



Santa Ynez Valley Riders



December 22, 2020

Mr. Jon Menzies
County of Santa Barbara Parks
4568 Calle Real, Bldg E
Santa Barbara, CA 93110

RE: Public Review "Pilot Program" at Live Oak Equestrian Trails (VIA EMAIL)

Dear Mr. Menzies,

Thank you for your response email to our letter of December 18, 2021. We have reviewed the Cachuma Resource Management Plan (RMP) and Environmental Impact Statement (EIS) and continue to believe the decision to move forward with the Pilot Project (Pilot) to open Live Oak Trail at Lake Cachuma is premature.

With our review and additional research, we have the following additional issues and questions that need resolution prior to starting the Pilot:

1. Programmatic vs. Project Specific Environmental Review

As you identified, the RMP and EIS, specifically identify permitting 'hiking and biking' on the Live Oak trails as the preferred alternative in the EIS (Alternative 2). However, in the EIS introduction it states that: **"The RMP is a long - term plan that will guide future actions in the Plan Area and is based on a comprehensive inventory of environmental resources and facilities and input from local, state, and federal agencies, and the general public. The Final EIS is a program - level analysis (emphasis added) of the potential environmental impacts associated with adoption of the RMP."**

Additionally, Under Alternative 2, Section 2.7.2 On the North Shore, Alternative 2 would allow limited hiking and biking on primitive trails. Permits issued by the local managing partner would regulate these uses. Users could be required to make advance reservations and pay a small fee for access to the north side of the lake. **The Trail System Management Plan that would be developed under this alternative** would specify the process for obtaining a permit.

Also, Section 2.7.3 describes "Management Actions for County Park Under this alternative" and goes on to say that the following recreational enhancements and projects would be encouraged at the County Park area. **The precise number, layout, and timing of the new facilities would be determined by the local managing partner¹ through a separate planning, design, and permitting process.**

These statements indicate that **the USBR contemplated follow-up analyses and public input** by the County as individual components or “projects” are implemented on the ground over time. the **California Environmental Quality Act (CEQA)** and the County’s planning process (including public comment) are mandated.

2. NEPA and CEQA

While the Pilot appears to meet the intent of the RMP and EIS, and these two documents satisfy environmental review under the **National Environmental Quality Act (NEPA)** at the Federal level (the US Bureau of Reclamation being the lead agency), implementation of the RMP requires the County (as lead agency) to develop a Trails Management Plan, and complete environmental review of individual “projects” (such as the proposed Pilot) under the **CEQA**, to implement the RMP. (See comments above)

Note that it has been 10 years since review for the EIS was published in the Federal Register (May 19, 2010). Many changes in recreational activity and equipment technology (not all for the good) and popularity have occurred. We believe the impacts of new users on Live Oak Trail needs to be revisited, the new impacts identified and mitigated to minimize conflicts among users as required under the CRM, EIS and CEQA.

If the CEQA review and associated documents are complete, please provide us with a copy of the CEQA documents for the Pilot program. If not, please start the CEQA process start as soon as possible.

3. EIS Mitigation and Trail System Management Plan

The CRM, Page 4-78, Section 4, Environmental Consequences, Impact R – 3, states “Potential conflicts would occur between users on trails that are shared among different user groups including hikers, mountain bikers, and horseback riders. **This impact is considered a potentially major adverse impact** (emphasis added) and

Mitigation R - 3 **A Trail System Management Plan would be developed under Alternatives 2 and 3** (emphasis added). The plan would include provisions for management of trails. An education program would also be implemented to solve trail conflicts. Trail rules can be established for different users. It would be the management’s and visitors ' collective responsibility to find and uphold solutions that allow multiple use trails to work. Cyclists must be safe and conscientious riders and should follow some general rules that respect hikers and horses and their riders. Equestrians must also be safe and conscientious riders; they should only ride horses that are well trained and capable to withstand sharing multiple use public trails. Therefore, residual impacts would be minor. However, no Trail System Management Plan is proposed for the No Action Alternative; therefore, **impacts could be major under this alternative as future demand grows**

From the summary of Environmental Consequences and Mitigation above it’s clear that the Trails System Management Plan is anticipated **BEFORE** any type of new trail users are added at the

Equestrian Trail at Live Oak. As the potential conflicts among users is identified as a potentially major significant impact, preparation of a Trail System Management Plan and public comment are required by the CRM and County processes.

