

CALIFORNIA COASTAL COMMISSION

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Th22a



Prepared December 6, 2011 (for December 8, 2011 hearing)

To: Commissioners and Interested Persons

From: Dan Carl, District Manager
Susan Craig, Coastal Planner

Subject: STAFF REPORT ADDENDUM for Th22a
CDP Application Number 3-11-074 (Arana Gulch Master Plan)

The purpose of this addendum is to modify the staff report for the above-referenced item. Specifically, staff was informed this week that the portion of the proposed Creek View Trail that is closest to Arana Creek is actually proposed as an elevated causeway in this area extending from two elevated fill/abutment areas. The entire elevated portion of this trail (i.e., on fill and the elevated causeway) would extend about 200 linear feet total, with 50 feet of that being the causeway portion of it that would extend about 3 to 5 feet above the existing fill slope atop the existing Arana Creek culverts (i.e., it would not extend over open water of the creek, rather it would extend atop the existing fill and culverts that were installed when the Santa Cruz Harbor was originally constructed). The City indicates that the causeway design will avoid putting any load-bearing pressure on the existing culverts, and it would allow a 100-year flood event to flow over the culverts and under the causeway. The revised design would also better accommodate future projects that might affect this area, such as redesign/redevelopment of the culvert fill/area in the future, and it would be a slightly better visual fit for the area as compared to the previously identified fill over the culverts (see attached exhibit). There is some question about appropriateness of the fencing/railing proposed for the elevated trail/causeway in this area, but that can continue to be addressed through existing proposed condition 2c (on staff report page 73).

In short, the revised design only further limits potential resource impacts associated with the proposed project, and does not change staff's overall recommendation. However, certain specific references in the staff report need to be modified to reflect to the new revised design, and thus the staff report dated prepared November 17, 2011 is modified as shown below (where applicable, text in underline format indicates text to be added, and text in ~~strike through~~ format indicates text to be deleted):

1. Revise the following paragraph on staff report page 20 as follows (footnotes, other than footnote 20 (see below) would remain unchanged, and are omitted here for clarity):

Construction of the new multi-use 'Creek View Trail' along the northern boundary of the upper Harbor at the dry boat storage parking lot area and through to 7th Avenue (see Exhibit P, Tab 27, Map 2) requires an easement from the Santa Cruz Port District and coordination with Santa Cruz County. The ~~trail would be elevated via retaining walls for the easternmost portion of the paved Creek View Trail on Harbor property~~ would be on an elevated causeway extending from two elevated fill abutment areas so



as to locate the trail as far from Arana Creek as possible in this narrow area. The entire elevated portion of this trail (i.e., on fill and the elevated causeway) would extend about 200 linear feet total, with 50 feet of that being the approximately 12-foot wide causeway portion of it that would extend about 3 to 5 feet above the existing fill slope atop the existing Arana Creek culverts (see Exhibit C). This portion of the Creek View Trail would be located atop the fill slope that itself is above the four, six-foot-in-diameter culverts that allow Arana Creek to pass under the Harbor's dry boat storage area and adjacent parking lot and to empty into the Harbor's waters. The proposed elevated trail/causeway would include retaining walls at either end that would vary in height up to a maximum height of 6 feet 7 inches in order to meet the grade extending away from the Harbor and toward 7th Avenue along the Harbor access road. This segment of trail lies within Arana Gulch's 100-year floodplain and 100-year floodway. The 50-foot causeway portion of the trail in this area would be elevated in such a way as to allow a 100-year creek flow event to pass both through the existing culverts as well as under the causeway in such a way as to not unimpeded and without any change to upstream conditions. No bridge is proposed over the open water of Arana Creek.

2. Revise footnote 20 on staff report page 20 as follows:

Some have claimed that the elevated trail ~~structure in this area~~ is better considered a bridge due to such elevation. Because it is a causeway that does not extend over open water and instead extends over existing fill supported on fill with no airspace underneath, it is more aptly considered an elevated trail. In any case, there is no material difference in this report analysis whether it is called a bridge or it is called a causeway. See elevations of this trail segment in Exhibit C.

3. Revise the following paragraph on staff report page 50 as follows:

The paved Creek View Trail would extend to within about 10 feet of Arana Creek where it enters into the four, six-foot-in-diameter culverts that extend under the Harbor's dry boat storage area and Harbor parking lot and empties into Harbor waters. In other words, this portion of the trail would cross the historic fill that created the Harbor in the first place, with a 50-foot section of the trail being elevated as a causeway above the fill on top of the culverts that are currently buried and topped by the Port District's dry boat storage area. There would also be an overlook with an interpretive display at this location. The proposed trail in this area is located outside the boundaries of the seasonal wetlands associated with Arana Creek, and the trail will be located above the creek, along the edge of the Harbor's dry boat storage area in an alignment similar to an existing unpaved trail. There would be no bridge over the open waters of Arana Creek or fill within the adjacent wetlands associated with the creek. To protect steelhead that may be found in the creek, the project includes appropriate best management practices to minimize sediments from entering the stream system during construction (see Exhibit F for the project's required mitigation measures).



4. Revise the following paragraph on staff report page 51 as follows:

Although it would be optimal if the City's proposed project could also fix the long-standing sedimentation issue, it is hardly the responsibility of the City to fix a decades old problem that is more regional and watershed based in nature, as well as based in large measure on the construction and development of the Harbor itself in what was historically (pre-Harbor) Woods Lagoon fed by Arana Creek. Such issues are real, to be sure, but their connection to the City's project is more limited. From another point of view, the City's project within Arana Gulch should, if anything, reduce sedimentation within Arana Creek by removing multiple trails (including significant erosional trails) and restoring grades, and by better managing trails as part of the project. As to whether the City's project could prejudice a future potential project designed to redo the connection of Arana Creek to the Harbor (such as replacing the existing culverts with larger culverts, bridging the connection, etc.), such an outcome is speculative. It is true that if such a project came to fruition after the City's project were constructed, then such project would need to also account for the path too. However, the existing fill area extends a minimum of 350 feet from the Creek to the Harbor water, and this area is already covered by significant development, including the Harbor's dry boat storage area, the access road around the Harbor, and a parking lot. The proposed trail would cover at most a 15-foot wide area and would be a minor addition to the existing development in this area. Furthermore, a 50-foot portion of elevated trail directly atop the culvert area would be an elevated causeway that would provide more flexibility for future project options (including being able to move the causeway and put it back, as applicable, as part of such future project). Again, it would be ideal if the trail and any such larger project designed to redo the fill area coincided, but it is certainly not required and the City's project is not inappropriate in terms of a potential future project associated with the fill area. In addition, the proposed Master Plan also includes resource management strategies to enhance the habitat of the Arana Creek riparian and wetland areas, including restoration of the eroded gully in the northern portion of Arana Creek, removal of non-native invasive vegetation, closure of unauthorized pathways that currently exist within the wetland and riparian habitat areas, and, if necessary, installation of fencing and/or signs to deter off-trail use in these areas.

5. Revise the following paragraphs on staff report pages 68 and 69 as follows:

The project includes less than ½ mile of 8-foot-wide paved multi-use paths and just over a mile of unpaved paths in the meadow (see Exhibit D for photographic simulations of the proposed paths). The proposed trail access improvements (except for the bridge over Hagemann Gulch and the ~~retaining wall~~ elevated trail/causeway near Arana Creek) are at-grade facilities, so their visual impact will be minimal. Also, neither long-range views of the hills nor scenic views of the Upper Harbor will be impacted by the proposed project. Also, the paved paths will be colored a neutral tone to better blend with the hues of the surrounding coastal prairie environment.

Construction of the portion of the Creek View Trail on Harbor property would require associated retaining walls and railings adjacent to Arana Creek and a 50-foot elevated causeway over the culverts leading from Arana Creek into the Harbor (see page 2 of Exhibit D). The trail, the retaining walls, and



the railings would be visible from the Upper Harbor and from a portion of the southern end of Arana Gulch. The introduction of a human-made structure into the natural landscape of this portion of the Arana Gulch open space area would result in a change in the visual character of this area.

Fortunately, the paths and related design have been proposed to be sensitive to these aesthetics. Provided the siting, design, and materials (including structural elements, finishes, and landscaping) are chosen to be subordinate to this setting, they can be found consistent with the Coastal Act's visual resource protective policies (see special condition 2). The same cannot be said for the proposed fence on the inland side of the trail skirting the Harbor or the fence proposed under the elevated causeway. Such fenceing, even if mesh or chain link, as proposed, will detract from the viewshed, including because the above-trail fence will serve to create a "chute" effect for the trail extending from the Harbor access road to the entrance to Arana Gulch where the path alignment extends up to the meadow because it would be matched on the southern side by the existing dry boat storage chain link fence. The proposed mesh and chain link fences in this area, while proposed for a good reason (to help keep path users out of the buffer area along the upper Harbor dry boat storage area and to prevent camping under the elevated causeway), will have a significant adverse impact on public views and enjoyment of this trail segment. The Master Plan includes adequate provisions to address the need to keep users on paths, and the fence can safely be removed without impacting this objective. See Special Condition 2.

6. Modify page 3 of staff report exhibit C to eliminate cross-sections E and F, and add the attached graphic of the elevated trail/causeway as page 3a of Exhibit C (see attachment)



Th22a

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATIONS

Name or description of project, LPC, etc.: Application No. 3-11-074

Date and time of receipt of communication: November 26, 2011 – 10:00 am

Location of communication: Summerland Cafe, Summerland Ca

Type of communication (letter, facsimile, etc.): Meeting

Person(s) initiating communication: Don Lane

Detailed substantive description of content of communication:

(Attach a copy of the complete text of any written material received.)

I met briefly with Don Lane the Vice-Mayor of Santa Cruz to discuss the Arana Gulch Master Plan that will be in front of the Commission on Thursday December 8th. Mr Lane gave a short history of the project and the fact that the project had been in front of the Commission a number of times, and each time getting closer to approval but with some conditions that needed to be worked out prior to returning to the Commission. The Vice-Mayor stated that he felt that the conditions from the past Commission meeting had been addressed and that he and the City were in support of staff's recommendation of approval.

11/27/11
Date


Signature of Commissioner

If the communication was provided at the same time to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

Thada

From: Jana Zimmer [mailto:zimmerccc@gmail.com]
Sent: Monday, December 05, 2011 10:15 AM
To: Vanessa Miller; Jeff Staben
Subject: Fwd: Fragmentation document/Arana Gulch

More ex parte communication on Arana Gulch

----- Forwarded message -----

From: **Michael A. Lewis** <malewis@calcentral.com>
Date: Mon, Dec 5, 2011 at 8:51 AM
Subject: Fragmentation document/Arana Gulch
To: zimmerccc@gmail.com

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DEC 05 2011

California Coastal Commission,
Central Coast Area

Commissioner Zimmer:

The "fragmentation" article you referred to is *Response to habitat fragmentation and Santa Cruz tarplant (Holocarpha macradenia) at Arana Gulch* by Ecosystems West Consulting Group, that was commissioned by the City of Santa Cruz to compile the 2006 Arana Gulch Draft Master Plan EIR. The EIR documents "significant and unavoidable impacts to tarplant habitat" "that cannot be fully mitigated," including the issue of habitat segmentation.

In cases of disagreement in scientific conclusions, the Precautionary Principle holds that one should adopt the alternative with the least potential for a negative outcome.

Thank you for your time in considering our position on the Arana Gulch Master Plan.

Michael A. Lewis, Ph.D.
FOAG

California Coastal Commission
Central Coast District Office
725 Front St, Suite 300
Santa Cruz, CA, 95060

REPRESENTATIVE FORM
LETTER RECEIVED FROM 3
SEPARATE INDIVIDUALS

December 05, 2011

Subject: Proposed Arana Gulch/Broadway Paved Bicycle Path - OPPOSED

Dear Commission Members –

I am writing you today as a concerned Santa Cruz Resident. I have been following the proposed development through Arana Gulch for a paved bicycle route that includes removing many trees, installing lights in a natural, open space preserve area, not to mention disruption of an endangered species habitat in the Coastal Zone.

I hope the commission recognizes the this project is in direct violation of the Coastal ACT, and that the funding for this proposed project would be far better served in the development of the Rails to Trails project a mere ¼ away. Developing the Rails to Trails would allow better access throughout the county as well as working toward the common goal of completing the Monterey Bay National Marine Sanctuary Scenic Trail.

Thank you for your consideration,

Ken Nowak

307 Centennial St.

Santa Cruz, CA 95060

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California Coastal Commission,
Central Coast Area

Thada

Thur Dec 8, 2011
Charles Paulden
Agenda No: TH22a
Application No: 3-11-074
Opposed to project.

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan.

This is not a resource dependent project. It is a transportation project that is holding ESHA hostage.

Much like La Bahi Hotel and Trestles Toll Road, this is the wrong project for this space, a road dressed up as an interpretive trail for ADA access. It is rather a campaign by a divisive contingent of the bicycle community to force a road through this beloved space using transportation funds.

There are alternatives that are less expensive and do not despoil the greenbelt, that lets us have an authentic experience of the Coastal Prairie.

We are in an increasingly urbanized environment. Getting into open natural space does a great deal to combat nature deficit disorder.

If this were a road for electric cars, it would not be acceptable, even if they added billboards with pictures of what we will lose if this project is not rejected.

Much like the freeway through Trestles, this is a transportation project looking for a route, not a road to a destination. The bisecting of ESHA with a Road, illustrates this clearly, no matter what Green House Gas reduction is touted. The GHG argument could be made for electric cars, using this road and illustrates the point that it is not a resource dependent Project.

While the City has a Park, that could access the Harbor at Fredrick St, it does not have ADA access.

This Park is a few blocks away from the Harbor access that their proposed road would provide. By not providing ADA access at Fredrick St Park, their plan would necessitate the transit of many miles to get to the harbor on this expensive and ill-suited road.

The coming Monterey Bay Scenic Trail along the Rail line, a few blocks away, will provide me with a better cross-town bike route, without desecrating a precious Coastal Resource.

There are feasible, reasonable, and less environmentally destructive bicycle/pedestrian alternatives that are available, as recognized in the Coastal Commission staff report.

Please preserve the Visual as well as Biotic Resource in this quite escape from the noisy busy City surrounding this beloved and precious natural retreat.

I support the Santa Cruz Sierra Club in their continuing promotion of the preservation of Arana Gulch in its natural and quite beauty while preserving ESHA, as a gift to the State and the future generations.

Please save, rather than pave paradise.

Charles Paulden

Th 22a

The coastal terrace prairie of Arana Gulch is a fraction of the remaining 1% of California's original unique coastal prairie ecosystem. The Arana Gulch greenbelt, saved from development by a vote of the people in 1979 and again in 1994, is home for many sensitive species, including the Santa Cruz Tarplant (*Holocarpha macradenia*). It is a rare natural place in an urban setting, with two existing accesses serving City and County residents, who enjoy and appreciate its uniqueness daily.

The City's draft Master Plan EIR states that there will be "significant and unavoidable" impacts to the endangered and threatened Santa Cruz Tarplant "which cannot be fully mitigated" if the Broadway Brommer project within the Arana Gulch Master Plan is approved, and the US Fish & Wildlife Service and CA Dept. of Fish & Game agree with the City's determination. This non-resource dependent, City Public Works component of the Arana Gulch Master Plan is inconsistent with the Coastal Act.

We ask that Coastal Commissioners vote to approve the Arana Gulch Master Plan ONLY if the proposed paved City-County connector bicycle project (called Broadway Brommer) through ESHA and "critical habitat" of an endangered species is REMOVED from the AG Master Plan.

