

B. LOCAL AND REGIONAL AGENCY COMMENTS



ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

March 9, 2006

Susan Harris
City of Santa Cruz
809 Center Street
Santa Cruz, CA 95060

**Re: MCH# 020613- Draft Environmental Impact Report
Arana Gulch Master Plan**

Dear Ms. Harris:

AMBAG's Regional Clearinghouse circulated a summary of notice of your environmental document to our member agencies and interested parties for review and comment.

The AMBAG Board of Directors considered the project on **March 8, 2006** and has no comments at this time.

Thank you for complying with the Clearinghouse process.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicolas Papadakis", is written over a horizontal line. The signature is fluid and cursive.

Nicolas Papadakis
Executive Director

B1-1

LETTER B1
Association of Monterey Bay Area Governments

Response B1-1: Comment noted.



SANTA CRUZ COUNTY REGIONAL TRANSPORTATION COMMISSION
1523 PACIFIC AVENUE, SANTA CRUZ, CALIFORNIA 95060-3911 • 831/ 460-3200 • FAX 831/ 460-3215

March 28, 2006

Susan Harris
City of Santa Cruz
Parks and Recreation Department
323 Church Street
Santa Cruz, CA 95060

SERVICE AUTHORITY
FOR FREEWAY
EMERGENCIES
(SAFE) ☐

RAIL/TRAIL
AUTHORITY ☐

COMMUTE
SOLUTIONS ☐

TRANSPORTATION
POLICY WORKSHOP ☐

BUDGET &
ADMINISTRATION
PERSONNEL
COMMITTEE ☐

INTERAGENCY
TECHNICAL
ADVISORY
COMMITTEE ☐

BICYCLE COMMITTEE ☒

ELDERLY & DISABLED
TRANSPORTATION
ADVISORY COMMITTEE ☐

RE: Bicycle Committee Comments on the Arana Gulch Park Master Plan
DEIR

Dear Ms. Harris,

I am writing on behalf of the Bicycle Committee of the Santa Cruz County
Regional Transportation Commission (RTC) to thank you for the opportunity
to comment on the Arana Gulch Park Master Plan Draft Environmental
Impact Report.

Consistent with our letter to you of August 5, 2005, the Bicycle Committee
strongly supports the Bicycle/Pedestrian Path Connection proposed in the
Arana Gulch Park Master Plan and believes it will help fill a critical gap in the
regional east-west bicycle and pedestrian network thereby increasing the ease
and safety of bicycle and pedestrian trips for transportation purposes in and
between our communities. The Committee values a complete and convenient
regional bicycle and pedestrian network as it increases the opportunity and
attractiveness of bicycle and pedestrian trips for transportation purposes which
can have positive, cumulative environmental impacts.

The Bicycle Committee encourages the Santa Cruz City Council, as RTC
staff has done, to move forward with implementation of the multi-use trail
project and completely utilize the \$1.7 million the RTC has programmed to
the Broadway-Brommer Bike Path to date.

Thank you for the opportunity to comment. If you have any questions about
the above comments, please contact Cory Caletti, RTC staff at (831) 460-
3201.

Sincerely,

Daniel Kostelec
Chair, SCCRTC Bicycle Committee

cc: SCCRTC Bicycle Committee
SCCRTC

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WWW.SCCRTC.ORG
EMAIL:INFO@SCCRTC.ORG

MEMBER AGENCIES: SANTA CRUZ METROPOLITAN TRANSIT DISTRICT, COUNTY OF SANTA CRUZ, CALTRANS,
CITIES OF CAPITOLA, SANTA CRUZ, SCOTT'S VALLEY, WATSONVILLE

B2-1

LETTER B2

LETTER B2

Santa Cruz County Regional Transportation Commission (3/28/2006)

Response B2-1: Comment noted.



