CITY OF
SANTA CRUZ

PLANNING DEPARTMENT

June 2, 2011

California Native Plant Society
c/o William Parkin, Esq.
Wittwer and Parkin
147 South River Street, Suite 221
Santa Cruz, CA 95060

Re: Arana Gulch Master Plan

Dear Mr. Parkin:

We appreciate the time the California Native Plant Society has taken over the past two months to discuss the Arana Gulch Master Plan ("AGMP") and ways we might implement the Plan with the Coastal Commission's approval and oversight. Our discussions have helped us all better frame the issues.

It might be useful for us to summarize where we are at this point on the key issues:

The North-South Trail: CNPS proposed that the north-south segment of the Multi-Use Trail (to Agnes Street) not be paved, and we are open to that as part of an overall agreement. The trail alignment would be as proposed in the AGMP, on the old ranch road, and would be composed of base aggregate with a decomposed granite ("DG") surface and constructed to California State Park trail standards. The trail would not be paved unless an objectively verifiable degradation baseline is crossed. In this regard the City is agreeable to committing to a maintenance regimen for the trail similar to those it employs elsewhere in its park system, the objective of which would be to assure that the degradation threshold is not crossed. Nonetheless the City feels that this pavement safeguard is necessary in the event public use of the trail renders it impassable to individuals in wheelchairs and others with limited mobility who should enjoy access to this natural coastal area to the same extent as non-disabled individuals. The DG surface and the typical multi-use eight foot trail width are necessary to provide wheelchair access from the Agnes Street entrance. The trail would not be paved absent the prior written approval of Coast Commission staff. From the City's perspective, wheelchair users must be able to access Arana year round and safely pass one another as well as other trail users.

Funding for Tarplant Restoration: You have sought assurances that there will be greater funding for tarplant restoration. We agree that tarplant restoration is a primary objective of the Master Plan. With the AGMP's implementation, tarplant restoration funding will clearly be dramatically increased above the levels we have historically been able to provide. As you know, a core strategy underpinning our proposed AGMP is the acquisition of state and federal funding for the Multi-Use Trail which will in turn enable us to use a portion of those funds for a significant increase in tarplant restoration efforts. These state and federal funds will cover all capital costs for the enhanced tarplant restoration program and at least the first three years of operating costs as well. For operating costs thereafter we have committed to using a portion of the funds generated by sale of the residentially-zoned parcel on the property at the end of Broadway. Those ear-marked tarplant restoration funds would be deposited in the City's Public Trust Fund account. This funding mechanism effectively creates a higher level of future fiscal security for the tarplant restoration program and management of the other resources in Arana Gulch than the City is able to provide for any other open space land in the City's extensive greenbelt.

We cannot legally commit future City Councils to budget an exact amount of tarplant restoration funds for each year into perpetuity, just as we cannot predict the necessary amount of funding needed for tarplant program funding in any given future year. Nonetheless, given the legal constraints under which the City operates in this regard, from our perspective we have offered an extraordinary level of certainty relative to future funding for tarplant restoration. It must also be noted that absent adoption of the AGMP, there is no funding at all for increased tarplant restoration efforts. We have now gone nearly two years without any living tarplant at Arana Gulch, despite the efforts which have been undertaken to protect tarplant and tarplant habitat under the current limited management regimen. Clearly there must be a substantial increase in tarplant habitat improvement or the tarplant will become extinct at that location. In summary, AGMP proposes the only fully funded and viable mechanism for saving the tarplant at Arana. With current and anticipated future budget limitations imposed upon both the City and the state, we are extremely fortunate to develop and leverage funds that provide such a unique opportunity for implementing a habitat restoration plan such as this and it is extremely unlikely that a similar plan will be implemented if this one is not.

Success Criteria for Tarplant Restoration: CNPS has sought specific guaranteed tarplant restoration benchmarks by which the level of tarplant recovery would be specifically measured into the future, with penalties to be paid by the City, i.e. by City taxpayers, if those specific benchmarks are not achieved. We have agreed to be guided by a panel of the best scientists in this field and to undertake what they recommend as best management practices ("BMP's") for tarplant recovery. So as to offer its considerable expertise, CNPS has been invited to sit on that panel. But as CNPS knows, tarplant restoration at this location is by definition adaptive and therefore experimental. We know that tarplant thrived on this property many years ago when it was grazed by dairy cows. All the answers are not known at this time and the precise impact of BMP implementation, singularly or in combination with one another, cannot be predicted with any degree of scientific certainty. We have therefore proposed, at the urging of

biologists, the subject adaptive program that will monitor progress carefully and modify the program as we go along to emphasize those BMP's that are producing the best results at Arana. While we therefore cannot state with certainty what will, in several years, be found to have been the best regimen of BMP's, let alone exactly what results those unknown actions will have achieved, we do know that the experts have given our proposed Adaptive Tarplant Management Program high marks and consider it the best chance the tarplant has of restoration and subsequent survival at Arana Gulch. The Coastal Commission staff has referred to our proposed actions as "the last best option for the tarplant." Success criteria will be developed as part of this ongoing monitoring process, and will change over time, as hopefully the level of tarplant expression on the property increases. We absolutely agree that development of success criteria is a key component of the Adaptive Tarplant Management Plan but in light of the foregoing factors, CNPS's "benchmark/penalty" proposal is neither workable nor acceptable.

We would hope to continue to work with CNPS toward our common objective of improved tarplant habitat and restoration at Arana and are willing to meet with CNPS in this regard at its earliest convenience although its early departure from last Friday's meeting and the press release it issued on Sunday indicated to us, and the City Council as well, that CNPS may not be interested in doing so. We all need to recognize that time is short, particularly with respect to the tarplant, for which the status quo is proving fatal. We look forward to hearing from CNPS.

Thank you very much for your attention to the foregoing.

Very truly yours,

Juliana Rebagliati,
Director of Planning and
Community Development

Dannettee Shoemaker,
Director of Parks and Recreation

cc: Mayor and City Councilmembers
Supervisor Mark Stone
Supervisor Neil Coonerty
Supervisor John Leopold
Susan Craig, California Coastal Commission
Martin Bernal, City Manager

Th 8a

County of Santa Cruz

BOARD OF SUPERVISORS

701 OCEAN STREET, SUITE 500, SANTA CRUZ, CA 95060-4069
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JOHN LEOPOLD	ELLEN PIRIE	NEAL COONERTY	TONY CAMPOS	MARK W. STONE
FIRST DISTRICT	SECOND DISTRICT	THIRD DISTRICT	FOURTH DISTRICT	FIFTH DISTRICT

October 7, 2010

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

ATTN: Dan Carl

Dear Commissioners:

I am writing to urge you to support the City's revised Arana Gulch Master Plan and approve the staff's recommendations.

I am currently serving my second term as Santa Cruz County Third District Supervisor. My district includes portions of Arana Gulch as well as the City of Santa Cruz and the entire North Coast to the San Mateo County border. I am in strong support of this updated plan and believe that the enhanced management plan has addressed all of the Commission's concerns. The revised plan represents the very best option for this property as it balances coastal access and provides an interpretive program for this unique area while primarily providing a tool to protect and enhance the sensitive habitats of this open space.

In addition, the vast majority of my constituents who have contacted me regarding this project also strongly support the City's revised plan. In fact, there have been few issues in my experience as an elected official where there has been this much unanimity of support for a project in Santa Cruz.

Again, I ask that you support the City's revised Master Plan for Arana Gulch and allow this important project to move forward.

Thank you for your service and dedication to preserving our coast and natural resources.

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CENTRAL COAST AREA

Sincerely,

NEAL COONERTY, Supervisor
Third District

NC:ted

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Exhibit L

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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

October 8, 2010

Bonnie Neely, Chair
California Coastal Commission
725 Front St, Suite 300
Santa Cruz, CA 95060

RE: Support for the Arana Gulch Master Plan

Dear Chair Neely:

The Santa Cruz County Regional Transportation Commission (RTC) staff, per numerous action directions from the board, remains in steadfast support of the Arana Gulch Park Master Plan and urges you to approve the City of Santa Cruz and the County of Santa Cruz's permit request at the upcoming meeting of the Coastal Commission. The City of Santa Cruz and Coastal Commission staff have completed their due diligence work in examining natural habitat management options, as well as multi-use path alternatives, and crafting a Master Plan that provides a multitude of benefits for a wide range of users, as well as environmental protections.

The RTC has long supported the proposed multi-use trail system in the greenbelt between Broadway and Brommer Streets included in the Arana Gulch Master Plan. The paths provide safe access for all including bicyclists, pedestrians, people with disabilities and coastal access enthusiasts.The RTC's two citizen advisory committees, the Elderly and Disabled Transportation Advisory Committee and the Bicycle Committee, are among the many entities in our region that have taken positions of support for this project.

Following the Coastal Commission's request for reconsideration of the Arana Gulch Master Plan at its Spring meeting, several enhancements have been added that further strengthen the plan. The tarplant management program would cover nearly the entire grassland area, the trail surface and base material will be permeable, and existing trails that cause habitat or erosion problems will be closed and restored. In addition, the value of providing access for mobility impaired individuals (seniors and persons with disabilities) cannot be understated as the City's revised Plan would create the first wheelchair-accessible trails in any of the City's four greenbelt parks.

The Arana Gulch Park Master Plan supports several of the *Santa Cruz County Regional Transportation Plan*'s Goals and Policies, including policies to increase bicycle and pedestrian use and reduce vehicle miles traveled, fill gaps in the transportation system, support development of multi-use paths, and increase safety.

