

C. PUBLIC COMMENTS

Susan Harris

From: Marty Pingree [mastil@cruzio.com]
Sent: Tuesday, March 07, 2006 6:21 PM
To: undisclosed-recipients
Subject: Arana Gulch

113 Mentel Avenue
Santa Cruz, California 95062

8 March 2006.

Dear Ms. Harris and Members of the City Council,

I am a third-generation Santa Cruzan writing to urge you, in the strongest possible terms, to preserve Arana Gulch as an undeveloped open space for our community. That this remarkable piece of land is being threatened with the possible paving and lighting of its paths is anathema to my family and me. This space is treasured by hundreds of hikers, dog owners, and artists who enjoy it for its natural state; it is this innate beauty that keeps all of us coming back to visit time and time again.

Were the Gulch wildlife, which includes Red-tailed Hawks, Great Blue Herons, and Great Horned Owls, able to compose a letter to you, I am certain they would ask that you spare them any "home improvement" projects. Night-lighting and asphaltting parts of the field would destroy portions of their hunting, foraging, and nesting spots. They do not have the option to move into another neighborhood and start over as we humans do. This is /it/ for them, and their needs certainly deserve serious consideration when designing a master plan for the area.

These so-called improvements would likely draw unwelcome use of the Gulch, such as motorbikes and skateboards. It's quite likely that graffiti and other types of vandalism would increase. Moreover, the rise in traffic would further clog the streets around the entrance to the park. Tagging, quite possibly, would spiral upward in the surrounding neighborhood. There is already a problem with after-hours partying; having the area lighted would only further incite revelers. Who would patrol the park to curb any rise in problematic situations and enforce park rules? Who would be responsible for the additional refuse clean-up generated by the rise in Gulch visitors? Since ranger patrols are already nearly non-existent, how would the area be protected from an uptick in negative behaviors?

In our extremely cash-strapped city, how would these additions, and the necessary costs to maintain them down the road, be accommodated? In these perilous financial times, is this expense really justified? I am appalled that many of our governmental leaders are leaving this area for greener pastures, yet you, the current council, continue to promote this extravagant idea, an idea that would actually cause a decline in the quality of life for the wildlife in the Gulch and the residents who populate the surrounding areas. It is difficult to envision any positive environmental, economic, or aesthetic end products from this scheme.

I encourage each of you to envision what is best for the future of our region. What legacy will this council leave to the generations to follow? It is really in your hands, and on your collective conscience, to choose between protection and preservation or degradation and devaluation of our community's natural heritage. Please do the right thing and preserve the integrity of Arana Gulch for the present and the future. Let it be.

Sincerely,

Martha Mee Pingree

C1-1

C1-2

C1-3

C1-4

LETTER C1
Marty Pingree

- Response C1-1: Comment noted. As stated on page 3-25 in the DEIR (Table 3-2), only 0.6 mile of paved trails would be provided in Arana Gulch, and this trail system would be no more than 8 feet in width. Lighting is described in the second paragraph of page 3-18, which states that no lighting would be located in the meadow area of Arana Gulch. Low level lighting may (emphasis added) be installed at the Hagemann Gulch Bridge and Upper Harbor area if deemed necessary for public safety.
- Response C1-2: Refer to Master Response No. 1. Impacts on birds are fully addressed in Chapter 4.2 of the DEIR. Specifically, potential impacts on avian species are addressed under Impact BIO-8 and appropriate mitigation measures are recommended to reduce the identified impact it to a less-than-significant level.
- Response C1-3: No motorized vehicles (other than electric wheelchairs) would be allowed in Arana Gulch. Skateboard use would be allowed.
- As stated on page 4.13-5 of the DEIR, first paragraph, improvements to Marsh Vista Trail could increase public views into this area of Arana Gulch, helping to discourage illegal camping and other activities that have occurred in the area. Park Ranger patrols would be present at Arana Gulch to monitor on-site activities. Potential impacts on police services were addressed on pages 4.13-4 and 4.13-5 of the DEIR and no significant impacts were identified.
- No significant traffic impacts were identified because any increased usage of Arana Gulch is anticipated to be mainly from people arriving by foot or on bicycles, as stated on page 4.7-3 of the DEIR. The available on-street parking spaces would be adequate for any users arriving by automobile.
- Response C1-4: The DEIR is not required to evaluate the financial elements of the project. Comment noted.

Susan Harris

From: Larsen [bnlarsen@cruzio.com]
Sent: Monday, March 20, 2006 1:54 PM
To: Susan Harris
Subject: Arana Gulch

Dear Susan,
I have read the draft master plan and EIR plan for Arana Gulch. Once again, lots of time and money have gone into planning for this space. I admire all the tarplant research and suggestions, but have a hard time with the two bridge proposals.

Mid town bicycle access is already available through Frederick St. park. I do not think we should sacrifice the beauty and tranquility inherent in any Greenbelt by crisscrossing it with paths, bridges, and interpretive signs. The joy of experiencing Arana Gulch is in getting away from the hubbub of the city and breathing in Nature. Our manmade parks (De Laveaga, Frederick St. etc.) should serve the needs of humanity, but the Greenbelt should be ruled by the flora and fauna. Let us focus on that priority and use the money saved for improving bike paths along Soquel Ave. (for instance) or along the railroad tracks.

