

COMSTOCK HOMES DEVELOPMENT AND ELLWOOD MESA OPEN SPACE PLAN FEIR

4.10 RECREATION

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This section identifies existing recreation resources, assesses potential impacts associated with the proposed project, and recommends mitigation measures to reduce potential projects impacts to levels of insignificance. Information in this section is based on various sources, including previous environmental documentation for other developments in the vicinity, consultation with the City of Goleta, and consultation with Santa Barbara County (County) Parks Department. Full bibliographic entries for all reference materials appear in Section 9.0.

4.10.1 Existing Conditions

4.10.1.1 Regional Overview

The project area for the proposed Comstock Homes Development and Ellwood Mesa Open Space Plan lies in a region that because of its topographic character and climate offers a wealth of recreational opportunities. Recreational resources in the project vicinity, including unimproved open space and developed park and recreational facilities, are owned, maintained, and operated by a number of entities, including the City of Goleta, the County, the University of California, Santa Barbara (University), and the Isla Vista Recreation and Park District. The Comstock Homes Development site and Ellwood Mesa Open Space area, although currently undeveloped, serve as an informal recreation area for residents and visitors alike.

This section (4.10.1.1 Regional Overview) describes regional recreational facilities, by jurisdiction. Recreational resources at the proposed project site(s) are described in Sections 4.10.1.2 and 4.10.1.3.

4.10.1.1.1 City of Goleta Parks and Open Spaces. In the general vicinity of the project site, the City of Goleta is responsible for the Santa Barbara Shores City Park, Stow Grove City Park, Lake Los Carneros City Park, and the Evergreen Open Space (refer to Figure 4.10-1). These parks and open spaces are managed under contract by the County Parks Department. The Santa Barbara Shores Park, as currently configured, is approximately 116 acres adjacent to the Ellwood Mesa site. The property boundaries of the park are anticipated to change associated with the proposed project. Lake Los Carneros (137 acres) is dedicated as a “natural, cultural, and historic preserve.” It is primarily used for passive recreational uses. Stow Grove City Park (11.6 acres) is a developed park with facilities including group and family picnic areas, volleyball courts, horseshoe pits, playground equipment, lawn areas, and a softball diamond. The Evergreen Open Space is a 3.5 acre parcel with tennis courts, baseball field, picnic tables, and playground.

4.10.1.1.2 County Parks. The County Parks Department is responsible for enhancing recreational opportunities, preserving natural resources, and maintaining facilities at County parks and open spaces. In the general vicinity of the project site, the County maintains four public parks for recreational use: Isla Vista Beach Park, Goleta Beach County Park, the Del Sol Open Space and Vernal Pool Reserve, and Camino Corto Open Space (refer to Figure 4.10-1).

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Section 4.10 Isla Vista Beach Park is a half-acre park with a lawn area for sports on the bluff and three raised wooden platforms for lounging and enjoying the view. Goleta Beach County Park (29 acres) is located directly east of the University main campus. The park provides active recreational facilities such as volleyball courts, horseshoe pits, fishing pier, boat launching, playground equipment, and picnic areas, as well as a restaurant and snack bar.

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A report on the status and availability of recreational fields was prepared in 1999 by the City and County of Santa Barbara along with the Santa Barbara School Districts (including the Goleta Union School District [GUSD]). The results of the study showed that the region is currently in a significant recreational field deficit for youth and adult ball fields. Further deficits were projected for the year 2010. Numerous recommendations were provided to promote development, such as the recently funded and developed Girsh Park.

4.10.1.1.3 University Facilities. The University is a primary recreational resource for both University affiliates (students, faculty, staff, alumni, and families) and the South Coast community. According to the 1990 and 1997 LRDP EIRs, the University provides approximately 77 acres (9 percent of campus land) for recreational facilities, and 108 acres (13 percent) for landscaped open space. The main concentration of recreational facilities is located in the northwest corner of the Main Campus, which is about 2 miles east from the City of Goleta's project site. The Recreation Center and Aquatics Complex, located in this area adjacent to Rob Field, provides for consolidated recreational, athletic, and administrative facilities (refer to Figure 4.10-1).

In addition to landscaped open space areas, the University also provides access to 2.5 miles of coastline from four points on the campus. The University also provides numerous recreational programs in both academic and non-academic formats. In the decade between 1980 and 1990, University enrollment in the more than 400 recreation classes increased 417 percent, from 3,264 to 13,622 students. Participation in club sports, intramural leagues, recreation classes, and day camps has also increased significantly in the last decade.

Stables and boarding facilities are also provided on the University's West Campus area.

4.10.1.1.4 Isla Vista Parks. The Isla Vista Recreation and Park District owns and operates 26.75 acres of property, including both natural open space and developed park facilities. Most of the parks are quite small, the largest developed park is the 1.6 acre Aniso Oyo Park (refer to Figure 4.10-1) in the business section of Isla Vista. As a result, most of the park spaces are designed for primarily passive recreational uses and for use by residents of the immediate neighborhood.

Although not an Isla Vista Recreation and Park District facility, the Isla Vista Elementary School provides a large recreation area that is heavily used during non-school hours by students and area residents. The recreational facilities at the school, which is located just east of the project area at Storke Road and El Colegio, include a soccer field, playground equipment, basketball courts, and a baseball diamond.

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**Figure 4.10-1
Recreational Resources in the
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4.10.1.1.5 Other Recreational Facilities.

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Other Beaches With Public Access. Public beach access is available at Haskell's Beach, located seaward of the Bacara Resort on the west end of Goleta. This beach access is served by a 50-space public beach parking lot and a dedicated public beach access.