Please accept the following comments for your consideration:

- On January 14, 2010 the RTC programmed $1.1 million of the region's share of federal Transportation Enhancement funds for the project. This was in addition to the $1.8 million previously allocated to this project over a period spanning many years. The RTC has preserved funding for this project even though transportation funding is very limited because of its importance to the region.

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- RTC staff strongly supports the bicycle/pedestrian paths proposed in the Arana Gulch Park Master Plan. These proposed multi-use trails will help fill critical gaps in the regional network of low greenhouse gas emission mobility options such as bicycle and pedestrian choices. Providing a complete and convenient regional bicycle and pedestrian network increases the opportunity and attractiveness of bicycle and pedestrian trips. Bicycle/pedestrian facilities have positive, cumulative environmental impacts. Our community's efforts to reduce greenhouse gas (GHG) emissions by promoting alternative transportation would be greatly aided by this project.

- This project also provides "universal access" by enabling all people, including young, old and disabled persons who may have diminished perceptual or ambulatory abilities, to travel safely in ecological habitats and to destinations served by our public streets and pathway systems.

- We fully support ADA accessibility to wheelchair users that would be provided by the Arana Gulch multi-use path. Of all four greenbelts in Santa Cruz County, only this project would construct trails that allow access for people using mobility devices. The semi-permeable trail would greatly improve access to the coastal zone for persons with disabilities.

- The Arana Gulch Master Plan trail system is consistent with the concepts for the Monterey Bay Scenic Sanctuary Trail (MBSST) Network which includes interpretive elements as well as transportation elements and recreation elements. The RTC is expected to undertake a Master Plan and Environmental Review process for the MBSST this spring.

The Arana Gulch Master Plan meets the Coastal Commission's goal of improving access to the coastal zone and we strongly encourage you to support this project.

Thank you for the opportunity to comment. If you have any questions please feel free to contact me at 831-460-3200.

Sincerely,

George Dondero
Executive Director

cc: RTC
RTC Bicycle Committee
RTC E & D TAC Committee
City of Santa Cruz Public Works – Chris Schneiter
Coastal Commission Staff – Susan Craig

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Exhibit L

Th8a

EcologyAction

Innovation • Partnership • Community

October 5, 2010
Dan Carl
District Manager
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
Dear Mr. Carl and Coastal Commissioners,

Ecology Action of Santa Cruz, a non-profit environmental consultancy since 1970, would like to re-assert its support for the City of Santa Cruz's Arana Gulch Master Plan with the multi-use interpretive trail. In our letter of March 8, 2010 to the Coastal Commissioner we expressed our support for the City's plan with a caveat. That exception was the lack of an identified funding source for the City's ongoing Arana Gulch natural resource management plan. Fortunately, the City has addressed this issue by identifying a specific and ongoing funding source for their natural resource management plan for Arana Gulch through the sale of public property near Arana Gulch and from the City's operating budget.

Ecology Action is also satisfied to see other master plan improvements including use of permeable materials for the interpretive trail, elimination of several dirt paths and a better articulated grazing plan to restore and maintain the tarplant. The proposed Arana Gulch multi-use path would significantly improve access for pedestrians, cyclists and the
disabled to this coastal area designated as a greenbelt. Non-motorized access to this coastal area will greatly enhance Santa Cruz residents and visitors ability to better understand, appreciate, and enjoy the natural resources of this special land.

Given these improvements to the City's plan, Ecology Action offers its wholehearted support for this environmentally worthy project. Thank you for your consideration in approving the City's master plan with multi-use trail for Arana Gulch. It will be a welcome improvement to California's coastal area.

Sincerely,

Virginia Johnson
Executive Director

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UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA
INSTITUTED AUGUST 12, 1881

Local Union 505
County of Santa Cruz
(831) 688-5025

225 Searidge Road
Aptos, CA 95003
F(831) 688-5027

ALWAYS DEMAND THE LABEL

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November 1, 2011

Mary K. Shallenberger, Chair
California Coastal Commission
45 Fremont St. Suite 2000
San Francisco, CA 94105

Dear Chair Shallenberger,

Carpenters Union Local 505 has endorsed the Arana Gulch Master Plan and urges the Coastal Commission to approve the Coastal Development Permit application for the Arana Gulch Master Plan (AGMP).

We believe that the most important element of the AGMP is the provision of habitat monitoring and restoration. As members of the community, our members are concerned that green spaces provide access, recreation, and habitat protection. The environmental and biological studies of the Arana Gulch point to the precariousness of the population of Santa Cruz Tarplant. Those studies indicate that the population has experienced significant and continued declined since grazing was ended on the site. Unrestricted and undirected access to the site seems to have contributed to the decline of the population. Absent designated trails and interpretive guides we fear that the tarplant population will fall below a sustainable or recoverable level.

One of the most challenging aspects of habitat restoration is access to adequate funding and continued and concerted efforts. While numerous methods of habitat restoration and population stimulation have been attempted, none has been shown to be aggressively successful. As a consequence, on going application and study of various methods appear to be necessary if the tarplant population is to recover. We believe that rapid implementation of the AGMP is vital to rescuing this population. Further, we believe that the management plan brings the necessary resources to provide the needed on-going efforts.

In addition, completion of this project will enable environmental education programs at Arana Gulch and provide the first ever handicapped-accessible trails to one of the City's greenbelt parks. The proposed access elements of the plan maximize habitat protection while providing access to all of the public, including the mobility-impaired. Of particular note is the design of the pedestrian bridge across Hagemann Gulch. With no intermediate supports this bridge spans the riparian area providing unparalleled viewing opportunities with minimum habitat impact. In addition, the paths through the Arana Gulch circumvent the identified tarplant populations but will provide defined access for study and restoration efforts, as well as interpretive opportunities.

We believe that since the City acquired the Arana Gulch green belt in 1994 a management plan has been largely absent. As a consequence public access has created numerous informal trails without regard to erosion or damage to sensitive habitats. We believe that a strong management plan with adequate funding and the provision of designated pathways are imperative to fulfill the goals of the Coastal Act regarding ESHA. We believe the proposed Plan accomplishes this core mission of the Coastal Act while providing educational and interpretive opportunities that are dependent upon the ESHA.

We believe our community and our environment will benefit enormously from this proposed AGMP, and we urge you to approve the Coastal Development Permit necessary for its implementation.

Fraternally yours,

Tom Ward
Recording Secretary
Carpenters Local 505

405 Old San Jose Road, Soquel, California 95073 | (831) 429-3410 | www.sccs.santacruz.k12.ca.us

Gary Bloom
Superintendent of Schools

Karen Hendricks
Assistant Superintendent Human Resources

Alvaro Meza
Assistant Superintendent Business Services

Kris Munro
Assistant Superintendent Educational Services

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California Coastal Commission,
Central Coast Area

To Whom It May Concern,

November 14, 2011

Santa Cruz City School (SCCS) serves approximately 7,000 K-12 students in the City of Santa Cruz and adjacent communities. SCCS enjoys a strong, multi-dimensional collaborative relationship with the City of Santa Cruz.

Santa Cruz City Schools, its students, staff and communities take full advantage of the many parks and recreation resources that are managed by the City of Santa Cruz. This includes our participation in docent led programs administered by the Museum of Natural History and offered in city open spaces, after school and summer recreational programs, and other quality youth programming.

Should the Arana Gulch Master Plan be approved, SCCS will work closely with the City of Santa Cruz to insure that the interpretive programs planned for the project are appropriately utilized by our students. SCCS is fully committed to quality science and environmental education and understands that science and environmental education must be rooted in local, hands-on experiences.

Sincerely,

Gary Bloom
Superintendent

Board of Trustees
John T. Collins II, Rachel Dewey Thorsett, Cynthia Hawthorne, Deborah Tracy-Proulx, Steve Trujillo, Claudia Vestal, Ken Wagman

International Brotherhood of Electrical Workers

LOCAL UNION NO. 234

CASTROVILLE TELEPHONE (831) 633-2311
MONTEREY TELEPHONE (831) 373-1411
(800) 499-4239
FAX (831) 633-0570

10300 MERRITT STREET
CASTROVILLE, CALIFORNIA 95012
WWW.IBEW234.ORG

November 10, 2011

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California Coastal Commission,
Central Coast Area

Mary K. Shallenberger, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

RE: Urge Approval of Arana Gulch Master Plan

Dear Chair Shallenberger,

The International Brotherhood of Electrical Workers (IBEW) Local 234, the Electrician's Union for Santa Cruz, San Benito, and Monterey County, urge you to approve the application of the City of Santa Cruz for the Arana Gulch Master Plan (AGMP), a park access and habitat protection plan.

The AGMP has broad support and a wide range of benefits for our community and the environment. Completion of this project will bring greater access and appreciation to this area by providing the first ever ADA accessible trail in any of the City's greenbelt parks and enabling environmental education programs at Arana Gulch, as well as providing for habitat restoration and protection. In addition, this project will provide a connection between the east side of the City of Santa Cruz and the County of Santa Cruz, which is to say "access along the coast" as called for in the Coastal Act.

IBEW Local 234's members are part of the community and have the same interest as other members of the community in the core missions of your Commission: public access "to and along the coast" and protection of the coastal environment as a great place to live and work. The proposed Plan accomplishes both of these core missions of the Coastal Act.

Our community and the environment will benefit enormously from this proposed Master Plan. The members of IBEW Local 234 and I urge you to approve it.

