

From: Katherine Emery [<mailto:katherine.emery@lifesci.ucsb.edu>]

Sent: Monday, January 13, 2020 11:00 AM

To: Kyle Richards <krichards@cityofgoleta.org>; Roger Aceves <raceves@cityofgoleta.org>; James Kyriaco <jkyriaco@cityofgoleta.org>; Stuart Kasdin <skasdin@cityofgoleta.org>; Paula Perotte <pperotte@cityofgoleta.org>; JoAnne Plummer <jplummer@cityofgoleta.org>; Vyto Adomaitis <vadomaitis@cityofgoleta.org>; City Clerk Group <cityclerkgroup@cityofgoleta.org>; goleta@public.govdelivery.com

Subject: Letter concerning Goleta Parks Facilities & Playgrounds Master Plan "Final Draft" January 2020.

Dear Hon. Council Members and Goleta City Staff,

Enclosed is a letter from Santa Barbara Audubon Society concerning the Goleta Parks Facilities & Playgrounds Master Plan "Final Draft" January 2020.

Thank you for the opportunity for our key SBAS experts on this matter to meet with you tomorrow.

Sincerely,
Katherine Emery

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Katherine Emery, PhD
Executive Director
Santa Barbara Audubon Society



Santa Barbara Audubon Society
A Chapter of the National Audubon Society

PO Box 5508
Santa Barbara, CA 93150
www.SantaBarbaraAudubon.org

Date: January 13, 2017

To: City of Goleta Council

Re: Goleta Parks Facilities & Playgrounds Master Plan "Final Draft" January 2020

Dear Council members,

The Santa Barbara Audubon Society (SBAS) hopes to mobilize the necessary resources to provide written commentary on the January 2020 "Final Draft" Goleta Parks Facilities & Playgrounds Master Plan that will be presented to you on January 16. However, we are presently uncertain as to whether an adequate review will be possible in the short time frame available between the Plan's online posting on January 10 and this meeting. Consequently, we wanted you to at least have access to the three comment letters (of June 4, July 24, and August 5, 2019) that we submitted to City of Goleta Parks and Recreation Commission and staff regarding earlier versions of this Plan.

A major focus of our review of the latest version of the Plan will be to evaluate the extent to which we find it responsive to the concerns raised in those letters, as well as to the public comments made by five SBAS Board and Conservation Committee members at the August 7 presentation of the Plan to the Parks and Recreation Commission. We hope the contents of the letters will provide you with insights into our concerns and perhaps serve to focus some of the questions or discussion at your January 16 meeting.

We are very appreciative of the efforts made by JoAnne Plummer to keep us in the loop on the status of the Plan throughout the revision process and to schedule a briefing with us on the Plan for later this week.

Please contact me with any questions you might have about the enclosed material.

Sincerely,

A handwritten signature in black ink, reading "Katherine Emery". The signature is fluid and cursive, with the first name "Katherine" being more prominent than the last name "Emery".

Katherine Emery, PhD
Executive Director
Santa Barbara Audubon Society

Attachments: SBAS letters of June 4, July 24, and August 5 City of Goleta Parks and Recreation Commission and Staff



Santa Barbara Audubon Society

A Chapter of the National Audubon Society

PO Box 5508
Santa Barbara, CA 93150
www.santabarbaraaudubon.org

Date: June 4, 2019

To: City of Goleta Parks and Recreation Commission and Staff

Re: Goleta Parks, Facilities and Playgrounds Master Plan (May 2019 Draft)

Dear Parks and Recreation Commission members and Staff,

The Santa Barbara Audubon Society (SBAS) is writing to offer comments in connection with your scheduled June 5th presentation and discussion of the Goleta Parks, Facilities and Playgrounds Master Plan (May 2019 Draft). SBAS works to connect people with birds and nature through education, science-based projects, and advocacy. We have over 1,100 members, including hundreds in the City of Goleta.

We appreciate the opportunity to comment on this draft Plan and commend the comprehensive and detailed thought and work it reflects. We do, however, have one major area of general concern with the Plan, as well as two more specific issues, that we wish to bring to the Commission's and staff's attention.