Name Printed	Signature	Zip Code
1. Rich Peterson	<i>Rich Peterson</i>	95062
2. JOANNE GRAMO	<i>Joanne Gramo</i>	95062
3. Shane Rafferty	<i>Shane Rafferty</i>	95062
4. Tucker Peterson	<i>Tucker Peterson</i>	95063
5. JAMES GRAMO	<i>James Gramo</i>	95062
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DEC 05 2011

California Coastal Commission,
Central Coast Area

Audubon
Joanne Gramo
211 Forest Ave
Santa Cruz CA 95062

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DEC 05 2011

California Coastal Commission,
Central Coast Area

Barton T. Coddington

Agenda No: TH22a
Application No: 3-11-074
For the project.

December 1, 2011

Ms. Susan Craig
California Coastal Commission
725 Front Street
Santa Cruz, CA 95060

Re: Master Plan for Arana Gulch

Please vote yes on the City of Santa Cruz Arana Gulch Master Plan. I am very much for to the project.

The City of Santa Cruz has a well-thought out plan for saving the endangered tar plant. Your staff has reviewed the plan and is in full support of the Arana Gulch Master Plan.

As a resident of Aptos I need a safe bicycle route to get to Santa Cruz.

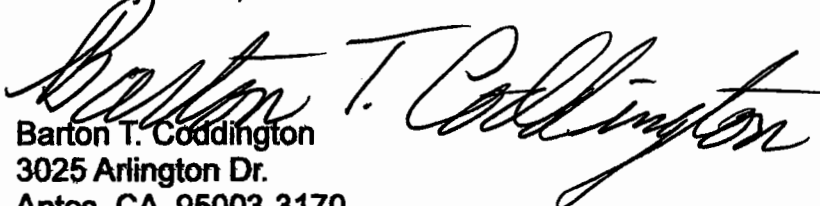
Right now Arana Gulch is a mud hole. With no paths for people to follow, walkers create new paths – even walking over the tar plant. How can we ask people to stay on the trails when there are none.

With the largest medical rehabilitation facility next to Frederick Street, it would be it would be wonderful to have ADA compliant trails for them to use.

Teachers do not take students to Arana Gulch for the lack of safe trails. There are five schools within walking distance of Arana Gulch. Such a waste in its current state of mud trails.

Please do not listen to a few not-in-my-backyard folks who are keeping this jewel from being used by all of us.

Sincerely Yours,


Barton T. Coddington
3025 Arlington Dr.
Aptos, CA 95003-3170
831-475-5234



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December 3, 2011

DEC 05 2011

Mark Stone
California Coastal Commission
725 Front Street
Santa Cruz, CA 95060

California Coastal Commission,
Central Coast Area

The California Native Plant Society remains opposed to the Arana Gulch Master Plan as submitted to the Coastal Commission for consideration at its December meeting. It is still true that the proposed transportation infrastructure through ESHA is not resource dependent and at the same time degrades habitat as well as restoration and management options for the riparian, wetland, and coastal prairie communities.

The condition of the City's Neary Lagoon property makes CNPS deeply concerned about the City's long-term commitment and ability to carry out riparian, wetland, and coastal prairie habitat protection and enhancement at Arana Gulch. Neary Lagoon's habitats are dominated by invasive species, many of which are toxic to wildlife, despite the City's promises for good management.

While CNPS remains opposed to the approval of the Master Plan as stated above, if the Commission approves the plan in spite of the fact that the bike transportation project is non-resource dependent development in ESHA that is prohibited, it should consider additional conditions to avoid repeating the mistakes made at Neary Lagoon, CNPS suggests for Arana Gulch:

- ▲ The Coastal Commission include a *reopener clause* in the permit as suggested by one of the Commissioners in October, 2010. This gives the Commission the ability to re-examine the City's long-term coastal resource restoration and protection. If the *reopener clause* had the possibility of significant penalties (bike path closure?) it would provide incentive for the City to act appropriately.
- ▲ The Adaptive Management Working Group (AMWG) must be more than an advisory group. It must have the authority to implement rather than just recommend management actions. This should be a condition of approval.
- ▲ The structure and governance of the AMWG needs to be better defined to:
 - clarify the governance process (consensus? majority rule?),
 - clarify leadership—who is responsible for convening, facilitating, and recording group activities,
 - clarify membership—what expertise is needed, how many members, terms of members, responsibilities of members, financial compensation for members,
 - insure that science-based decisions are given highest priority,
 - assure that Working Group decision making processes are transparent, well informed, and relevant.

Protecting California's native flora since 1965



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- ▲ The authority of the AMWG over riparian areas needs to be clarified. It appears from current AG Master Plan wording that this group has input only on grassland habitat. The neglect by the City of the ecological integrity of riparian areas at Neary Lagoon makes clarification vital.
- ▲ The City has never developed a grazing plan for Arana Gulch, even though it promised to do so as far back as 1997. As a result the City has no reliable estimates for infrastructure, maintenance, or operation costs, no implementation strategy, no management plan, and no plan for public outreach for this urban grazing effort. Nevertheless the City specifies details (like width of gates) in the Master Plan which are better left to a well thought out grazing plan specific to unique circumstances at Arana Gulch. It should be a condition of approval that grazing infrastructure details be removed from the Master Plan (or specified as simply approximate) and that a grazing plan must be funded, developed and approved under the authority of the AMWG before any trail work is begun.
- ▲ CNPS is very concerned that City underfunding will cripple long-term restoration efforts. To assure funding:
 - The City must commit to no further off-the-top subtractions for non-management activities. The City proposed to sell its Frederick Street property to fund long-term management. From the proceeds (which have dropped by at least 30% due to the economy) the City is subtracting money for matching construction funding, leaving restoration with whatever is left over. The matching funds have grown from \$420k to \$525k even as the property value has fallen. No further subtractions should be a condition of approval.
 - The City must not be allowed to constrain funding based on underestimates in the Master Plan. CNPS has estimates from Certified Range Managers that grazing alone with appropriate monitoring and public outreach will cost \$25k/year. This is more than the City estimated for *all* management activities. CNPS is very concerned that City underfunding will cripple vital restoration and coastal resource management efforts.
 - The City must commit staff resources to work with the AMWG to raise additional funding, since the City's funding is inadequate for the long term. The Phasing Plan for Implementation in the Master Plan contains no mention of such fundraising for restoration and management.

Thank you for your consideration,

Brett Hall

Vince Cheap, Conservation Chair,
Santa Cruz Chapter, CNPS

Brett Hall, CNPS State President

cc: Coastal Commission Staff

Protecting California's native flora since 1965



CENTER for BIOLOGICAL DIVERSITY

*protecting and restoring natural ecosystems and imperiled species through
science, education, policy, and environmental law*

Th22a

App. 3-11-074

Center for Biological Diversity
Opposed to east-west paved path

Because life is good.

Mr. Dan Carl
Ms. Susan Craig
California Coastal Commission
725 Front Street
Santa Cruz, CA 95060
dcarl@coastal.ca.gov
scraig@coastal.ca.gov

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DEC 02 2011

California Coastal Commission,
Central Coast Area

Re: Item Th22a, Application 3-11-074 – Arana Gulch Master Plan

These comments are submitted on behalf of the Center for Biological Diversity (“Center”) on the City of Santa Cruz’s Master Plan for Arana Gulch (the “Project”). The Center urges the California Coastal Commission (“Commission”) to reject the Project as proposed until the non resource-dependent, east-west paved multi-use path through the meadow and Hageman Gulch is removed, or reconfigured to avoid significant disruption of designated endangered species critical habitat.

The Center applauds the City’s efforts to develop the Arana Gulch Habitat Management Plan in accordance with the “Management Program for the Santa Cruz Tarplant (*Holocarpha macradenia*) Population at Arana Gulch.” The Center also appreciates the City’s modifications to the Master Plan that reduce impacts on endangered Santa Cruz tarplant habitat. However, the Project as proposed will still result in significant destruction of endangered tarplant habitat because the east-west paved multi-use path will permanently develop parts of an Environmentally Sensitive Habitat Area (“ESHAs”) by paving over tarplant critical habitat.

Because the east-west paved multi-use path is not resource-dependent, and because it will cause significant disruption of habitat values to tarplant habitat, the Commission should not approve the Project. The Commission should adopt a less destructive alternative; one which accomplishes the City’s goal of creating an interpretive trail system throughout Arana Gulch that is accessible to all users with various mobility methods while still protecting the endangered Santa Cruz tarplant and preserving its critical habitat.

I. The Project Conflicts with the Coastal Act

The Commission should again reject the application because it would cause disruptions of significant habitat values in an ESHA, and the east-west multiuse path is non-resource dependent. The Coastal Act mandates that “environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.” Pub. Res. Code § 30240(a). The Coastal Act

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mandates strict protections for ESHAs and the Project's attempt to mask the habitat disruption and the non-resource dependent east-west multi use path cannot be balanced by independent habitat management. *Bolsa Chica Land Trust v. Superior Court* (1999) 71 Cal. App. 4th 493, 508 ("the power to balance and compromise conflicting interests cannot be found in section 30240").

A. The Project would Result in Significant Disruption of Habitat Values

The Project Environmental Impact Report ("EIR") recognized that the east-west trail components would result in impacts that "would remain significant and unavoidable because it cannot be fully ensured that all tarplant habitat would be protected."¹; See also Exhibit 1. Commission staff has recommended approval of the Project based on the erroneous conclusion that, contrary to the EIR, no significant disruption of habitat would result from the Project.² The California Code of Regulations requires CDP applications to be consistent with CEQA. 14 C.C.R. § 13096. Commission staff's assertion that no significant disruption of habitat would occur is contrary to the direct findings of the EIR and CEQA's triggers for a mandatory finding of significance for impacts to imperiled species. *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2009) 40 Cal.4th 412, 449; 14 C.C.R. 15065(a)(1); Pub. Res. Code § 21083.

B. The Project is Non-Resource-Dependent

The Coastal Act also prohibits non-resource-dependent uses within an ESHA. Pub. Res. Code § 30240(a). In other words "only uses dependent on those (ESHA) resources shall be allowed." *Id.* The Center supports the City's efforts to "maximize opportunities to educate, inform, and inspire" users of the Arana Gulch trail system and "provide an interpretative path system...for users for whom access to this area is currently unavailable."³ However, the current location of the east-west paved multi-use path that was developed primarily to facilitate bike transportation is not a condition precedent to accomplishing these goals. Transportation infrastructure—whether for bikes, cars, or pedestrians—is non-resource dependent.

In the 2011 CDP Application, Commission staff references prior Commission approvals of trails through ESHA.⁴ However, these cases do not support the Commission's ability to ignore a project's significant disruption of habitat values under the Coastal Act. Pub. Res. Code §

¹ City of Santa Cruz 2006, Arana Gulch Master Plan DEIR at 4.2-44. The DEIR made this determination because the Project would result in significant impacts to the environmentally sensitive tarplant habitat due to the following: "routing of trail segments through historic Santa Cruz tarplant habitat" resulting in "a direct loss of habitat for the species"; "[c]onstruction of trails... [that] would result in permanent loss of tarplant habitat within the width of the trail"; disturbance of additional tarplant habitat outside the trail footprint by pedestrians and bicyclists; and indirect effects of construction such as deposition of fill, altered hydrology, or the introduction of weeds. Master Plan DEIR at 4.2-42 to 43; See 14 C.C.R. 15065(a)(1), Pub. Res. Code § 21083.

² California Coastal Commission. 2010. Coastal Development Permit Application 3-09-068. Arana Gulch Management Plan at 44-45. ("CDP Application 2010").

³ CDP Application 2010 at 43, 53.

⁴ California Coastal Commission. 2011. Coastal Development Permit Application 3-11-074. Arana Gulch Management Plan at 32, 35. ("CDP Application 2011").

30240(a). The cases support developing less disruptive unpaved paths or boardwalks, not paved transportation paths through ESHAs.⁵ The applications also do not condone the recognized significant disruption to habitat values through the development of transportation systems through critical habitat for endangered species in an ESHA.⁶ The approvals permit development of paved paths where there is no significant disruption of habitat values.⁷

II. Alternatives to the Project Conform with the Coastal Act

A much narrower unpaved trail around the perimeter of the meadow (such as the Coastal Prairie Loop Trail shown in the Arana Gulch Master Plan Map) would be able to accomplish all of the City's stated goals without destroying critical Santa Cruz tarplant habitat. Interpretive signage could be placed along the perimeter trail that would allow the City to "maximize opportunities to educate, inform, and inspire" users of the Arana Gulch trail system. The trail could still be made accessible for all without being an 8 feet wide paved trail. A boardwalk, crushed rock or decomposed granite trail could be used by the user groups the City identifies as "underserved"⁸ and conform to the Americans with Disabilities Act.⁹ Instead of permitting the destruction and adverse modification of Santa Cruz tarplant habitat, the Commission should stipulate that the City adopt one of the many feasible alternatives, or develop new alternatives.

III. The Project Conflicts with the City of Santa Cruz's General Plan

The east-west paved multiuse path would directly abut historic tarplant area D contrary to the City of Santa Cruz General Plan requirement that the City must "preserve the Santa Cruz Tar Plant by requiring appropriate buffers from any development."¹⁰ The Commission should not

5 CDP 2-07-018 (Sonoma County Regional Parks – multi-use path consisting of crushed rock, located in coastal scrub habitat containing sensitive plant species); CDP 3-01-101 (Del Monte Beach re-subdivision – boardwalk through dune habitat); 3-01-003 (Grover Beach Boardwalk – boardwalk through dune habitat); CDP 3-87-258 (Asilomar State Beach Boardwalk – boardwalk through dune habitat); CDP A-3-SLO-04-035 (PG&E Spent Fuel Storage – unpaved paths through coastal terrace prairie habitat); CDP 3-05-071; CDP A-1-MEN-06-052 (Redwood Coast Public Access Improvements – unpaved paths through rare plant habitat and riparian habitat); 80-P-046-A1 (Humboldt County Public Works Subdivision – compacted gravel trail through riparian habitat); CDP 3-00-092; CDP 3-06-069 (Fort Ord Dunes State Park Improvements – unpaved path through dune habitat); CDPs 3-98-095 and 3-98-095-A1 (Elfin Forest Boardwalk – boardwalk through terrestrial habitat ESHA); CDP 6-06-043 (Otay River Valley Regional Park trails – decomposed granite trails through coastal sage scrub and wetland habitat). CDP Application 2011 at FN 34.

6 City of Santa Cruz 2006, Arana Gulch Master Plan DEIR at 4.2-42 to 44.

7 CDP 3-05-071 (Morro Bay Harborwalk—the dune habitat that was lost or disturbed was not designated critical habitat for an endangered or threatened species, nor was it even suitable habitat); CDP 1-07-005 (Crescent City Harbor Trail North Segment—multiuse paved path but it did not go through ESHA); CDP 3-97-062 (Sand City Bike Path—bike path was adjacent to an existing road and not result in significant disruption of habitat value); CDP 3-00-092 (Monterey Dune Recreation Trail—no significant habitat disruption by turning an existing road into a trail).

8 "Including those in wheelchairs, those less physically able to traverse uneven footpaths, caregivers with strollers, pedestrians with walkers, etc".

9 Americans with Disabilities Act Accessibility Guidelines, § 4.3.3 Accessible Route Width (Guidelines for Buildings and Facilities only requires that "the minimum clear width of an accessible route shall be 36 in")

10 City of Santa Cruz, General Plan at 28, available at

<http://www.cityofsantacruz.com/Modules/ShowDocument.aspx?documentid=8976>.

approve a project that would hinder the City's application of greater environmental protections. See Pub. Res. Code § 30005(a).

IV. Conclusion

There are many feasible and reasonable alternatives that still meet the City's goals and avoid the significant impacts inherent to the east-west paved multi-use path on the endangered Santa Cruz tarplant and its designated critical habitat. The Commission should not approve the Project until the City proposes an alternative that properly protects and enhances endangered species critical habitat within the ESHA, while also satisfying its goals to improve the Arana Gulch trail system for users with various mobility methods, increase educational and informational opportunities, and facilitate east-west bicycle commute options.