Thank You,
Bruce Larsen

C2-1

LETTER C2
Bruce Larsen

Response C2-1: Refer to Master Response No. 7 regarding an off-site alternative. The comment noted about the desires for future use of Arana Gulch is noted.

Susan Harris

From: Kit Birkovich [kitb@baymoon.com]
Sent: Tuesday, March 21, 2006 1:37 AM
To: Susan Harris
Subject: plan for Arana Gulch

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

Dear City Diplomats,

For over eight years I have walked the simple routes around and through Arana Gulch. Multiple times a week, every week. It is church to me. Its seasons and wildlife -- the flowers, blue dragonflies, raptors, Monarchs, grasses, snakes, foxes, and mud -- inspire me, sustain me, connect me to the earth.

A "greenbelt" does not have pavement running through the middle of it. Protecting an endangered species does not mean dividing its habitat in two with paved roads and bridges and lights at night. Go out there this summer and rub a little tarplant leaf (looks like rosemary somewhat) between your index finger and thumb, then take a sniff. This might cure your sister's recurrent virus, or your son's chronic fatigue, or your own baldness -- who knows!

There is no rationale to continuing with the projected rape of Arana Gulch. The bicycle-mad "Broadway-Brommer" enthusiasts already have a route: a few hundred yards south: through Frederick Street Park, down the stairs, and out the back of the harbour.

Give this little bit of heaven-on-earth a break, and allow the sweet, humble flourishing of native California to exist among us.

C3-1

LETTER C3

Spend the money and energy somewhere else. Really.

There are yet unborn children who deserve to have this greenbelt saved for them: Tall grass to run through, wide sun, cool fog, blue heron standing still in the mist, frog songs in February, four kinds of native lilies, and blackberries!

Kit Birskovich

Piano Teacher, dog owner, gardener, painter

LETTER C3**Kit Birskovich (No. 1)**

Response C3-1: Comment noted. As stated on page 3-18 of the DEIR, no lighting would be installed in the meadow area and any potential future lighting of the Hagemann Gulch Bridge and Upper Harbor area of the trail would be based on a public safety need. Refer to Master Response No. 1. Only one bridge is proposed over Hagemann Gulch. Refer to Master Response No. 2. Regarding Frederick Street Park stairs, refer to Master Response No. 7.

Linda Wilshusen
1115 Live Oak Avenue
Santa Cruz, CA 95062
l-j-w@pacbell.net 831/462-6241

VIA EMAIL ONLY
March 27, 2006

Santa Cruz City Council
Santa Cruz City Parks & Recreation Commission
809 Center Street
Santa Cruz, CA 95060

RE: Draft Arana Gulch Master Plan

Dear Members of the City Council and Parks and Recreation Commission:

I am writing in support of the draft *Arana Gulch Master Plan*, particularly in strong support of the *Arana Meadow, Canyon and Creek View Trails* (Bicycle and Pedestrian Trails).

These Trails will provide long-sought-after access for pedestrians and bicyclists to the Arana Gulch Park, and will also serve as an important transportation link for bicyclists and pedestrians between eastside City neighborhoods and businesses, and adjacent Live Oak neighborhoods and businesses.

It is an established fact that providing safe and convenient trails in urban areas enhances the ability of people to choose to use non-automobile transportation modes for many trips, thereby reducing local traffic. Trails also encourage walking and biking for commuting and recreation, enhancing health and helping to reduce obesity, which is now fully accepted as a significant public health threat. The lack of a safe and convenient east-west connection in this location is a very real disincentive to using alternatives to the automobile in the "Eastside" area, and these Trails would provide a huge benefit to City as well as Live Oak residents and businesses.

I have one request for your consideration: it isn't clear to me that the Creek View Trail continues all the way to Brommer Street (located within the unincorporated County). Please ensure that this is in fact the case, or that the east end of the Trail will be linked with sidewalks and bike lanes which extend all the way to the intersection of 7th Avenue and Brommer Street in the County.

Thank you very much for your consideration. I truly look forward to one day being able to walk or ride my bike from my home in Live Oak into Santa Cruz via these scenic Trails.

Sincerely,

Linda Wilshusen

cc: County Redevelopment Agency, Santa Cruz Port District

C4-1

C4-2

LETTER C4**Linda Wilshusen**

Response C4-1: Comment noted.

Response C4-2: The trail would be connected to a sidewalk along the western edge of Brommer Street and would include a bike trail in this location as shown in Figures 3-5 and 3-6 of the Draft EIR. This portion of the trail is outside the boundaries of the Arana Gulch Master Plan and thus is not addressed in the Alternatives chapter (Chapter 5) of the DEIR.