1. Failure to Recognize or Address the Problems of Off-Leash Dogs and Lack of Leash Law Enforcement (Major Concern)

The draft plan fails to recognize or acknowledge the long-standing issue of lack of leash law enforcement in City parks and open spaces, and the harmful effects of this problem on bird and wildlife habitat, which are substantial.¹ We have discussed these impacts in prior correspondence to the Commission, in which we have also made clear our strong support for properly sited and managed off-leash dog areas.² (The negative impacts of off-leash dogs on public health and safety have also been well documented³ and should, along with the attendant liability risks, be of great concern to the City, but these are beyond the scope of SBAS's mission to comment upon.) The unchecked presence of (illegally) off-leash dogs is a problem in all City

¹ Hennings, L. (April 2016). The impacts of dogs on wildlife and water quality: A literature review. *Metro Parks and Nature*. [<http://birddigiscoper.com/dogimrev.pdf>]. This review encompasses 77 individual studies or reports, including 54 from peer-reviewed journals, concluding that "The evidence that dogs negatively impact wildlife is overwhelming." Her summary states: "...people and their dogs disturb wildlife, and people are not always aware of or willing to acknowledge the significance of their own impacts. Wildlife perceive dogs as predators. Dogs subject wildlife to physical and temporal displacement from habitat, and dog scent repels wildlife with lingering impacts. Dogs disturb wildlife which can induce long-term stress, impact animals' immune system and reduce reproduction. Dogs spread disease to and outright kill wildlife. People with dogs are much more detrimental to wildlife than people alone; off-leash dogs are worse; and off-trail impacts are the highest" (p. 6).

² See attached SBAS July 31, 2018 letter to the Commission.

³ Rahim, T., Romero-Barrios, P., McKee, G., McLaws, M., & Kosatsky, T. (April 2018). Public health considerations associated with the location and operation of off-leash dog parks. *Journal of Community Health*, 43(2), 433–440. [<https://link.springer.com/article/10.1007/s10900-017-0428-2>].

parks but is particularly acute and harm-inducing in those sites that the Plan designates as “Regional Open Spaces,” such as Lake Los Carneros Natural and Historical Preserve and Sperling Preserve/Ellwood Mesa Open Space. This is because such sites are simultaneously the most attractive venues for leash-law-violating dog owners and the most environmentally sensitive (and most bird- and wildlife-critical) habitat in the City’s park and open space portfolio. The continuing and unconstrained presence of off-leash dogs represents the single greatest human-generated (and hence controllable) long-term jeopardy to such sites.

Recognition and active management of this issue is necessitated by: (a) the Plan’s definition of the City’s Regional Open Space areas (“The primary purpose of these areas is to protect their open space and natural values...”; p. 22); (b) Goleta’s General Plan Open Space Element, which states that “The City should ensure that park, recreation, and open space facilities are designed and managed in a manner that is consistent with protection of the ecology of the natural systems at each park site and that will serve the needs of the intended user groups” (p. 84); and (c) the Plan’s survey results, which found “preserve open space” to be (by far) the community’s top-rated and highest-priority need for the City over the next 5 to 10 years (pp. 212-215), and which yielded at least 10 write-in comments specifically reflecting resident concerns about unleashed dogs in parks and another 18 comments citing a need for appropriate (i.e., designated, fenced-in) facilities for off-leash dogs.

The Plan’s failure to even acknowledge the problem of off-leash dogs and associated enforcement needs as an issue (for example, in its listings of key issues, or in its recommendations and action plans) is an egregious oversight. It all but assures that the problem will continue to be ignored, in contravention to the Plan’s, the City’s, and the public’s stated priorities (noted above), while putting irreplaceable bird and wildlife habitat (as well as public health and safety) at risk. There are any number of strategies that could be brought to bear on this (public outreach, educational and informational signage; an escalating education-warning-citation program), but they all begin with the recognition and acknowledgement that (illegally) off-leash dogs in our parks and open space areas are a serious problem, and prioritizing accordingly. The Goleta Parks, Facilities and Playgrounds Master Plan provides a perfect opportunity to do this, and for the City to make an affirmative statement and commitment to addressing the problem. The Plan’s final version should reflect such a commitment in its needs analysis, recommendations, and action plans.