SANTA CRUZ COUNTY REGIONAL TRANSPORTATION COMMISSION
1523 PACIFIC AVENUE, SANTA CRUZ, CALIFORNIA 95060-3911 • 831/ 460-3200 • FAX 831/ 460-3215

March 27, 2006

MAR 29 2006

SERVICE AUTHORITY
FOR FREEWAY
EMERGENCIES
(SAFE) ☐

Susan Harris
City of Santa Cruz
Parks and Recreation Department
323 Church Street
Santa Cruz, CA 95060

RAIL/TRAIL
AUTHORITY ☐

Re: Arana Gulch Park Master Plan Draft EIR

COMMUTE
SOLUTIONS ☐

Dear Ms. Harris,

The Santa Cruz County Regional Transportation Commission (RTC) staff would like to thank you for the opportunity to comment on the Arana Gulch Park Master Plan Draft Environmental Impact Report (DEIR). The Arana Gulch Park Master Plan DEIR supports several of the Santa Cruz County 2005 Regional Transportation Plan's Goals and Policies. Please accept the following comments for your consideration:

TRANSPORTATION
POLICY WORKSHOP ☐

BUDGET &
ADMINISTRATION
PERSONNEL
COMMITTEE ☐

- The RTC has programmed \$1.7 million to the Broadway-Brommer Bike Path to date over a period spanning many years. The RTC has protected funding assigned to this project even though transportation funding is very limited. RTC staff encourages the City of Santa Cruz to continue moving forward with implementation of this multi-use trail project as soon as feasible. Further delay could jeopardize some or all of the funding.

INTERAGENCY
TECHNICAL
ADVISORY
COMMITTEE ☐

BICYCLE COMMITTEE ☐

- RTC staff strongly supports the Bicycle/Pedestrian Path Connection proposed in the Arana Gulch Park Master Plan. This path will help fill a critical gap in the regional east-west bicycle and pedestrian network. Currently, there is no continuous bike lane/bike path that connects Santa Cruz and the Live Oak/Capitola area. Hopefully in the future there will be several bikeway and pedestrian connections for convenient use by all users. The Arana Gulch bicycle and pedestrian path will increase the ease and safety of bicycle and pedestrian trips for transportation purposes in and between our communities. Providing a complete and convenient regional bicycle and pedestrian network increases the opportunity and attractiveness of bicycle and pedestrian trips for transportation purposes, thus allowing people a transportation option between Santa Cruz and the Live Oak/Capitola area in addition to cars and transit.

ELDERLY & DISABLED
TRANSPORTATION
ADVISORY COMMITTEE ☐

B3-1

B3-2

- The 2005 *Regional Transportation Plan* supports the development of multi-use paths. "Universal access", the goal of enabling all people, including young, old and disabled persons who may have diminished perceptual or ambulatory abilities, to travel safely to destinations served by our public street and pathway system, is desirable.

B3-3

- RTC staff fully supports that the Arana Gulch multi-use paths provide ADA accessibility to wheelchair users. The DEIR notes that this will be the only greenbelt area in the City of Santa Cruz that will be accessible to wheelchair users, which shows how needed this project is. Although the proposed Arana Gulch multi-use paths meet the minimum width requirements for bicycle and pedestrian paths per the Caltrans' Highway Design Manual, RTC staff suggests that the path be designed to have a width greater than eight feet where possible to better facilitate universal access. For example, the inclusion of some wider portions of the pathway on the bridge and in the sloped sections of the path would promote universal access.

B3-4

- As noted on page 3-15 of the DEIR, the Arana Gulch Master Plan trail system is indeed consistent with the concepts for the Monterey Bay Scenic Sanctuary Trail (MBSST) which includes interpretive elements as well as transportation elements and recreation elements. Several interpretive elements for the MBSST have already been constructed. The RTC is expected to address the next step in trail planning for the MBSST next fiscal year

B3-5

Thank you for the opportunity to comment. If you have any questions about the above comments, please contact Grace Blakeslee of my staff at (831) 460-3219.