Susan Harris

From: Lisa McGinnis
Sent: Tuesday, March 28, 2006 11:43 AM
To: Susan Harris
Subject: FW: Arana Gulch
Importance: High

From: Shann Ritchie [mailto:sritchie@ucsc.edu]
Sent: Tuesday, March 28, 2006 11:23 AM
To: Lisa McGinnis; City Council; Mary Arman
Subject: Arana Gulch
Importance: High

Good day,

We write to take issue with the "new" Master Plan for the only remaining acreage of open space on the east side of Santa Cruz. My family became involved with trying to mitigate the development of the 67 acres of Arana Gulch in 1998, shortly after we moved here from Marin County where development has removed most of the open areas and where green areas or protected open space is now at an extreme premium - due in many ways to the development of open green space in the name of making it "accessible to all".

We find it appalling that the City Council continues to throw money at this development of Arana Gulch when you can't find money to repair the pot holes in our city streets (some of which you can drive a MAC truck through) or keep public schools open without the community finding ways of making the money to do so.

Now the plan is to destroy the SC Tarplant critical habitat in order to secure Federal money? What in the world are you people thinking???

Bridges over Arana and Hagemann Gulches will require clear-cutting of the trees and brush in both areas in order for the heavy equipment to be able to get into the gulches to set the footing for these inappropriate, un-needed, and huge bridges. This will destroy the existing habitat for many species of animals and birds that call this area "home". You cannot re-establish critical habitat by re-planting - it does not work; what is destroyed is gone forever. Heritage trees take centuries to grow and only one day to remove; again, what are you thinking? Check in with any environmental group if you think that is an incorrect assessment of what you plan.

Again your EIR fails to give any credence to the FACT that raptors and in particular red-tail hawks use the trees along the AG for critical nesting habitat. Neighbors next to the gulch (of which we are one) can swear to the fact that these hawks return EVERY YEAR to nest and raise their young. Your EIR is wrong that these nests are "unused"; one can only assume they were looked at off season? But then again, the company contracted with to give such a report is, as we are all well aware, beholden to the agenda of who pays them for the report; in this case the City of Santa Cruz.

Building roads through the AG - (and let's be clear that an 11 foot wide macadam "path" is for want of a

C5-1**C5-2****C5-3****LETTER C5**

better word a ROAD) - that will not only destroy critical habitat, but will also effectively cut through space that is used by snakes and other creatures that will then be at risk to be run down or "squashed" by high-speed bicyclists, is completely unacceptable. Also, where is the money coming from to maintain this new road? We can't even maintain our city streets at this point due to lack of funds.

C5-4

The lighting you propose: an article in last week's Science News gives a very accessible explanation of recent research that supports the position that artificial lighting for the proposed bike road should be considered a serious environmental impact.

C5-5

<http://sciencenews.org/articles/20060318/bob10.asp>

These roads will be used by a few bicyclists, not the "hundreds" that some like to fantasize about. It will also be used by (and let's be realistic here) off road vehicles (probably illegally, but who will police that?), those very tiny motorcycles that create a stink and noise that has now been banned from city streets, and that element of our town "the homeless" will also have better access to camping in the Gulch which will then require more policing of the area, not to mention the neighborhoods around the AG, and access by emergency vehicles because there will be more fires in the AG than before. This was in one of your numerous reports: more access means more chance of fire, etc.

C5-6

Where is the money coming from to increase the police and fire coverage for the area?

C5-7

Regarding the use of the roads by those who are physically challenged: there may be young wheelchair recreationists (and skateboarders!) who will no doubt use the road for those purposes, but then that negates the "resource dependent" requirement of building in an environmentally sensitive habitat area (ESHA) identified by the CA Coastal Act. However we seriously doubt that someone in a wheelchair will be coming across town using a road through AG to go to the Capitola Mall.

Arana Gulch was approved by the voters as a greenbelt open space - not a park, not an access for bicycle commuters, not a way for parents to address obesity in their children, but GREENBELT OPEN SPACE.

If this was being proposed by UCSC as a road through Pogonip the City Council would undoubtedly be threatening to sue the UC over it. But in this case it is simply a majority of citizens who VOTED this as greenbelt open space and it's been "open season" on the AG ever since by Public Works and other city entities who have their own agendas which undoubtedly include the fact that so much money has been wasted on trying to ram through development of AG over the years you just can't not move forward now.

C5-8

If all this energy, money and time had been put into doing something about Soquel Ave's lack of an adequate bike lane, we would not be still wasting time and money trying to pave the last green area on the East Side of town.

Time to reassess your priorities people. Not only are you violating your own procedures in "molding" the AG around your proposed bicycle connection you will also be violating the Endangered Species Act.

As the points below indicate, bicyclists have huge infrastructure support plus thousands of miles of roadway to use - leave the Gulch alone.

C5-9

1. The Arana Gulch Master Plan is a proposal to attempt to do what Public Works has been trying to

do for over 10 years: build bridges over Hagemann and Arana Creeks and construct an 8' wide paved bicycle thruway (with shoulders that really create 10' - 15' widths) on the coastal prairie meadow of voter approved greenbelt open space.

2. The City has violated its own procedures in molding the proposed Master Plan for the greenbelt around a specific project, the Broadway-Brommer bicycle connection.