Best regards,

A handwritten signature in black ink that reads "Jonathan Evans". The signature is written in a cursive, flowing style.

Jonathan Evans
Center for Biological Diversity

Elise Torres
Center for Biological Diversity

Exhibit 1

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The Endangered Santa Cruz Tarplant in Arana Gulch

The Santa Cruz tarplant is listed as “endangered” by the State of California under the California Endangered Species Act, and “threatened” under the federal Endangered Species Act. It is also listed on List 1B of the CNPS’s inventory of rare, threatened, or endangered plants. As an endangered species, the state of California has determined that the Santa Cruz tarplant “is in serious danger of becoming extinct.” Cal. Fish & Game Code § 2062. The legal designation of endangered is supported by the dire factual circumstances of the few remaining Santa Cruz tarplant populations. As of 2000, 11 of the 24 Santa Cruz County tarplant populations were known to be extinct.¹ In 1997, there were approximately 12,962 Santa Cruz tarplants growing in the Arana Gulch Master Plan area, as of August 9, 2011 there are only 32 total plants in Arana Gulch.² These numbers show how truly close the Santa Cruz tarplant is to extinction and also highlight how important the conservation of its critical habitat is.

The U.S. Fish and Wildlife Service designated 65 acres of Arana Gulch (including the entire Master Plan area) as critical habitat for the Santa Cruz tarplant. The Arana Gulch critical habitat unit is crucial for the Santa Cruz tarplant’s survival as it is one of two populations in close proximity that are lowest in elevation in the northern Monterey bay area and, thus, closest to the moderating climactic influence of the Pacific Ocean.³ Arana Gulch also has the third largest standing native population of tarplants, which contributes significantly to the seed bank reserve for the species and is large enough to support management activities that are necessary to maintain the population at the site.⁴

Active management for tarplant populations is a crucial component of maintaining the population, and the Center supports the City’s extensive plans for implementing such management. However, active management of the tarplant population does not negate significant negative impacts on other portions of the habitat caused by a paved multi-use trail through the middle of the meadow. As Commission staff acknowledges, in addition to the historical areas of tarplant populations (Areas A-D), “the rest of the meadow area provides appropriate physical habitat for coastal prairie and tarplant” and as such “the whole of the meadow [is arguably] considered Santa Cruz tarplant habitat.”⁵

The Effects of Habitat Fragmentation on the Santa Cruz Tarplant

The Santa Cruz tarplant is highly susceptible to the effects of habitat fragmentation. First, the tarplant is estimated to have a maximum unassisted seed

1 California Coastal Commission. 2011. Coastal Development Permit Application 3-11-074. Arana Gulch Management Plan at 35. (“CDP Application 2011”).

2 CDP Application 2011 at Exhibit P, Table 2.

3 USFWS 2008 BiOp (1-8-07-F-46).

4 USFWS 2008 BiOp (1-8-07-F-46).

5 California Coastal Commission. 2010. Coastal Development Permit Application 3-09-068. Arana Gulch Management Plan at 28. (“CDP Application 2010”).

dispersal radius of 1.5 feet.⁶ The paved east-west multi-use trail component will be 8 feet wide with a 2 foot graded shoulder on each side, which makes the paved trail through the meadow a barrier to effective dispersal of tarplant seeds. This is especially relevant for historic tarplant Area D which is located directly adjacent to the proposed 8 feet wide paved trail. Considering that “the whole of the meadow [is arguably] considered tarplant habitat”⁷ constructing a paved trail directly adjacent to one of the largest historic tarplant areas on the site will prevent the dispersal of tarplant seeds to the west of Area D. This fact makes it all the more important that the Commission reject the Project as currently proposed, since there will be significant tarplant habitat destruction due to bisection of the meadow by a paved multi-use path, thus further limiting the area in which tarplants could potentially thrive.

⁶ Hayes, G. 2003. *Holocarpha macradenia* (Santa Cruz tarplant). Plant community composition, seedling density, pollination, seed dispersal and plant vigor/phenology. A report to California Department of Fish and Game.

⁷ CDP Application 2010 at 28.

Susan Craig

From: Joi Carey [joicarey@yahoo.com]
Sent: Friday, December 02, 2011 1:38 PM
To: Susan Craig
Subject: arana Gulch

Dear coastal commisioners, I am writting to you to OPPOSE the building of a bridge through Arana Gulch.

This is Agenda item #th22a, application # 3-11-074. While I ride my bike to work when possible, and the proposed bridge site would save me perhaps half a mile of my commute, I would rather go out of my way than disturb the gulch habitat. When I ride or walk through the gulch meadow, I have frequently seen hawks and owls, and I wouldn't want them impacted by more people in a hurry. I am very excited by the prospect of the rail line project. Also, I still think the bike situation could be well addressed by pursuing an improved ramp via the Frederick Street Park, even though the Harbor currently says they do not want this. Thank you for your consideration, and for your work. Joy LeClair

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California Coastal Commission,
Central Coast Area

12/2/2011

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Susan Craig

From: Kelley-Robbins nest [dad1994@yahoo.com]
Sent: Friday, December 02, 2011 1:53 PM
To: Susan Craig
Subject: Arana Gulch

Nov.30,2011

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan.

Agenda No: TH22a

Application No: 3-11-074

While I support trail improvement, I am opposed to the project of a bridge across the gulch. I feel transportation funds should be used for the rail/trail project which would have much less negative environmental impact on the gulch area rather than through an endangered specie's habitat. I currently enjoy Arana in it's current undeveloped state and although it would be nice to be able to take my wheelchair bound mother around the park, the bike bridge is not worth the cost financially or environmentally

Sincerely,

David Robbins

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California Coastal Commission,
Central Coast Area

12/2/2011

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Susan Craig

From: Ray LeClair [leclair2000@sbcglobal.net]**Sent:** Friday, December 02, 2011 1:54 PM**To:** Susan Craig**Subject:** Arana Gulch project

My name is Ray LeClair and I'm opposed to the project, Agenda # TH22a, application3-11-047. I feel that the project is way too severe for the overall purpose of easement and access to Arana Gulch. Especially THE BRIDGE! OMG! We already have a train bridge with a right-of-way built in. I ride my bike, walk, observe owls, foxes, and a variety of other wild life including plants. I love that it was mowed I think it will help the Tar Plant. In the past the cows used to keep it mowed and fertilized and the Tar Plant thrived! I'd love to see the cows back or some other grazing animal. Thanks for your help.

Ray LeClair, a lover of Arana Gulch and all its naturalness.

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California Coastal Commission,
Central Coast Area

**LAW OFFICE OF MARK SULLIVAN
508 Oak Drive
Capitola, California 95010**

Mark Sullivan
Agenda No: TH22a
Application No: 3-11-074
Opposed to project.

December 2, 2011

Ms. Susan Craig
California Coastal Commission
725 Front Street
Santa Cruz, CA 95060

Re: Master Plan for Arana Gulch with Broadway-Brommer Pedestrian-Bicycle Path

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan (Plan). Specifically, I am opposed to the alignment of the paved pedestrian/bicycle paths that are proposed for Arana Gulch. I have walked the property, Plan in hand, in order to evaluate the project and I have come to the conclusion that these bicycle paths are massive in their scope, will change the nature of the greenbelt, and are not resource-dependent.

The California Coastal Act § 30240(a) requires, "Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas." The bicycle paths are in violation of this section as they are not resource-dependent uses. The bicycle paths will cause significant and unavoidable impact to the sensitive habitat area and they are clearly transportation-related since they are funded by transportation money and they provide east-west and north-south access across Arana Gulch. Further, the City of Santa Cruz has not demonstrated by a preponderance of the evidence that this is a resource-dependent use. The placement of a few interpretive signs does not establish resource-dependence. Transportation is the point of the project, and any assertion otherwise does not pass the straight-face test.

Also, I am concerned because the southeastern portion of the east-west bicycle path is inadequately planned and will cause major disruption to the existing landscape. Hundreds of feet of concrete retaining walls will be required to address the significant height differential between Brommer Street and Arana Gulch. The Arana Creek culvert beneath the retaining wall will require major reconstruction which is not yet resolved.

Feasible, reasonable, and less environmentally destructive alternatives are available, as recognized in the Coastal Commission staff report. Further evaluation and realignment of the bicycle path portion of the Plan is warranted. Thank you for your consideration.

Sincerely,

Original Signed By

Mark Sullivan

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California Coastal Commission,
Central Coast Area

Susan Craig

From: Mary Molseed [mimolseed@yahoo.com]
Sent: Friday, December 02, 2011 3:32 PM
To: Susan Craig
Subject: Opposed to Bicycle Route through Arana Gulch

December 2, 2011
Mary Molseed
Agenda No:TH22a
Application No: 3-11-074
Opposed to Project

A bicycle transportation route through the Arana Gulch would be a hugely destructive impact, disrupting habitat in this Environmentally Sensitive Habitat Area for All life that thrives here. There are other less environmentally destructive bike/pedestrian alternative routes as recognized in the Coastal Commission Staff Report.

Arana Gulch is a small, beautiful greenbelt sanctuary in an otherwise urban area, a refuge that my family, friends, and I visit on a regular and frequent basis. Being able to walk through here, experience the seasons, being nourished by the quiet and gentle paths through the meadows, rolling terrain and Oak and Eucalyptus trees while swallows swoop and dive, hawks soar and kestrels hunt is nothing short of nature's healing.

All species that live here could decline, be impacted and harmed by this project.

Please do all that you can to preserve this peaceful greenbelt by choosing an alternative bicycle/pedestrian thoroughfare,...NOT through this small, peaceful, beloved Arana Gulch.

Thank you,
Mary Molseed

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California Coastal Commission,
Central Coast Area

12/2/2011

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Susan Craig

From: Brandon Mills [crystallinesheen@hotmail.com]
Sent: Friday, December 02, 2011 3:53 PM
To: Susan Craig
Subject: No Broadway-Brommer pathway in Arana Gulch!
12/02/11

Brandon Mills

Agenda No: TH22a
Application No: 3-11-074
Opposed to project.

I am a Santa Cruz resident who lives close by Arana Gulch. I love to go walking up there everyday. It is the one place within walking distance where I can "get away from it all" and just relax. I love to see the wildlife as well. So I am understandably upset at the idea that there is a plan to put a 12 foot pathway through the field. It will totally destroy the serenity of the place, as well as interfere with the endangered tarplant. I feel that there are adequate bike paths and trails already established, let's just keep the Gulch the way it is. Why do we as humans feel the need to pave over everything? Please, I really would like the Gulch to be left alone in its natural state, that is all I ask.

Thank you for your time.

Sincerely,
Brandon Mills

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California Coastal Commission,
Central Coast Area

12/2/2011

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Susan Craig

From: Jean Brocklebank [jeanbean@baymoon.com]
Sent: Friday, December 02, 2011 4:03 PM
To: Susan Craig
Subject: Opposed to Agenda No.Th22/Application No: 3-11-074

Attachments: Blueprint text.doc; ATT303081.txt



Blueprint
text.doc (36 KB)



ATT303081.txt
(69 B)

Dear Commissioners ~

Friends of Arana Gulch (FOAG), long opponents of a City Public Works Dept. route through (not to) the ESHA known as Arana Gulch, oppose the current recycled application by the City of Santa Cruz. Until the City removes the Broadway Brommer project (easy to do) from its AG Master Plan, we will continue to oppose the project. All of the impacts to resources and all of the controversy over this project sit squarely in the path of Broadway Brommer. Once it is excised, the remaining Master Plan would surely receive a unanimous vote of approval by the Commission.

We support the remainder of the wonderful AG Master Plan, which contains important management objectives, including real interpretive trails, existing access improvements, ADA compliant pathways, and management of the critical habitat of the endangered tarplant.

Tarplant has rebounded in Arana Gulch. The City tried new prescriptions this fall (in part based on recommendations from field work of FOAG) and after last winter's rains following three years of drought, we all look forward to a good 2012 season for tarplant and its associated web of life species. NONE of this good news is tied in any way, whatsoever, to Broadway Brommer.

We look forward to sharing even more interesting news and information with you at the hearing on Agenda item Th22 next week. Meanwhile, attached is our Blueprint for a Resolution to the Controversy.

Sincerely,
Jean Brocklebank
Michael Lewis
On behalf of Friends of Arana Gulch

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California Coastal Commission,
Central Coast Area

Blueprint for a Resolution to the Arana Gulch Controversy

Friends of Arana Gulch

December 2011

GOALS

To allow the California Coastal Commission to approve the City's Master Plan for the Arana Gulch Greenbelt that provides for appropriate public use of an environmentally sensitive habitat area (ESHA)

To acknowledge support for an additional transportation project connecting the west side and east side of Santa Cruz County

To acknowledge the concerns of the environmental community as well as other citizens to keep transportation pavement out of the City's tiniest greenbelt

To facilitate the restoration and recovery of an endangered species and its habitat

To assure that the California Coastal Act remains the strong system of protection and conservation that it was intended to be

To acknowledge that everyone can be involved in a community solution to the current controversy

RECOMMENDATIONS

Since the California Coastal Commission advised the City to "prepare a specific management plan for the Arana Gulch greenbelt prior to consideration of a Broadway-Brommer Bicycle Pedestrian Path project," in a January 11, 2000 letter from Charles Lester to Ted Lopez, Transportation Planner, Santa Cruz City Public Works Dept.,

We therefore **recommend** that the City first withdraw its Arana Gulch Master Plan application, and then resubmit the Master Plan without Broadway-Brommer (See Annotated AGMP), for a hearing in January 2012, to receive unanimous approval by the Coastal Commission.

TIMELINE

October - December 2011 -- City uses mowing/raking and limited scraping to remove invasive thatch in preparation for winter rains. City closes (with signage) the badly eroded slope segment at the existing south entrance to the greenbelt and begins to divert users to the existing perimeter paths.

November - December 2011 -- City withdraws its current AGMP application and resubmits it without Broadway-Brommer.

January 2012 -- City wins approval of its AGMP (minus Broadway-Brommer) from Coastal Commission

January - March 2012 -- City, County and S.C Port District form a team to study restoration and recovery of Arana Creek's tidal reach, which also addresses sedimentation into the upper harbor that requires dredging.

Spring - Fall 2013 -- City initiates the Murray Bridge Street Seismic Retrofit project that includes widened bike lanes and a widened pedestrian sidewalk.

Spring - Fall 2013 -- County Public Works Dept. initiates a Brommer Street Extension bike lane and pedestrian safety project design that also solves the current drainage sedimentation pollution into Arana Creek.

2012 - 2013 City Parks and Rec. Dept. initiates repaired and enhanced Frederick Street Park stairway to facilitate bicyclists use of this route, widening both the stairs and the existing 9" bike ramp

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Margaret Waters
Agenda #: TH22a
Application #: 3-11-074
Opposed to project

DEC 02 2011

December 2, 2011

California Coastal Commission,
Central Coast Area

Ms, Susan Craig
California Coastal Commission
725 Front St,
Santa Cruz, CA 95050

re: Master plan for Arana Gulch with Broadway-Brommer Pedestrian Bicycle Path

Dear Commissioners:

I urge you to vote NO on the City of Santa Cruz Master Plan.

Because Arana Gulch is an ESHA for the Santa Cruz Tarplant this project can only be approved if it is a resource dependent use. This is a transportation project. Putting up a couple of signs next to a wide paved path that bisects the tarplant habitat does not make it a resource dependent use. The Coastal Commission is the only hope this plant has of not going extinct. The city has to say the project will preserve it in order to get you to agree. Saying it doesn't make it so.

There are 2 main reasons to oppose this project.

Firstly, there is no real reason to think that this plan will protect the tarplant. It is pretty obvious that paving over and dividing the small amount of sensitive habitat left to this plant is not going to save it. This is especially true since the project does not include any management plan or any budget for one. In this economic environment there is no reason to think money will be budgeted for this. Also, the city's track record of implementing their plans is not good (eg, Neary lagoon). There is no accountability and no motivation for the city to come up with a workable management plan if a project is approved without one. The city has neglected its responsibilities as steward for this plant so far. There is no reason to think it will change now.