Sincerely,



Pat Dellin

Acting Executive Director

cc: RTC Commissioner Emily Reilly
 RTC Commissioner Mardi Wormhoudt
 RTC Bicycle Committee
 RTC E&DTAC Committee
 RTC
 Nick Papadakis, AMBAG
 Susan Pearlman, Santa Cruz County Sanctuary Task Force

LETTER B3**Santa Cruz County Regional Transportation Commission (3/27/2006)**

Response B3-1: Comment noted.

Response B3-2: Comment noted.

Response B3-3: Comment noted.

Response B3-4: Comment noted. The trail as currently designed is 8 feet in width to allow adequate room for passage of wheelchairs, bicycles and pedestrians without resulting in further impact to Santa Cruz tarplant habitat. Rest platform areas are provided in the sloped sections in compliance with the Federal Regulatory Negotiation Committee's Accessibility Guidelines for Outdoor Developed Areas. See Response to Comment C74-6.

Response B3-5: Comment noted.

Santa Cruz Port District
135 5th Avenue, Santa Cruz, CA 95062
(831) 475-6161

Revised (04-14-06) Comments on the Draft Greenbelt Plan

The Santa Cruz Port District is pleased that the draft EIR recognizes the 2002 Arana Gulch Enhancement Plan (AGEP), specifically the need to address and correct:

- the greenbelt gully erosion project (project #18);
- the tidal reach bank erosion in the lower greenbelt (project #19).

However, these projects are not scheduled for any action until 2009. We feel this is a serious delay relative to ongoing, significant sedimentation Santa Cruz Harbor is experiencing.

In an overall view, we believe that the bank erosion project in the lower greenbelt (project #19) needs to be revisited. Recent shoaling rates in the north harbor have increased alarmingly and caused multiple damage to the harbor:

- Escalating costs for:
 - Dredging
 - Dock replacement
 - Loss of income

This winter as much as 40,000 cubic yards could have entered the north harbor – a rate far beyond what we have seen before. Innovative dredging permits have been obtained over the past few years, but the problem is escalating and a revised, comprehensive approach is required.

The southern greenbelt area plan should include:

- a comprehensive plan to stabilize the east and west banks of the creek;
- a sediment retention element, including provision for maintenance of any structures;
- re-establishment of the wetlands already lost to erosion;
- preservation of remaining wetlands;
- an integrated plan to improve steelhead fish habitat. Specifically, enhance the species' ability to transit to and from Arana Gulch at all tidal levels.

B4-1

We do not believe that the above recommendations are counter to any other objectives of the proposed Arana Gulch greenbelt plan.

The Port District may receive some FEMA assistance for the sedimentation events of 2005-06, and that will be fortunate. In addition to direct assistance for removal, there is an opportunity for a "hazard mitigation" project. This is a FEMA-sponsored program to provide structures and/or programs that would prevent future FEMA claims from occurring.

We believe that the City, County and the Port District should pursue this "hazard mitigation" program to the fullest extent. Use of City property will certainly be required in some manner.

The "hazard mitigation" project could be a combination of the implementation of the programmed sediment basins in the watershed plan and new concept(s) in the greenbelt. The AGEF has three sediment basins in the plan as depicted in Figure 9.1.

Action Plan

- Have Barry Hecht of Balance Hydrologics (BH) review the AGEF sediment management plan in light of recent erosion and sedimentation rates of the north harbor, with focus on project #19 area.
- Have BH propose a comprehensive project that may qualify as a FEMA "Hazard Mitigation" project that would involve the City, County and Port District.

Multi-Purpose Pathway

The Port District endorses the pathway alignment as proposed in the draft plan. This alignment requires Port District property. A formal agreement will need to be reached. The Port District looks forward to a positive, collaborative process with all objectives being met.

Contact

Brian E. Foss, Port Director
Santa Cruz Port District
135 5th Avenue
Santa Cruz, CA 95062
(831) 475-6161

B4-2

LETTER B4
Santa Cruz Port District

Response B4-1: These recommendations pertain to the Draft Arana Gulch Master Plan and are not comments on the adequacies of the DEIR.