4. Summary

In light of research and our findings, we support the following actions:

- **Create a Live Oak Trail Management Plan Working Group** consisting of the County, USBR, Santa Barbara Trails Council, Santa Ynez Valley Riders (as representative for the equestrian community), the grazing permittee, and any other representatives as is appropriate.

The Trails Management Plan working group would be responsible for developing the Trails System Management Plan that would undergo public review, like the Baron Ranch Master Plan.

- **Complete the Trail System Management Plan for the Equestrian Trail at Live Oak.** It is required for compliance with the CRM and to mitigate significant impacts identified in the EIS. Through the development process, allow for public input, including interested all equestrians to the Trails System Management Plan development and review.
- **Accomplish environmental review for the Pilot as proposed under CEQA.** The CRM and EIS offered the programmatic overview of proposed changes at Live Oak. Completing the (project specific) CEQA process for the Pilot is required by the CRM. Now that the County is preparing to launch improvements suggested in the CRM (the Pilot), it is time to do “project specific” CEQA analysis that includes public input and review. The project description and mitigations must address all potential impacts identified in the CRM and EIS as well as those issues identified through robust public comment.
- **Create a Foundation for the Live Oak Trail.** Mitigations for the project must include provisions for trail safety and security. The County has not proposed nor funded any new staff to patrol or otherwise monitor the trails and user interactions or provide for trail maintenance if the number of users increase. We reviewed the County’s 2019-2024 Capital Improvement Program and, to our knowledge, no large improvement project for the Live Oak Camp or the Trail is proposed or scheduled for funding. Therefore, funding from a separate Foundation will be necessary to provide any level of funding to adequately monitor and maintain the trail.

As we proposed in our previous letter, the SYVR, under our 501(c)(3) status, wishes to begin negotiations with the County Park, Cachuma Lake, and/or the USBR to create a Foundation to provide a reliable source of funds for improvements at the Live Oak trailhead (parking, kiosk, etc.) and for trail maintenance.

We envision that the Live Oak Trail Foundation would be a partner with the County to develop the Trails System Management Plan, and monitor trail use as well as be the responsible

partner for fundraising to support the County and USBR staffing and trail maintenance for the Equestrian Trail at Live Oak.

Finally, your statement that “This (the Pilot) is also the standard for trails throughout Santa Barbara County” indicates that more dialog between County and equestrians is necessary. The Live Oak Equestrian Trail was dedicated specifically as an equestrian trail over 30 years ago and, while unique, should be the gold-standard the County strives for in multi-use trail design. Many of the amenities at the Live Oak trailhead; its remoteness, safety and rideable trails allow equestrians to enjoy not only the historic California Oak Woodland and grassland environments but also provides a time with our horses **without harassment from other users**. Having a safe environment to ride and enjoy the area without bullying (or even recourse) is a huge draw to the Live Oak Equestrian Trail for equestrians.

You should be aware that one of the most limiting factors to equestrians is adequate parking. Trailhead design over time and user non-compliance (i.e., parking in space intended for equestrian parking or parking so close trailers cannot be accessed) have deterred and all but excluded equestrians at a majority of other County hiking trails. **No other trail user group (hikers and bikers) have been so systematically excluded.**

Again, thank you for your time and attention to our requests and suggestions. We hope formation of the above-mentioned Working Group will be instituted and SYVR will be pleased to join as a member. The equestrian trails at Live Oak are such a limited resource to equestrians, we are adamant that the process described in the RMP and EIS be coordinated and followed.

Please contact me with questions or concerns. We look forward to working with you in the future.

Best Regards,

Kathy Rosenthal
2021 President
Santa Ynez Valley Riders

Cc: Todd Stepien, Parks Operations Manager, Cachuma Lake Recreation Area, Santa Barbara County
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Linda Clarke, West Coast Rocky Mountain Horse Club
Sheila Patterson, President, Ride Nipomo
Nancy Emerson, President, WEWatch
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Joan Hartmann, Third District Supervisor, County of Santa Barbara

¹ The County of Santa Barbara Park Division