Sincerely,

Andy Hartmann
Business Manager/Financial Secretary

CC: Santa Cruz City Council
Santa Cruz County Supervisors

Th8a

AARP California
Pasadena Office
200 S. Los Robles Ave.
Suite 400
Pasadena, CA 91101

T 1-866-448-3615
F 626-583-8500
TTY 1-877-434-7598
www.aarp.org/ca

Thursday October 7, 2010

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

Re: Item Th7a, Application 3-09-068-Master Plan for Arana Gulch, Broadway-Brommer – Pedestrian-Bicycle Path

We recently received correspondence from our AARP California members in Santa Cruz concerning an Arana Gulch Project. They are concerned:

- That continued delays in the project have deprived seniors and those with disabilities from access to public property that is enjoyed by other member of the community.
- About an alternate plan recently proposed that would impede use by seniors and those with disabilities due to path lengths and steepened slopes
- That a small but powerful group that desire to maintain their vision of the property seems to have trumped overwhelming analysis of the project's goal of protecting and preserving while making the land accessible for the enjoyment and health of a wider group of residents.

Neither AARP nor AARP California maintains specific principles that encompass the totality of issues you must consider on this project. . However, AARP does maintain strong livable community principles which guide out advocacy. These include:

- Engaging residents in community planning and decision making
- Creating safe, walkable communities which foster aging in place and promote a strong sense of place
- Supportive features and services designs that enhance the ability of residents with diverse needs to remain independent and actively engaged in community life.

Based on our review of recent reports, including that of your staff, the very strong views of our members which live in the Arana Gulch Area and our livable communities principles we recommend you favorably consider and sanction the Arana Gulch Project.

Sincerely,

David Pacheco
AARP California State President

Tom Porter
Tom Porter
AARP California, Snr. State Director

Sacramento Office
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TTY 1-877-434-7598

San Francisco Office
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W. Lee Hammond, President
Addison Barry Rand, Chief Executive Officer

Charles L. Dixon
524 #B Ocean View Avenue
Santa Cruz, California 95062
(831) 426-3689
wilda@cruzio.com
10/18/11

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OCT 19 2011
California Coastal Commission,
Central Coast Area

Dan Carl
District Manager
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
10/18/11
Re: Arana Gulch Master Plan

Dear Commissioners and Coastal Commission Staff:

The purpose of the photos is to establish that the Coastal Commission approved a paved trail through ESHA when they approved the Sand City Section of the Monterey Bay Coastal Trail. I will leave it to you to supply the particulars of that hearing.

The four directional photos were taken pretty much dead center in the area. I would like to point out that the trail doesn't go through this ESHA's width but through its much longer length. Much of the trail is **equidistant** from the ocean and the road on the Eastern boundary of this ESHA section.

I think the photos show a paved trail through ESHA quite clearly.

Opponents have asserted that the Coastal Commission never approved a paved trail through ESHA. These photos refute that assertion and in so doing the assertion that the Arana Gulch Master Plan would establish a precedent of pavement in ESHA.

You have my permission to use the photos as you see fit. I have included a CD of the 5 photos.

Please vote to approve the Arana Gulch Master Plan.

Sincerely,

Charles Dixon

Monterey Bay Coastal Trail
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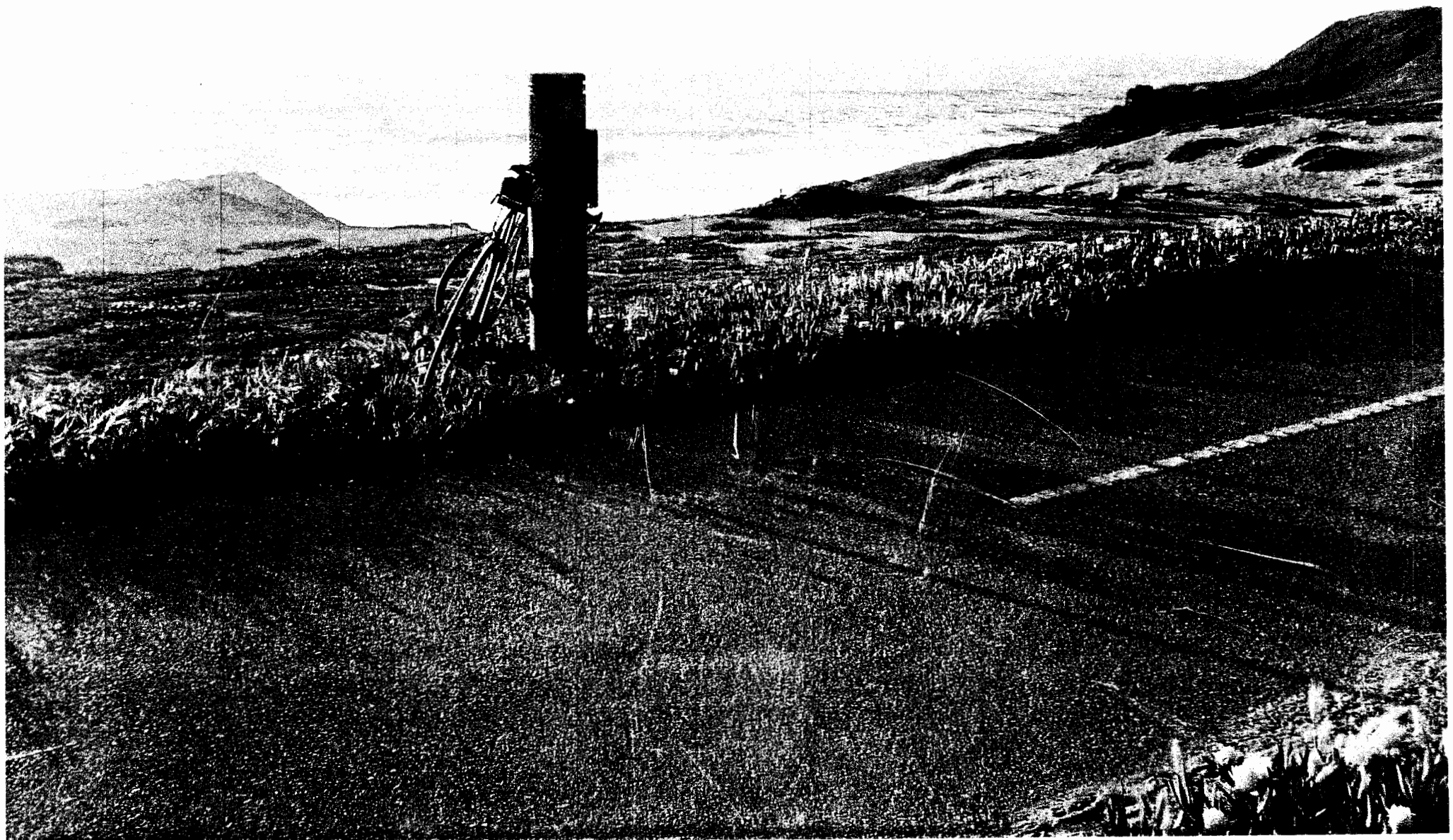
Looking West