2. Inconsistent Designation of Lake Los Carneros Natural and Historical Preserve (Specific Issue)

Lake Los Carneros Natural and Historical Preserve is one of Goleta’s two (along with Sperling Preserve/Ellwood Mesa Open Space) most iconic and character-defining (emblematic of the “Good Land”) natural areas. It has been described as “one of the most important natural and cultural resources in the region...because of its natural beauty and resource value, its large size and its historical associations”⁴ and “As one of the few open space areas in Goleta and along the South Coast area, its native habitats, water bodies and winter wetlands provide both wildlife and

⁴ Penfield & Smith Engineers, Inc., & Royston Hanamoto Alley & Abey, Landscape Architects and Planners. (February 1987). *Lake Los Carneros Natural and Historical Preserve, County of Santa Barbara, California Master Plan*, p. 1.

the community with a treasured resource.”⁵ To have such a place within our small City, barely more than a five-minute drive (or a pleasant walk or short bike ride away) from anywhere in Goleta, is truly a gift to the community—it’s like having a National Wildlife “Refuge-in-miniature” right in our own backyard.

It is therefore most regrettable, and almost inconceivable, that this treasured natural area does not have a singular, recognizable, and appropriate name (nor, as the Plan itself notes on page 94, even an entry sign or official entrance feature). This unfortunate circumstance is reflected in the Plan’s use of at least seven different terms with reference to this site: “Los Carneros Park” (p. 17 map; p. 22 photo caption; p. 79 Figure 5-7); “Lake Los Carneros” (p. 128 section heading; p. 129 site summary label); “Lake Los Carneros Park” (p. 128 within-map designation); “the Los Carneros” (p. 94 Section 5.10.3 text); “Los Carneros Natural and Historic Preserve” (p. 19 Table 3.3; p. 80 Table 5-3; p. 90 Section 5.10.1 text; p. 93 Figure 5-9); “Los Carneros Natural and Historic Preserves Park” (p. 94 Section 5.10.3 text); and “Lake Los Carneros Natural and Historical Preserve” (p. 129 Appendix A Section 9.1 text).

We would note that the last of these (“Lake Los Carneros Natural and Historical Preserve”) is the designation used for the site’s original Master Plan⁶ and is also the one preferred and viewed as most appropriate by both SBAS and the Goleta Valley Historical Society⁷ because it best embodies all key elements of the property, as well as a desired differentiation (as a “preserve”) of its intended passive recreational usage⁸ from other active-recreation-oriented “parks.”⁹

We believe that the Goleta Parks, Facilities and Playgrounds Master Plan affords the ideal opportunity for initiating a process to rectify this serious nomenclature (and associated signage) shortcoming by: (a) using a single (and, we hope, our recommended) designation when referring to this property throughout the Plan; (b) explicitly calling out this issue in the Plan’s needs analysis; and (c) developing recommendations and/or action plans that place a high priority on resolving both the nomenclature and entry signage issues for this treasured site.

Beyond the issues of nomenclature and signage, we would also note that this Preserve represents a birding resource of particular value and significance to SBAS members and the greater community—through SBAS’s annual “Winter Bird Count 4 Kids” event (which the City of Goleta supports) and various SBAS-sponsored bird walks and field trips. Also, it is a crucial link in the Goleta South Coast network of “Important Bird Areas” designated by the National Audubon Society. Its patchwork of habitats supports a myriad of birds and wildlife that persevere, despite the absence of an active management or restoration plan. They could truly thrive under an updated and well-executed master plan, as has been proposed in the City’s

⁵ Santa Barbara County Trails Council. (September 2009). *Lake Los Carneros Trail Management, Rehabilitation and Interpretive Program Review*, p. 1. [<http://sbtrails.org/docs/Lake-Los-Carneros-Management-Review-2009.pdf>]

⁶ Penfield & Smith, 1987; op. cit.