Golf Courses. There are five golf courses (refer to Figure 4.10-1) in the vicinity of the project area:

- The privately owned 18-hole Sandpiper Golf Course borders the proposed development (west side) and Hollister Avenue
- The privately owned Ocean Meadows Golf Course is approximately 1.5 miles east of the project site on Storke Road
- The Glen Annie Club is a full service privately owned 18-hole golf course, located on Glen Annie Road approximately 1.5 miles north of the project site
- Twin Lakes Golf Course, a privately owned 9-hole course, is approximately 4 miles east of the Comstock Homes Residences site, on Hollister Avenue
- Santa Barbara Golf Club is a full-service 18-hole course, owned by the City of Santa Barbara, located approximately 11 miles from the project site, in Santa Barbara

All five golf courses are open for public use.

Little League. The Goleta Valley Little League operates on Girsch Park Fields adjacent to the Camino Real Marketplace. These facilities are at the intersection of Pacific Oaks and Phelps Road.

Equestrian Facilities/Opportunities. The Santa Barbara Shores Park and University West Campus Stables currently provide entry points for equestrian use for the system of interconnected trails in Open Space Plan area. A limited amount of information on the rate of equestrian use is available based on user surveys and observations. This information is summarized below in Section 4.10.1.3.1.

4.10.1.2 Comstock Homes Residential Development Site

The proposed Comstock Homes Development is located on the northwest portion of the existing Santa Barbara Shores Park. The proposed project includes incorporation of the undeveloped portion of Santa Barbara Shores Park into the overall Ellwood Mesa Open Space Plan Area. This section focuses on the portion of Santa Barbara Shores Park that is proposed for development. The Santa Barbara Shores City Park, which as described in this EIR will be modified as part of the proposed project, currently offers 15 off street parking places, as well as additional parking on a 10- to 15-foot-wide dirt shoulder along Hollister Avenue. The Hollister Avenue frontage is typically used by up to 3-6 equestrian trailers on any given day.

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This park is a dedicated natural area without any structural developments. Main activities include hiking, biking, and equestrian use with an informal network of trails. Several major north-south and east-west facing trails currently exist on this 116-acre property. The property is bounded on the north by Hollister Avenue, to the south by the Pacific Ocean, Sandpiper Golf Course to the west, and residential development and Ellwood Mesa to the east. Within the proposed new 36-acre parcel, there are three footpaths that run for a total of approximately 0.87 miles. These paths include the major coastal access trail that runs southeasterly to the southwest corner of the subdivision; the Western Perimeter Trail that runs north-south adjacent to Sandpiper Golf Course; and a minor east-west trail that crosses the northern portion of the subdivision (Figure 4.10-2). These trails cross Devereux Creek or tributaries to the creek at different locations. The major southeasterly trending trail crosses the creek in the eastern portion of Santa Barbara Shores is the most extensively used trail segment in this part of the property. The Western Perimeter Trail crosses Devereux Creek adjacent to the eucalyptus windrow located between the golf course and the Open Space Plan boundary. The small east-west footpath cross tributaries to Devereux Creek, referred to as Drainages A1 and A2.

Trail markers are installed at the existing 15-space gravel parking lot trail entry point (refer to Figure 4.10-2) as well as throughout the Santa Barbara Shores property. In addition, the main access point and parking lot contain a dog “pick up mitt station,” trash receptacles, signage, and a “Save Ellwood Mesa” brochure box. The parking area is surrounded by a split-wood fence and gate with hours posted at the entrance. Signage denotes prohibited motorcycle and motorized vehicle uses on the property. Signs are also in place to identify priority public uses of the area, (i.e., which trails are appropriate for equestrian use and/or hiking).

4.10.1.3 Phelps Ditch Trail

The beginning of the Phelps Ditch Trail (starting at Phelps Road) runs southerly through property owned by the Goleta Union School District. The trail is adjacent to the restored riparian corridor of the ditch. This trail is level and wide with an aggregate base that is maintained by the Santa Barbara County Flood Control District. The trail is frequently used by hikers and bicyclists as a connection to the open space areas south and west of the Ocean Meadows Golf Course. There are no other developments along the trail or on the Goleta Union School District property.

4.10.1.4 Ellwood Open Space Plan Area

4.10.1.4.1 Overview. The proposed Ellwood Mesa Open Space Plan area under the jurisdiction of the City of Goleta is a multiple-use, passive recreation area influenced by two primary factors: the level and general quality of recreational use and opportunities, and the proximity to recreational access and use. The Ellwood Mesa area and greater Devereux Slough ecosystem are in close proximity to the urban and suburban areas of Goleta and Isla Vista. Passive recreational activities currently take place over most of the proposed Ellwood Mesa Open Space Plan area as well as the overall Ellwood-Devereux Open Space and Habitat Management Plan area. Existing trails and improvements in the proposed

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Figure 4.10-2

Existing Trails and Recreational Improvements

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Ellwood Mesa Open Space Plan area are shown on Figure 4.10-2. Proposed trails and improvements in the Ellwood Mesa Open Space area, as described in Section 3, are shown on Figure 4.10-3.

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The primary recreational activities that currently take place within the proposed Open Space Plan areas under the City of Goleta's jurisdiction include:

- Walking/jogging/hiking
- Biking
- Picnicking
- Wildlife viewing (in particular birding)
- Public trail use
- Glider flying
- Sun bathing
- Swimming
- Horseback riding
- Surf fishing
- Dog walking
- Photography

The recreational use of the proposed Open Space Plan area varies according to season. Fewer joggers, hikers, bicyclists, and other recreational users are in the Open Space Plan area during wet periods. Joggers, hikers, and horseback riders often use some combination of the Ellwood, West Campus, and Sands beaches. Access to the beaches of the Open Space Plan area is limited to the existing coastal access points shown on Figure 4.10-2.

In September and October 2001, a visitor count and data from a survey questionnaire was gathered by staff at the County. On eight separate days during the survey period, for an average of 3.5 hours per day, surveyors were stationed at one or more of the following locations: the Sands Beach coastal access, Back Dune coastal access (where the trail passes through dunes to the beach), Ellwood East coastal access (top of the bluff), Ellwood Central coastal access (top of the bluff), and the Santa Barbara Shores Park parking lot.