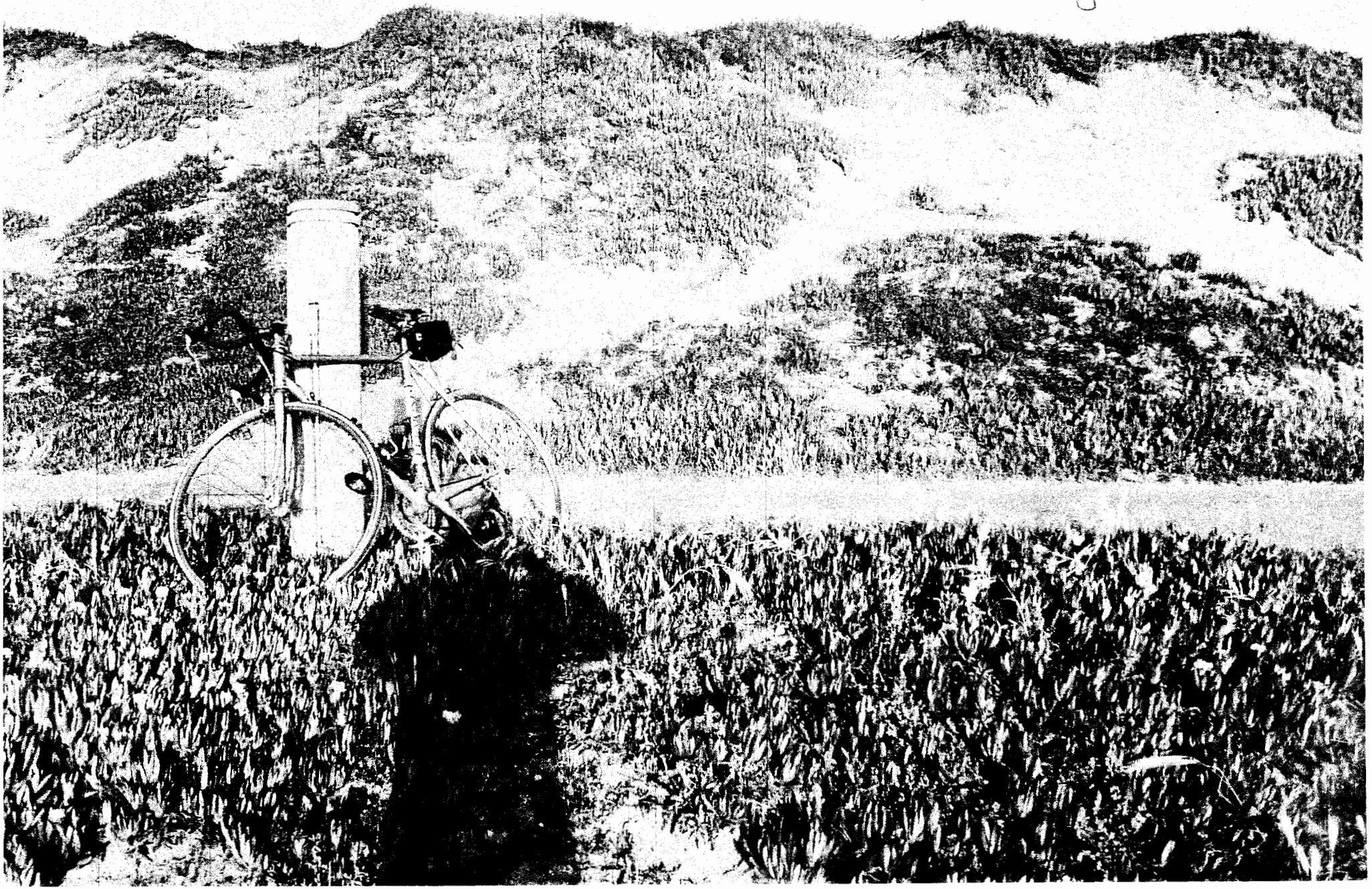


Looking North

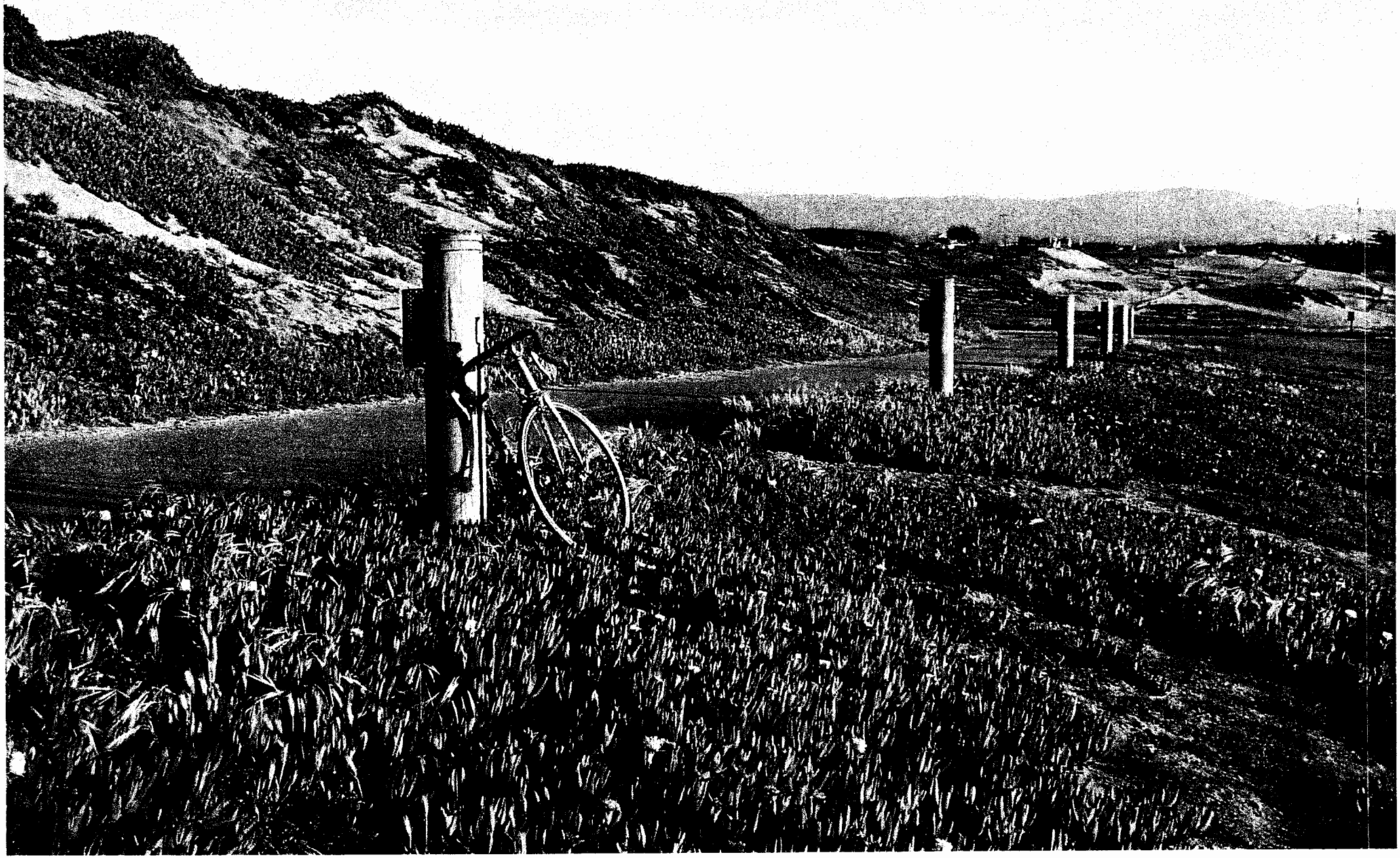
Looking North

Looking East

Looking East



Looking South



Th9a

AGWA **Arana Gulch Watershed Alliance**
345 Lake Ave., Suite E, Santa Cruz, CA 95062 (831) 475-2379
rjhaver@pacbell.net www.aranagulch.org

October 6, 2010

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

RE: Support letter for the City of Santa Cruz's Arana Gulch Master Plan

I am writing in support of the City of Santa Cruz's Arana Gulch Master Plan. The Arana Gulch Watershed Alliance (AGWA) is primarily focused on water quality issues in Arana. Arana Gulch Creek has long carried unnaturally heavy loads of sediment, accompanied by other urban runoff pollutants. Over the past ten years AGWA has been working successfully with landowners in the upper watershed to repair erosion sites and improve fish passage.

In order for us to do more (specifically to restore and clean-up the sediment problems in the Arana Gulch Greenbelt) we need to have final approval of the Master Plan so that we can get available state and federal funding for those high priority restoration projects. The creek can't get cleaner until the Master Plan receives final approval. Thank you for your consideration.

Sincerely,

Roberta J. Haver

Roberta Haver, Watershed Coordinator
Arana Gulch Watershed Alliance

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Cc:
Mike Ferry, Associate Planner
City of Santa Cruz
809 Center Street, Room 206
Santa Cruz, CA 95060

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Charles Dixon
524 #B Ocean View Avenue
Santa Cruz, California 95062
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wilda@cruzio.com
12/3/10

Mark W. Stone, Supervisor
Board of Supervisors
County Government Center
701 Ocean Street, Room 500
Santa Cruz, CA 95060
CC: Dan Carl California Coastal Commission

Dear Commissioner Stone:

I have attached the draft of a letter I wrote to the Sentinel. I hope you will see the shorter, 150 word version in the Sentinel soon. But just in case it ends up on the editing room floor, I am sending you the long version.

I have watched your testimony from Oceanside several times now. It's got great stuff, some insightful angles I hadn't thought of. For example, your handling of the CNPS Alternate. You avoided all the secondary bickering between the City and CNPS by focusing on a fatal aspect which didn't depend on the City's collaboration; namely that the eastern leg down to the harbor was a construction nightmare. You said, "I don't think that it can be done without extensive engineering and extensive grading and that is not something that this commission should support…. I just don't see that it is necessarily there or necessarily viable." You trumped the lack of collaboration argument.

But I'm certainly not one to miss a chance to argue my side of secondary bickering. The City bent over backwards to engage CNPS, strategically this was a no brainer because they knew of the CNPS alternate's shortcomings and didn't want to go through all the work and have CNPS say, *Oh that's not the plan we meant.* So to make sure that they were spending 5 figures on evaluating the right plan "the city undertook to carefully evaluate the CNPS alternative in detail, and to seek clarification from CNPS as needed." This quote from Juliana Rebagliati on City letterhead to CNPS attn: Vince Cheap copied to the Coastal Commission on October 11, 2010. This was in response to a letter from Vince Cheap (not on CNPS letterhead) of October 7, 2010 which included: "After the March meeting the City of Santa Cruz did not consult or collaborate with CNPS." It comes down to Julianna's credibility against Vince's. You know them better than I, you be the judge.

Commissioner Stone, I wouldn't make such a big deal on this issue if it didn't appear to be getting traction amongst the Commissioners. There were several testimonies at Oceanside that accused the city of subterfuge over this issue of collaboration. Later Steve Blank said he had come ready to vote yes but the appellants had convinced him to vote otherwise. I hope you will be able to shed some light on the City's credibility to the other commissioners.

I will close with a tarplant quip from a friend.

The road to extinction… is not paved.

Sincerely,

Charles Dixon

Th8a

CATHERINE TOLDI, M.A.

- 3267 Roland Drive
  Santa Cruz, CA
  95062
- 831-462-1446
- ctoldi@cruzio.com

To: Supervisor Mark W. Stone

Board of Supervisors
701 Ocean Street, Room 500
Santa Cruz, CA 95060

Dear Mr. Stone,

Please vote to approve the Arana Gulch Master Plan!

I am writing this as an environmentalist— a long-time Sierra Club member who strongly supports the Arana Gulch Master Plan—and as a priest at Santa Cruz Zen Center, where we have worked hard to make our own property accessible to all who are mobility-impaired.

It's imperative that we open up more access to natural environments for disabled people. The Arana Gulch Master Plan does this in such a way as to restore native species in general, and the much-debated tarplant in particular. The Commission's own biologist, along with the rest of the commission staff, will be urging the commissioners to approve the City's plan.

Since you have noted publicly that you "think we need to make sure that the access is going to be something that someone in a wheelchair is likely to use," it would be extremely disappointing should you choose to vote against the plan. It's particularly noteworthy that the Arana Gulch decision was delayed in order to provide a study on an alternative trail—however this alternative is actually worse from the perspective of habitat and native species protection.

I look forward to hearing about your vote to approve the Master Plan.

