August 21, 2020

RE: Concerns Regarding the Rincont Trail Project

To the Carpinteria City Council Members,

The Santa Barbara Soaring Association (SBSA) is submitting this official letter to members of the City Council in the interest of working together to minimize the impact of the Rincon Trail Project. We are in full support of the much needed bike path, however, the current design virtually eliminates coastal soaring in Carpinteria, destroying a treasured recreational facility.

We're sending this letter in response to the MND determination made on January 6, 2020. We initially delayed transmission in order to respect the difficulties caused by Covid-19. Our hope is to use this letter in lieu of a legal appeal to convey our concerns and demonstrate our willingness to collaborate with the City and public. We are asking the City to help us implement design changes that will preserve airflow along Bates ridge and allow continued use of this widely-celebrated flying site. Bates is visited by countless pilots from around the world. It would be tragic to lose this special place because 0.2 miles of bike path couldn't be routed elsewhere.

Paragliding and Hang Gliding are established sports that have been happening regularly at Bates for over 40 years and are fully established there. It is the only coastal soaring site in Carpinteria and the best known site with consistent soaring wind between San Diego and San Francisco. Unique geographic features combine Southwest facing terrain with prevailing channel winds, allowing airflow to hit Bates ridge like the swells hit Rincon Point. This is a recreational airpark that attracts visitors from afar and deserves preservation with the City.

Our local group of 500 members is concerned the MND was rushed to avoid our inclusion. Those attempting to participate early in the Project were told it did not concern us. While this was true for the previous designs, the current proposal will significantly impact our recreational site. We were surprised to hear of this latest iteration when it was announced in November 2019, especially because the City's website still carried the outdated Alternative Proposal.

It's difficult to understand the City's lack of outreach given that the MND includes a photograph of a paraglider flying over the project site. Our frustration with this treatment is evident in the public comments in Appendix E of the MND. To push this Project past our group, last minute changes were made to the Proposed Final MND (Exhibit 2) for the purpose of denying CEQA consideration, disqualifying free flight as a form of recreation, and bypassing the EIR. These changes included inaccurate statements that we have addressed in the attached Appendix.

We are fortunate to live in Carpinteria, a place where many land uses coexist. This is especially true at Bates. This coastal gem creates pockets of diversity where small groups like ours can use the same natural resources for recreation as the local bikers, surfers, beachgoers, and joggers. The current Project design runs counter to this sentiment: the bike path expands access to one group at the exclusion of another. While bikers and joggers have many miles of recreational paths to access, the construction of this 0.2 mile path will likely end free flight for many of the soaring community members and ruin the only soaring site in Carpinteria.

Additionally, the Certified Santa Barbara County Coastal Land Use Plan adopted in 1982 states "recreational uses on oceanfront lands, both public and private, that do not require extensive alteration to the natural environment...shall have priority over uses requiring substantial alteration". According to this guidance, free flight at Bates should be given priority over this Project because our recreation requires no alteration to the existing environment.

We would like to challenge the City to design a Project that is inclusive of all users and that avoids ruining this 40-year flying site. This is the one place in Carpinteria where we can pursue our passion and practice our craft, sharing the joy of free flight with residents and tourists alike. Please consider Project alternatives that avoid cutting into Bates ridge and work to achieve no impact to free flight recreation, with corroboration from scientific evidence and expert testimony.

We look forward to building a bike path that meets everyone's needs. Rather than creating conflict around this Project, SBSA is focused on working with the City to find solutions. We have nationwide resources to support these efforts, including our membership with the United States Hang Gliding and Paragliding Association (USHPA). Please contact us to review next steps using the email addresses provided. Thank you for considering the importance of this matter.

Sincerely,

Santa Barbara Soaring Association Officers

James Zender, President
Daniel Garcken, Vice President, Hang Gliding
Derek Musashe, Vice President, Paragliding
Cort Flinchbaugh, Treasurer
Jon Blake, Secretary
Mike Harrington, Activities, Hang Gliding
Chris Heckman, Activities, Paragliding
John McMahon, Website Design and Maintenance
John Greynald, Public Relations
Rob Sporrer, Safety Officer
Aaron LaPlante, Site Preservation
Jeff Longcor, Director at Large

Appendix

Corrections to the Proposed Final MND

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Corrections to the Proposed Final MND