Respondents to the survey questionnaire were asked to rank the importance of a variety of the area's uses. Walking was ranked by 78 percent of the respondents as a very important activity, followed by dog-walking, jogging, biking, and sunbathing with each being ranked as important by about one-third of survey respondents. Table 4.10-1 provides a general summary of information collected in the survey and visitor count. Table 4.10-2 depicts a general summary of the findings of the visitor count survey in terms of numbers of visitors and percent of the total.

Survey respondents indicated that there are diverse users of the Ellwood Mesa Open Space Plan area. At 30 percent, walkers are the most prevalent user group. The joggers that were counted often use the entire Open Space Plan area.

4.10.1.4.2 Coronado Butterfly Preserve. The Coronado Butterfly Preserve is one of the few areas in the Open Space Plan area with ongoing restoration efforts, where volunteers are planting trees, shrubs, and native grasses. The Coronado Butterfly Preserve is located in the Ellwood neighborhood on Coronado Street. Informal parking for the Preserve exists along

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Table 4.10-1. Visitor Count Survey Summary¹

Activity	Total Number of Visitors From All Survey Dates and Locations)	Percent of Total
Walk	388	30.4
Surf	222	17.4
Jog	203	15.9
Bicycle	164	12.9
Sunbathe	118	9.2
Dog walking	100	7.8
Horseback ride	61	4.8
Model glider flying	13	1.0
Nature/bird watching	4	0.3
Artist/photographer	3	0.2
Total	1,276	100

¹ Note: this table includes visitor count data from locations outside of the jurisdiction of the City of Goleta.

Coronado Street, and the Preserve entrance provides a connection to the Coronado Open Space Trail that leads towards the Ellwood Main Monarch Grove via a footbridge over a tributary of Devereux Creek. The Coronado Open Space Trail is an improved trail made from wood chips, and is currently in good condition. Existing trails in this area are proposed to remain as is and will be designated for pedestrian use only.

4.10.1.4.3 Ellwood Mesa Open Space. The Ellwood Mesa Open Space Plan area has been further subdivided and described below as the Ellwood Mesa, Ellwood Beach, and the Ellwood Main Monarch Grove. This 217-acre site consists of undeveloped open space that can be accessed by an existing trail network via foot, bike, or horse along several trails. Several interconnected, unimproved bluff trails are located on the Ellwood Mesa. From the bluff area, a number of relatively steep informal coastal access trails are used by visitors in the area (refer to Figure 4.10-2).

No trail improvements or benches currently exist in the Ellwood Mesa bluff area. As described in Section 3.0, and shown on Figure 4.10-3, existing trails are proposed to remain as is, with the exception of the Anza Trail across the Ellwood Mesa (Trail 6). A parking area and trailhead restroom would be constructed at Hollister Avenue. Minor improvements to coastal access points E and F would be made to improve public safety and for erosion control.

The Ellwood Mesa contains a number of remnant barbed wire fences that cut across the area in both an east-west and north-south direction. Equestrians, bicyclists, and pedestrians use the perimeter trail near the southern portion of the Ellwood Main Monarch Grove area.

Although most of the area within the Ellwood Mesa Open Space Plan area is currently privately owned and public recreational use is not formally authorized on those private lands, recreational activities are considered established because they have historically been part of the existing

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Figure 4.10-3

Existing Trails and Recreational Improvements

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Table 4.10-2. Ellwood-Devereux Visitor Count and Questionnaire¹

Count Information				Observations											
Count Date	Count Location	# of Count Hours	Weather	Walk	Jog	Bicycle	Horseback Riding	Surf	Sun bathing	Dogs (on leash)	Dogs (off leash)	Nature/Bird Watch Model	Glider Flying	Artist/Photographer	Total
9/29/01	Ellwood Central Coastal Access	3.5	Sunny, warm	35	30	25	9	0	0	2	16	0	0	1	118
9/29/01	Sands Beach Coastal Access	3.7	Sunny, warm	42	21	3	0	157	102	3	6	0	0	0	334
9/29/01	Back Dune Coastal Access	3.7	Sunny, warm	24	11	3	8	20	2	4	0	0	0	0	72
10/4/01	Ellwood East Coastal Access	3.5	Hazy, windy, cool	42	35	24	1	2	2	0	8	0	0	0	114
10/6/01	Sands Beach Coastal Access	4.5	Cloudy, cool	50	14	11	5	17	0	1	1	4	3	0	106
10/7/01	Ellwood East Coastal Access	3.0	Sunny, breezy	72	27	40	10	0	4	2	18	0	10	2	185
10/11/01	Ellwood East Coastal Access	3.0	Partly cloudy, strong breeze	26	26	12	0	3	0	0	10	0	0	0	77
10/13/01	Back Dune Coastal Access	3.0	Sunny, warm	6	1	2	7	0	0	0	0	0	0	0	16
10/13/01	Back Dune Coastal Access	3.0	Sunny, warm	20	9	7	0	20	5	1	4	0	0	0	66
10/19/01	Ellwood East Coastal Access	4.0	Sunny, very warm	39	19	16	7 ²	3	3	2	5	0	0	0	87
10/19/01	County Park Parking Lot	3.0	Overcast, cool	13	5	3	0	0	0	0	4	0	0	0	25
10/27/01	County Park Parking Lot	3.8	Partly cloudy, warm	19	5	18	21	0	0	3	10	0	0	0	76
		41.7	Total	388	203	164	61	222	118	18	82	4	13	3	1,276

¹ Note: This table includes “observations” from locations outside of the jurisdiction of the City of Goleta.

² Not included in total to avoid double counting.

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Section 4.10 Recreation physical setting and land use. Historical photos showing trails are evidence of long-term informal recreational use on the Ellwood Mesa.