Secondly, and more importantly, it is a very bad precedent for you to take. This is a transportation project disguised as an environmental project. The commission recognized this and sent it back to the city with instructions to consult with CNPS and come up with a better plan. The city did just enough that they could say they consulted, but there was no real cooperation or attempt to come to a better plan. CNPS proposed several changes that the city just rejected. There are less destructive feasible alternatives in the Coastal Commission's own Staff report.

The city is bringing it back to the Commission again after being rejected. Do you really want to encourage an applicant to disregard your instructions, call something environmental that is transportation, and keep bringing it back in hopes that there will be different commissioners to hear it? This totally undermines the purpose of the Coastal Commission which is to protect ESHA.

I would also like to point out that there is an alternative to the bike path. The railroad area that is being developed can be a better bike path that serves the same function and it doesn't destroy a species.

I repeat, you are the only hope this species has.

Thank you ,



Peggy Waters, CNPS board member.

Susan Craig

From: Celia Scott [twinks2@cruzio.com]
Sent: Friday, December 02, 2011 4:58 PM
To: Susan Craig; Jeff Staben
Subject: City of Santa Cruz Arana Gulch Master Plan/Application No. 3-11-074, Coastal Commission Agenda, December 8, 2011

To: The California Coastal Commission

Re: City of Santa Cruz Arana Gulch Master Plan
 Application No. 3-11-074
 Commission Agenda, December 8, 2011

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DEC 02 2011

California Coastal Commission,
 Central Coast Area

Members of the Coastal Commission:

I am writing in support of the recent Sierra Club California letter to the Commission, which recommends that the controversial Broadway-Brommer bicycle route through Arana Gulch, with the bridge over Hagemann Gulch and the small steel span over the culverts carrying Arana Creek, be deleted from the Master Plan, and the Arana Gulch Master Plan without the bike route be approved. Including the controversial bicycle transportation route in the Master Plan has delayed the adoption of the Master Plan, to the detriment of the valuable habitat and open space resources of Arana Gulch.

The desire for a transportation route through the Arana Gulch lands to connect Broadway in the City with Brommer St. in the County was a priority for the City of Santa Cruz dating from 1965, when a bond issue included the road project, to be jointly constructed by the City and the County. Contrary to the impression given in the current staff report (and the City's Executive Summary in its permit application), the road project was only abandoned because a Claim of Exemption from the 1972 Coastal Act was denied in 1974 by the Regional and State Coastal Commissions upon recommendation of the Attorney General. The City and County did not pursue a coastal permit subsequent to the denial of the Claim of Exemption. Thus the 1972 Coastal Act essentially terminated the road project, which included a major fill of Arana Creek.

With the acquisition of the entire 63 acre Arana Gulch property in 1994, the City did not abandon the quest for a transportation route from Broadway to Brommer, but transformed it into a proposed bicycle

12/2/2011

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route, undoubtedly superior to the originally proposed roadway. However, as the current General Plan and LCP policies (Land Use 3.4, 3.4.5, and Environmental Quality 3.1.4) made clear, the City, having designated Arana Gulch as natural area, was required to develop, implement and maintain an updated management plan for Arana Gulch, with specific attention to the 1982 study which documented erosion and siltation in upper Arana Gulch. For some reason, EQ Policy 3.1.4, which committed the City to work with the County and the Port District to reduce erosion and sedimentation in Arana Gulch is omitted from your staff report on this project. This is an unfortunate omission, since the steel span which is proposed to be constructed over fill which covers the existing culverts to achieve the grade necessary to reach Brommer St. from the harbor property may complicate future efforts to mitigate the ongoing erosion and sedimentation arising in upper Arana Gulch, to the detriment of an important coastal resource.

If the Commission does not decide to remove the east-west bicycle route across Arana Gulch, and its accompanying bridge over Hagemann Gulch and steel span on fill over Arana Creek, from the Arana Gulch Master Plan, then I would urge the Commission to add to its Special Conditions, an additional condition.

This condition would delay the bicycle route for a sufficient period of time to demonstrate that the adaptive management program of the Master Plan, the grazing program and other techniques to improve the habitat and numbers of the endangered Santa Cruz Tarplant, as well as the proposed interpretive signs and programs, are in fact carried out and are successful in reversing the current ongoing degradation of the natural resources of Arana Gulch. In other words, the bicycle route should not be approved and constructed until the City has demonstrated that it is able to fund and carry out resource management on Arana Gulch.

As Mayor of Santa Cruz in 1998 I worked to find an better off-site alternative for the cross-town bicycle route, and was disappointed that the various community groups and government agencies involved were not able to come to an agreement. I still think such an off-site alternative is possible, and remain concerned that the proposed bicycle route through Arana Gulch will result in habitat deterioration, contrary to the provision of the Coastal Act, Section 30240.

However, I think the time has come for the City to demonstrate that it is really committed to habitat improvement, and to accept a pause

in the bicycle project so that a convincing effort to protect the natural resources of the Arana Gulch can be made. The open space lands of the Santa Cruz greenbelt are one of our most precious resources, and deserve a maximum effort to maintain and restore their natural gifts to our community. I urge the Commission to ensure their protection to the highest level possible.

Thank you for consideration of my views.

Yours truly,

Celia Scott
1520 Escalona Dr.
Santa Cruz, CA 95060

Thada

157 Trescony St.

Rick Longinotti
Santa Cruz, CA 95060

longinotti@baymoon.com

RECEIVED December 1, 2011

Mary K. Shallenberger, Chair
California Coastal Commission
PO Box 354
Clements, CA 95227

DEC 02 2011

California Coastal Commission,
Central Coast Area

cc. Dan Carl, District Manager
California Coastal Commission
cc. Mark Stone, Commissioner

Dear Chair and Commissioners,

I urge you to approve the staff recommendation for the Arana Gulch Master Plan.

I understand the point of view of opponents of the paved pathway. It is often a difficult choice to increase public access to a natural space when that access makes the space less wild.

In this case it appears to me that the benefits of increasing access to Arana Gulch outweigh the downsides. People who have not been able to access the area will be able to do so. I trust that this will enhance visitors' appreciation for our natural environment.

As a co-founder of Transition Santa Cruz, I am supportive of ways in which our community can grow our care for the natural environment. More public exposure to Arana Gulch is one way.

Thanks,

Rick Longinotti

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DEC 02 2011

California Coastal Commission,
Central Coast Area

TH 22a
Linda Brodman
1231 Andrew Lane
Santa Cruz, CA 95062

Agenda No: TH22a
Application No: 3-11-074
Opposed to project

December 2, 2011

Ms. Susan Craig
California Coastal Commission
725 Front Street
Santa Cruz, CA 95060

Re: Master Plan for Arana Gulch with Broadway-Broomer Pedestrian-Bicycle Path

I am opposed to the project for the following reasons:

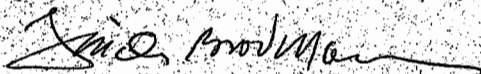
It is my understanding that the City of Santa Cruz has refused all important suggestions by the California Native Plant Society to create an environmentally superior Master Plan for Arana Gulch, and they have failed to develop a restoration budget or success criteria for its coastal resources within that plan.

In order to have success in protecting the entire Arana Gulch habitat, which is designated as an environmentally sensitive habitat area (ESHA) for the Santa Cruz sunflower (*Holocarpha macradenia*), the city of Santa Cruz should develop their master plan with a focus on protection of such habitat and its listed species. It should be their highest priority rather than human exploitation of the land for recreation or transportation.

I have worked as a volunteer for almost 20 years in the area of habitat restoration with State Parks and County Parks. I have seen many success stories with other endeavors towards restoring habitat through effective, well-written management plans. It is possible to have a positive outcome. Many years of well thoughtout suggestions have been communicated to the City and its staff.

Please vote NO on the City of Santa Cruz Arana Gulch (proposed) Master Plan.

Sincerely,


Linda Brodman



December 2, 2011

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DEC 02 2011

Mary K. Shallenberger, Chair
California Coastal Commission
P.O. Box 354
Clements, CA 95227

California Coastal Commission,
Central Coast Area

Dear Chair Shallenberger,

Ecology Action of Santa Cruz, one of the leading environmental organizations in Santa Cruz since 1970, has previously indicated its support for the Arana Gulch Master Plan, and we continue to support it. The City's proposed Plan advances environmental protection of this important coastal resource in a number of ways:

- It enhances protection of the habitat in general and restores tarplant habitat in particular.
- It provides important opportunities for educating the public about environmental issues and why they matter.
- It will reduce greenhouse gas emissions by virtue of the fact that all the access it provides will be non-motorized access.

We are also pleased that the City has continued to improve the Plan. The City has significantly expanded the interpretive/educational aspects of the Plan, incorporating the Museum of Natural History into its programs and including curriculum for school field study. We at Ecology Action put great weight on environmental education in our own programs because we believe it is of great long-term importance. The City has also further expanded the area to be grazed and otherwise included in tarplant restoration efforts. It has committed to permeable paving on the Multi-Use Trails. And it has continued to implement its commitments for long-term funding for tarplant restoration, recently establishing a trust fund account for that purpose. All these recent developments speak to the fact that this is in the broadest sense a Plan for environmental protection.

Ecology Action therefore fully supports the Arana Gulch Master Plan, including its Multi-Use Trails, and urges the Commission to approve it.

Sincerely,

Virginia Johnson
Executive Director

cc: Dan Carl
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060



SANTA CRUZ COUNTY REGIONAL TRANSPORTATION COMMISSION

1523 Pacific Ave., Santa Cruz, CA 95060-3911 • (831) 460-3200 FAX (831) 460-3215 EMAIL info@sccrtc.org

Thada

November 28, 2011

RECEIVED

Mary Shallenberger, Chair
California Coastal Commission
P. O. Box 354
Clements, CA 95227-0354

DEC 02 2011

California Coastal Commission,
Central Coast Area

Dear Ms. Shallenberger:

With regard to the Arana Gulch Master Plan (application # 3-11-074), you recently received a letter from Vicki Lee, Chair of the Sierra Club California, which states that the funds that would be provided to this project through the Santa Cruz County Regional Transportation Commission (RTC) "could be applied to alternative routes outside ESHA." This statement is based on an email from me to Jean Brocklebank, dated April 2, 2010. However, the statement disregards a number of relevant considerations:


1. Since the RTC first approved funding for the bicycle and pedestrian path through Arana Gulch in the mid 1990's, many project alternatives have been investigated and the project currently before you has been deemed the most feasible;
2. Currently, there are no alternative route projects to which this project's funding could be redirected nor does it seem likely that after so many years of study, an alternative that has not already been investigated and deemed infeasible could suddenly materialize;
3. The proposed project serves many public purposes including tar plant protection and restoration, accessible trails in a natural setting for mobility impaired individuals, and access to schools and the public for environmental education; and
4. The Transportation Enhancement (TE) program funding approved for this project is currently available. TE funding is used for bicycle and pedestrian projects, scenic and historic transportation, landscaping, beautification, historic preservation and environmental mitigation. Some members of Congress have been proposing the elimination of the TE program; therefore, any delay to the approval of this project may mean that its funding will be lost.

Almost any pedestrian or bike path will serve multiple purposes including some mix of recreation, commuting, interpretive/educational, access for the mobility-impaired, greenhouse gas reduction, air pollution reduction, etc. I am well aware that under the Coastal Act a trail cannot be built in an ESHA in most cases unless it serves an interpretive purpose. But to go beyond that and decree that a trail cannot be allowed to also serve any other viable purpose would take us to a conclusion that virtually no trails could ever be built.

Given the very real imperatives we all face to reduce greenhouse gas emissions, reduce vehicle miles traveled, and reduce consumption of fossil fuels, that would not appear to be a direction that sound public policy would take us, and is not a policy that the Regional Transportation Commission is ever likely to support. It was not my intent to suggest that the Coastal Commission should apply such a narrow policy to this or any other project with potential multiple benefits.

I hope that these comments will clarify any misunderstanding of my email response to Ms. Brockelbank. The Santa Cruz County Regional Transportation Commission will continue to support and fund projects that can benefit the public and the environment in as many ways possible.

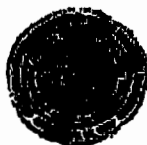
Sincerely,

A handwritten signature in black ink, appearing to read "George A. Dondero", with a long horizontal flourish extending to the right.

George A. Dondero
Executive Director

Cc: Coastal Commissioners

Th22a



Monterey/Santa Cruz Counties Building & Construction Trades Council

3239 Imjin Road, Suite 103, Marina, CA 93933-5109

Phone 831.883.1188 • Fax 831.883.8112

Email: Office@MSCBCTC.com

www.MSCBCTC.com

FPPC No. 850048

Ned Van Valkenburgh
President

Vice President

Paul Arsenault
Treasurer

Recording Secretary
Mario Maciel

Ron Chesshire
CEO

SENT BY FACSIMILE TRANSMISSION TO (415) 904-5400 AND (831) 427-4877

December 2, 2011

Mary K. Shallenberger, Chairperson
45 Fremont Street, Suite 2000
San Francisco, California 94105

Re: Th22a - Coastal Development Permit Application, 3-11-074
Arana Gulch Master Plan

RECEIVED

DEC 02 2011

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

To Mary K. Shallenberger, Chairperson, and Commissioners:

The Monterey/Santa Cruz Counties Building and Construction Trades Council, representing 22 Trade Unions comprised of approximately 3,800 members in the Monterey Bay Area, has discussed the stated project.

At a meeting of the Council a unanimous vote took place to support the application and the Coastal Commission's staff recommendation.

This plan has been in process for many years and we believe has been fully vetted. The project has broad community support and if approved will provide many benefits to the community while preserving its natural beauty and protecting and restoring the natural habitat. This project has been before the Commission previously and there were many concerns about the native tarplant. We believe the staff has adequately addressed issues pertaining to the tarplant which meet the terms of the Coastal Act.

Because of the nature of ESHA's and the location of the project we believe it to be more prudent to "manage" the flow through the project area in order to protect, preserve, and restore what is there. The only way you could truly protect the area would be to fence it off and we find this unacceptable. Not only would the community lose a much used route through the area but it would miss the opportunity for educational programs on the environment and the first handicapped accessible trail in the City.

Again, we support the project and staff recommendation and urge you to approve the application.

Sincerely,

Ron Chesshire

Ron Chesshire, CEO

RRC:hp

Thada

Susan Craig**From:** Andria Gordon [agordonsc@yahoo.com]**Sent:** Friday, December 02, 2011 8:43 AM**To:** Susan Craig**Subject:** broadway brommer

Coastal Commissioners,

I would like to go on record as a voter who is against the development and bisecting of one of our last remaining greenbelts.

I am a bike commuter, the constituency supporting this measure. However, I believe that only a small but vocal minority of bike commuters want to compromise the integrity of this precious, urban oasis.

Furthermore, this 12" road would help only a small group of bike commuters, and the damage to the environment and the homes and livelihoods of the animals who live there. Imagine a paved road running through your living room, filled with fast moving vehicles!

Instead, please support the rail trail, which will provide a safe route for bikes throughout the county. If all funds were put into this project, and soon, many more citizens could reap the benefits of bike commuting safely, without compromising one of our last remaining greenbelts.

I do support an unpaved, path through Arana Gulch with wheelchair access, that could be built with minimal disturbance.

