diminish natural resource values and that, by and large, biocide use should be prohibited in open space areas. However, we are concerned about possible maintenance actions that diminish or damage native shrubs because much of the local native habitat is coastal sage scrub.

All of these issues need to be addressed in the plan, with recommendations for diminishing their effects on natural resources in Goleta's open space areas. A possible way to address all of these issues is to give "natural area" designations to regional open spaces to make their priority values clear. Such a designation would be consistent with the "Preserve" designation applied to the Sperling Preserve and the Lake Los Carneros Natural and Historical Preserve. The plan, then could clearly spell out the focus (as it does now) of such preserves, as well as the associated rules and regulations needed to protect their natural resources. Mechanisms for enforcing these rules and regulations should be spelled out in the Master Plan.

6. **Signage**. We devote a separate section to this issue because it is so important for reaching the Master Plan's goals. Although the draft plan expends considerable space on the design and form

of park signs (Section 5.10), it devotes almost no space to the content of signs. As indicated in our previous letter, all parks should be clearly, consistently named and entrance signs installed (see Section 5.10.3). Signs indicating the name of the park and <u>all major rules</u> (see list under 5) should be placed at all major park entrances, consistent with the way that state and national parks are signed. We believe that appropriate signage could mitigate many of the conflicts we see among park user groups.

7. Specific corrections or comments.

- a. In the needs analysis, the plan consistently states that the goal for Goleta parks is 10 A of parkland per 1000 residents, although the current ratio is 17.5. Part of what makes Goleta the "Goodland" is its impressive amounts of open space, whose protection is a priority for residents, so it makes no sense to set a goal that is <u>lower</u> than current values. Goletans want to preserve their park and environmental amenities.
- b. On Figure 3-1, park 32 is indicated on the map, but not identified in the map code.
- c. Table 3-3 lists two trails for Ellwood Open Space/Sperling Preserve but 10 trails for the park at Lake Los Carneros. There are many more trails at Ellwood than indicated.
- d. Some of the figures, such as 3-9, indicate Goleta areas that are not within a 15-minute walk or a 5-minute drive of a park. We believe that these maps are misleading, because they exclude open space, a priority use and need of Goleta residents. For example, the western Goleta area, south of Hollister Avenue, is cheek-by-jowl to the Ellwood Open Space/Sperling Preserve, and also encompasses Santa Barbara Shores Park, which contains playground equipment in its southern section. Many residents of this area use the playground or open field facilities at Ellwood School and Girsh Park. Residents of this area will say that parks and open spaces are readily accessible to them.
- e. The color code for Fig. 5-11 needs to be explained.
- f. Although the plan devotes considerable space to deciding where recycled water can be used, there needs to be greater attention to using native, drought-resistant plants in parks and eschewing maintenance of water-intensive landscaping, such as lawns.
- g. Although the plan indicates that its architects conducted a statistically valid survey of residents' views on parks, we cannot find evidence for this assertion. Statistically-valid surveys depend on a random or representative sample of the population of interest, but the way the intercept survey were conducted (self-selection at Lemon Festival and on-line) indicate that this assumption was not met. In fact, there are companies that provide representative samples of names that represent the ethnic, gender, age, income, and other attributes of the population at large, which was not done in this case. Sample size for the intercept survey constituted only 214 self-selected participants, constituting less than 1% of Goleta's population (0.7 %). Further, no statistical analyses were done to examine relationships among the characteristics of people vs. their views or use of parks. No confidence limits or error estimates were provided for responses. The point of statistical analyses in this context is to extrapolate from samples to the population at large, something that could clearly not be done in this case.

We hope these comments and suggestions are useful. Please let us know if you have any reactions or questions. We believe that the draft Master Plan, after considering the issues outlined above and in our previous letter, could provide a valuable, clear vision and blueprint for Goleta's parks and open spaces.

Sincerely,

Kathaire Emy

Katherine Emery, PhD Executive Director Santa Barbara Audubon Society

Connecting people with birds and nature since 1963