Ellwood Beach. Only a few structures exist on Ellwood Beach. A picnic table is located within the dune habitat west of Point D, and a remnant sea wall exists near Coastal Access Point F. The beach area near Access Point F contains abandoned oil pier structures that are exposed seasonally, primarily during the winter.

Ellwood Beach is used by equestrian operators and tours that serve the Bacara Resort and Spa, and signage is located at Access Point D (on University-owned land) requesting that equestrian users remain out of the critical habitat designation area for the western snowy plover located near this access point.

Ellwood Main Monarch Grove. Several trails enter the Ellwood Main Monarch Grove. There are two main butterfly viewing areas currently protected by a low-profile rope fence, with posted signs prohibiting horses and bicycles, and signage advising visitors on appropriate use of the area. No other developments exist in this area. This area is heavily used by hikers during the peak butterfly season.

The trails near the Ellwood Main Grove aggregation area all exist in close proximity to Devereux Creek. The Devereux Creek Trail runs near the grove. The Coronado Open Space Trail, which begins at Hollister Avenue and runs generally parallel to Santa Barbara Shores Drive, follows a tributary of Devereux Creek to the Ellwood Main Grove. Existing trails in this area, which is closely linked with the Coronado Butterfly Preserve, will remain as is and will be designated for pedestrian use only.

4.10.2 Regulatory Framework

The development and management of recreational resources are for the most part regulated at City and County levels. As described above, the City of Goleta, County, the University, and the Isla Vista Recreation and Park District all manage recreation resources within the immediate vicinity of the project site. Each of these agencies is responsible for the overall management of these resources.

At the County level, the Parks Department is responsible for the management and maintenance of parks within their jurisdiction as well as on a contract basis with the City of Goleta.

4.10.2.1 Federal Authorities and Administering Agencies

There are no federal regulations applicable to recreational resources for the proposed Comstock Homes Development site or Ellwood Mesa Open Space project.

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4.10.2.2 State Authorities and Administering Agencies

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4.10.2.2.1 CEQA, Public Resources Code §21000 et seq. The basic goal of the California Environmental Quality Act (CEQA) is to develop and maintain a high-quality environment now and in the future. The CEQA Guidelines provide a framework for the analysis of impacts to Recreation Resources. Appendix G of the CEQA Guidelines suggests that a project would have a significant impact if it would increase use of an existing neighborhood and regional park or other recreational facilities. Section 4.10.3.1 provides additional information related to CEQA guidelines as they apply to this analysis.

4.10.2.2.2 California Coastal Act §30000 et seq. As described in Section 1, the Coastal Act is the only set of policies that apply to development projects within the City of Goleta's Coastal Zone, pending certification of the City of Goleta's Local Coastal Plan. The California Coastal Act Coastal Resources Planning and Management Policies include provisions (§30220, 30221, and 30223) for the protection and management of coastal recreational resources. Specifically, these policies state:

- **Section 30220:** *“Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.”*
- **Section 30221:** *“Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.”*
- **Section 30223:** *“Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.”*

The Coastal Act also contains the following goals regarding public access:

- **Section 30001.5:** *“...Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners...”*
- **Section 30210:** *“...maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.”*
- **Section 30212.5:** *“Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.”*

4.10.2.3 Local Authorities and Administering Agencies

4.10.2.3.1 City of Goleta Coastal Zoning Ordinance. As described in Section 1, the County of Santa Barbara's Coastal Zoning Ordinance and other implementing ordinances

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(including subdivision and grading ordinances) were adopted by the City of Goleta but have not been certified by the California Coastal Commission. The City of Goleta's Coastal Zoning Ordinance provides guidance for those areas of the City of Goleta within the Coastal Zone. Applicable procedures prioritize low impact recreational development (35-62), require trail easements for development on sites with existing trails (35-63) and require recreational opportunities in new development (35-75.1.4).

4.10.2.3.2 Other Local Plans and Policies. As described in Section 5, other plans and policies exist that are not adopted by the City but nevertheless provide useful guidance for analysis of projects within the City of Goleta. The City of Goleta's pending Comprehensive Plan and Local Coastal Program recreation goals and priorities are anticipated to be at least as protective as those policies contained in the County's Comprehensive Plan Land Use Element, the work plan for the Recreation Element, the Parks, Recreation and Trails map of the Comprehensive Plan, and the County's Local Coastal Plan. These plans and policies are generally consistent with the policies contained in the Coastal Act, and the development standards contained in the City of Goleta's Coastal Zoning Ordinance. Refer to Section 5.0 for a detailed discussion of the project's consistency with relevant plans and policies.

4.10.3 Project Impacts and Mitigation

4.10.3.1 Thresholds of Significance

As suggested by CEQA Section 15064 and Appendix G of the CEQA Guidelines, a project may have a significant impact related to Recreation if it would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impacts REC-1 and REC-2 address these specific CEQA thresholds.

4.10.3.1.1 Environmental Thresholds Manual and Related Guidelines For Determining Recreation Thresholds.

The Environmental Thresholds and Guidelines Manual that has been adopted by the City of Goleta does not contain specific significance thresholds for Recreation. However, in its analysis of recreational impacts, the City of Goleta uses guidelines for determining recreational thresholds that have been developed jointly by the staffs of the County of Santa Barbara Planning and Development Department and the County Parks and Recreation Department. These guidelines provide a framework for analysis of recreation impacts. This EIR analysis is generally consistent with the recommended methods contained in the County guidelines. The following key elements of the County guidelines are applied in this analysis.