Yours truly,

Catherine Toldi

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COASTAL COMMISSION
CENTRAL COAST AREA

cc. Dan Carl, District Manager, California Coastal Commission

Supervisor Mark. W. Stone
Board of Supervisors
701 Ocean Street, Room 500
Santa Cruz, CA 95060
CC: Dan Carl, District Manager, California Coastal Commission

Dear Supervisor Stone,
I am writing to urge you to follow staff recommendations and support the approval of the revised Arana Gulch Master Plan at the upcoming Coastal Commission meeting.

As the Central Coast district representative to the commission you have a particular obligation to our community to weigh both the environmental and social benefits of this project and champion the staff recommendations to gain approval of the project as conditioned.

The expert analysis contained in the Coastal Commission Staff Report speaks for itself. The US Fish and Wildlife Services stated that they are *"pleased that the currently proposed project further reduces impacts to Santa Cruz tarplant habitat compared to the project that was reviewed and evaluated [earlier]". (pp. 41-42)*

Further, the alternative alignment as proposed by the CNPS, while well intentioned, has shown to be a very bad option by every available metric. The latest staff report summarizes by stating: *"the CNPS alternative would have significant impacts to visually and environmentally sensitive resources and would result in a much greater need for landform alteration than the City's proposed east-west trail alignment." (p. 55)*

The primary objections from those opposing the AGMP has centered on the use of a path for both transportation and interpretive purposes as grounds for a claim against being "resource dependant" or as setting a bad precedent for future projects involving trails in ESHA environments. Both of these claims have been addressed and disproved by staff in their report. Specifically, the reports states *"It is clear that the nature of the proposed trails provides for both types of uses, i.e. the more reflective, natural interpretive experience, as well as the use of the paved paths as a through non-automobile transportation alternative. These two uses are not mutually exclusive and other Commission-approved projects that have trail components in ESHA provide access to both types of users (e.g., the Sand City and City of Monterey paved paths in dune habitat)." (pp. 66-67)*

Perhaps the strongest arguments in support of the AGMP are to consider the "big picture" issues of environmental sustainability and stewardship. The staff report stated *"the proposed project will provide options for a variety of types of recreational and interpretive uses in Arana Gulch, and will also provide a safer non-automobile alternative transportation option for those who wish to move from one side of Arana Gulch to the other between the City and the County. As such, the proposed project will reduce vehicle miles traveled and energy consumption, and by extension address issues associated with global climate change. Therefore, the Commission finds the proposed project consistent with Coastal Act Section 30253." (p. 67)*

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Accepting the recommendations of the Coastal Commission's Staff and supporting the AGMP is the right thing to do for the environment and for our Community. This project has become a turning point for a large and diverse group of people that were brought together by collective interests and a common vision to develop a community resource in an environmentally responsible way. It will provide educational and recreational benefits to users ranging from pre-school children to the elderly and disabled.

There is a lot of potential goodwill to be had from compromise and supporting the vision of progressive eco-urbanism. It is time to reject the tired polemics and obstructionist tactics of our local environmental "fundamentalists".

Please put your full support behind the AGMP.
Respectfully,

William Menchine

William Menchine
116 Otis Street
Santa Cruz, CA 95060
menchine@cruzio.com

CALIFORNIA
COASTAL COMMISSION
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Th8a

October 7, 2010

Supervisor Mark Stone
701 Ocean Street, Room 500
Santa Cruz, CA 95060

Dear Supervisor Stone,

As a resident of Santa Cruz County, I'm writing to you on behalf of the Arana Gulch Master Plan, which was recently updated by the City of Santa Cruz. I've been following this project for at least a couple of years, and I'm convinced this updated plan is the best effort put out by the city thus far, and, among other things, it will help ensure the survival of the native Tarplant at this location.

For background, I have a degree in Environmental Resource Management and Planning, so I've had the opportunity to work on many projects similar to this one over the years, and two projects in particular come to mind. One was a project in Florida that involved access into environmentally sensitive wetlands that contained endangered and protected plant species - including pitcher plants and wild orchids. The other project involved access through a riparian habitat near Davis, California. In the latter project, we had to be concerned about two protected species as well - Swainson's Hawks, and a species of beetle unique to California's Central Valley.

As with the Arana Gulch project, all of the protected plant and animal species in the respective projects detailed above were seriously at risk prior to the development and implementation of a management plan. Unlawful encroachment was prevalent, and pedestrians would frequently stray from established paths, which resulted in plants being trampled, leading to denudation and subsequent erosion during the rainy season. These are the same problems that Arana Gulch is experiencing now. After the access management plans were adopted, plants and animals in the target areas enjoyed better protection than they had in decades. Protective fencing was erected and, invasive encroachment by pedestrians virtually disappeared, and the native plants and animals are now protected for generations to come.

I would like to respectfully request your support in voting without delay for approval of the Arana Gulch Master Plan submitted by the City of Santa Cruz when the California Coastal Commission Convenes at it's meeting in Oceanside next week. If you have any further questions, please feel free to contact me at bustostimothy@gmail.com, or by phone at 831.239.6686.

Thank you for your time and consideration of this matter.

Regards,

Timothy M. Bustos, Sr.
2-2625 East Cliff Drive, #11
Santa Cruz, CA 95062

XC: California Coastal Commission

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Th8a

Susan Craig

From: Pat Dellin [patinsantacruz@yahoo.com]
Sent: Monday, October 11, 2010 11:00 AM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: support Arana Gulch Master Plan

Dear Commissioner Stone,

I strongly support the proposed Arana Gulch Master Plan for its close attention to environmental, educational and access issues.

Arana Gulch is my neighborhood greenbelt and I look forward to sharing this great community resource with people of limited mobility.

I hope you will take a strong leadership role in approving the Plan at this week's meeting of the California Coastal Commission.

Thank you,
Pat Dellin
resident of eastside Santa Cruz

Th8a

Supervisor Mark. W. Stone
Board of Supervisors
701 Ocean Street, Room 500
Santa Cruz, CA 95060

CC: Dan Carl, District Manager
10/7/10

Dear Commissioner Stone:

I am a longtime member of the Sierra Club, and I want to brief you on some aspects of the Sierra Club Santa Cruz Group, particularly as it relates to the Arana Gulch Master Plan.

The Group arguably does not have a position on the City's Arana Gulch Master Plan (AGMP). The Group's Executive Committee has not taken a position on Arana Gulch since 1995, a time when the City was just beginning to discuss alternative routes for pedestrian/bike/handicapped trails, and no one was working on a Master Plan for Arana Gulch. The Arana Gulch Master Plan did not exist until 2006. There has never been an Executive Committee vote on the Master Plan.

Furthermore, the few on the Executive Committee who claim to speak for the Sierra Club on this matter have never allowed the Group membership to vote on this issue. In my estimation, a majority of the Group's members would support the Arana Gulch Master Plan on environmental grounds. I note that at the May Coastal Commission meeting, 17 people spoke during oral communications in favor of the AGMP (only 2 opposed), and at least 8 of the 17 were current Sierra Club members.

Sierra Club National has not signed on with those claiming the Sierra Club opposes the AGMP. In 2006 there were those in the Executive Committee who loudly announced that the Sierra Club would join the lawsuit against the AGMP. In order for that to happen the Santa Cruz Group would have had to submit a "New Matter Form" to Sierra Club National. Approval of this submission would have allowed the Group to be one of the litigants in the suit. Responding to my query as to the validity of the assertion that Sierra Club National denied the Group's request to being a party in the Arana Gulch suit, a member of the Executive Committee responded "No validity. They were never asked." Why this turn around on Group's commitment to being party to the suit against AGMP?

It is also noteworthy that Sierra Club National has excellent policies on the importance of bicycle transportation and other alternative transportation in reducing greenhouse gas emissions, and emphasizes the importance of providing infrastructure

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for alternative transportation.

The makeup of the local Group's Executive Committee could very well change in this December's Executive Committee election. At the Group's September meeting Paul Elerick, member of the Executive Committee and its nominating committee, announced the names of 8 potential candidates for the Executive Committee election. Among those names were Paul Schoellhamer, Keresha Durham, and David Casterson -- all champions of the environmental benefits of bicycle transportation and other forms of alternative transportation. There might be bicycle-friendly petition candidates as well.

Sincerely,

Charles Dixon
524 #B Ocean View Ave
Santa Cruz, CA 95062

1h 8a

Hal Anjo, MPA, DPA
226 Fern Drive
Boulder Creek, CA 95006

Ph. 831.236.3475
Fax 831.338.8322
Email: HalAnjo@comcast.net

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OCT 07 2010
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October 3, 2010

Supervisor Mark Stone
Board of Supervisors
County of Santa Cruz
701 Ocean St # 500A
Santa Cruz, CA 95060-4069

Dear Supervisor Stone,

I am writing this letter in support of the City of Santa Cruz proposal for an accessible path through the lower section of Arana Gulch. I serve as one of your appointees to the Seniors Commission and I am also a member of the Regional Transportation Commission's Elderly and Disabled Transportation Advisory group. Both of these groups represent many who have ambulatory limitations and have recommended approval of the City of Santa Cruz proposal, and both groups are on record as endorsing the City's proposal. However, I want to be clear that I do not at this time speak for either group.

The City's proposal is a reasonable and limited modification which will have minimal impact on the better part of the open space and has potential for increasing the quality of life for a significant part of the community. I am also aware of the fact that similar modifications in Monterey County have been previously approved by the Coastal Commission.

As I understand, the Arana Gulch plan will provide a paved path with adjusted elevations for persons who have problems with mobility or stamina but will also serve as alternative route for cyclists and pedestrians. The path is located in a section of Arana Gulch that minimizes impact on the overall area and at the same time allows all to enjoy access to the open space. Various documents indicate that the impact of the paved path is at best minimal and will prevent erosion and runoff all the while providing a stable surface for walking, wheelchairs and bicycles.