Response B4-2: Comment noted.



Santa Cruz Local Agency
Formation Commission
701 Ocean St. Room 318-D
Santa Cruz, California 95060
Phone: (831) 454-2055 Fax 454-2058

Email: info@santacruzlafo.org
website: www.santacruzlafo.org

April 10, 2006

Ms. Susan Harris
City of Santa Cruz
Parks and Recreation Department
323 Church Street
Santa Cruz, CA 95060

Subject: Arana Gulch Master Plan Draft EIR

Dear Ms. Harris:

I have reviewed the Draft Environmental Impact Report circulated for the Arana Gulch Master Plan. LAFCO would use the Final EIR to process any application to annex the approximate 8 acres of the site outside the city limits. The potential annexation area is contiguous to the city limits and within the Sphere of Influence that LAFCO has adopted for the City of Santa Cruz. Any city annexations typically involve detachments from the Central Fire Protection District, the Santa Cruz County Resource Conservation District, County Service Area 9 (public works), County Service Area 11 (parks), and County Service Area 38 (sheriff's patrol).

The Draft EIR contains appropriate information for LAFCO's use in considering an annexation application. I found no errors that need to be addressed in the Final EIR.

Yours truly,

A handwritten signature in black ink, appearing to read "Patrick M. McCormick".

Patrick M. McCormick
Executive Officer

B5-1

LETTER B5

Santa Cruz Local Agency Formation Commission

Response B5-1: Comment noted.



MONTEREY BAY

Unified Air Pollution Control District
serving Monterey, San Benito, and Santa Cruz counties

AIR POLLUTION CONTROL OFFICER
Douglas Quetin

24580 Silver Cloud Court • Monterey, California 93940 • 831/647-9411 • FAX 831/647-8501

April 11, 2006

Ms. Susan Harris, Associate Planner
City of Santa Cruz Parks and Recreation Department
323 Church Street
Santa Cruz, CA 95060

SUBJECT: ARANA GULCH MASTER PLAN DEIR

Dear Ms. Harris:

The District submits the following comments on the Draft EIR:

Section 4.8 Air Quality. Page 4.8-1

The federal 1-hour ozone standard establishes the maximum concentration for ozone (identified in parts per million, or micrograms per cubic meter), not particulate matter.

2004 Air Quality Management Plan (AQMP)

The most recently adopted AQMP is the 2004 edition, not 2000.

Cumulative Impacts on Ozone / Project Consistency with the (AQMP)

Consistency of indirect emissions associated with commercial, industrial or institutional projects intended to meet the needs of the population as forecast in the AQMP is determined by comparing the estimated current population of Santa Cruz with the applicable population forecast in the AQMP. AMBAG should be contacted for a consistency determination.

Ambient Air Quality Standards and Attainment Status of the North Central Coast Air Basin

Please see the attachments regarding ambient air quality standards and attainment status.

Thank you for the opportunity to review and comment on the Draft EIR.

Yours truly,


Jean Getchell
Supervising Planner
Planning and Air Monitoring Division

cc: Todd Muck, AMBAG

B6-1

B6-2

B6-3

B6-4

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹		Federal Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O ₃)	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)*		0.08 ppm (157 µg/m ³)* ⁸		
Respirable Particulate Matter (PM ₁₀)	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		50 µg/m ³		
Fine Particulate Matter (PM _{2.5})	24 Hour	No Separate State Standard		65 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	15 µg/m ³		
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m ³)	None	Non-Dispersive Infrared Photometry (NDIR)
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—		
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	—	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m ³)	Same as Primary Standard	Gas Phase Chemiluminescence
	1 Hour	0.25 ppm (470 µg/m ³)		—		
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	0.030 ppm (80 µg/m ³)	—	Spectrophotometry (Pararosaniline Method)
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (365 µg/m ³)	—	
	3 Hour	—		—	0.5 ppm (1300 µg/m ³)	
	1 Hour	0.25 ppm (655 µg/m ³)		—	—	
Lead ⁹	30 Day Average	1.5 µg/m ³	Atomic Absorption	—	—	—
	Calendar Quarter	—		1.5 µg/m ³	Same as Primary Standard	High Volume Sampler and Atomic Absorption
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates	24 Hour	25 µg/m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ⁹	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

*This concentration was approved by the Air Resources Board on April 28, 2005 and is expected to become effective in early 2006.