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- A familiarity with recreational resource needs, policies and goals. Recreational resources include such items as bikeways, playgrounds, hiking and riding trails, equestrian facilities, coastal access to recreation, play fields, community centers, etc. Section 4.10
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- An assessment of proposed project's impact on regional recreational demand
- Consideration of the recreational amenities proposed to be provided by the applicant
- Consideration of existing regional recreational opportunities compared to the potential impact of the project on those facilities.
- Consultation with Parks personnel and with other appropriate departments (e.g., Flood Control and Public Works) prior to a final determination of the potential impact.
- Discussion with residents and/or consideration of public comments

According to the County guidelines, the following questions should be considered during the analysis:

1. Does the project site have significant existing recreational resources through established or historic use?
 - 1b. If so, does the proposed project have the potential to significantly impact the site's existing recreational resource through overuse, removal, degradation, etc.?
2. Does the proposed project have the potential to significantly impact and/or disrupt coastal recreational resources or public coastal access?
 - 2b. If so, does the proposed project have the potential to conflict with policies set forth in the Local Coastal Plan to protect recreational resources? (Chapter 3.7)
3. Does the project site or adjacent land contain existing or proposed riding/hiking trail corridors as depicted on PRT maps?
 - 3b. If so, does the proposed project have the potential to conflict with existing or proposed riding/hiking trail corridors (ex. Obstruction that would impede passage of a trail is considered a significant impact) and/or

Does the proposed project include dedication of identified trail easements as shown on PRT maps as part of the development proposal? If the developer will not agree to dedicate the identified trail easement, then the impact will be Class I, unmitigated.

4. Does the proposed project have the potential to create a significantly adverse impact to the quality or the quantity of existing recreational resources and opportunities (e.g. potential overuse exceeding capacity, safety concerns, or degradation of environmental habitat within a geographic distance from the project site)?

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The significance of these factors is in large part determined in relation to the regional context. For example, impacts to recreational uses in an area that does not offer other in-kind recreational areas nearby could be considered a significant impact. Conversely, if many similar recreation areas occur in a region, impacts to any one area may not be considered significant.

4.10.3.2 Project Impacts

This EIR's assessment of potential recreational impacts is based on: 1) the CEQA thresholds and recreation resource analysis guidelines described above, and 2) written and oral public input to the Notice of Preparation (NOP) specific to this project, including workshops held regarding the Open Space Plan Preliminary Concepts document (Ellwood-Devereux Joint Review Panel, 200.). Impacts to regional recreation resources are addressed in Impacts REC-1 and REC-2 (Section 4.10.3.2.1); these impacts address the specific CEQA thresholds guidelines from Appendix G of the CEQA Guidelines. Impacts REC-3 through REC-7 address the project-specific issues raised through public comments received on both the NOP for this EIR and the Open Space Plan Preliminary Concepts document. Specifically, site-specific impacts due to residential development are addressed in Impact REC-3 (Section 4.10.3.2.2). Impacts to existing recreation patterns in the Ellwood Mesa Open Space Plan area as a result of the plan implementation are addressed in Impacts REC-4 through REC-7 (Section 4.10.3.2.3).

4.10.3.2.1 Regional Recreation Impacts. With regard to the project's potential impacts to existing neighborhood and regional parks in the general vicinity of the project site, the City of Goleta is responsible for the Santa Barbara Shores Park (which would become integrated into the City of Goleta's Ellwood Mesa Open Space Plan management area), Stow Grove City Park, Lake Los Carneros City Park, and the Evergreen Open Space. The County maintains Isla Vista Beach Park, Goleta Beach County Park, and the Camino Corto Open Space.

Potential impacts to the Santa Barbara Shores Park are addressed in Sections 4.10.3.2.2 and 4.10.3.2.3, in the context of the proposed residential development and Open Space Plan improvements which will directly impact this park. Potential project impacts to the remainder of these offsite local recreational facilities are addressed in Impacts REC-1 and REC-2 below.

Impact REC-1. Impacts to Existing Regional Recreation Facilities. Excluding consideration of Santa Barbara Shores Park, the project will not lead to substantial physical deterioration of existing regional recreation facilities. Residential development of the Comstock Homes Development portion of the proposed project would introduce additional population (approximately 234 persons, assuming a 3.0 person household size) into the general project area. While this additional population would tend to increase the demand for use of the existing parks and other recreational facilities within the City of Goleta and other regional areas, it is not expected that such usage would directly lead to physical deterioration of the existing parks, assuming regular maintenance.

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The overall projected increase in the residential population of 234 persons could result in a related increase in the demand for parks or other recreational facilities within the City of Goleta. Using the adopted countywide and citywide ratio of 4.7 acres per 1,000 persons, the addition of 234 persons would result in demands for 1.1 acres of new parkland. Currently, the unincorporated County contains 8,372 acres of parkland, and the City of Goleta contains 382 acres of parkland (Garciacaley, 2003). These parklands total 8,754 acres, or 45.26 acres of parkland per 1,000 residents, in the combined unincorporated County of Santa Barbara and City of Goleta area. This is substantially more than the respective adopted countywide and citywide ratio of 4.7 acres per 1,000 persons. Therefore, this impact is considered *adverse but not significant (Class III)*.

Although the identified impact is considered less than significant, it should be noted that the City of Goleta's standard impact fee program will obligate the applicant to contribute funds (referred to as "Quimby Act" fees) to offset regional recreational impacts. These fees would be in addition to any onsite mitigations or fees that result from other identified impacts.

Impact REC-2. Demand for New Regional Recreation Facilities. The residential project component would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Impacts related to the construction and maintenance of regional recreational facilities within the project area (excluding the Santa Barbara Shores Park) are considered *less than significant (Class III)*.

The project would, however, displace an existing public coastal access parking area, and eliminate 0.87 miles of existing recreational trails. These trails would be partly replaced by public access easements through the subdivision, as described below. Potential impacts to recreation from these project actions are discussed in Impacts REC-3 through REC-5, below.

4.10.3.2.2 Project-Specific Recreation Impacts Due to Residential Development. Impact REC-3 addresses site-specific recreation impacts related to development of the Comstock Homes residential site.