1. Inaccuracy #1: free flight at Bates is an unsanctioned activity (p.133)
    a. We legally fly in this airspace as a recognized group by the Federal Aviation Administration (FAA) and United States Hang Gliding & Paragliding Association (USHPA). We have federal permission to use this airspace.
    b. Paragliding and Hang Gliding have been happening regularly at the Bates bluff for over 40 years and is fully established in this location. It is the only coastal soaring site in Carpinteria and the best known site with consistent prevailing wind soaring between San Diego and San Francisco. Unique geographic features combine Southwest facing terrain with channel winds, allowing airflow to hit Bates ridge like the swells hit Rincon Point.
    c. Bates is special in allowing cross country flight. The Project site generates lift that allows pilots to transition to the surrounding bluffs and travel dozens of miles along the coastline, making this activity suited to the “transportation corridor”.
    d. Exhibit 2 lists official rules governing free flight while also claiming it’s an unrecognized recreational activity. This is an obvious contradiction resulting from the City’s selective use of the term “unsanctioned” to fit their needs. How do activities become publicly recognized? Are bikers or surfers sanctioned? No guidelines or examples are provided to address a shared space like Bates.
    e. Exhibit 2 states there are safety hazards regarding the freeway and UPRR, yet no evidence is provided. No free flying accidents have occured in these areas. Meanwhile, the MND has no mitigation plan for the significant impact of bike traffic in Rincon Park caused by the Project. This congested area is already the site of numerous collisions that regularly occur between bikers and vehicles.
    f. Exhibit 2 states that flying at Bates is questionable because foot traffic across the UPRR is restricted. However, pilots are not crossing the tracks by foot and there are no airspace restrictions around the UPRR.
    g. FAA officials and career airline pilots provided expert testimony during the MND hearing to confirm that no aviation rules are being violated at this site.

2. Inaccuracy #2: the preferred launch site disqualifies free flight from CEQA (p.134)
    a. The Rincon Trail Project has no bearing on the current launch locations, it is outside the scope of the project and irrelevant to the MND.
    b. The ownership status of the launch location parcels is subject to change before, during, and after the project, and should not factor into the MND.
    c. Pilots have the capacity to launch from public and private locations to arrive at Bates, at times flying from National Forest property, but can only soar Bates ridge if the existing geological features remain within this unique recreational facility.
    d. On rare windy days, pilots launch from the county property portion below the bluff, which is not in the Rincon Beach County Park or any private property.

e. The Certified Santa Barbara County Coastal Land Use Plan adopted in 1982 states "recreational uses on oceanfront lands, both public and private, that do not require extensive alteration to the natural environment...shall have priority over uses requiring substantial alteration". According to this plan, whether the land is public or private, free flight at Bates should be given priority over this Project because our recreation requires no alteration to the natural environment.

3. Inaccuracy #3: the Project will not have a negative impact on uplift and airflow (p.135)
    a. During the Public Workshop and the MND hearing, SBSA provided expert testimony and evidence from engineers and FAA officials to substantiate the Project's negative impact on uplift and airflow.
    b. SBSA created a video describing in detail how the Project will drastically affect airflow. This video was provided to the Planning Commission and City Employees, and discussed at length during the MND hearing: https://www.youtube.com/watch?v=SVIdEfWHMpE&t= .
    c. Despite SBSA's efforts, Exhibit 2 states that the flying community has not provided evidence of negative impact. This assertion is made without acknowledgement of what SBSA already provided and without explanation of what more is needed. Additionally, the City fails to share the burden of proof. If a study of scaled models is required to demonstrate the before and after conditions of wind deflection, the City should take responsibility for gathering this data.
    d. The City should be responsible for proving that this Project will not change airflow and will be inclusive of all current users. Where is the proof that this project will not ruin a treasured flying site that has been lovingly used for decades?
    e. Exhibit 2 claims that the Project will not have a negative impact on airflow. No expert testimony, data, or evidence is provided. It also appears that Exhibit 2 confuses our sport with parasailing, which is a separate activity involving a boat. How can the City make assertions without even knowing the name of our sport?
    f. Exhibit 2 states that the Project will improve uplift, yet no scientific proof is provided. Wind gradient models are readily available online and SBSA is willing to further demonstrate how uplift is less productive at lower elevations and severely disrupted by benches like the two proposed for this Project. Below are two online articles that speak to soaring dynamics in areas of ridge lift.
    Ridge Lift Research: http://journals.sfu.ca/ts/index.php/ts/article/viewFile/608/571
    Ridge Soaring: https://chessintheair.com/what-conditions-produce-good-ridge-lift/
    g. Exhibit 2 wrongly suggests that uplift is equal across all seaside bluffs in the area. While pilots may launch from a lower bluff, rarely is there enough uplift to sustain flight. Pilots immediately transition to the Bates ridge, which has a steep, unobstructed face that generates adequate lift in a wide range of wind conditions.
    h. The Project will cause permanent damage to a unique, treasured flying site, yet there are no assurances it will withstand rising sea levels and increased storm activity on the unstable slopes where it's being proposed. The MND has not

demonstrated compliance with the Carpinteria Rising Sea Policy and does not account for long term maintenance or provide a plan for preventing eventual slope failure, which has already happened for the old railroad and highway.

i. The City has not provided evidence of exploring a North Side alternative on either the North or South sides of the highway. This approach would satisfy all potential end users and potentially save costs. If not for the blue view directive, this project could be replaced by a line of barriers along the 101 South to protect bikers between exits.