⁷ Personal communication from Amanda DeLucia, Executive Director, June 1, 2019.

⁸ Hunt & Associates. (January 25, 2000). *Lake Los Carneros County Park 1999 Updated Management Plan*. [<http://lakeloscarneros.com/management---plan---1999.pdf>] (See pp. 44-45 section on public education recommendations.)

⁹ Penfield & Smith, 1987; op. cit. “These [12/19/85 Park Commission and 1/9/86 Public Workshop] meetings clearly indicated a community desire to minimize active recreational development and to leave the park in as natural a state as possible. The public interest in the existing natural and manmade resources of the park inspired a change in the project name from Lake Los Carneros Park to Lake Los Carneros Natural and Historical Preserve” (p. 2).

Strategic Plan.¹⁰ We hope that attention to the nomenclature and signage issues outlined above will serve as a catalyst for this, enabling the Preserve to become the fully realized natural jewel that the City deserves.

3. Inaccuracies Regarding Accessibility and Other Facilities at Lake Los Carneros Natural and Historical Preserve (Specific Issue)

The section of the Plan's Appendix A (City Park Accessibility Compliance Assessment) concerning Lake Los Carneros Natural and Historical Preserve (Section 9.1 on pp. 129-130) has several serious errors. It almost appears, from the discussion and associated photos, that accessibility considerations have been limited to just the (secondary) property access from North La Patera Lane, while seeming to ignore or overlook the Preserve's primary access and parking area from Los Carneros Road.

Regardless of the reason for the oversights, it should be noted that the accessibility descriptions provided in Sections 9.1.5 (Accessible Parking; stated as "not provided") and 9.1.6 (Public Restrooms; referring only to the "outhouse located along the asphalt utility road") are incomplete and misleading. The property in fact has (from its Los Carneros Road entry) an accessible parking lot with two designated "handicapped" parking spaces, including an accessible portable restroom facility within the parking lot, as well as additional (albeit limited-hours) fully accessible men's and women's restrooms located behind the Rancho La Patera Visitors' Center Museum Store. These errors carry over to the information summarized in Table 3.3 (p. 19) in the main section of the Plan, which incorrectly indicates only one restroom and no ADA parking.

Table 3.3 also reflects other (non-accessibility-related) errors regarding facilities at this site. There is a significant undercounting of benches—the table shows 12, whereas there are in fact 15 benches in the dam area alone, plus eight more in the train depot and south oak grove areas, plus many more along the trails north and east of the lake. In addition, the table lists no picnic areas or picnic tables at the site, whereas there are in fact picnic areas in both the train depot and south oak grove sections, which also contain a total of nine picnic tables. It is important that all such errors are corrected in the final version of the Plan.

SBAS views the Goleta Parks, Facilities and Playgrounds Master Plan as a wonderful opportunity to further the General Plan's vision of Goleta as a community "that treasures open spaces and ecological resources."¹¹ We are available for continued dialogue and support of the Commission and City staff as they consider further refinements and improvements to it.

Sincerely,



Cherie Topper, Executive Director
Santa Barbara Audubon Society

¹⁰ City of Goleta 2017 -2019 Strategic Plan, p. 6.

¹¹ Goleta General Plan/Coastal Land Use Plan, September 2006, p. 2.



Santa Barbara Audubon Society
A Chapter of the National Audubon Society

PO Box 5508
Santa Barbara, CA 93150
www.SantaBarbaraAudubon.org

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 all major rules (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 lower 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,

A handwritten signature in black ink that reads "Katherine Emery". The script is fluid and cursive, with the first name and last name clearly distinguishable.