3. The Master Plan refers to the so-called 8' wide paved roadway as a "multi-use interpretive trail" only in an attempt to meet the Federal "resource dependent uses" definition that allows development in an Environmentally Sensitive Habitat Area.

C5-10

4. Only the Proposed Project and Alternative 2 are identified as providing money that can be used for a Tarplant Adaptive Management Plan. The other alternatives claim "uncertain" funding status for management for the tarplant. Therefore, the City is proposing alternatives which will violate the Endangered Species Act. Furthermore, these alternatives do not meet the "feasibility" test according to CEQA, which stipulates that when an alternative does not comply with "other plans or regulatory limitations," it is not a feasible alternative.

C5-11

5. The unique population of Santa Cruz Tarplant grows nowhere else in this developed City. Bicyclists have City and County bike lanes, bike paths, bike routes, bike committees, bike subsidies and bike infrastructure support programs plus thousands of miles of roadways. The Tarplant has about 60 acres. In one place.

6. To say there is no bridge over Arana Creek is a lie. According to the EIR, the ramped & paved roadway will cross Arana Creek as a steel bridge.

Shann and Dennis Ritchie
106 Hagemann Avenue
Santa Cruz CA 95062

LETTER C5
Shann Ritchie

- Response C5-1: Comment noted.
- Response C5-2: Potential impacts on Santa Cruz tarplant are addressed on pages 4.2-42 to 4.2-44 of the DEIR and appropriate mitigation measures are recommended to reduce potential impacts to historic Santa Cruz tarplant habitat.
- Response C5-3: No bridges over Arana Gulch Creek are proposed. See Master Response No. 2. The bridge over Hagemann Gulch would not remove trees since the abutments would be located on either side of the bridge to minimize impacts in the riparian area, as explained on page 3-18 of the DEIR. Protective mitigation measures for the riparian corridor are addressed on page 4.2-39 of the DEIR.
- Potential impacts on raptors are addressed on page 4.2-46 of the DEIR and appropriate mitigation measures are recommended to reduce the impacts to less-than-significant levels.
- Response C5-4: The paved trail would be 8 feet wide, significantly narrower than a vehicular road. The area of disturbance during construction would be up to 11 feet, 7 inches in width. Impacts on biological resources are addressed throughout Section 4.2 of the DEIR. The Master Plan addresses potential funding sources. This issue is not relevant to the EIR.
- Response C5-5: Refer to Master Response No. 1.
- Response C5-6: No motorcycle use would be allowed in Arana Gulch and the area would be patrolled by City Parks and Recreation Department Park Ranger staff to ensure that violations do not occur. Illegal camping is anticipated to be reduced with the improvements to Marsh Vista Trail that would increase public views into the area (see page 4.13-5 of the DEIR).
- Response C5-7: The DEIR did not identify any need for increased fire or police personnel.
- Response C5-8: This comment does not relate to the DEIR but expresses the commentor's wish about how Arana Gulch should be used.
- Response C5-9: Comment noted. No bridge would be built over Arana Gulch Creek. See Master Response No. 2.
- Response C5-10: Park master plans commonly address recreational elements such as trails, picnic areas, restroom facilities, and special habitat areas for protection. The proposed multi-use trail is only one element of the Master Plan. The development of trails in Environmentally Sensitive Habitat Areas is noted in Master Response No. 3.

Response C5-11: Refer to Master Response No. 4.

Susan Harris

From: Lisa McGinnis
Sent: Tuesday, March 28, 2006 6:35 PM
To: Susan Harris
Subject: FW: Arana Gulch

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

From: Robin Drury [mailto:drury@cruzio.com]
Sent: Tuesday, March 28, 2006 5:49 PM
To: Lisa McGinnis; City Council
Subject: Arana Gulch

Having lived in Santa Cruz County for nearly thirty years and on the City's east side for twenty years, I have had more than a casual interest in the former Kinzli property now known as Arana Gulch. I was among the signature gatherers in 1987 who turned back proposals by auto dealers to remove Arana from open space designation and among those at numerous City Council meetings who supported Council members in their votes to thwart development and sustain the will of City voters. I thank those of you who have stood with the citizens you represent to rebuke efforts by developers and others to turn this rare piece of open land into housing, soccer fields, school grounds, and, back in the distant pass, into a cross-town bypass. I ask you once again to stand up for this open space, for Santa Cruz voters, and to reject aspects of the Master Plan that ignore that will. Arana does not need a road; it does not need a paved path; it does not even need an interpretive trail. It most certainly does not need LIGHTS! City Parks must have more appropriate projects to work on than this.