CNPS is concerned that the variety of tar plant that is found in Arana Gulch will be threatened by increased access to the area. The recently issued report by the Coastal Commission staff, however, very thoroughly makes the case that the tarplant is now in decline because it needs more aggressive management of non-native grasses (which the staff calls the tarplant's "last best option"), and that the way to get that more aggressive management is to approve the City's Arana Gulch Master Plan.

Sound public policy must focus on the need to consider the needs and demands of all stakeholders. This is not and should not be regarded as a zero sum game. The City's proposed Master Plan is the best option both for the tarplant and for public access, including access for persons with mobility or stamina limitations.

I sincerely hope that you will vote to permit the Arana Gulch plan to proceed.

Sincerely,
Dr. Hal Anjo

cc: All Commissioners
Dan Carl

From the desk of Trician Comings

Re: the Santa Cruz Arana Gulch
Master Plan with Multi-use trails

Dear Mark Stone,

The time has come for you to represent the (nine-to-one) majority of your constituents. Please urge your fellow-commissioners to vote FOR this plan on October 14th.

Those of us who live in the area KNOW that alot of the vocal minority opposing this plan are <u>not</u> REALLY concerned about the tarplant. They are just desperate to keep this nearby open space for themselves (and their dogs). They are just hiding behind the "Environmental" banner.

I'll bet if some tarplant sprouted in their back yards, they'd quickly spray it with Round-Up.

You would be surprised how many Sierra Club members SUPPORT this plan as it now stands.

(OVER)

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Th8a

Susan Craig

From: Heather Babcock, CPA [hbabcock@cruzio.com]
Sent: Thursday, October 07, 2010 4:27 PM
To: Susan Craig
Subject: Arana Gulch

Coastal Commission,

I would like to encourage you to approve the City of Santa Cruz's updated Arana Gulch Master Plan. It is time to get this plan off the back burner and headed towards reality.

This revised plan addresses all of the Coastal Commission's issues and provides for management of Arana Gulch's acres of open space, habitat, and unique resources. The plan will protect sensitive areas while allowing our citizens to enjoy them. This open space will be a valuable resource for all to enjoy.

Please make a vote to move this plan forward

Sincerely,

Heather Babcock
city resident

Th8a

Susan Craig

From: David Zweig [david.j.zweig@gmail.com]
Sent: Wednesday, October 06, 2010 9:24 AM
To: Susan Craig
Subject: Fwd: Arana Gulch Multi-Use Trail

-------- Original Message --------
Subject: Arana Gulch Multi-Use Trail
Date: Wed, 06 Oct 2010 09:20:09 -0700
From: David Zweig <david.j.zweig@gmail.com>
To: mark.stone@co.santa-cruz.ca.us
CC: scraig@coastalca.gov

Dear Mr. Stone,

Please vote in favor of the City's recommendation to **APPROVE THE ARANA GULCH MULTI-USE TRAIL.**

1) Soquel avenue and Murray are not good options for bicycle traffic. I have lived in Live Oak and East Side Santa Cruz for 7 years and as an avid cyclist have been inhibited by a lack of good bike-able routes between Live Oak and downtown Santa Cruz. This one small trail will make all the difference in the world in getting across town.

2) The current Arana Gulch is a series of muddy trails and trenches. This is the craziest part of this whole controversy. Arana Gulch as it exists today is a series of eroded foot trails with people going wherever they want and trampling whatever they want. A multi-use trail will concentrate the foot and wheel traffic to a non-erosive surface. Get people off the muddy dirt trails and onto asphalt or decomposed granite. Save Arana Gulch by doing the right thing. A trail is the best thing for the gulch's plant habitat.

I know this is a difficult decision. Thank you in advance for your YES vote on the Arana Gulch Multi-Use Trail,

Dave Zweig

Th8a

Susan Craig

From: Dan Carl
Sent: Wednesday, October 06, 2010 9:59 AM
To: Susan Craig
Subject: FW: AGMP permit #3-09-068

From: Ron Pomerantz [mailto:RonForCouncil@cruzio.com]
Sent: Tuesday, October 05, 2010 8:26 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: Dan Carl
Subject: AGMP permit #3-09-068

October 5, 2010

Supervisor Mark. W. Stone
Board of Supervisors
701 Ocean Street, Room 500
Santa Cruz, CA 95060

Dear Mark
I write you today to strongly request your vote in favor of the Arana Gulch Master Plan (AGMP) and its multi-use path as presented on the upcoming Coastal Commission agenda on October 16th.
As a candidate for Santa Cruz City Council I have been going door to door. When I discuss that I am in favor of the Arana Gulch Master Plan I get roughly a 9 to 1 favorable response, which is similar to the ratio in favor as noted in the Coastal Commission's March staff report. Mark, please note the wishes of your constituency. Not only is this project overwhelmingly popular, but the environmental benefits of a funded tarplant management plan, greenhouse gas reductions, green jobs for the Construction and Building Trades, and access and interpretive use for young, elderly, and wheelchair bound, make this project of critical importance.
I believe that the Coastal Act demands a yes vote on AGMP. I think that Peter Douglas would agree. We'll see what he says at Oceanside.

Your local Coastal Commission staff, this region's experts on the Coastal Act, had this to say in their staff report:
"The Commission has a long history of approving interpretive public access trails and pathways in ESHA as resource-dependent developments. In this case, the proposed project not only includes trails of this nature, but it will also result in the improvement of habitat resources in Arana Gulch as part of the proposed project. In other words, this project goes beyond many other interpretive trail projects approved by the Commission in the past to not only provide the interpretative trail itself, but to also provide for significant habitat restoration and enhancement as part of the project." (p. 4)

"...the proposed project represents an appropriate resource-dependent development in ESHA that will not result in a significant disruption of habitat values. ...the proposed project should result in overall habitat enhancement for the special resources at Arana Gulch coincident with interpretive access

enhancement in the same area, including allowing more and different user groups to experience such resources effectively and appropriately. The proposed project is consistent with Coastal Act Section 30240 and the other cited resource protection policies of the Coastal Act." (p. 50)

"In conclusion, staff, including the Commission's senior ecologist and the Commission's hydrogeologist, have further reviewed the City's now revised project as well as new data and information developed in the time since the March hearing, and staff is convinced that the City's proposed project, as conditioned, represents the best possible outcome under the Coastal Act with respect to this project." (p. 8)

This project has has been studied and scrutinized to the Nth degree for nearly 15 years, as well as successfully weathering repeated court challenges. Please, no more delays. Your affirmative vote for the AGMP is essential.

Thank you for your time and thoughtful consideration.

Sincerely,

Ron Pomerantz
215 Gharkey Street
Santa Cruz CA 95060

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

Susan Craig

From: Jack Bowers [jbowerspiano@aol.com]
Sent: Tuesday, October 05, 2010 3:39 PM
To: Susan Craig
Subject: Arana Gulch Access Plan

Th8a

Mark Stone
California Coastal Commission

Mark-

I strongly support the Arana Gulch Access Plan as recommended for approval by the Coastal Commission. As a Seabright neighborhood residence and a senior, it will contribute greatly to open space access for myself and my neighbors, as well as protect a beautiful and unique piece of Santa Cruz openspace.

Thank you for your work,

Jack Bowers
422 Windsor St.
Santa Cruz

Th8a

800 Brommer St. #80
Santa Cruz, CA 95062
27 September 2010

Dear Dan Carl,

Future accidents will be prevented with the creation of a multi-use trail through Arana Gulch, allowing safe passage from east to west Santa Cruz and vice versa. Because no such trail exists, accidents and even fatalities occur. Last Friday, a senior couple riding a tandem bicycle, was struck by a flat bed truck on Murray Street, pitching them to the pavement. Traffic was blocked while the woman, who was knocked unconscious, was flown to a trauma center. Unfortunately, neither bicyclist was wearing a helmet; fortunately, the woman is expected to recover. Two years ago, however, another bicyclist, Lucien Gregg, was killed not far from Friday's accident, when a delivery truck struck and killed him as he traveled west on Murray Street, only to have the truck hit him when it turned into a side street.

How many accidents and fatalities will it take for the Coastal Commissioners to realize the desperate need for a safety corridor between the east and west sides of town? If the couple on a tandem, as well as Mr. Gregg, had access to a nearby off-road corridor to travel, their stories would not need to be told. Opponents of this multi-use/safety corridor cite the need for preserving the endangered tar plant. Their argument is well founded, but empty compared to the need to protect human lives.

Santa Cruz citizens need as many safe off road corridors as possible. The environment needs cleaner air due to lower carbon emissions as people leave their cars at home to walk or ride the Arana Gulch multi-use path for daily errands. I live in a Live Oak senior community near the access to Arana Gulch. Some of my neighbors, who already walk for exercise, say they look forward to an off road link to the Seabright area to run errands as well as for exercise. (New Leaf Grocery and Wells Fargo will open for business soon just down the street from the Broadway exit of the proposed path.)

It is well and good to argue for the health of an endangered California native, the tar plant. But flesh and blood California citizens of Santa Cruz are more important. Their lives depend upon safe off-road trails like the Arana Gulch multi-use path. Please make this multi-use path a reality.

Sincerely,

Grace Voss

Grace Voss

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Th8a

Ryan Sarnataro

118 Hagemann Ave.

Santa Cruz, Ca. 95062

831-466-9570

California Coastal commission

725 Front St room 300

Santa Cruz, Ca. 95060

To the commission,

I am writing as a resident of Santa Cruz who lives within yards of Arana Gulch. Unlike some of my neighbors I wholeheartedly approve of the plan to install the multi-use path, reintroduce limited grazing and protect parts of the open space from people and dogs.