Katherine Emery, PhD
Executive Director
Santa Barbara Audubon Society



Santa Barbara Audubon Society
A Chapter of the National Audubon Society

PO Box 5508
Santa Barbara, CA 93150
www.SantaBarbaraAudubon.org

Date: August 5, 2019

To: City of Goleta Parks and Recreation Commission and Staff

Re: Pre-Final August 2019 Goleta Parks, Facilities & Playgrounds Master Plan

Dear Parks and Recreation Commission members and staff,

The Santa Barbara Audubon Society (SBAS) wishes to offer a brief initial comment on the Pre-Final August 2019 Goleta Parks, Facilities & Playgrounds Master Plan Revised Draft (posted on August 2). We expect to provide additional written and/or verbal comments on this Revised Draft when (or after) it is presented to the Commission on August 7, and once we have had the opportunity to more fully review it.

We appreciated the opportunity to comment on the prior version of the Plan in our letters of June 4 and July 24. We also appreciated the offer extended by Ms. Plummer and Mr. Adomaitis to meet with several of our members on July 29 to discuss these comments in detail. During this meeting Ms. Plummer outlined how the City had either addressed or was planning to address many of the points raised in our letters, and we exchanged views on different options for strengthening the Plan. We felt this to be a highly productive and collegial meeting.

We recognize and appreciate the effort made in this Revised Draft to address the major concern of our June 4 letter: the Plan's failure to address the long-standing issues of (illegally) off-leash dogs and the lack of leash law enforcement in City parks and open spaces, and the harmful effects of these problems on bird and wildlife habitat. However, we are disappointed in the results of this effort, as reflected in the addition of Objective 9.1 ("Enhance the enforcement of dog leash rules"; p. 72). This objective reads as follows:

"While exploring opportunities for designated off-leash dog parks, dog leash rules should be better enforced in the existing parks and open spaces for the safety and comfort of non-dog owners. The City has a contract with County Animal Services for the enforcement of off-leash dogs. The City may consider putting up more signs and organizing educational activities to help enhance the enforcement."

We offer the following thoughts about this manner of addressing off-leash dog and enforcement issues in the Plan:

- This objective seems misplaced under Goal 9 ("Create a dog-friendly park system") and would seem more appropriately placed under Goal 12 ("Preserve and make open space more accessible for the general public").
- The language refers to dog leash "rules," when what is actually at issue are laws (i.e., City ordinance requiring dogs to be on leash in all public areas other than designated off-leash dog

areas), albeit laws that are also reflected in park and open space rules. The effect of this is to understate their importance.

- The language makes it seem as though the only reason for enforcement of leash laws is “for the safety and comfort of non-dog owners.” This fails to recognize that such enforcement is also: (1) for the protection of birds and wildlife; (2) for the preservation of sensitive habitat; (3) for the safety of dogs and dog owners; (4) for the health and safety of all park users; and (5) to promote and enhance public access to parks and open spaces by constraining the chilling effect of loose dogs in public spaces (i.e., referring to people who have stopped patronizing such areas, and are hence unable to enjoy their benefits, because they do not wish to be disturbed, frightened, or harassed by off-leash dogs).¹
- The last sentence of the above objective (“The City may consider putting up more signs...”) does not seem to reflect a strong commitment to remedying the problem. It could be strengthened by committing to an affirmative plan for implementing signage that displays city ordinances and park rules relevant to off-leash dogs (and other issues), as we discussed in our letter of July 21.
- All of the above perpetuate a timid and tepid approach to leash law enforcement, signaling that the issue is not taken seriously by the City, while promoting the myth that only non-dog owners are concerned with or affected by (illegally) off-leash dogs. (In fact, dog trainers and law-abiding dog owners are among the strongest advocates for vigorous leash law enforcement.²³) In so doing it misses an opportunity to both educate the public and take a strong position that would truly reflect the City’s commitment to open space habitat protection and preservation (a top Goleta resident priority, based on repeated community surveys) through serious leash law enforcement efforts.

We offer the above points in the spirit of helping the City create a valuable and clear guiding vision for Goleta’s parks and open spaces. We hope they will be taken into consideration when creating the final version of this Plan.