Thank you very much for your consideration,

Andria Gordon
Santa Cruz

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

12/2/2011

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Thadda

Susan Craig**RECEIVED****From:** Mary Offermann [moffermann@hotmail.com]**Sent:** Friday, December 02, 2011 10:07 AM**To:** Susan Craig**Subject:** Arana Gulch

DEC 02 2011

California Coastal Commission,
Central Coast Area

To the Coastal Commission:

Arana Gulch is a wonderful, quiet nature preserve which is easily accessible to many people here in Santa Cruz. I walk there more than once a week, appreciating the early morning light across the fields, the ancient oaks, other walkers, and the sense that I am in touch with what has been here always.

Pavement and cyclists do not belong in this nature preserve.

Please continue to protect this quiet haven for those of us who enjoy it now and for future generations.

Thank you very much.

Mary Offermann
831 Hanover Street
Santa Cruz, 95062

12/2/2011

73

Susan Craig

Thada

From: Isabel Gilman [gilmanizy@hotmail.com]
Sent: Thursday, December 01, 2011 7:37 PM
To: Susan Craig
Subject: Arana Gulch Master Plan

Dear Commissioners, this is to let you know that myself and my family are strenuously opposed to this Arana Gulch Project. The Broadway-Brommer Pedestrian Bicycle Path creates significant adverse impacts on the Santa Cruz tarplant and compromises the City's ability to restore and protect tarplant habitat.

The entire Arana Gulch greenbelt is an Environmentally Sensitive Habitat Area (ESHA) and critical habitat of the Santa Cruz tarplant. A bicycle transportation route through the greenbelt will significantly disrupt habitat values, is not dependent on the resources of Arana Gulch, and cannot become an interpretive trail with signage.

The poorly conceived retaining wall and raised earthen ramp structure for the "Creek View Trail" at the north end of the Santa Cruz Harbor represents an environmental and economic disaster waiting to happen. The culvert carrying Arana Creek beneath this wall already is too small and obstructed by sedimentation for high stream flows and must be replaced.

Feasible, reasonable, and less environmentally destructive bicycle/pedestrian alternatives are available, as recognized in the Coastal Commission staff report. I have walked in this area for years. It is a beautiful, scarce piece of coastal prairie. The herons still roost in the trees. The wild flowers still bloom in the spring. Please do not allow a road to go through there. This is a road that is planned, not a bike path. It will be on the level of the roads that crossed this country before the freeway system came to be. It is a poorly disguised transportation measure that seeks to expend allocated funding, regardless of the physical impact. We don't need it. The bikes have plenty of alternatives and do not need to speed through there pretending to be environmentally conscious. Thank you, Isabel Gilman 825 Pelton Ave. Santa Cruz, Ca. 95060

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DEC 02 2011

California Coastal Commission
Central Coast Area

Thada

Mary K. Shallenberger
Chair

P.O. Box 354
Clements, CA
95227-0354
(415) 904-5200

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DEC 02 2011

California Coastal Commission,
Central Coast Area

Attn: Commissioner,

I am writing this letter to inform you that I have sent a letter of opposition to the Broadway/ Brommer Path, as well as a DVD containing views of this beautiful area to all the new commissioners that did not get the chance to come to visit this place in person. I realized that you had the chance to visit Santa Cruz, CA and see Arana Gulch for yourself. I hope you can revisit "Arana Gulch" through my DVD.

Thank you for all your time and consideration.

Sincerely,

Colleen Garde

Colleen Garde
128 Forest Ave
Santa Cruz, CA 95062

Letter and DVD provided for
each Commissioner.

Enc:

RECEIVED

Th22a

December 2, 2011

DEC 02 2011

Agenda # Th22a

California Coastal Commission,
Central Coast Area

Application # 3-11-074

Opposed to Project

Dear Commissioner,

I am sending you a DVD of the open space, a small piece of Arana Gulch! This is not a professional movie just a place that is close to my heart. I wanted you to see why we love this Gulch as it is. We have spent 15 years here watching the hawks, owls, listening to the coyotes, and watching the spiders make incredible webs as the dew sweeps across the morning. Many of us come to visit this serene landscape daily. I hope you can see some of what we love.

I have a place in this DVD about changing Fredrick Street Park's stairs to become the alternative bike path instead of through Arana Gulch. Since then so many wonderful events have changed. The Rail/Trail is close to becoming a reality. The Monterey Bay Sanctuary Scenic Trail would be our best option. This would benefit our whole community and beyond. It is a 1/4 mile from the Gulch and its proposed road. This would not destroy the beautiful open space of Arana Gulch. Please consider this alternative over the proposed destruction of Arana Gulch.

Thank you so much for taking time out of your busy day to listen to my story.

Sincerely,

Colleen Garde
128 Forest Ave
Santa Cruz CA
95062

Letter and DVD provided for
each Commissioner/

*Thada***Susan Craig****From:** Pam Nelson [pamela05n@yahoo.com]**Sent:** Thursday, December 01, 2011 8:42 PM**To:** Susan Craig**Subject:** arana gulch

Dec. 1, 2011

Pam Nelson

Agenda No: TH22a

Application No: 3-11-074

Opposed to project.

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan.

Coastal habitat has been disrupted up and down the State. Biodiversity is a fraction of what it was and with climate change the future of many species is questionable. We need to save the few refuges that exist, such as the Arana Gulch.

Since the entire Arana Gulch greenbelt is an Environmentally Sensitive Habitat Area (ESHA) and critical habitat of the Santa Cruz tarplant, a bicycle transportation route through the greenbelt will significantly disrupt habitat values. This plant is only an example of organisms dependent on this area.

The design of the "Creek View Trail" at the north end of the Santa Cruz Harbor represents an environmental and economic disaster waiting to happen. The culvert carrying Arana Creek beneath this wall already is too small and obstructed by sedimentation for high stream flows and must be replaced.

Less environmentally destructive bicycle/pedestrian alternatives are available, as recognized in the Coastal Commission staff.

Thank you,
Pam Nelson

12/2/2011

77

Susan Craig

RECEIVED

From: Jean Brocklebank [jeanbean@baymoon.com]
Sent: Thursday, December 01, 2011 7:30 PM
To: Susan Craig
Subject: opposed to project/Th22/Application No: 3-11-074

DEC 02 2011

California Coastal Commission,
Central Coast Area

Dear Commissioners ~

The message that follows comes from this week's newsletter of Santa Cruz County's First District Supervisor John Leopold. He is also a member of the Santa Cruz County Regional Transportation Commission, as are all County Supervisors. Supervisor Leopold's message is incredibly timely. It shows that there is indeed an alternative place to build designated bicycle routes for Santa Cruzans -- an alternative to Arana Gulch that enjoys unanimous support from bicyclists as well as opponents of the paved bicycle route project before you as agenda item Th22. The Rail Trail (the same corridor as the Monterey Bay Sanctuary Scenic Trail) is not a dream. Hearings will be held just one week after the SF hearing on Arana Gulch. The MBSST designated bicycle/pedestrian pathway will not pave "critical habitat" of the Santa Cruz tarplant. Here is a way for our community to be united, no longer divided!

Rail Trail Planning Coming Soon
November 30, 2011

"As I worked to help secure funding for the purchase of the rail line through Santa Cruz County, I heard from many people about the importance of maintaining this right of way for future transportation. There were many good ideas about how to best use this corridor. **One of the most desired aspects** of the whole deal was the proposal to build a trail parallel to the tracks that could be used by both pedestrians and bicyclists alike.

"We are now days away from receiving final approval from the federal Surface Transportation Board. Fortunately the Regional Transportation Commission (RTC) staff has decided not to wait to start thinking about the trail and they have included it as part of the planning for the Monterey Bay Scenic Trail Network. The Trail Network will span the coast of the Monterey Bay National Marine Sanctuary from the San Mateo/Santa Cruz County line to Pacific Grove, in Monterey County. The RTC is leading the planning effort for project development in Santa Cruz County and the Transportation Agency for Monterey County (TAMC) is responsible for Monterey County projects. **By working together, the agencies will ensure that the planned bicycle/pedestrian network will cover the entire Monterey Bay region, as well as tie in the larger California Coastal Trail and Pacific Coast Bicycle Trails.** To find out more about the Trail Network click here.

"There is a series of upcoming meetings to show preliminarily identified segments of the trail and to solicit input about where the trail should go and what amenities will be needed to serve the different populations who are expected to use this trail system. The Mid-County meeting will be held from 6:00 - 8:00 pm on December 14th at Simpkins Swim Center (979 17th Avenue, Santa Cruz, CA). If you can't make that meeting, consider attending a similar meeting on December 13th in Davenport or the 15th in Watsonville. Click here to see the full schedule. This is an exciting development in the use of a great public resource made available by the activism and participation of so many people in our community. Look for news about the final approval of the rail line and an upcoming celebration sometime soon."

Thank you for your careful consideration of this message of this newsletter.
Best regards,
Jean Brocklebank
Friends of Arana Gulch

12/2/2011

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TH22a

Susan Craig

RECEIVED

From: Bruce [bnlarsen@cruzio.com]
Sent: Thursday, December 01, 2011 7:22 PM
To: Susan Craig
Subject: Arana Gulch

DEC 02 2011

California Coastal Commission,
Central Coast Area

Greetings,

It's 12/1/11 and time to make a decision.

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. There are many reasons to do so, but the foremost is the proposed Broadway-Brommer bike bridge.

This transportation concept is ill conceived and unpractical. The basic idea of crossing Hageman Creek, bisecting the greenbelt, and then dropping to the Yacht Harbor, and then climbing the steepest uphill to Brommer Street is wrong and undoable by most bicyclists. The "best"

bicycle solution would be a super bridge across Arana Gulch, but that would cost way too much for it's actual usage and be a real eyesore.

So, the compromise solution seems to be cross Hageman Creek, drop to the Harbor, and climb back up to Brommer.

Hey, guess what, one can do that right now by biking through Frederick Street park, dropping to the Harbor, and climbing up to Brommer! Hey, who needs to screw up the tarplant environment and build expensive bridges through riparian corridors? And we have bike lanes already from Santa Cruz to Capitola along Soquel Ave./Capitola Ave. And there will be bike lanes on Murray Street/East Cliff soon. And the proposed bike trail along our Railway is a good possibility. Let's keep our open space, open.

Just a thought,
Bruce Larsen

Agenda # TH22a
Application # 3-11-074
Opposed to project

Th22a

Susan Craig

From: Dennis P. Davie [dendavie@cruzio.com]
Sent: Thursday, December 01, 2011 6:48 PM
To: Susan Craig
Subject: City of Santa Cruz Arana Gulch Master Plan



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DEC 02 2011

California Coastal Commission,
Central Coast Area

CA Coastal Commission,
1 December, 2011
Dennis P. Davie
Agenda No: TH22a
Application No: 3-11-074
Opposed to project.

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. I am opposed to the project for the following reasons:

The Broadway-Brommer Pedestrian Bicycle Path creates significant adverse impacts on the Santa Cruz tarplant and compromises the City's ability to restore and protect tarplant habitat.

The entire Arana Gulch greenbelt is an Environmentally Sensitive Habitat Area (ESHA) and critical habitat of the Santa Cruz tarplant. A bicycle transportation route through the greenbelt will significantly disrupt habitat values, is not dependent on the resources of Arana Gulch, and cannot become an interpretive trail with signage.

The poorly conceived retaining wall and raised earthen ramp structure for the "Creek View Trail" at the north end of the Santa Cruz Harbor represents an environmental and economic disaster waiting to happen. The culvert carrying Arana Creek beneath this wall already is too small and obstructed by sedimentation for high stream flows and must be replaced.

Feasible, reasonable, and less environmentally destructive bicycle/pedestrian alternatives are available, as recognized in the Coastal Commission staff report.

Thank You,

Dennis P. Davie

12/2/2011

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*TH22a***Susan Craig**

From: pleasure_point_1@yahoo.com
Sent: Thursday, December 01, 2011 4:30 PM
To: Susan Craig
Cc: mark.stone@co.santa-cruz.ca.us
Subject: Oppose Arana Gulch Road Letter for CCC
Attachments: Arana Gulch CCC.doc

RECEIVED

DEC 02 2011

California Coastal Commission,
 Central Coast Area

Thur Dec 8, 2011
 Charles Paulden
 Agenda No: TH22a
 Application No: 3-11-074
 Opposed to project.

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan.

This is not a resource dependent project. It is a transportation project that is holding ESHA hostage.

Much like La Bahi Hotel and Trestles Toll Road, this is the wrong project for this space, a road dressed up as an interpretive trail for ADA access. It is rather a campaign by a divisive contingent of the bicycle community to force a road through this beloved space using transportation funds.

There are alternatives that are less expensive and do not despoil the greenbelt, that lets us have an authentic experience of the Coastal Prairie.

We are in an increasingly urbanized environment. Getting into open natural space does a great deal to combat nature deficit disorder.

If this were a road for electric cars, it would not be acceptable, even if they added billboards with pictures of what we will lose if this project is not rejected.

Much like the freeway through Trestles, this is a transportation project looking for a route, not a road to a destination. The bisecting of ESHA with a Road, illustrates this clearly, no matter what Green House Gas reduction is touted. The GHG argument could be made for electric cars, using this road and illustrates the point that it is not a resource dependent Project.

While the City has a Park, that could access the Harbor at Fredrick St, it does not have ADA access.

This Park is a few blocks away from the Harbor access that their proposed road would provide.

By not providing ADA access at Fredrick St Park, their plan would necessitate the transit of many miles to get to the harbor on this expensive and ill-suited road.

The coming Monterey Bay Scenic Trail along the Rail line, a few blocks away, will provide me with a better cross-town bike route, without desecrating a precious Coastal

Resource.

There are feasible, reasonable, and less environmentally destructive bicycle/pedestrian alternatives that are available, as recognized in the Coastal Commission staff report.

Please preserve the Visual as well as Biotic Resource in this quite escape from the noisy busy City surrounding this beloved and precious natural retreat.

I support the Santa Cruz Sierra Club in their continuing promotion of the preservation of Arana Gulch in its natural and quite beauty while preserving ESHA, as a gift to the State and the future generations.

Please save, rather than pave paradise.

Thank you

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<!--[endif]-->

*Thdda***Susan Craig****From:** Jane Allen [jane_e_allen@sbcglobal.net]**Sent:** Thursday, December 01, 2011 3:28 PM**To:** Susan Craig**Subject:** No Broadway-Brommer in Arana Gulch

Date: Dec 1, 2011

Your name: Jane Allen

Agenda No: TH22a

Application No: 3-11-074

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

Opposed to project.

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. I am opposed to the project for the following reasons:

- The Broadway-Brommer Pedestrian Bicycle Path creates significant adverse impacts on the Santa Cruz tarplant and compromises the City's ability to restore and protect tarplant habitat.
- The entire Arana Gulch greenbelt is an Environmentally Sensitive Habitat Area (ESHA) and critical habitat of the Santa Cruz tarplant. A bicycle transportation route through the greenbelt will significantly disrupt habitat values, is not dependent on the resources of Arana Gulch, and cannot become an interpretive trail with signage.
- The poorly conceived retaining wall and raised earthen ramp structure for the "Creek View Trail" at the north end of the Santa Cruz Harbor represents an environmental and economic disaster waiting to happen. The culvert carrying Arana Creek beneath this wall already is too small and obstructed by sedimentation for high stream flows and must be replaced.
- Feasible, reasonable, and less environmentally destructive bicycle/pedestrian alternatives are available, as recognized in the Coastal Commission staff report.

Arana Gulch is a small oasis of peace and natural beauty that hosts an amazing variety of wildlife in the middle of urban density. Please consider alternatives and leave Arana Gulch as untouched as possible for future generations to enjoy.