It is not my intent to reiterate points I know my neighbors and other Friends of Arana will be making as we stand up once more for the animals and plants that make up this little remnant of the coastal prairie ecosystem that once stretched along the entire bay edge of our city. As changed as it is by a hundred years of human use, this is what we have left — 67 acres — that's all. Its value for humans lies in our ability to visit it, to stand under the spreading branches of its venerable oaks, to observe seasonal changes in a relatively natural place, to silently watch the heron watching the still water, to marvel at the swallows harvesting thousands of mosquitos from the air, to wonder where the skunks who wander through our yards at night sleep during the day. Its value does not lie in its potential as a bypass. Not to allow people to speed through it on a bike, not to find an even easier route to a secluded spot to drink beer with other teenagers and ravage an old oak's bark with broken bottles and pocket knives. If this supposedly liberal, even at times progressive, city leadership cannot see that there is inherent value in protecting this ecosystem for itself alone, then consider this: there are better uses for FEDERAL funds than building bicycle and pedestrian bridges for locals. What, besides the monetary scale, makes this different from all the other Pork Barrel projects coming out of Washington that we like to deride? Santa Cruz Pork Barrel? Please! Let's keep that an oxymoron.

Sincerely,

Robin Drury
114 South Park Way
Santa Cruz, CA 95062

C6-1

C6-2

LETTER C6
Robin Drury

Response C6-1: Refer to Master Response No. 1 regarding lighting.

Response C6-2: Comment noted.

Comments on the Draft Master Plan for Arana Gulch
and the Draft EIR for the Proposed Project included in the Master Plan

Submitted by Michael Lewis & Jean Brocklebank, on behalf of Friends of Arana Gulch
<http://members.cruzio.com/~arana/>
to the City Council and Parks & Recreation Dept.
at the March 28, 2006 public hearing

Natural History of Arana Gulch

We begin by making note of our sincere appreciation of the incredibly well researched and presented natural history of the greenbelt. It is beautifully crafted and exceptionally thorough and Parks and Recreation staff can be proud of their work in this regard.

C7-1

Master Plan Process

We read in the introduction of the Draft Arana Gulch Master Plan that the "the intent of this Master Plan is to establish a **vision and goals** that will shape the future of Arana Gulch as a unique open space within the City of Santa Cruz." However, these words of intent ring hollow because "a vision and goals" were never developed, not even at the only Public Scoping Session of last year. Instead, at that Scoping session, the public was told that a paved bicycle route and its bridge over Hagemann Creek would be included in the Master Plan.

C7-2

The purpose of a Master Planning process is to analyze the resources of the area under study and develop goals and objectives for its use based on public input. The proposed Arana Gulch Draft Master plan has substituted a **project** for a **process**. Instead of the Master Planning process, the City has produced a project (the Broadway-Brommer Bicycle/Pedestrian Path Connection) around which the entire Master Plan has been developed. Project, not process.

C7-3

In a letter dated January 11, 2000, from the California Coastal Commission the City's Dept. of Public Works was advised of the proper planning process for the Arana Gulch greenbelt, as directed by the City's own Local Coastal Program (LCP). The "preferred planning approach would be to prepare a specific management plan" for the greenbelt" prior to consideration of a Broadway-Brommer Bicycle Pedestrian Project."

Friends of Arana Gulch has been asking for this proper planning process for Arana Gulch for years. Once again, this latest incarnation of the paved Broadway-Brommer Bicycle route through an environmentally sensitive habitat area is an obvious attempt at slipping a preconceived project under the door of the Master Planning process.

Why Two Documents?

If the City had followed both its LCP planning directive and the advise of the CA Coastal Commission, we would not now be reviewing two separate documents and the City would not have had to spend so much of its limited funds to produce twice the documentation needed for a Master Plan for Arana Gulch.

C7-4

Be that as it may, we now have two flawed documents. One is the Draft Master Plan with flaws in its basic approach and which created a project instead of a process and the other is the Draft EIR, which is

LETTER C7

duplicitous, factually inaccurate, internally inconsistent and self-contradictory.

A Bridge Over Troubled Water

The most glaring misrepresentation of both documents is their statement that there is no longer a bridge over Arana Creek in the proposed project. This is simply not true. The project includes a ramped bridge over Arana Creek. The DEIR states (p. 3-17): "Where the trail rises in the floodplain/floodway area, a small steel bridge span would be designed to achieve the change in grade." In point of fact, there is no way to bring the paved bike roadway up to Brommer St. without crossing Arana Creek.

C7-5

Even if the bridge crosses the creek mostly over the existing culverts of the Harbor, it still crosses the creek and it is still a bridge per the DEIR.

Legally Feasible Alternatives

Only the Proposed Project and Alternative 2 are identified as providing money that can be used for a Tarplant Adaptive Management Plan. The other alternatives claim "uncertain" funding status for management for the tarplant. Therefore, the City is proposing alternatives which will violate the Endangered Species Act. Furthermore, these alternatives do not meet the "feasibility" test according to CEQA, which stipulates that when an alternative does not comply with "other plans or regulatory limitations," it is not a feasible alternative.

C7-6

The City is required, by law, to manage for the tarplant. It must provide such management even if there is No Project. It may not consider an "uncertain" funding project.

Interim Management Plan

On page 8 of the Master Plan document we read that many of the "unauthorized pathways are located in the southern grassland and tarplant areas, and, though the City has made efforts to close these pathways and restore the habitat, management actions have been somewhat limited under the *Arana Gulch Interim Management Plan*." Attached are two pictures that show the so-called management actions. Two bits of plastic fencing, put in place and never again reinforced, can hardly be called serious management.