Sincerely,



Katherine Emery, PhD
Executive Director
Santa Barbara Audubon Society

¹ See <https://paloonline.com/news/2017/09/17/guest-opinion-why-leash-laws-there-are-plenty-of-good-reasons>

² See <https://www.dogster.com/lifestyle/leash-your-dog-its-law-for-number-very-good-reasons>

³ See <https://badrap.org/training-resources/dog-law-dog-owner-rights>



Santa Barbara Audubon Society

A Chapter of the National Audubon Society

PO Box 5508
Santa Barbara, CA 93150
www.santabarbaraudubon.org

Date: July 31, 2018

To: City of Goleta Parks and Recreation Commission, and Staff

Re: August 1, 2018 Agenda Item B.3: Preliminary Discussion and Initial Considerations for an Off-Leash Dog Park

Dear Parks and Recreation Commission members and Staff,

The Santa Barbara Audubon Society (SBAS) is writing to offer comments in connection with your scheduled August 1st discussion of considerations for an off-leash dog park in Goleta (agenda item B.3). SBAS works to connect people with birds and nature through education, science-based projects, and advocacy. It has over 1100 members, including hundreds in the City of Goleta.

SBAS has a longstanding interest in the subject of off-leash dog areas (OLAs), particularly in the context of protection/preservation of environmentally sensitive habitat areas (ESHAs) and important bird areas (IBAs). For example, when this same issue was previously considered by the Commission at its December 14, 2016 meeting, three of our members provided detailed and well-received public comments regarding the critical importance of avoiding OLA development in or around any of Goleta's two largest, most important, and most sensitive bird habitat areas—the Lake Los Carneros Natural and Historical Preserve (“LLC”) and the Ellwood Mesa – Sperling Preserve Open Space complex (“Ellwood”). We will reiterate that view here.

SBAS fully recognizes and appreciates the role and community value of OLAs, provided they are consistent with generally accepted “best practices” for the siting of such facilities.¹

It is noteworthy that these practices are often promulgated and endorsed by highly “dog-centric” organizations, such as Seattle’s COLA (Citizens for Off Leash Areas) group. It is also noteworthy that every jurisdiction that has seriously studied the issue (including the City of Santa Barbara²) has categorically ruled out locating off-leash dog parks anywhere near ESHAs and IBAs.

¹ These include: (1) avoid interference with other established uses or sponsored activities; (2) avoid locations directly abutting residences; (3) assure availability of close-by parking; (4) avoid locations near children’s play areas; (5) choose spots where there are minimal impacts on the visual character of a park; (6) site so as to avoid spillover into non-dog areas; and (7) avoid sensitive environmental habitats. References to these principles, and examples of their application across many jurisdictions, can be found in:

http://cloud.tpl.org/pubs/ccpe_Dog_Park_Report.pdf;

[https://www.seattle.gov/Documents/Departments/ParksAndRecreation/PoliciesPlanning/Plans/Response_to_SLI_69-1-B-1_\(Dog_Off-Leash_Areas\).pdf](https://www.seattle.gov/Documents/Departments/ParksAndRecreation/PoliciesPlanning/Plans/Response_to_SLI_69-1-B-1_(Dog_Off-Leash_Areas).pdf);

https://www.denvergov.org/content/dam/denvergov/Portals/747/documents/planning/master_plans/Off_Leash_Dog_Park_MasterPlan.pdf;

http://destinyhosted.com/tilladocs/2014/BEA/20140818_255/885_Dog%20Park%20BP%27s%202011%20FINAL.pdf.

² City of Santa Barbara Parks and Recreation Department. (February 2015). Off leash dog areas feasibility study. [https://www.santabarbaraca.gov/SBdocuments/Advisory_Groups/Park_and_Recreation_Commissions/Archive/2015_Archives/03_Staff_Reports/f2015-02_25_02_25_2015_Item_4_Atch_Off_Leash_Dog_Areas_Feasibility_Study.pdf]. This study concluded, with respect to off-leash dog park siting, that: “Parks with environmentally sensitive areas are not ideal due to the potential impacts to wildlife, native habitat, and water quality.” (p. 11).