Impact REC-3 Residential Rezone and Development. The project would rezone the 36-acre northwestern portion of the existing Santa Barbara Shores park and convert the site to residential use, thus displacing approximately 4,600 feet, or 0.87 miles, of existing undeveloped trails (approximately 6% of all trails in the Ellwood Mesa Open Space Plan area), and displace the existing 15-space off-street parking area and informal on-street parking. These trails and parking areas are presently used extensively as an access to the Ellwood-Devereux coastal area. The residential project includes two connections to the Open Space Plan area from Hollister Avenue: one leading to the southeastern corner of the subdivision in the area of the "Drainage B" bioswale improvements (between Lots 47 and 48); and one near the southwestern perimeter (between Lots 41 and 42) (refer to Figure 2.2-2 in Section 2.0 of this EIR). Public pedestrian and bicyclist access into and through the development would be provided, as would access along these two connections into the Open Space Plan area.

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In addition to these existing site features, the Hollister Avenue frontage at Santa Barbara Shores presently provides approximately 1,200 feet of unobstructed “gateway” access (i.e., the entire north side of the parcel, excluding the eastern eucalyptus windrow). The Comstock Homes Development would significantly alter the character of this trailhead area by adding a substantial urban development on this frontage and reducing the available public frontage to approximately 600 feet, approximately half of the present frontage area.

As described below, the existing public access is proposed to be replaced by a new parking area to the east of the development site as a part of the Ellwood Mesa Open Space Plan. Nonetheless, the proposed urbanization of this existing recreational access area, combined with the loss of 0.87 miles, or 6%, of existing undeveloped trails and narrowing of the recreational trailhead area, will significantly change the present visitor trailhead experience at this site from a semi-rural and informal experience with numerous trail choices to a much narrower and more developed and formalized “gateway” to the Ellwood Mesa Open Space Plan area with fewer trail choices. These changes to the existing recreational experience at the Santa Barbara Shores frontage area are considered a *significant unavoidable (Class I) impact*.

4.10.3.2.3 Project-Specific Recreation Impacts Due to Implementation of the Ellwood Mesa Open Space Plan. Impacts REC-4 through REC-7 address site-specific recreation impacts associated with implementation of the Ellwood Mesa Open Space Plan.

Impact REC-4 Open Space Rezone and Access Improvements. At the time of the rezone for the 36-acre Comstock site, the project would simultaneously convert the 136.62-acre Ellwood Mesa Open Space properties (five separate lot parcels) from residential to recreational use. After deducting the 36 acres that are converted to residential use, this would result in a net increase of 100.62 acres of contiguous recreationally-zoned land, and a corresponding 100.62-acre decrease in privately owned coastal land. Therefore, the loss of 36 acres of recreationally-zoned land would be substantially offset by the addition of 136.62 acres of new recreationally-zoned lands.

The rezone from residential to recreation would effectively assure that most of the existing open space lands, including the remaining 80.16-acre portion of the existing Santa Barbara Shores Park parcel that is not part of the Comstock Homes Development site (a total of 216.78 contiguous acres) will remain in long-term recreational use. Additionally, three parcels located within or adjacent to the Coronado Butterfly Preserve will be rezoned from residential to recreation. These three parcels total 9.2 acres.

In addition to the proposed rezone to recreation, long-term implementation of the Ellwood Mesa Open Space Plan would provide trail amenities including an improved parking area, mutt-mitts for pets, and interpretive signs at trailheads. The Open Space Plan also recommends the construction of a restroom serving the new parking lot, although this would not be constructed during the relocation of the parking lot. Existing trails to remain open for passive recreation would be kept in their current configuration, with the exception of the Anza Trail segment through the Ellwood Mesa. Minor trail maintenance and coastal access improvements would be

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implemented over time to manage erosion and maintain public safety. In addition, certain uses that are contrary to existing policies, such as BMX bicycles, would be controlled and passive uses would be promoted.

The long-term preservation of coastal access and passive recreational land (via the rezone) and management of the open space trails and coastal access points are considered beneficial recreational impacts to both the local neighborhoods of the Ellwood community and the South Coast region in general. This is considered by the City of Goleta a *beneficial impact (Class IV)*.

Impact REC-5. Open Space Plan Trail Closures. The presence of numerous and diverse trails in the Ellwood Mesa area, combined with its visual attractiveness and uniqueness as one of the few remaining undeveloped coastal bluff areas, contributes to its recreational importance. Therefore, proposed trail closures and other efforts to formalize the trail system and other potential changes to the rural character of the existing recreational resource is potentially significant. Table 4.10-3 summarizes the length of existing and proposed trails within the Ellwood Mesa Open Space Plan area. These estimates exclude the Phelps Ditch Trail (approximately 600 feet, or 0.11 miles to remain open within City of Goleta jurisdiction). The estimates also exclude trails through the Comstock Homes Development site (approximately 4,600 feet, or 0.87 miles of existing trails to be closed due to development).

Table 4.10-3. Trail Lengths and Trail User Groups

Proposed Trail Type by User Group	Trail Length (feet) ¹	Trail Length (miles)	Percent
Total Existing Trails	77,790	14.73	100%
Proposed Pedestrian-Only Trails	13,810	2.61	18%
Proposed Pedestrian and Bicycle Trails	27,550	5.22	35%
Proposed Pedestrian, Bicycle and Equestrian Trails	7,730	1.46	10%
Total Trails to Remain Open	49,090	9.30	63%
Trails to be closed	28,700	5.44	37%

¹ Includes Coronado Preserve; does not include trails through Comstock Homes Development site (approx. 4,600 feet, or 0.87 miles) or the Phelps Ditch Trail (approx. 600 feet, or 0.11 miles).