In my personal case I am both a bicycle rider and a disabled person (yes it is possible to be able to ride a bicycle for miles while being unable to walk a couple of hundred yards). I see the trail improvements and the bridge as augmenting my personal comfort and safety. Right now the trails in the park are rutted and uneven in the summer and turn into sloppy gullies in the winter. If the open space remains unimproved, erosion and the problem of new trails popping up will further degrade the environment. The gulch will not remain static, it will be used by more and more people over time - the improvements are the best way the natural environment can be preserved.

The most important reason to approve the plan really has to do with the future. Long after I am no longer traveling through the park and my neighbors disturbed by the change of view have passed from the scene the improvements will be part of the infrastructure of Santa Cruz, a legacy to our descendants. At a time when spending on vital projects is drying up the opportunity to improve the open space and, dare I say, improve the non-vehicular arteries of Santa Cruz may not come again.

I urge the commission to approve the improved plan now under consideration.

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Sincerely,

Ryan Sarnataro

Susan Craig

From: David Foster [davidfoster118@live.com]
Sent: Friday, October 08, 2010 3:01 PM
To: Susan Craig
Subject: Support for Arana Gulch improvements

Th8a

Dear members of the California Coastal Commission:

I have lived in Santa Cruz County for fifty-two years. I am an avid hiker/walker of the Santa Cruz area parks and green belts and grew up hiking the area with my parents who are still living in the area. Both of my parents (now 84 and 88 years old) still like to get out into the natural areas and to enjoy the trees and the grasslands. Unfortunately, they both now use walkers to get around and may soon be transitioning to wheelchairs. Currently there are no wheelchair or walker-accessible trails in any of the Santa Cruz area greebelt parks. Please help to bring Arana Gulch up to the accessibility standards that are so important for the growing population of seniors and persons with disabilities.

Thank you for your careful review of this important habitat accessibility/improvement project,

Sincerely,

David Foster
Santa Cruz City Planning Commissioner
118 Miles Street
Santa Cruz, CA 95060
davidfoster118@live.com

Susan Craig

From: Jesse Nickell [jnickell@BarrySwensonBuilder.com]
Sent: Friday, October 08, 2010 4:53 PM
To: Dan Carl; Susan Craig
Cc: Juliana Rebagliati
Subject: support of Arana Gulch Master Plan application

Th8a

California Coastal Commission
Central Coast Office
725 Front Street, Ste 300
Santa Cruz, CA 95060
Fax: (831) 427-4877

Re: Santa Cruz Arana Gulch Master Plan

Dear Dan Carl and Coastal Commissioners:

The long term vision for the abovementioned project is about getting more people to use the green belt. This project is all about green belt access and saving the Tar plant. The revised plan by the City of Santa Cruz, represents the very best options for this property. It balances Coastal Access, providing an Interpretive program for this beautiful area and it is a great way to protect a sensitive habitat open area.

I want to communicate my support for the approval of the Arana Gulch Master Plan application that is before you. I believe the enhanced management plan addresses all the Coastal Commission's concerns and unlocks access for all; additionally, it will provide revitalization the tar plant area. I think it will be a catalyst for more public use and to educate people visiting this green belt area.

With regards to the proposed revised Master plan, I would strongly urge you to support the current design. The green belt deserves better. We need to recognize and allow certain access to these green belts as it is an important way of life for the Santa Cruz Community.

Your vote will send an important message to our local community. I look forward to your support of Arana Gulch Master Plan application in its current form.

Jesse L. Nickell III
Santa Cruz Resident

Jesse L. Nickell III
119 Clinton St.
Santa Cruz, CA 95062
(831) 475-7100 ext. 113
(831) 901-1572 Cell
(831) 475-4544 Fax

Th8a

Susan Craig

From: judymarsalis@yahoo.com
Sent: Thursday, October 07, 2010 10:22 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: Please vote for the Arana Gulch Master Plan

This is a valuable safety corridor for children and adults who walk or ride bikes, as it will connect the east and west sides of santa cruz...at present, the city owns Arana Gulch, maintaining it as open space...if the city had not purchased it, developers would have done so, and then where would the endangered tar plant be?.

Even at 67 I bike all over the county to do my errands, please make it easier while saving the environment FOR ALL not just the close neighbors!

Judy Marsalis
318 Everson Dr
Santa Cruz
95060

Th 8a

Susan Craig

From: Matt Farrell [mateo@cruzio.com]
Sent: Thursday, October 07, 2010 10:35 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: Matt Farrell; Susan Craig
Subject: Please Support City's Proposal for Arana Gulch Bike Path

I plead for your support of the City's proposal for a mixed use bike path through Arana Gulch. Commission staff has taken the time to evaluate the California Native Plant Society's and exercising its professional role as staff in support of the Coastal Act determined that the City of Santa Cruz proposal has less overall adverse impacts than the alternative proposed by the California Native Plant Society.

I had a chance the other day to see a picture of what will happen to Downtown Santa Cruz by 2050 if we don't take direct and continuous action to change our patterns of travel and consumption. If things continue as they are, virtually of Downtown Santa Cruz will be under water. This image was very disturbing to me and brought back memories of the Loma Prieta earthquake and how our failure to move forward on seismic retrofitting of unreinforced masonry structures resulted in three fatalities and the loss of an irreplaceable historic district.

Please demonstrate leadership and courage and do the right thing.
Support a plan and proposal which will protect the Arana Gulch, the tar plant, and provide access to the citizens of the City and County. I want to remind you that our dear friend Mardi Wormhoudt supported this proposed path and that she was a comrade of yours in protecting environmental values throughout the county and region. I also think it was very telling, because Mardi wasn't much of a bicyclist herself.
She knew it was the right thing to do.

The best way to teach stewardship for our environment is to encourage people to act and move in tune with nature. Whether that is swimming the English Channel or running an ultra marathon or riding from Santa Cruz to Watsonville on bicycle using the available network of bicycle lanes and paths doesn't make a difference. These behaviors encourage harmony with nature. They provide ownership to open space and ensure that there will be stewards after us to watch over and protect it.

Matt Farrell

20

Th8a

Susan Craig

From: Claudio Schnier [cschnier@cruzio.com]
Sent: Monday, October 11, 2010 6:52 AM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: Arana Gulch

Dear Mr. Stone:

My understanding is that the Coastal Commission is voting this week on the future of Arana Gulch. I would like to voice my strong support for the approval of the Arana Master Plan, as developed by the Commission staff. The accessibility considerations for the mobility impaired, pedestrians and cyclists, as well as the environmental considerations make this a sound plan.

I could go on and outline numerous other reasons to support the Plan however, all my points are already covered in the planning documents.

I would close by saying that I understand that support for this project far, far outweigh any opposition. I do hope you will support the Master Plan and vote in favor.

Please keep me informed of your vote on this matter.

My address:
Claudio Schnier
95 Caledonia Street
Santa Cruz, CA 95062

Sincerely,
Claudio

cschnier@cruzio.com

Th 8a

Susan Craig

From: Cory Caletti [cory@caletticycles.com]
Sent: Friday, October 08, 2010 9:46 AM
To: mark.stone@co.santa-cruz.ca.us
Cc: John Caletti; Susan Craig
Subject: support for the Arana Gulch Master Plan

Hello Coastal Commissioner Stone:

As a resident and voter in the Santa Cruz County supervisorial district you represent, I urge you to please support the Arana Gulch Master Plan as submitted by the City of Santa Cruz.

The project has an astonishing amount of public support with only a handful of vocal opponents. The Arana Gulch Master Plan project would provide innumerable benefits to natural habitat preservation, open space access, as well as a critical multi-use path for bicyclists, pedestrian, seniors and people with disabilities. Not approving the plan, or further delaying approval, would be a blow to our community after a needlessly long and expensive battle. Please act in accordance with the wishes of the overwhelming majority of your constituents.

Regards,

Corina (aka Cory) Caletti
218 Brookside Ave
Santa Cruz, CA 95060

22

Th8a

Susan Craig

From: Paul Schoellhamer [paulschoel@msn.com]
Sent: Friday, October 08, 2010 7:59 AM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: Arana Gulch Master Plan

October 8, 2010

Supervisor Mark Stone

701 Ocean Street, Room 500

Santa Cruz, CA 95060

Dear Mr. Stone,

At the March hearing of the Coastal Commission, you marched to a different drummer. Everybody else either supported the City's Arana Gulch Master Plan as fully compliant with the Coastal Act, or opposed it with the argument that it was not resource-dependent (which boiled down to the claim that although the proposed Multi-Use Trail served an interpretive function, it also served a transportation function, and that was somehow disqualifying). You, however, took a different position, that the proposed Master Plan met the legal requirement of being resource dependent, but not the requirement that it not significantly disrupt habitat values.

So you've already taken a firm position in favor of the Master Plan with respect to the resource-dependent requirement. The remaining question is the no-significant-disruption requirement, and what the further study you successfully argued for found on that issue.

Your concern on no-significant-disruption was that the Multi-Use Trail might act as a biological barrier for the tarplant, or in other words would create habitat fragmentation. The study that was completed at your request, however, found that the Trail would not function as a biological barrier. As noted in the report recently issued by the Commission staff, "In terms of habitat fragmentation, although the City's proposed path alignment will go through the meadow (but not through identified historic tarplant areas), it will not lead to significant adverse fragmentation impacts." (pp 7-8) The staff further concludes "...the facts specific to tarplant habitat indicate that such habitat fragmentation is not a significant concern in this case." (p. 8)

These are specifically the conclusions of Dr. John Dixon, senior ecologist for the Coastal Commission and one of the most respected environmentalists and scientists in the state.