The implication of these practices for the City of Goleta is that **it is imperative that, as future options for potential OLAs are considered, LLC and Ellwood are excluded, a priori, from any such consideration.**

Not only do these two properties represent Goleta's largest and most unique remaining natural open space areas, they both contain substantial ESHA lands (as we were pleased to see recognized on p. 3 of the Staff Report for this agenda item³). Consequently, both properties enjoy special protections under the Conservation, Open Space, and Visual/Historic Resources elements of the Goleta *General Plan*, as well as via various regulations issued by five Federal and State agencies that have jurisdiction over wildlife resources in these areas.⁴

Moreover, both LLC and Ellwood are part of a National Audubon Society designated Goleta Coast IBA, meaning they have been identified using an internationally agreed-upon set of criteria as being globally important for the conservation of bird populations. The Goleta Coast IBA additionally is ranked among the top 50 (of 177 total) "most climatically suitable" California IBAs, that is, in terms of its likelihood of withstanding future projected climate change⁵, making it "important" in multiple ways.

These considerations mean that siting an OLA at LLC or Ellwood would violate many of the best practices listed above (footnote 1), but most significantly, the practice of not siting OLAs near ESHAs. The adverse consequences of violating this principle can hardly be overstated. This is largely due to the almost inevitable "spillover" effects of such siting; that is, the likelihood that OLA patrons will be drawn to—and allow their dogs (illegally) off-leash within—nearby parks or open spaces, as is commonly observed in existing Santa Barbara City and County designated OLAs. LLC and Ellwood already suffer greatly from an almost complete lack of leash law enforcement, and their bird and wildlife habitat and trail systems have become substantially degraded over the years as a consequence. (Members of our Conservation Committee have had productive conversations on this subject with City staff, such as a February 16, 2017 meeting with Ms. Plummer, Mr. Adomaitis, and Ms. Wells, but this problem has nevertheless persisted.) Further, the negative impact of dogs on wildlife and sensitive habitat has been extensively documented in a multitude of scientific studies.⁶

To recap, we hope the above points make clear that, while we value OLAs as an important community resource, their appropriate siting is paramount both to their successful implementation and the City's fidelity to its heritage as "The Good Land" and the *General Plan*'s vision of Goleta as a community "that treasures open spaces and ecological resources."⁷ As there are no more treasured City open spaces than LLC and Ellwood, every effort must be made to preserve and protect them.

We appreciate the opportunity to comment on this issue and look forward to continuing dialogue with the City in any further consideration of OLA development.

Sincerely,



Cherie Topper, Executive Director
Santa Barbara Audubon Society

³ <https://goleta.legistar.com/LegislationDetail.aspx?ID=3583257&GUID=42337ED1-511F-4C6B-BC4B-EA9EC4AC43C0>

⁴ Hunt & Associates, Lake Los Carneros County Park 1999 Updated Management Plan, January 25, 2000, p. 1;
<http://lakeloscarneros.com/management-plan-1999.pdf>

⁵ <https://www.audubon.org/important-bird-areas/goleta-coast>

⁶ Hennings, L. (April 2016). The impacts of dogs on wildlife and water quality: A literature review. Metro Parks and Nature.
[\[http://birddigiscoper.com/dogimrev.pdf\]](http://birddigiscoper.com/dogimrev.pdf).

⁷ <http://www.cityofgoleta.org/home/showdocument?id=585>, p. 1-2.

-----Original Message-----

From: Victor Cox [<mailto:vic.cox.freelance@gmail.com>]

Sent: Wednesday, January 15, 2020 4:11 PM

To: Paula Perotte <pperotte@cityofgoleta.org>; Deborah Lopez <dlopez@cityofgoleta.org>; James Kyriaco <jkyriaco@cityofgoleta.org>; Stuart Kasdin <skasdin@cityofgoleta.org>; JoAnne Plummer <jplummer@cityofgoleta.org>

Subject: draft master plan for city parks

Dear Mayor Perotte and councilmembers,

Attached are comments regarding agenda item B1 for the special meeting on Jan. 16.