Sincerely,
Jane Allen

12/2/2011

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TH22a

Susan Craig

From: Virginia Mayer [vamayer@sbcglobal.net]
Sent: Thursday, December 01, 2011 3:06 PM
To: Susan Craig
Subject: Arana Gulch: Agenda #TH22a Application #3-11-074

RECEIVED

December 1, 2011

DEC 02 2011

Virginia Mayer
335 Pennsylvania Ave.
Santa Cruz, CA 95062

California Coastal Commission,
Central Coast Area

Agenda No. TH22a

Application No. 3-11-074

Hello, I am writing to you about Application # 3-11-074, Agenda #TH22a, the Arana Gulch masterplan which is before you for a vote. I am opposed to the proposed project which would dissect a valuable open space in my part of the city of Santa Cruz and would build a paved roadway right through the endangered tar plant area of Arana Gulch. An alternative to this bike pathway could easily be found that would not threaten this endangered native plant. Even the proposed bridge to be built over Hagemann Creek is very near this sensitive area and the creek itself is a wildlife corridor. The project, which many local people have literally been fighting for decades, is really a transportation project and should be rejected. Even as a transportation project it is ridiculous to dissect the greenbelt when alternative routes are so obvious and make so much sense. Please don't deprive future generations of the wonders of this rare spot on the east side of Santa Cruz. Thank you, Virginia Mayer

Thaada

Susan Craig

From: Lee Taiz [leetaiz@cruzio.com]
Sent: Thursday, December 01, 2011 12:29 PM
To: Susan Craig
Subject: Arana Gulch

Dear Coastal Commission,

Arana Gulch is a small treasure supporting important species in an important ecological area. It is not appropriate for a transportation project. The Broadway-Brommer element should be removed from the master plan.

Lee Taiz
328 Oxford Way
Santa Cruz, Ca 95060

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

Thaada

Susan Craig

From: John Moir [John@jmoir.com]
Sent: Thursday, December 01, 2011 11:53 AM
To: Susan Craig
Subject: Vote no on Arana Gulch Master Plan

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. This is an ill-conceived plan that will have significant adverse impacts on this lovely greenbelt.

Thank you,

John and Ellen Moir
Santa Cruz, CA

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

12/2/2011

86

Thada

Susan Craig

From: Amy Isacson [agoldenmoon@sbcglobal.net]
Sent: Thursday, December 01, 2011 11:14 AM
To: Susan Craig
Subject: please vote no!
Attachments: coyote_2727595_1631172971_n.jpg; IMG_7235.JPG

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan.

My family lives adjacent to the Arana Gulch and as avid bikers, we oppose the project for a number of reasons:

This is an undisrupted habitat that will forever be gone, should the path be created. The diverse wildlife habitat residing in the gulch as well as in the creekbed have never been exposed to the public. The result of this frightens us all. It is something you can never take back.

12/2/2011

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Ed Porter's powerpoint presentation of an alternate bike bath zig zagging up through Fredrick Street Park solves it all. Please consider this and close this issue once and for all.

Arana Gulch is special to us with families growing up in Santa Cruz. Arana Gulch is untouched. Please help us keep it that way.

Please reconsider the easy solution right before you.

Attached please find 2 images I have seen or heard from inside my house ...

Thanks for your time,

Amy Isacson





Susan Craig

Th 22a

From: Fred [fredjgeiger@yahoo.com]
Sent: Thursday, December 01, 2011 10:36 AM
To: Susan Craig
Subject: Arana Gulch Master Plan, permit 3-11-074

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

Arana Gulch Master Plan
Permit 3-11-074
Item number Th22a

We Oppose the project.

Dear Coastal Commissioners,
We are opposed to this transportation project through an ESHA. This is NOT a conservation project in it's entirety. We do, however agree with the Tar Plant conservation wording in the Master Plan before you.

The path can be re-routed around the perimeter of this environmentally sensitive area and modified down to a narrower, unpaved path that still satisfies ADA access standards. This option has been voiced many times before and consistently ignored by the City of Santa Cruz.

We are bicyclists and members of Santa Cruz People Power who are actually environmentalists and our focus is conservation of this area, not modifying it for our convenience.

Thank you for your consideration. Please oppose this project until it is modified as a true conservation project.

Susan Martinez
Fred Geiger
1517 Delaware Ave, Santa Cruz, Ca 95060

TH22a

Susan Craig

From: Sue Reynoldson [utopia@cruzio.com]
Sent: Thursday, December 01, 2011 10:16 AM
To: Susan Craig
Subject: Please vote NO on the City of Santa Cruz Arana Gulch Master Plan

December 1, 2011
Sue Reynoldson

Agenda No: TH22a

Application No: 3-11-074

Opposed to project.

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. I am opposed to the project for the following reasons:

The Broadway-Brommer Pedestrian Bicycle Path creates significant adverse impacts on the Santa Cruz tarplant and compromises the City's ability to restore and protect tarplant habitat.

The entire Arana Gulch greenbelt is an Environmentally Sensitive Habitat Area (ESHA) and critical habitat of the Santa Cruz tarplant. A bicycle transportation route through the greenbelt will significantly disrupt habitat values.

Feasible, reasonable, and less environmentally destructive bicycle/pedestrian alternatives are available, as recognized in the Coastal Commission staff report.

I am disabled from walking very far into the Gulch, and I realize not much of it is accessible to wheelchairs, but there are many beautiful natural landscapes and seascapes nearby that are accessible to persons with ambulatory disabilities. My enjoyment of the part of the Gulch I can access would be diminished by passage of the Santa Cruz Arana Gulch Master Plan. It would be enhanced by knowing it will remain in its natural state in perpetuity with the tarplant protected.

Thank you.

Sue Reynoldson
Live Oak

12/2/2011

92

Th 229

Susan Craig

From: fred geiger [fredjgeiger@yahoo.com]

Sent: Thursday, December 01, 2011 8:55 AM

To: Susan Craig

Subject: Santa Cruz proposed Broadway/ Brommer bicycle road.

I am apaled that there is a proposal to put this project THROUGH an endangered species habitat area. There is no good reason not to route the project AROUND the area instead!!! The coastal Commission Must rule against this project as required by law. Fred J. Geiger

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

12/2/2011

93

Susan Craig

TH22a

From: damon meyer [vidgi01@yahoo.com]
Sent: Thursday, December 01, 2011 8:42 AM
To: Susan Craig
Subject: Vote no on Arana Gulch

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

December 1, 2011
Damon Meyer
Agenda No: TH22a
Application No: 3-11-074
Opposed to project.

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan.

I am strongly opposed to the Broadway to Brommer Pedestrian Bicycle Path. People will not improve this delicate area by developing it with pathways, trails and a "Creek View Trail". I ride my bike from my home to the harbor and have no problem at all with the available routes and have no longing for a route which goes through Arana Gulch. People who feel inconvenienced by this "obstruction" need to get over themselves. I also have a suspicion that there is some kind of motivation revolving around **money** as people push for this project.

It seems to be the nature of Man to get his/her hands on anything and everything, with the goal of progress. But this greenbelt is best left alone, and it is a constant struggle to preserve it. Please help us finally turn away these people who have pushed and pushed to change Arana Gulch.

Thank you, Damon Meyer

12/2/2011

94

Susan Craig

Ma2a

From: Karen [seaglassklp@ymail.com]
Sent: Thursday, December 01, 2011 5:24 AM
To: Susan Craig
Subject: No Broadway to Brommer in Arana Gultch

I believe the placement of a bike path in this area would severely disrupt this beautiful, quiet area.

I've lived in Santa Cruz for years and bicyclists zip through everywhere without regard to habitat or people quietly walking.

Why spoil a natural area with a special path for one class of people, people that walk through now will be subject to high speed mountain bike types that disregard others use of the area, this will lead to destruction of area plants also!

Please, vote to preserve this quiet piece of land.

Karen Prouty
Santa Cruz, CA

Sent from my iPad

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

Susan Craig

Th22a

From: Kit Birskovich [kitb@baymoon.com]
Sent: Thursday, December 01, 2011 1:07 AM
To: Susan Craig
Subject: Arana Gulch Agenda #TH22a

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DEC 02 2011

California Coastal Commission,
Central Coast Area

December 1, 2011
from Kit Birskovich
Regarding Agenda No. Th22a
Application No 3-11-074
OPPOSED TO PROJECT

Dear Commissioners,

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan for the following reasons:

1. Regarding the Broadway/Brommer portion of the Master Plan: This is now and always has been a TRANSPORTATION PROJECT disguised as something else. You can dress up two bridges and a paved road short-cut for bicycles as an "Interpretive Trail," but this isn't Halloween, this isn't fooling anyone.
2. "Unmitigable" damage to environmentally sensitive habitat area of an endangered species (Santa Cruz Tarplant) means "Don't do it!" I'm pretty sure that's your sworn duty.
3. "Feasible, reasonable, and less environmentally destructive" alternatives exist. Ask the City of Santa Cruz to please find them, thank you very much.

I love this sweet little greenbelt and have walked there very often in all seasons for twelve years. The City's current transportation project proposal would permanently and violently destroy the heart of this coastal prairie. Please put a halt to it.

Thank you for your good work.

Sincerely,
Kit Birskovich
Santa Cruz

TH 22a

Susan Craig

From: Jean-Sylvain Negre [jean.sylvain.negre@gmail.com]
Sent: Wednesday, November 30, 2011 11:56 PM
To: Susan Craig
Subject: Agenda No: TH22a Application No: 3-11-074 Opposed to project.
Date: November 30th , 2011

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast AreaMy name: Jean-Sylvain NegreAgenda No: TH22aApplication No: 3-11-074**Opposed to project.**

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. I am opposed to the project for the following reasons:

In my opinion, the Broadway-Brommer Pedestrian Bicycle Path should only be designed AND BUILT according to strictly ecological construction guidelines.

We should only use materials suitable for an area containing endangered species. Such as : wood , gravel , sand , natural stone. In no event should concrete and tar be utilized.

A bicycle transportation route at this location should be limited in size and scope ; it should be designed so as not to interfere with the intended protection of identified endangered species in that area.

Most likely , any bike trail should be mostly as a bridge at a considerable distance above ground.

In addition , attention should be focused on restructuring the raised earthen ramp structure closer to Brommer street utilizing feasible, reasonable, and less environmentally destructive bicycle/pedestrian alternatives included in the Coastal Commission staff report. to include : prevention of erosion of dirt sand and gravel which is periodically carried to the Gulch; remove the culvert which is filling up so as to let the tides go in and out , as nature provides

Jean-Sylvain Nègre

12/2/2011

97

Thada

Susan Craig

From: Elizabeth Anthony [elzantho707@gmail.com]

Sent: Wednesday, November 30, 2011 10:16 PM

To: Susan Craig

Subject: Broadway-Bommer

Please honor our signatures and petitions and do not allow a paved bike path through a green belt area.

Elizabeth Anthony

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DEC 02 2011

California Coastal Commission,
Central Coast Area

12/2/2011

98

*Thada***Susan Craig****From:** Jacqueline Jacqueline [jacqueline1122@sbcglobal.net]**Sent:** Wednesday, November 30, 2011 11:01 PM**To:** Susan Craig**Subject:** Arana Gulch: opposed to project

p; 11/30/11

Jacqueline Davidow

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

Agenda No: TH22a

Application No: 3-11-074

Opposed to project.

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. I am opposed to the project for the following reasons:

- 1) The Arana Gulch area is an Environmentally Sensitive Habitat Area (ESHA) and critical habitat of the Santa Cruz tarplant.
- 2) The retaining wall and raised earthen ramp structure for the "Creek View Trail" at the north end of the Upper Harbor represents an environmental and economic disaster waiting to happen. The culvert carrying Arana Creek beneath this wall is already obstructed by sedimentation for high stream flows and needs to be replaced.
- 3) Feasible, reasonable, and less environmentally destructive bicycle/pedestrian alternatives are available, as recognized in the Coastal Commission staff report.

And, of utmost importance to me is the fact that I live on the south end of Broadway and really do not want one more reason to route people past my home!! It was bad enough when they put in that mega church at the end of the block. The bicycles are fine going just the way they've been going. If it works why mess it up?

Additionally I like to walk in Arana Gulch and don't want it paved with bicycles

12/2/2011

99

zooming by. Some of them are polite but many are not. I am an older retired person who likes to walk my small dog on the paths. Pavement and speedy bicycles would destroy not only the ecological environment but the tranquility there enjoyed by myself so many of my neighbors.

Thank you for your thoughtful and reasonable consideration in this matter.

TH22a

Susan Craig

From: Lois Robin [lolotusi@cruzio.com]
Sent: Wednesday, November 30, 2011 10:35 PM
To: Susan Craig
Subject: Arana Gulch Master Plan

November 30, 2011

Lois Robin

Agenda No: TH22a

Application No: 3-11-074

Opposed to project.

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. I am opposed to the project for the following reasons:

The entire Arana Gulch greenbelt is an Environmentally Sensitive Habitat Area (ESHA) and critical habitat of the Santa Cruz tarplant. A bicycle transportation route through the greenbelt will significantly disrupt habitat values, is not dependent on the resources of Arana Gulch, and cannot become an interpretive trail with signage. As a photographer, I have taken photos of Arana Gulch from many angles: of the great old oaks, the native plants that exist alongside the endangered tarplants, the creek with the egrets enjoying the tidal flows. To me it is a green breathing space in our urban landscape, which is why it exists. The Bicycle Path is like a giant cleaver bisecting this special space. Like a giant freeway that roars through a coastal town, dividing it into two halves, this expensive and expansive bikeway will divide the small park and ruin its integrity. A mistake! A mistake to do that to the Gulch.

12/2/2011

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California Coastal Commission,
Central Coast Area

I cannot understand the impetus behind the bike people's eagerness for this bikeway when very soon feasible, reasonable, and less environmentally destructive bicycle/pedestrian alternatives will be available, as recognized in the Coastal Commission staff report. Why then, this push to build such an expensive counter productive project?

Yours truly,

Lois Robin
4701 Nova Dr.
Santa Cruz, CA
831 464-3939
www.LoisRobin.com

*Thada***Susan Craig**

From: holly schipper [hollysails@hotmail.com]
Sent: Wednesday, November 30, 2011 9:59 PM
To: Susan Craig
Subject: Arana Gulch

RECEIVED

11/30/2011
From: Holly Schipper

DEC 02 2011

Agenda No: TH22a
Application No: 3-11-074
Opposed to project.

California Coastal Commission,
Central Coast Area

Dear Commissioners:

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. I am opposed to the project for the following reasons:

There are many reasons to vote no on this project including that there are other feasible ways to gain a bike path without going through Arana Gulch. This beautiful area is the only one of its kind. I often take my children there and we can play in the creek, watch the flowers bloom, climb a tree. It is the only open space left and there is such a natural beauty that I cannot stomach the idea of having it paved with bikers zooming past us. How much more fun it is to splash through mud puddles. as a family we sometimes will bike through the gulch on our way to the beach. It is accessible most of the times that from Siquel without the need to pave.

Please don't do this. Once it is done you can never get this untouched land back.

*Sincerely,
Holly Schipper*

12/2/2011

103

Th 22a

Susan Craig

From: Cedar Geiger [cedarspirit@gmail.com]
Sent: Wednesday, November 30, 2011 9:37 PM
To: Susan Craig
Subject: Arena Gulch "bike path"

I ask you to please deny the city of Santa Cruz's plan to put a bikeway through the Arena Gulch area. I feel this "bikeway" is just a smokescreen for a more aggressive paving project.
Thanks for listening.

--

Cedar Geiger
518 Errett Circle
Santa Cruz, Ca

RECEIVED

DEC 02 2011

California Coastal Commission,
Central Coast Area

12/2/2011

104

TH22a

Susan Craig

From: LeAnne Ravinale [coachleanne@hotmail.com]

Sent: Wednesday, November 30, 2011 9:50 PM

To: Susan Craig

Subject: Oppose Arana Gulch Path

November 30, 2011

LeAnne Ravinale

RECEIVED

Agenda No:

TH22a

DEC 02 2011

Application No: 3-

11-074

Opposed to project

California Coastal Commission,
Central Coast Area

Dear Commissioners,

I have a opposed a paved trail in Arana Gulch for over 15 years now. Please vote NO on the current proposed the Santa Cruz Arana Gulch Master Plan.