C7-7

On page 46 we read that "the *Arana Gulch Interim Management Plan* limits existing maintenance responsibilities to annual fuel break and trail mowing, emptying trash containers, and clean-up of refuse and illegal campsites."

However, we find, in the City's Creeks & Wetlands Management Plan document a different statement about the Arana Gulch IMP. It specifically allows for "resource protection, including management of the Santa Cruz Tarplant." No limitations are identified that would establish green plastic fencing, left in disarray, as the only management actions allowed.

Environmentally Sensitive Habitat Areas

C7-8

"The site is considered an environmentally sensitive habitat area (ESHA) by the Coastal Commission (under Coastal Act Section 30240) and as such is required to have resource-dependent uses. The proposed interpretive trails that are identified in the Arana Gulch Master Plan are resource-dependent and would allow

a diversity of visitors to the project area. With development of the proposed multi-use and pedestrian trails, the resources of Arana Gulch could be viewed and experienced by visitors on foot, in wheelchairs, and on bicycles." (DEIR, Page 4.2-38)

The only part of the proposed paved bike route system that could be considered a "resource dependent use" are the interpretive signs. Interpretive signs do not require an ADA compliant, paved trail system that connects adjacent communities, one to another or to any other destination, via bridges over Hagemann Gulch and Arana Creek.

ESHA development restrictions specify that "Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values." The Draft EIR states, "Construction of trails through these areas would result in permanent loss of tarplant habitat within the width of the trail; additional habitat for 1 to 2 feet outside the trail footprint could also be disturbed if pedestrians and bicyclists do not stay strictly within the trail width." "Loss of tarplant habitat would be relatively greater with the multi-use trails (Canyon Trail, Arana Meadow Trail, and Creek View Trail) because these trails would be 8 feet wide, as compared to the pedestrian-only trails which would be 18 to 24 inches wide. To the extent that these trails cannot be routed to avoid the tarplant habitat (see Mitigation Measure BIO-5, below), this would be an impact that cannot be fully mitigated."

With regard to proposed mitigation measures, the Draft EIR states, "The combination of the above measures would reduce this impact, but the impact would remain significant and unavoidable because it cannot be fully ensured that all tarplant habitat would be protected. (Significant Unmitigated)"

Therefore, the paved, ADA compliant bicycle/pedestrian/wheelchair roadways cannot be considered "resource dependent uses" in the ESHA area, and furthermore will not be permitted by the California Coastal Commission and the California Department of Fish and Game because of the significant unmitigatable impacts to the resource on which the ESHA is based.

Trail Widths

There is probably no part of any of the proposed 8' wide paved "trails" that is truly only 8 feet wide. Figure 3-8 of the Master Plan shows four sections that, including their shoulders or cut and fill slopes and all are greater than 8 feet. They range from 9' 4" to 15' and include a more than 13 foot wide route.

Confusion Reigns

Prior to the April 14th comment deadline, we hope that we shall be able to make sense of several incomplete and confusing aspects of the documents. For instance:

1. Appendix A of the Master Plan on the City web site is missing several pages.
2. It is clear that the part of the Proposed Project on Port District Property has received scant attention to detail and therefore true environmental impacts cannot be known or evaluated. Additionally there is no discussion of hazards created by high-speed downhill bicycle traffic in both directions.
3. The applicability of the riparian 100 foot setback required by the CA Coastal Act, the City's LCP and the Citywide Creeks and Wetlands Management plan is not clearly addressed and is confusing as it is stated in the DEIR. We can't make sense of it. Does it apply or doesn't it?

C7-9

C7-10

C7-11

C7-12

In conclusion, the only alternative that we can support is our own Restoration Alternative, which was submitted to the Parks & Recreation Department in the summer of 2005. Our alternative recognizes Federal, State and local laws. It provides for a handicapped compliant trail south from Agnes Street about a quarter of a mile into the greenbelt, so that disabled residents may be engulfed in the essence of the area's unique biological diversity and tranquility. And calls for continuous, ongoing management for all endangered, threatened and special species of the greenbelt. If Alternative 4 was not so wishy washy about funding for the tarplant, we'd get behind that one. In a heart beat.

C7-13

The unique population of Santa Cruz tarplant grows nowhere else in this developed City. Bicyclists have City and County bike lanes, bike paths, bike routes, bike committees, bike subsidies and bike infrastructure support programs plus thousands of miles of roadways. The tarplant has about 60 acres. In one place.

We want this place preserved and protected, not developed.

LETTER C7**Michael Lewis and Jena Brocklebank on behalf of Friends of Arana Gulch (No. 1)**

Response C7-1: Comment noted.

Response C7-2: Refer to Master Response No. 10.

The scoping session for the Draft EIR was held on July 21, 2005. The purpose of the scoping session was to solicit public comments on issues of concern as related to the topics that would be addressed in the EIR. The scoping session included a presentation of the proposed project, but this meeting did not include a discussion of how the Master Plan should be crafted or what specific elements should be included in the Master Plan, as this is not the intent or purpose of a scoping session.