Implementation of the Open Space Plan could result in closure of an estimated 5.44 miles (or 37%) of the estimated 14.73 miles of existing footpaths within the City of Goleta’s Ellwood Mesa Open Space Plan area. This would be in addition to the loss of 0.87 miles of trails from the Comstock development. Trail closures would be focused on those trails or trail segments that are located in the highest priority areas for habitat restoration. These trails are generally located in the vicinity of vernal pools located on the eastern and central portion of Ellwood Mesa, and along the bluff edge in the southeastern corner of the Ellwood Mesa (refer to Figures 11 and 12 in Section 3 of this EIR). Trail closures on the portion of Santa Barbara Shores that would remain in open space are limited to the trail segments that currently enter the proposed residential development site.

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Section 4.10 The remaining 9.3 miles, or 63%, of existing trails would remain available for passive public recreation and coastal access. Trail closures would likely occur over an extended period of time as site restoration and trail construction activities are implemented.

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Numerous comments received in the public scoping meetings for this the EIR expressed concerns that trail closures could significantly alter the existing open and unrestricted “semi-wilderness” feeling that characterizes the Ellwood Mesa recreational experience by restricting trail users to fewer and more formalized trails. The proposed trail closures and accompanying habitat restoration and interpretive signage may have certain beneficial aspects for recreational users (such as increased awareness of wildlife and habitat resources). Moreover, trails on the Ellwood Mesa would generally be left as is, with only minor grooming, with the exception of the Anza Trail improvements. Nevertheless, the general public’s existing trail choices on the Ellwood Mesa would be reduced by more than one third. From the perspective of past and present trail users, trail closures could change their recreational experience from a rural and unrestricted experience with numerous trail choices to a more restrictive and more formalized trail system. As public use of the area gradually increases over time, particularly with the addition of the Comstock Homes residences directly adjacent to the open space, the remaining trails could experience crowding, thus further diminishing the very open and unrestricted experience that exists today. These proposed changes represent a significant shift from the historical pattern and are therefore considered a *significant unavoidable (Class I) impact*.

Impact REC-6. Open Space Plan Trail User Restrictions. In addition to eliminating approximately one third of the existing trails, certain user groups would be restricted to a subset of the remaining trails. As shown in Table 4.10-3, plan implementation would allow pedestrian access on all open trails, but would limit the trails available to bicyclists and equestrians (as described in Section 3 and shown on Figures 11 and 12). Public Access Policy 2.2 of the Open Space Plan prohibits commercial equestrian operations in the open space area.

Equestrian trails would be limited to a single loop trail on the Ellwood Mesa, a total of 1.46 miles, or 10% of the existing Ellwood Mesa trails. Further, equestrian beach access would be prohibited on the three existing Ellwood Mesa coastal access points, and restricted to a single point at existing Access D located on the University’s adjacent property to the east. A portion of the designated equestrian loop will be on the proposed Anza Trail. As currently envisioned, the Anza Trail would provide a separate single track tread; this trail design would effectively require “in-line” riding as opposed to side-by-side riding which is presently unrestricted. Parking for horse trailers (estimated at six or more informal spaces along Hollister Avenue) would be reduced to three designated spaces within the proposed public parking at the Santa Barbara Shores parking area. On-street trailer parking would likely not be practical at the Hollister Avenue frontage due to the residential development frontage improvements. Taken together, these changes would alter the existing pattern of equestrian access to and use of the Ellwood Mesa by reducing the number of equestrian users at a given time, by potentially crowding the equestrians onto multi-use trails, and by limiting the range of options for equestrian trail riding compared to existing use patterns and opportunities.

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Bicyclists would be restricted to an estimated 5.22 miles, or 35%, of the existing Ellwood Mesa trails that are presently unrestricted (with the exception of the Main Monarch Grove trails). Bicyclists would generally be restricted to the open grassland area of the Ellwood Mesa, and would be required to walk their bicycles in the eucalyptus woodlands, riparian areas, and coastal bluff trails.

While there would be certain positive attributes to these changes (e.g., recreation amenities such as the bathroom and interpretive signs), restrictions on specific user groups could result in greater numbers and multiple types of users on the remaining trails, compared with present-day uncontrolled use patterns. Members of the public expressed concern about the potential crowding effect that would result from trail restrictions. This crowding effect, whether real or perceived, would be viewed by many present day users as a diminution of the semi-wild character of the area, in comparison to trail use patterns that have been enjoyed over many years. These proposed changes represent a significant shift from the historical pattern and are therefore considered a *significant unavoidable (Class I) impact*.

Impact REC-7. Trail Construction, Well Abandonment and Soil Remediation.

Trail construction, abandonment of historic wells, possible remediation of impacted soils, and debris removal activities on the Ellwood Mesa Open Space Plan area could result in temporary trail closures, temporary loss of coastal access, and short-term nuisance effects from dust, debris, or potential hazards. Potential long-term impacts to recreation could result if existing hazards are worsened or if new hazards are created as a result of these activities. The potential environmental effects of these activities are evaluated in Sections 4.2 through 4.15 of this EIR. Given the temporary nature of these activities and the range of coastal access trails that would remain open during these activities, and the incorporation of relevant City of Goleta policies and mitigation measures discussed in other sections of this EIR, potential impacts associated with trail construction, well abandonment, and soil remediation activities are considered *significant but feasible mitigated (Class II)*.

4.10.3.3 Cumulative Impacts

Impact REC-8. Cumulative Increase in Open Space Usage. The proposed project, in combination with other proposed projects and a general increase in population and use intensity in the Open Space Plan area, would cumulatively add to a long-term trend of increased public use, access or activities in the Open Space Plan area. In addition to the various planned commercial and residential development projects in the general project vicinity, the proposed Ocean Meadows Residences (County) and University Student and Faculty Housing projects would contribute to cumulative use and demand for recreation resources. This increase in public use, access, and activity could result in further restrictions on recreational use of the area and overall deterioration of the recreational resources. The project's contribution to this cumulative impact is considered a *significant and unavoidable impact (Class I)*. Implementation of the Open Space Plan would include measures (e.g., defined trails, trail maintenance, and interpretive/educational signs and trailhead information) designed to increase public awareness and appreciation of natural, cultural, and recreational resources, thus partially offsetting this

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Section 4.10 impact by reducing the risk of unintentional or intentional deterioration of recreational
Recreation resources.