Thank you for considering them

Vic Cox

Date: January 15, 2020
To: All City Councilmembers
From: Vic Cox

Re: Final Draft Goleta Parks, Facilities and Playgrounds Master Plan

To me open space AND public parks should be considered together, not as separate entities within defined boundaries having no influence on each other. Dividing land into parks or open space probably violates principles of good ecosystems management. It also invites narrow, short-term thinking that can produce unintended consequences.

The current draft "Goleta Parks, Facilities and Playgrounds Master Plan" has good points but is not comprehensive and fails to evaluate, or barely mentions, some Goleta parks and open spaces, including Winchester II Open Space. Contrary to Fig. 4-13 this parcel is labeled either open space or a neighborhood park, depending on the map consulted. It is NOT available for development. Fig. 4-13 also labels what is probably an electrical easement as vacant land (along Winchester Canyon Road).

The minimal description of the new Jonny D. Wallis neighborhood park is baffling considering the time and resources poured into this badly needed urban project. Since Table 3.3 lists Wallis' amenities Existing Facilities text (3.1.1) should be corrected.

As these examples illustrate the City Council should be wary of adopting the draft as is. The Master Plan consultant seems to recognize the one-size-fits-all approach is wrong when it comes to open spaces. Page 21, under section 1.5, "Scope of Document," has the following: "Some open space areas within the City are dominated by natural habitat, and in these areas the goals of this Master Plan should be secondary to habitat preservation objectives in the General Plan/Coastal Land Use Plan..." Please defer to the GP.

I like the philosophy inherent in many of the Action Plan's Recommendations (Section 5), specifically seeking recreation partnerships with local schools (5.2.3 and 5.3). Humans also share a number of local parks and open spaces with wildlife, especially birds at Winchester II. Egrets and endangered hawks lift our spirits. Sustainability of wildlife should be included in Objective 5.1: "Think outside of the park."

With climate change tightening its grip on planet Earth adaptability to major change will be required of all of us. There is no more appropriate place to begin than with the city's ambitious Master Plan for Parks, Facilities and Playgrounds. Thank you for listening.

From: Jeff Villano [mailto:villanostennis@aol.com]

Sent: Wednesday, January 15, 2020 10:53 PM

To: Deborah Lopez <dlopez@cityofgoleta.org>

Subject: Park Master Plan - Goleta

Dear Mayor and Council-

My name is Jeff Villano and I'm a single father of four children. I live in the low income housing off of Los Carneros across from the Goleta City Hall. I noticed in the Newspress you will be meeting on Thursday, October 16th to discuss proposals of new parks in the City of Goleta. I do not think I will be able to make the meeting so I hope you will consider my email for discussion.

I have lived in my apartment for almost two years and I've really noticed there are no public parks or open spaces for kids or families to play at close to my location. All parks are on the other side of the freeway. I have visited the park by the car dealerships and that is too far from my neighborhood. My understanding is there is a City lot close to the Goleta City Hall to build a small park. I strongly feel a park is much needed for residents on the ocean side of the freeway in the Los Carneros area. Children, adults, and workers would greatly benefit from a free public space to exercise and relax.

I feel important features would be:

1. Two to four tennis courts. Tennis is a sport of a lifetime. Children to seniors can play. Cardio tennis is a popular activity which has a high growth rate. Pickleball which is growing rapidly can be placed on tennis courts, and basketball hoops can be set up as well. So what I'm saying is tennis courts are multi-dimensional. You can have many activities on many courts. Lights on the courts would be smart too because this would create more safety in the area and promote all day usage.
2. Some type of small grass field (like a really big backyard) would be nice for sport activities for parents to use with their small children to: kick a soccer ball, throw a

football, throw a frisbee, or just to have a picnic with picnic tables.

3. A small playground would be great for toddlers and younger elementary school children.
4. I assume a restroom and water foundation would be standard.

I hope you would consider this idea. I'm not sure how much space is available but a minimum of two multi-dimensional tennis courts, a grass/picnic area and small playground would be incredible.

Thank you for your time,

Jeff Villano
11 Compass Lane #208
Goleta, CA 93117

805.680.5513
villanostennis@aol.com