Response C7-3: This comment refers to the Master Plan process and not to the EIR. The City has complied with the direction given by the California Coastal Commission in their letter dated January 11, 2000 by including the proposed multi-use trail as part of the overall Master Plan preparation process. Before this time, no action was taken on the original "Broadway-Brommer Bicycle/Pedestrian Path Connection" that was evaluated in an Environmental Impact Report/Environmental Assessment (EIR/EA) in 1999.

Response C7-4: Two documents are needed because these are separate approval items. An Environmental Impact Report is required for discretionary projects that may have significant environmental impacts (see California Environmental Quality Act, Section 15064). Before approval of a "project," which in this case is the Arana Gulch Master Plan, the Final EIR must be certified by the approving body, which in this case is the City of Santa Cruz City Council.

Response C7-5: Refer to Master Response No. 2.

Response C7-6: Refer to Master Response No. 4 regarding alternatives.

Tarplant management has been ongoing at Arana Gulch, as described on pages 4.2-29 and 4.2-30 of the Draft EIR.

Response C7-7: Comment noted. Management actions would not include only plastic fencing. For example, see Appendix A of the Master Plan, which addresses specific actions for the Santa Cruz tarplant.

Response C7-8: Refer to Master Response No. 3, which addresses development of trails within ESHAs.

Response C7-9: The actual paved width of the trail would be 8 feet, while the potential area of disturbance during construction would be up to 11 feet, 7 inches.

- Response C7-10: Comment noted.
- Response C7-11: The EIR addressed segments of the proposed trail that would be outside Arana Gulch. The proposed slope of the paved trail is no greater than 1-foot rise in 12 feet distance and would not create significant hazards from bicyclists.
- Response C7-12: Refer to Master Response No. 6 regarding the adopted Creeks Management Plan. Section 4.1 of the DEIR addresses the Coastal Act and applicable policies. Also, refer to Master Response No. 3 regarding recreational uses within ESHAs.
- Response C7-13: Refer to Master Response No. 4 regarding alternatives and funding for tarplant management. Comment noted.

Susan Renison
PO Box 397
Felton, CA 95018

March 29, 2006

City of Santa Cruz Parks and Recreation Department
Attention: Susan Harris
323 Church St
Santa Cruz, CA 95060

Dear Ms Harris,

Thank you for your work on the Arana Gulch Master Plan and for the opportunity to comment on it.

Although I have attended various meetings about Arana Gulch use and lived near it for many years, I was unaware of the planning background – this information helps me understand how some of our citizens keep discussing a road when others are discussing a bike trail.

As noted in the plan, I have also seen many people walking and playing, dogs running, and children digging in much of Arana Gulch other than the designated paths. I think that the proposed Master Plan takes this into consideration and offers greater attention and protection to the area because of the planned use.

I agree that the area should be rezoned into Natural Area and Park. I appreciate the thoughtfulness of the Adaptive Management Program to take care of the tar plant and other species of plant and animal as well as bank and gully restoration. **I support the construction of the paved trail and bridge over Hagemann Gulch.**

I have two concerns. I worry that bicycle use of a mixed use trail is too easily pushed aside; hopefully, there would be signage posted and something written on the trail itself explaining the shared use. My second concern is that there are strong feelings about Arana Gulch use. You've done a fine job in explaining how the proposed trails actually protect the various areas, the bridge provides an overlook not an entrance into the canyon, non-native species can be reduced, one of the trails connects to the Monterey Bay National Marine Sanctuary Trail, and more; this information needs to be as widely advertised as possible so that information and not emotion helps decide the matter.

Sincerely,



Susan Renison

C8-1

C8-2

C8-3

LETTER C8
Susan Renison

Response C8-1: Comment noted.

Response C8-2: The project would include posting of signs that address bicycle use while within Arana Gulch, especially as related to the need to stay on paved trails to protect the Santa Cruz tarplant habitat (see page 38 of the Master Plan).

Response C8-3: Comment noted.

Susan Harris

From: Leslie Cook on behalf of City Council
Sent: Wednesday, March 29, 2006 9:08 AM
To: Cynthia Mathews; Ed Porter; Emily Reilly; Mike Rotkin; Ryan Coonerty; Tim Fitzmaurice; Tony Madrigal
Cc: Susan Harris; Dannettee Shoemaker; JaneMarie Polmanteer
Subject: FW: Arana Gulch plan

3/28/06 meeting

From: Pete Card [mailto:CardPete@msn.com]
Sent: Wednesday, March 29, 2006 8:57 AM
To: City Council
Subject: Arana Gulch plan

After watching the Council meeting last night, it was clear that Councilman Portrer's suggestion to use the infinitely less intrusive and costly solution to an east west bicycle path implementing a ramp through Fredrick Street Park then up and through Arana Gulch was the only idea that makes sense both fiscally as well as being minimally disruptive to the environment. I urge you to take another look at this proposal. Under the current plan, there appears to be much more environmental damage possible than is being addressed. Further, the lack of information as to the source of monies for maintenance in a severely cash strapped city is a cause of real concern. Please put the brakes on regarding the current plan There is no reason to display a sense of urgency in building this costly, environmentally damaging bridge/trail.