The proposal path would negatively impact the flora including the tar plant) and fauna in one of our last undeveloped coastal terrace eco-systems. Pavement will eventually cause erosion, add to the heat island effect and make it much less enjoyable and beautiful for pedestrians. Presently the area is shared by pedestrians and bicyclists alike without a problem. I have used it for a bicycle commuting route for many years and it is not a problem on a mountain bike or hybrid commuter bike.

The Gulch is a treasure that should be left undisturbed. This proposed path and bridge are over-engineered and priced for what the community would be getting.

I support bicycle commuting in Santa Cruz and feel there are major thoroughfares nearby that will accommodate bicycles, including the pending rail trail.

Thank you for your consideration,
LeAnne Ravinale

12/2/2011

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TH22a

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NOV 30 2011

California Coastal Commission,
Central Coast Area

Denise Becker

Agenda No: TH22a
Application No: 3-11-074
Opposed to project.

November 30, 2011

Ms. Susan Craig
California Coastal Commission
725 Front Street
Santa Cruz, CA 95060

RECEIVED

DC

DEC 01 2011

California Coastal Commission,
Central Coast Area

Re: Master Plan for Arana Gulch with Broadway-Broomer Pedestrian-Bicycle Path

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. I am opposed to the project for the following reasons:

I was amazed and disappointed to hear that Santa Cruz has refused all important suggestions by the California Native Plant Society to create an environmentally superior Master Plan for Arana Gulch. This refusal makes me wonder what "big business" money is involved. I like to think of Santa Cruz City and County as "Main Street", in other words, as build of people like me and my neighbors. We all moved here to be a part of this beautiful area. Didn't you, or if you don't live here, don't you represent us? Why then would you ignore the suggestions of a group like the Native Plant Society? I don't think I need to repeat here what the Santa Cruz chapter of the CNPS has said about the Arana Gulch project, and will say again I am sure. I will repeat that I want you to listen to them and follow their suggestions.



Denise Becker
CNPA member, Felton Resident

Th22a

Regarding Th22a-12-2011, Arana Gulch Master Plan

Recommendation

I recommend the Commission approve the proposed plan WITHOUT the twelve foot wide road – a three or four foot width is more appropriate for an interpretive trail. Limit the trails to a three or four foot width. And eliminate the big bridge.

The Issue is ESHA.

Section 30240 Environmentally sensitive habitat areas

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

An interpretive trail through an environmentally sensitive habitat area seems to be allowed as a “resource-dependent” use. However, usually such trails are only three or four feet wide. I have never seen an interpretive “trail” twelve feet wide. At that width most people would simply call it “A Road”.

The thing I like about interpretive trails is enjoying the serenity of the place while learning something about the area. I doubt there will be much serenity on a twelve foot wide road – which also serves as a transportation corridor.

Bisecting an ESHA

Bisecting an ESHA is a bad idea for the habitat. Coastal Act Section 30240 (a). states:

Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values... Bisecting the Arana Gulch meadow ESHA with a twelve foot road would certainly be considered a “significant disruption of habitat values”.

The Staff report talks a lot about the importance of interpretive trails. But they do not adequately justify why it has to be twelve feet wide Their attempt to rationalize that the twelve feet wide “trail” is, if fact, NOT a transportation corridor is not convincing.

CNPS Plan part 1

The most remarkable comment in the Staff report is at the top of page 10 where the Staff is criticizing the CNPS alternative plan: “*such an alternative would also significantly alter the existing unpaved pedestrian-only trail experience extending along this loop trail (proposed to be retained in the City's project) and turn it into an overly-engineered trail facility that would significantly alter its interpretive public access utility and lead to significant public viewshed impacts.*”

This seems disingenuous. The same thing (or, actually worse) could be said about the City's proposed twelve foot wide “trail” through the middle of the meadow. The City's “trail” also would *significantly alter the existing unpaved pedestrian-only trail experience ... and turn it into an overly-engineered trail facility that would significantly alter its interpretive public access utility...*

CNPS Plan part 2

Also on page 10, the report acknowledges that the CNPS plan has considerable merit: *Thus, although true that the CNPS alternative would avoid trail development in the center of the site, and would free up an additional area for grazing centered there, it would lead to additional impacts, as discussed above, and remains a less preferred alternative under the Coastal Act.*

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DEC 02 2011

California Coastal Commission,
Central Coast Area

107

This opinion that the City's route is the preferred alternative is obviously a judgment call. It appears they want the transportation corridor. If you take out the twelve foot wide road, the CNPS alternative appears to be the better option.

Trail or Road

It is either a "trail" or a "road". It has to be one or the other – it can't be both.

If the "trail" is twelve feet wide (or even as it is euphemistically stated, "eight feet") and connects to long steel bridges, it is really a "road" -- a transportation corridor. A transportation corridor is NOT ESHA resource-dependent and, according to Section 30240, should not be allowed. A transportation corridor can (and should) be somewhere else. FYI: There will soon be a nearby bicycle trail along the railroad tracks.

If it is an "interpretive trail", it is allowed in an ESHA, but it should be only three or four feet wide.

The wider the trail (road), the faster they will go

The eight- to twelve-foot width of the path is particularly offensive. The excessive width will encourage bicyclists to speed along the path. Traffic studies have shown that car drivers drive faster on wide streets and slower on narrower streets. I'm sure a similar behavior applies to bicyclists on trails. Make the trail in the area a maximum of four-feet wide. We'll all enjoy the area much more without bikers whizzing by.

Fragmentation

On page 10 the report addresses the question of fragmentation:

In short, while the path across the meadow raises an obvious question of fragmentation (because it is a classic case of bisecting an area), the facts specific to tarplant habitat indicate that such habitat fragmentation is not a significant concern in this case...

My reaction to this is that common sense would conclude that any trail bisecting the habitat would hamper propagation of the tarplant throughout the meadow. One thing is certain: a twelve foot wide road through the center of the meadow will definitely stop any possibility of further propagation of the tarplant throughout the meadow.

In summary

I urge the Commission to approve the plan that will protect and restore the area with a narrower, meandering, pedestrian orientated, interpretive nature-trail path. But not the twelve-foot wide transportation corridor through the middle of the meadow. An twelve-foot wide bike path does nothing to protect and restore sensitive habitat—in fact, probably just the opposite.

--Bill Malone
519 Walnut Ave
Santa Cruz

TH22a

RECEIVED

Diane R. Ritch

DEC 01 2011

California Coastal Commission,
Central Coast Area

Agenda No: TH22a
Application No: 3-11-074
Opposed to project.

November 30, 2011

Ms. Susan Craig
California Coastal Commission
725 Front Street
Santa Cruz, CA 95060

Re: Master Plan for Arana Gulch with Broadway-Brommer Pedestrian-Bicycle Path

Please vote NO on the City of Santa Cruz Arana Gulch Master Plan. I am opposed to the project for the following reasons:

*The City has refused all important suggestions by the California Native Plant Society to create an environmentally superior Master Plan for Arana Gulch. The City has refused to develop a restoration budget or success criteria for the coastal resources. The City has refused all CNPS ideas to improve the habitat management. The City has even refused CNPS ideas for improved ADA access.

*The City's long-term riparian and grassland management failures elsewhere in Santa Cruz (such as at Neary Lagoon) demonstrate that the City's poorly defined habitat management plans for Arana Gulch are likely to lead to further loss of these habitats at Arana Gulch and to continued threats to the endangered and federally-listed Santa Cruz Sunflower (*Holocarpha macradenia*, the tarplant).

*The poorly conceived retaining wall and earthen fill for the Bicycle Path at the north end of the Santa Cruz Harbor represents an environmental and economic disaster waiting to happen. The culvert carrying Arana Creek beneath this wall already is too small for high stream flows and must be replaced first.

*The Coastal Act also prohibits non-resource dependent uses within an ESHA. The Bike Path has always been and will continue to be a transportation project and is not resource dependent. Feasible, reasonable, and less environmentally destructive alternatives are available, as recognized in the Coastal Commission staff report.

*The City's descriptions of interpretive exercises at Arana Gulch, led by the City Natural History Museum staff is nothing more than rhetoric and hollow promises. The City can promise anything since there is no planning or budget for this effort and no agreements of any kind with the Museum.

It is time for city officials to demonstrate a willingness to listen to the environmental concerns of the community and compromise.

Sincerely,

Diane R. Ritch
Diane R. Ritch



11/29/11

Application #3-11-074

Agenda #th22a

Wandis Wilcox

My position: In Favor

Th22a

RECEIVED

**California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060**

NOV 30 2011

**California Coastal Commission,
Central Coast Area**

**RE: Public Hearing concerning Arana Gulch Master Plan on
Dec. 8, 2011**

To commission staff:

**Please submit this written material to the Commission in
proper time for the hearing.**

**I've written several letters over the years stating my reasons
in strong support of the Arana Gulch Master Plan project.
It's a long overdue project that, most agree, needs to move
forward; for, the benefits to the community and environment
are overwhelmingly positive.**

**Thank you, Wandis Wilcox
1860 Via Pacifica, Apt. 1201
Aptos, CA 95003**



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Thada
AREA AGENCY ON AGING
San Benito & Santa Cruz Counties

FOSTER GRANDPARENT/SENIOR COMPANION PROGRAM
IN-KIND DONATION PROGRAM
RECEIVED Monterey, San Benito, Santa Clara & Santa Cruz Counties

PROJECT SCOUT
Santa Cruz County

NOV 30 2011

California Coastal Commission,
Central Coast Area

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NOV 28 2011

CALIFORNIA
COASTAL COMMISSION

November 22, 2011

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

RE: Support of the Arana Gulch Master Plan

Dear Commissioners:

The Area Agency on Aging (AAA) of Santa Cruz & San Benito Counties reiterates its ongoing support of the City of Santa Cruz' Arana Gulch Master Plan. **The AAA Advisory Council urges the Coastal Commission to approve this plan.**

The AAA recognizes the importance of exercise and outdoor access as a critical component of the well-being of aged and disabled members of our community. The Arana Gulch Master Plan would provide disabled access to a natural area in Santa Cruz and enhance the quality of life to older and disabled adults.

The City's Master Plan, while an improvement for those with disabilities, is only a modest improvement. Even after the Master Plan and its Multi-Use Trails are approved and implemented, only 30% of Arana Gulch's trails, and only 3% of all City greenbelt trails, will be ADA-compliant.

Area Agencies on Aging are empowered by Federal Legislation (Older Americans Act) to serve as the focal point for older individuals and to evaluate and comment on policies and community actions that will affect older individuals. **It is our expert opinion that the proposed Arana Gulch Master Plan is in the best interest of older individuals within our community.**

If you have any questions regarding this matter, feel free to contact me.

Sincerely,

Clay Kempf
Executive Director

234 Santa Cruz Avenue • Aptos, California 95003

PHONE: AAA – (831) 688-0400 • FG/SCP – (831) 475-0816 • SCOUT – 1-877-373-8297 • FAX: (831) 688-1225

SUPPORTED BY FEDERAL, STATE & LOCAL GOVERNMENTS, FOUNDATIONS, THE UNITED WAYS OF
MONTEREY & SANTA CRUZ COUNTIES & PRIVATE DONATIONS.

///

NOV 29 2011

Th22a

California Coastal Commission,
Central Coast Area

November 26, 2011

To: California Coastal Commission
725 Front St. Suite 300
Santa Cruz, Ca. 95060

Arana Gulch Master Plan
Permit # **3**-11-074
Item # Th22a
Position- Against
Wes & Katie Musitelli

Hearing Date 12-8-11

Subject: Arana Gulch Master Plan

We live on Harbor Dr. which overlooks the Arana Gulch Greenbelt. It is our opinion that the Arana Gulch Master Plan has one major flaw which is listed below.

- 1- **Bike Path**- We are bicycle users and advocates but feel that there is an equally suitable route for the bike path that does not involve the expense or environmental problems associated with constructing a bridge over Hagemann Gulch. A bicycle trail through Fredrick St. Park and a ramp into the Yacht Harbor would accomplish the same goal.
- 2- We support the limited paved trail system and appropriate fencing.

The Coastal Commission has already heard this item and denied it. It would not currently be on the agenda if not for the self serving political ambitions of a local politician. This appeal would not be afforded other projects and in our opinion is a misuse of political influence.

We ask that the Coastal Commission deny the Arana Gulch Master plan as it is currently proposed and instruct the City Staff to develop a plan that does not include a costly and unnecessary bridge.

Please distribute this letter our concerns to all voting and non-voting members of the Coastal Commission.

Thanks in advance for your consideration.

Wes & Katie Musitelli
216 Harbor Dr.
Santa Cruz, Calif

Thada

Charles L. Dixon
524 #B Ocean View Avenue
Santa Cruz, California 95062
wilda@cruzio.com
11/29/11

RECEIVED

NOV 29 2011

California Coastal Commission,
Central Coast Area

Dan Carl
District Manager
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
Re: Arana Gulch Master Plan

Dear Commissioners:

Please look at the photos of the Sand City Path approved by the Coastal Commission in 2004 as part of the Sand City Project. I submitted these photos to Dan Carl in October, but when the staff report came out the black and white copies were illegible, so I am sending you color copies.

The purpose of the photos is to establish that the Coastal Commission approved a paved trail through ESHA. The four directional photos were taken pretty much dead center in the area. You can't see anything but ESHA in all directions, it's not on the edge. I think the photos show a paved trail through ESHA quite clearly.

Opponents to the Arana Gulch Master Plan (AGMP) are asserting that the Coastal Commission never approved a paved trail through ESHA which included a transportation function. This Sand City Trail provides a transportation function as part of the bicycle/wheelchair/pedestrian route connecting the city of Marina with Monterey and points in between. Sand City is one example that the Coastal Commission approved a paved trail through ESHA that included a transportation function in addition to an interpretive function.

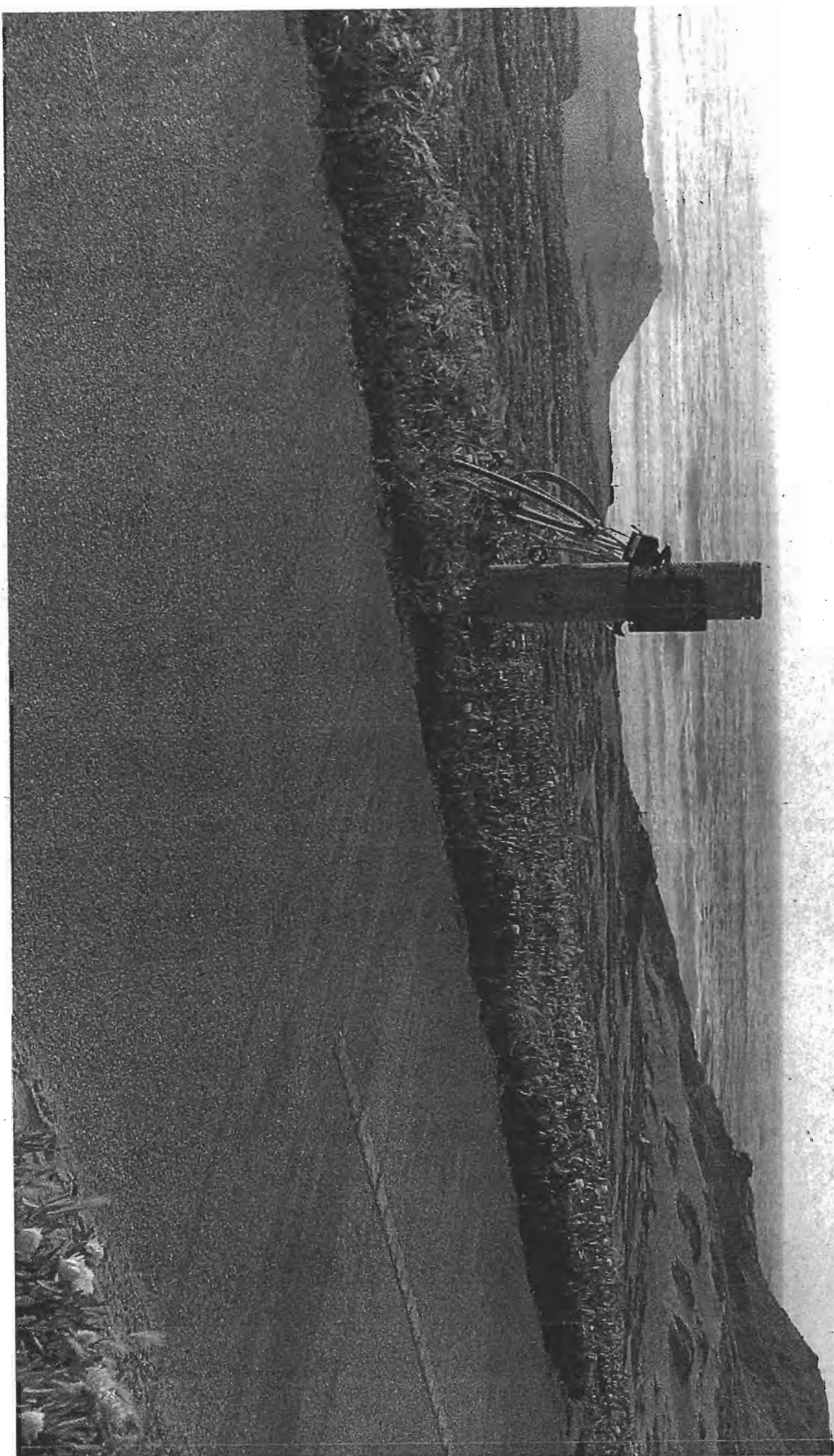
Some say that AGMP will weaken the Coastal Act. The reverse is true, AGMP will strengthen the access provision of the Coastal Act while allowing stewardship of the habitat. As the Staff Report says, it is a win-win project.