See footnotes on next page ...

1. California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter—PM10, PM2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above $150 \mu\text{g}/\text{m}^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.
8. New federal 8-hour ozone and fine particulate matter standards were promulgated by U.S. EPA on July 18, 1997. Contact U.S. EPA for further clarification and current federal policies.
9. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

**CURRENT ATTAINMENT STATUS OF THE NORTH CENTRAL COAST AIR BASIN
March 2006**

Pollutant	Federal	State
Ozone (O ₃) - 1 hour	Maintenance*	Nonattainment-Transitional
Ozone (O ₃) - 8 hour	Unclassified/Attainment	Not Available**
Carbon Monoxide (CO)	Unclassified/Attainment	Monterey-Attainment San Benito-Unclassified Santa Cruz-Unclassified
Nitrogen Dioxide (NO ₂)	Unclassified/Attainment	Attainment
Inhalable Particulates (PM ₁₀)	Unclassified/Attainment	Nonattainment
Fine Particulates (PM _{2.5})	Unclassified/Attainment	Attainment

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Notes for Table:

- * The Federal 1 hour standard was revoked in the NCCAB on June 15, 2005.
- ** Area designations in relation to the California 8-hour ozone standard are expected to be made by ARB in November 2006, after the rule is finalized. It is expected that the NCCAB will be designated as a nonattainment area for the California 8-hour standard

Website for current area designation maps for the State and National standards:

<http://www.arb.ca.gov/desig/adm/adm.htm>

A table of the current State and National standards can be accessed at:

<http://www.arb.ca.gov/aqs/aaqs2.pdf>

LETTER B6**Monterey Bay Unified Air Pollution Control District**

Response B6-1: The following correction is made to page 4.8-1 of the DEIR:

"...1-hour ozone standard (~~i.e., the average amount of particulate matter over a 1-hour period~~)."

Response B6-2: Page 4.8-2, paragraph 4, is changed as follows:

"In 1994, 1997 ~~and~~ 2000, and 2004, the MBUAPCD adopted updates to the AQMP. The 2004 ~~20~~"

The footnoted on page 4.8-2 is changed as follows:

"...~~2000~~ 2004 Air Quality Management Plan for the Monterey Bay Region, ~~May, 2001~~ September 2004".

Response B6-3: The proposed project would not result in any increase in population. Thus, a project consistency consultation was not considered necessary.

Response B6-4: Table 4.8-1 is changed as follows (with new changes shown in **bold/underline**):

Table 4.8-1: Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	Federal Primary Standard	State Standard
Ozone	1-Hour	0.12 ppm	0.09 ppm
	8-Hour	0.08 ppm	<u>0.07 ppm</u>
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.05 ppm	--
	1-Hour	--	0.25 ppm
Sulfur Dioxide	Annual	0.053 ppm	--
	24-Hour	0.14 ppm	0.05 ppm
	1-Hour	--	0.25 ppm
PM ₁₀	Annual	50 ug/m ³	20 ug/m ³
	24-Hour	150 ug/m ³	50 ug/m ³
PM _{2.5}	Annual	15 ug/m ³	12 ug/m ³
	24-Hour	65 ug/m ³	--
Lead	30-Day Avg.	--	1.5 ug/m ³
	3-Month Avg.	1.5 ug/m ³	--

Notes: ppm = parts per million
ug/m³ = Micrograms per Cubic Meter

Source: California Air Resources Board.