4.10.3.4 Mitigation Measures

The following mitigation measures are required to reduce significant impacts to recreation resources from the proposed project to the extent feasible. The proposed Ellwood Mesa Open Space Plan includes several measures that would provide for trail construction, site maintenance and other recreation amenities. The following mitigation measures incorporate these proposed initiatives, while providing additional specificity.

No mitigations are recommended for impacts associated with regional recreation resources (Impacts REC-1 and REC-2). Mitigations REC-1 and REC-2 address impacts associated with the residential development (Impact REC-3). Mitigation REC-3 addresses impacts associated with implementation of the Ellwood Mesa Open Space Plan (Impacts REC-4 through REC-6 and Cumulative Impact REC-8). Mitigation REC-4 addresses impacts associated with trail construction, well abandonment, and soil remediation activities (Impact REC-7).

Mitigation REC-1. Public Access Easements Through the Subdivision. An agreement shall be provided for dedication in perpetuity of the public access easements through the subdivision. Information regarding public access easements shall be included in the CC&Rs for the subdivision. Public access signage shall be installed at the Hollister Avenue frontage and at other appropriate locations within the subdivision and on the perimeter of the Open Space lands. This mitigation provides partial mitigation for Impact REC-1.

Plan Requirements and Timing. The agreement and dedications shall be reviewed and approved by the City of Goleta prior to tract map approval for the residential project. Prior to the recordation of the final tract map, the map shall contain a note stating that easements for public access are provided into and through the residential development. A copy of the landowner notification shall be submitted for review and approval by the City of Goleta prior to recordation of the tract map.

Monitoring. The City of Goleta will ensure that the agreement and dedications for the public easements are reviewed and approved prior to tract map approval and prior to recordation of the tract map.

Mitigation REC-2. Contributions to Open Space Plan Area Improvements. The Comstock Homes applicant shall contribute funds to the City of Goleta for construction of the public parking improvements at Hollister Avenue. The funding amount shall be determined in consultation with the City of Goleta and shall at a minimum be sufficient to replace the present day off-street 15-space parking capacity as well as any existing on-street parking capacity that would be displaced by the development.

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The Comstock Homes applicant shall also provide funds for trail improvements, habitat restoration, and other improvements in the Ellwood Mesa Open Space Plan area. The funding amount shall be determined in consultation with the City of Goleta and shall at a minimum be sufficient to construct and maintain trails equivalent in length to the present day trails within the 36-acre residential parcel that would be displaced by the development. This mitigation provides partial mitigation for Impact REC-1.

Plan Requirements and Timing. Funding for open space recreational amenities shall be identified in a legal agreement between the applicant and City of Goleta prior to recordation of the tract map. Funds shall be made available to the City of Goleta prior to recordation of the tract map.

Monitoring. The City of Goleta will ensure that funding for recreational amenities have been spelled out in a legal agreement with the applicant and that monies are provided to the City of Goleta at the agreed upon levels prior to recordation of the tract map.

Mitigation REC-3. Open Space Trail Closure Plan. Trail closures shall be limited to the extent feasible without substantially compromising the habitat restoration, resource protection, and public safety goals of the Open Space Plan. Prior to closing a trail or trail segment, additional site investigations shall be conducted as appropriate to document the prevailing recreational uses of the trail (number and types of users over multiple seasons) at the time of the proposed closure. This mitigation provides partial mitigation for Impacts REC-5 and REC-6.

Plan Requirements and Timing. The Trail Closure Plan shall be reviewed and approved by the City of Goleta prior to issuance of Land Use Permits.

Monitoring. The City of Goleta will conduct additional site investigations, as appropriate, to support trail closure recommendations in the Trail Closure Plan prior to issuance of Land Use Permits.

Mitigation REC-4. Trail Construction, Well Abandonment and Soil Remediation. Impacts to recreation shall be minimized to the maximum extent feasible during trail construction, abandonment of historic wells, soil remediation, debris removal, and other physical construction and maintenance activities within the Ellwood Mesa Open Space.

Temporary signs shall be posted at trailheads and along haul routes and major trail intersections notifying trail users of the location and timing of scheduled activities, and notifying the public of alternative routes. Onsite traffic controllers shall be employed to ensure public safety during working hours. If hauling is required, haul routes shall remain open to the public during non-working hours, and no barriers or obstruction shall be erected that would otherwise prohibit public use of the trails, subject to public safety requirements.

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Section 4.10 Excavated areas shall be fenced to avoid any public safety hazards excavated areas shall be
Recreation backfilled such that open pits shall be no deeper than 5 feet, and slopes no steeper than 2:1 until
site contouring has been completed.

A complaint telephone number shall be provided on the public notifications. Complaints and actions taken to resolve complaints shall be logged by the City of Goleta. As necessary to ensure public safety, additional temporary signs shall be posted at work sites.

Additional mitigation measures outlined in Sections 4.2 through 4.15 of this EIR shall be implemented to minimize recreation impacts caused by excessive noise, dust or other nuisances.

Plan Requirements and Timing. Plans for trail construction, well abandonment, soil remediation, and other physical site activities shall be reviewed and approved by the City of Goleta prior to approval of Land Use Permits for site activities. Signs shall be in place prior to commencement of site activities. Plans shall include appropriate public notification and complaint phone number.

Monitoring. City of Goleta shall monitor site activities and onsite notifications for compliance with the approved plans.

4.10.3.5 Residual Impacts

Residual impacts to recreation as a result of displacing 36 acres of existing recreational land would remain *significant (Class I)*. Residual impacts to recreation as a result of trail closures and trail user restrictions would remain *significant (Class I)*. Residual impacts to recreation as a result of temporary trail closures due to construction or remediation activities would be reduced to *less than significant levels*.