Please vote to approve the Arana Gulch Master Plan.

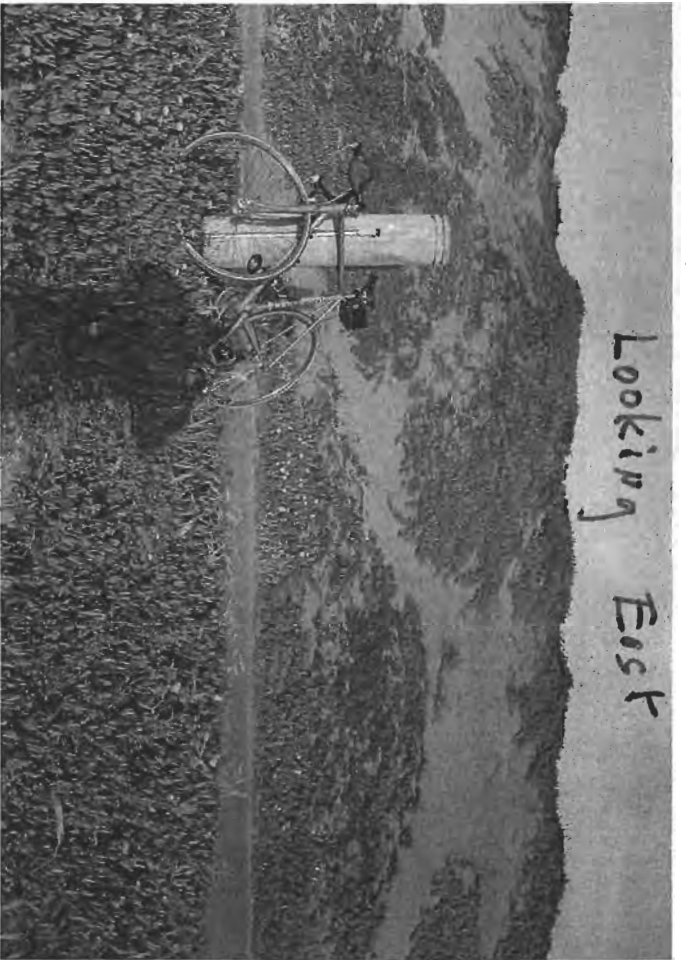
Sincerely,


Charles Dixon

Sand City ES HA Looking West



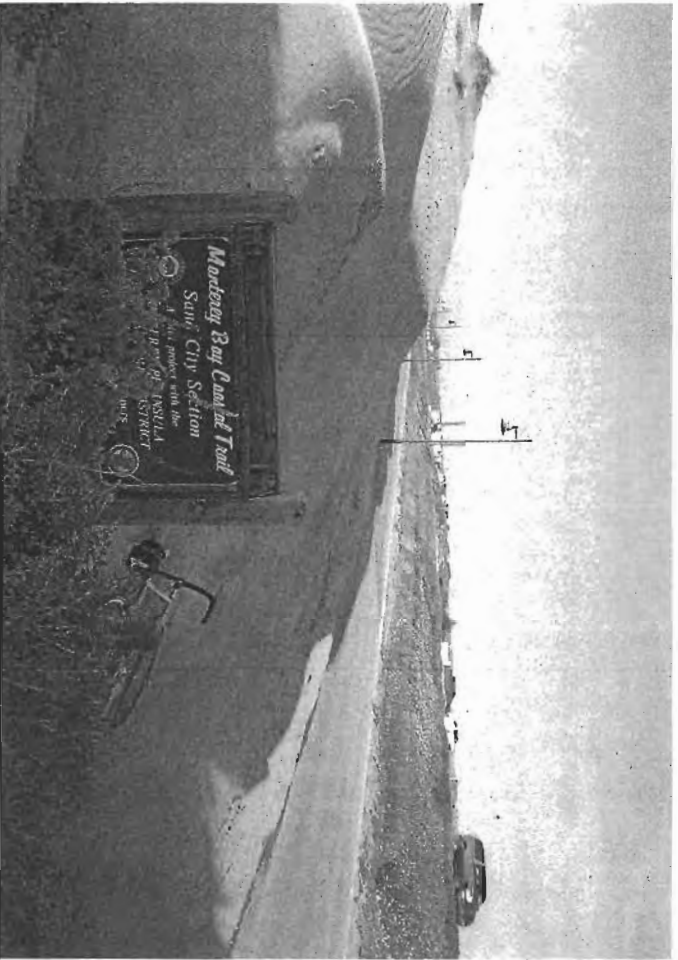
Looking East



Looking North



Looking South



RECEIVED

NOV 28 2011

California Coastal Commission,
Central Coast Area

Th 22a

Agenda #22A

Application #3-11-074

City of Santa Cruz Arana Gulch Master Plan

Position: In favor

My family and I have watched this public access and habitat restoration project develop over that past 16 years. We have seen it depicted as a quest for a safe, alternative bike path, a means of controlling illicit drug use, an effort to save the endangered Santa Cruz tarplant, and a confrontation led by local resident NIMBY concerns.

In my opinion, the City of Santa Cruz has worked diligently to move this project along in full compliance with Coastal Commission concerns. The current City plan consolidates and improves on the existing trail system while regulating public impact and restoring the tarplant population. I have been impressed by the quality of thought and depth of research that have gone into preparation of the current improved master plan. **I strongly encourage the Commission to accept the recommendations of its professional staff and to approve this project as it now stands.**

David Campbell
3665 Main St.
Soquel, CA



Th 22a

RECEIVED

NOV 28 2011

California Coastal Commission,
Central Coast Area

Monday November 21, 2011

California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA, 95060-4508

RE: Support for CDP Application 3-11-074, Arana Gulch Master Plan

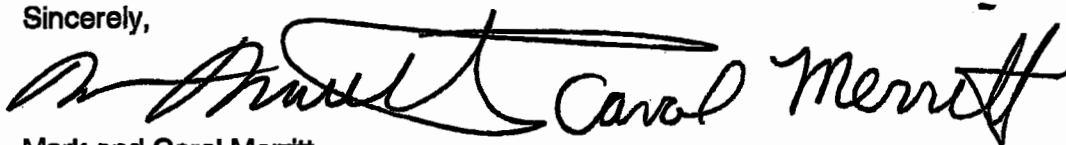
Dear Commissioners:

The purpose of this letter is to express our support for the Improved Arana Gulch Master Plan (Master Plan) in creating greater access to Arana Gulch from Frederick Street while protecting the Santa Cruz Tar Plant.

My family and I are twenty-year residents of the Seabright neighborhood. We are also slip renters in the harbor. My 13 year old son and I take frequent walks together from our house to the harbor but we rarely take in the beauty and tranquility of Arana Gulch because of the limited access. My wife also has limited mobility but is able to walk on more evenly graded pathways and would greatly benefit from the improved Master Plan. When my son and I walk through Frederick Street Park on our way to the harbor we see the magnificent old oaks crowning the beautiful coastal bluff. As we pass by we often remark on what a gem Arana Gulch is and how wonderful it would be to have greater access from our neighborhood.

When hearing the Coastal Commission staff recommendation on December 8, please consider lending your kind support and approval with conditions for the Arana Gulch Master Plan.

Sincerely,



Mark and Carol Merritt
416 Caledonia Street
Santa Cruz, 95062

Cc: Commissioner Mark Stone, Vice-Chair



COUNTY OF SANTA CRUZ

PLANNING DEPARTMENT

701 OCEAN STREET, 4TH FLOOR, SANTA CRUZ, CA 95060
(831) 454-2580 FAX: (831) 454-2131 TDD: (831) 454-2123
KATHLEEN MOLLOY PREVISICH, PLANNING DIRECTOR

RECEIVED

November 16, 2011

NOV 22 2011

Juliana Rebagliati
Planning and Community Development Director
City of Santa Cruz
809 Center Street, Suite 106
Santa Cruz, CA 95060

California Coastal Commission,
Central Coast Area

Subject: Arana Gulch Master Plan Coastal Development Permit

Dear Ms. Rebagliati:

The Santa Cruz County Board of Supervisors took action at its meeting of November 8, 2011 to agree to a consolidated permit process for the Arana Gulch Master Plan and project. This letter therefore requests that the City of Santa Cruz submit a consolidated permit to the Coastal Commission pursuant to Section 30601.3 of the California Coastal Act.

Sincerely,

Kathleen Molloy Previsich
Planning Director, County of Santa Cruz

cc: Dan Carl, District Manager
California Coastal Commission – Central Coast District
725 Front Street, Suite 300
Santa Cruz, CA 95060

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
 125 FRONT STREET, SUITE 300
 SANTA CRUZ, CA 95060
 (831) 427-4863 FAX (831) 427-4877

www.coastal.ca.gov



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 NOV 23 2011

CALIFORNIA
 COASTAL COMMISSION
 CENTRAL COAST AREA

Dr. M.F. Carl,
 I am unable to attend the Dec. 8
 meeting. I am writing in support of
 the Arana Gulch Master Plan.
 November 18, 2011

IMPORTANT PUBLIC HEARING NOTICE**COASTAL PERMIT APPLICATION**

PERMIT NUMBER: 3-11-074

APPLICANT(S): City Of Santa Cruz

PROJECT DESCRIPTION:

Implement the Arana Gulch Master Plan for the 67.7 acre City-owned greenbelt property. Project includes management and restoration of habitat areas; improvements to the existing trail system, including a paved multi-use path (some over existing trails, some new); construction of a new bridge over Hagemann Gulch; interpretive displays and trail signage; installation of fencing, including to allow limited cattle grazing. 9506

PROJECT LOCATION:

Arana Gulch (just inland of the Santa Cruz Harbor), Santa Cruz (Santa Cruz County) (APN(s) 011-101-12, 011-101-27, 011-101-28, 011-101-29, 011-101-30, 011-101-31, 011-181-04, 011-181-05)

HEARING DATE AND LOCATION:

DATE: Thursday, December 8, 2011

TIME: Meeting begins at 9:00 AM

PLACE: Aquarium of the Bay

Pier 39, San Francisco, CA

PHONE: (415) 407-3211 (this phone number will only be in
 service during the meeting)

ITEM NO: Th22a

HEARING PROCEDURES:

This item has been scheduled for a public hearing and vote. People wishing to testify on this matter may appear at the hearing or may present their concerns by letter to the Commission on or before the hearing date. The Coastal Commission is not equipped to receive comments on any official business by electronic mail. Any information relating to official business should be sent to the appropriate Commission office using U.S. Mail or courier service.

AVAILABILITY OF STAFF REPORT

A copy of the staff report on this matter is available no later than 10 days before the hearing on the Coastal Commission's website at <http://www.coastal.ca.gov/mtgcurr.html>. Alternatively, you may request a paper copy of the report from the Central Coast District office at (831) 427-4863.

SUBMISSION OF WRITTEN MATERIALS:

If you wish to submit written materials for review by the Commission, please observe the following suggestions:

- We request that you submit your materials to the Commission staff no later than three working days before the hearing (staff will then distribute your materials to the Commission).
- Mark the agenda number of your item, the application number, your name and your position in favor or opposition to the project on the upper right hand corner of the first page of your submission. If you do not know the agenda number, contact the Commission staff person listed on page 2.

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CALIFORNIA COASTAL COMMISSION

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www.coastal.ca.gov

K Julie Kimball
423 Darwin St.
Santa Cruz, CA 95062



I strongly support the project to improve the trail system in Arana Gulch.
November 18, 2011

IMPORTANT PUBLIC HEARING NOTICE
COASTAL PERMIT APPLICATION

Let's finally get this thing done Julie Kimball

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California Coastal Commission,
Central Coast Area

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*Th 22a***Susan Craig**

From: Dan Carl
Sent: Wednesday, November 23, 2011 9:58 AM
To: 'Patricia Matejcek'; patachek3@gmail.com
Cc: Susan Craig
Subject: RE: AG/B-B staff report

I think reasonable people can disagree, and sounds like we disagree on the way the facts and the law apply to this project. We tried our best – as we always do – to objectively analyze the project in light of the facts and the law, and the staff report reflects that analysis.

From: Patricia Matejcek [mailto:pmatejcek831@gmail.com]
Sent: Tuesday, November 22, 2011 9:44 PM
To: Susan Craig; Dan Carl
Cc: patachek3@gmail.com
Subject: AG/B-B staff report

Susan and Dan,

To say that I was/am shocked and appalled by the staff report for Broadway-Brommer is a massive understatement.

There are only 4 interpretive displays (signs) total on the City's maps for AG.

Two of these are at the ends of the Broadway-Brommer bikeway.

Do two signs change a bikeway into a resource-dependent interpretive trail?

This is especially ironic in light of the missing interpretive sign that's been missing from the Agnes St. entrance for 2 years by city action.

The destructive precedent that would be set for the Coastal Act if this transportation project in, over and through ESHA

in the CZ is approved would tear the very fabric of the Coastal Act. Political pressure may have been responsible for

your making the right assessment of La Bahia and may be a factor in what you've written for Arana Gulch but it's

still extremely disappointing.

Patricia

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DEC 05 2011

California Coastal Commission,
Central Coast Area

Thoda

Cary Froedman
2065 Chanticleer Ave
Santa Cruz, Ca.
95062

California Coastal Commission
Central Coast office
725 Front St. Suite 300
Santa Cruz, Ca. 95060

12/5/11

Re: Permit Number 3-11-074

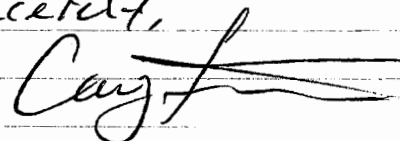
Dear Commissioners,

I am writing to request that you
approve the City of Santa Cruz's project
for the Anara Gulch.

By increasing access to the land
in the heart of Santa Cruz we
can better protect the habitat as
well as increase awareness and
education about our coastal habitats.

Please approve Permit number 3-11-074

Sincerely,

Cary  12/5/11