C9-1

LETTER C9
Pete Card

Response C9-1: Refer to Master Response No. 7 regarding an off-site alternative. Potential funding sources are addressed in the Master Plan and are not relevant to the EIR.

Richard Criswell
422 Harbor Drive
Santa Cruz, CA. 95062
831-423-8758

March 29, 2006

Santa Cruz Parks and Recreation
Attention: Susan Harris

Dear Susan,

We have enclosed a copy of the letter we presented to the City Council at their March 28, 2006 meeting for your records.

Sincerely,

The Criswells

Richard & Andrea Criswell

RICHARD AND ANDREA CRISWELL

March 28, 2006

RE: Arana Gulch Draft Master Plan and EIR

Dear Mayor and City Council Members,

Our main concern, is the Hagemann Gulch Bridge and the West Entrance to Arana Gulch.

WHERE WE ARE LOCATED: see enclosed maps

HISTORY ON PROPERTY: 1961-House built, 1968- City acquisition started for Broadway-Brommer Road connection, 1972-House Moved to make room for road, Construction phase never started. 1994-Green belt acquired by city. 1974 – 1998- land adjacent to our property vacant. This land has been maintained by our family since 1974. In 1998, we tried to acquire a part of this property from the city, so we could straighten the property line and install fences to secure our property. In 2001 we were informed that this would not be possible because the city had other plans in the works. 2003-Start of some kind of bike path plan. 1968 – 2006 – 38 Years of indecision from the city.

C10-1

HAGEMANN GULCH BRIDGE AND WEST ENTRANCE TO ARANA GULCH: Hagemann Gulch consists of riparian scrub and oak woodland. This is how it is referred to in the EIR. What we see are Oaks and Eucalyptus trees. These trees are inhabited by squirrels, red tailed hawks and blue herons as well as monarch butterflies and many other species of birds and animals. We look forward every day to the beauty and entertainment in our back yard. We have watched, over the last year, surveyors marking trees for removal and there are many of them. This is all being done in preparation for installing the bridge across Hagemann Gulch. What a shame to see! We thought that when the GREEN BELT-ARANA GULCH property was purchased this was meant to protect the wildlife and habitat.

C10-2

When the GREEN BELT-ARANA GULCH was purchased we felt a sense of security for the wildlife and habitat, as well as for our back yard. Now, again, we are faced with many new problems: SAFETY, who will patrol this area? We already know that there are not enough police or park rangers to go around. A bridge will open this area to the same problems that exist in the neighborhood now, ie. vandalism, drug problems at Frederick st. park, and transients sleeping in a easily accessible area that is not patrolled by anyone. This opens OUR property to more intrusion and possible damage. PARKING, the draft master plan and EIR state that there will not be any additional parking added. This means that in our area, visitors in vehicles using the proposed west entrance will have to park on the local residential streets, such as, Broadway, Fredrick st, Windsor st., and Harbor dr., these streets are already impacted by heavy on-street parking during certain times of the week.

C10-3

C10-4

In closing, the ARANA GULCH property is an asset to our community. It already gives people access to the park from the harbor and from Agnes st. If better trails and walkways are needed so

be it. Don't open it to more problems. Let the park stay in its protected natural state "GREEN BELT". We would encourage the city council to go with ALTERNATIVE #4. No bridge on Hagemann Gulch.

We would like to invite any interested council members to view the Hagemann Gulch area, and what a bridge would look like, from our back yard.

Enclosures:

Sincerely,

C10-5

LETTER C10**Richard and Andrea Criswell**

Response C10-1: Comment noted.

Response C10-2: The Hagemann Gulch Bridge was designed in a way to avoid removal of any heritage trees and to minimize removal of any kinds of trees. Refer to Master Response No. 5 regarding the bridge design and riparian vegetation. Surveyors were not marking trees to be removed but were using trees to help in the topographical survey undertaken for the project. Metal markers (vs. ribbons) were affixed to trees in the 2004 survey.

Response C10-3: Safety problems for nearby residents are not anticipated. With increased visibility from new/renovated trails, illegal camping and other illegal activities would likely be reduced, as evidenced by experience in other City open space and parks. With legitimate public use, a remote area is less attractive for illegal activities due to increased visibility.

Response C10-4: A parking survey was undertaken along Agnes Street and adjoining streets, as discussed on page 4.7-1 of the DEIR, and concluded that only about 29 percent of available on-street spaces were used. Many of the new users at Arana Gulch would be passing through on the trail and would not require parking. For those coming to Arana Gulch by car, adequate on-street parking would be available.

A recent informal survey of parking space availability on the north end of Harbor Drive, the east end of Broadway, and Frederick Street near the project site showed a total of 75 spaces and an average use of about 42 percent of these available spaces. Thus, about 58 percent (43 spaces) would be available for users of Arana Gulch if needed. However, as stated above, many new users would be passing through on the trail and are not anticipated to require parking.

Response C10-5: Comment noted.