There is also practical evidence of the accuracy of these scientific conclusions, and that practical evidence is located right here in Santa Cruz County. Watsonville Airport has seen a spectacular revival of Santa Cruz tarplant. Forty years ago, there was almost none on the airfield, and what there was was only in one place. In recent years the tarplant count at the Airport has fluctuated between 400,000 and 27 million, depending on annual weather conditions (per the Elkhorn Slough Foundation). It now covers a large portion of the airfield. And it has readily crossed runways and taxiways. These are not mere 8 foot wide pedestrian and bike paths -- the secondary runway is 100 feet wide and 4000 feet long, and the main runway is 150 feet wide and 4500 feet long. Tarplant has readily crossed these vast paved areas, and often seems to prefer areas of the airfield along both sides of the runways and taxiways. Casual observation suggests that the pavement may facilitate dispersal of the tarplant seed, in that the wind can readily move the seed along a flat, smooth surface, but cannot move it along rough and grassy areas.

Paved runways 100 feet wide and 150 feet wide are not functioning as a biological barrier to the tarplant at Watsonville Airport. I think you can accept the scientific judgement of Dr. John Dixon that 8 feet of pavement will not function as a biological barrier at Arana Gulch.

I am a Santa Cruz County resident and a member of the Sierra Club, and I urge you to support the City's revised Arana Gulch Master Plan, as recommended by the Commission staff.

Yours truly,

Paul Schoellhamer

cc: S. Craig

Th 8a

Susan Craig

From: daveterra@comcast.net
Sent: Thursday, October 07, 2010 11:50 AM
To: mark stone
Cc: Susan Craig
Subject: Arana Gulch Master Plan

Sent via email and USPS

October 7, 2010

Supervisor Mark Stone
701 Ocean Street, Room 500
Santa Cruz, CA 95060

Dear Supervisor Stone:
I write this letter to urge your support for the City of Santa Cruz's Arana Gulch Master Plan. As a long-time and active member of our city and former resident of a town in your nearby supervisorial district, I ask that you carefully consider the community's broad-based project support as well as the increased public access and environmental protections of this project in making your decision as a member of the California Coastal Commission. I urge your support the Arana Gulch Master Plan for the following reasons.

First, in regards to environmental protections, the City's Arana Gulch Master Plan has been revised to make clear that the tarplant management program will cover nearly the entire grassland area, that the trail surface as well as base material will be permeable, and that additional existing trails that cause habitat or erosion problems will be closed and restored. And the completed study ordered by the Commission has clearly shown that the City's revised plan is environmentally superior to any other plans.

Second, in regards to improved public access, the City's revised plan would create the first wheelchair-accessible trails in any of the City's four greenbelt parks as well as provide access to the Harbor and nearby beaches. This is a wonderful improvement which serves seniors and persons with disabilities who would not otherwise have the opportunity to visit this open space.

Third, as the parent of young children I am especially supportive of programs which serve our community's youth. The City's revised Plan would create educational opportunities, such as interpretive displays for students, teachers as well as the general public, to learn about the habitat of this space. It's important that we engage residents and especially young people in efforts to learn about and protect our coastal environment.

Finally, and of particular importance because of their objective viewpoint, the Commission's professional staff has concluded that the City's revised Arana Gulch Master Plan meets all the requirements of the Coastal Act and is consistent with Commission precedents.

Th8a

Susan Craig

From: Monica Pielage [mpielage@yahoo.com]
Sent: Thursday, October 07, 2010 9:56 AM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: I support Arana Gulch

Dear Sir/Madam:

I support the Arana Gulch Master Plan and improved public access to the open space as well as a safer east/west bike route for myself and my 4 year old son.

Please approve the plan.

Sincerely,

Monica Pielage
117 Darwin St
Santa Cruz CA 95062

Th8a

Susan Craig

From: Colleen Brokaw [colleenb@ebold.com]
Sent: Wednesday, October 06, 2010 4:43 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: Please support Arana Gulch Master Plan

Dear Mark Stone,

I wish I could come in person to Oceanside to let you know how much I and my friends support the City of Santa Cruz's revised Arana Gulch Master Plan! I and my friends have used Arana Gulch many times, both as bicyclists and as walkers, and feel the plan would be beneficial to all of Santa Cruz.

Some of my friends worked long and hard on this plan, and I know them to have been thoughful, smart, honest, and thorough in this, as in all their endeavors.

PLEASE SUPPORT THE ARANA GULCH MASTER PLAN FOR CITY OF SANTA CRUZ - AND FOR THE BENEFIT OF THE ENTIRE CENTRAL COAST!!

Thank you so much.

Sincerely,

Colleen Brokaw, Esq.
2630 Mattison Ln
Santa Cruz, CA 95063
831-535-2997

Th8a

Susan Craig

From: Kathleen Rose [kathoo@mac.com]
Sent: Wednesday, October 06, 2010 8:42 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: Arana Gulch Master Plan

Dear Mr. Stone,
I am a resident of Santa Cruz County and a longtime member of the Sierra Club, and I urge you to support the City's revised Arana Gulch Master Plan, as recommended by the Coastal Commission staff.

As the Commission staff makes clear in its recently issued report, the City's Arana Gulch Master Plan meets all the Coastal Act requirements, is the best option for the habitat, is the best option for the tarplant, is the best option for public access and accessibility for the mobility-impaired, and would provide an excellent opportunity to educate people about the habitat and the importance of preserving it.
There is no valid reason to oppose this Plan. I urge your support.

Yours truly,

Kathleen Rose

Th8a

Susan Craig

From: Kirby Fosgate [kirbyfosgate@yahoo.com]
Sent: Wednesday, October 06, 2010 11:55 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: Arana Gulch Master Plan

Mr. Stone .... First, I would like to introduce myself; My name is Kirby Fosgate, and I am a Santa Cruz City resident and a retired State Park Ranger and the Trails Coordinator for the Santa Cruz District State Parks for over 25 years. I worked over the years on numerous State Park trail projects in Santa Cruz, and surrounding counties.

I respectfully ask you to support the proposed Arana Gulch Master Plan at the California Coastal Commission meeting in Oceanside on October 14th. I will be driving the 12 hour round trip distance to attend the meeting to encourage you and the Commission to approve this well thought out plan to protect and maintain the natural resources of Arana Gulch while allowing people to safely visit the open space.

Thank you for consideration

Kirby Fosgate
Santa Cruz

Tn8a

Susan Craig

From: bkett@ix.netcom.com
Sent: Tuesday, October 05, 2010 5:32 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig; editorial@santacruzsentinel.com
Subject: Arana Gulch Plan

Dear Mr. Stone,

I met you about 2 1/2 years ago at a Santa Cruz Land trust luncheon at Diane Porter Cooley's ranch east of Watsonville. The whole group went for a walk through her ranch lands including supervisor Pirie. I am a 4th generation Santa Cruz County citizen (my greatgrandparents came here in the 1860's), and I feel very stongly about land preservation in this wonderful county that we live in.

I am writing to urge you to take a stand on the Arana Gulch city plan by supporting it. The not-in-my-back-yard(NIMBY)folks have dragged this on long enough. Santa Cruz needs people to get out of their cars and walk or cycle to get around town. The crossing through Arana Gulch gives access to people to a unique place, and at the same time helps preserve the endangered tar plant. This plan promotes health to all county residents, by allowing a safe crossing through town in a non-motorized fashion. Your support will be a positive action for the benefit of future generations of Santa Cruz County citizens.

Thank you for listening, Brandon Kett
39 Cutter Dr.
Watsonville, 95076

27

Susan Craig

From: Sonda Beal [scbeal@hotmail.com]

Sent: Wednesday, October 06, 2010 11:07 AM

To: mark.stone@co.santa-cruz.ca.us

Cc: Susan Craig; editorial@santacruzsentinel.com

Dear Mr. Stone:
During the time the Arana Gulch Bike and Interpretive Trail has been on the ag
If the city's proposal for a trail -- which has been years in the making and w
Thus, I urge you to vote in favor of the city's proposal at the October 14 mee
Sincerely,
Sonda Beal

Th8a

Susan Craig

From: Bruce Sawhill [bksawhill@cnsp.com]
Sent: Wednesday, October 06, 2010 3:49 PM
To: Stone Mark
Cc: Sawhill Bruce; Susan Craig
Subject: Arana Gulch

> Hi Mark;
>
> One of these days we'll actually meet up! I hope you're swimming in
> the meantime.
>
> I know you're busy with the Coastal Commission meeting coming up.
> Even though FORT's forte is rails/trails and we don't have any
> official opinion on Arana Gulch, I believe that due diligence has been
> served by the CC staff and that it is a good project and that it
> should proceed. Even if there were a bike trail along the rail line
> across the Harbor, it would still be a good idea because there are few
> other options available.
>
> Have you ever read the book by Bill McKibben, "The End of Nature"?
> It says we have become so disconnected with the natural world that we
> are not even aware of how we affect it.
>
> In that vein, things like national parks exist because people want
> them to exist and they want to visit them. Arana Gulch is a little
> piece of nature, and having it seen by more people in a low impact way
> would serve the appreciation of nature and our role in it to greater
> effect. A democracy is a popularity contest, and people vote with
> their feet.
>
> Cheers,
>
> Bruce Sawhill
> Chair, FORT

Th8a

Susan Craig

From: Dion Farquhar - SBC [dnfarquhar@sbcglobal.net]
Sent: Tuesday, October 05, 2010 3:28 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: micah@peoplepowersc.org; Susan Craig; editorial@santacruzsentinel.com; Marsh Leicester; Dion Farquhar
Subject: Support Arana Gulch Master Plan

Dear Public Supervisor Mark Stone,

We are writing to urge you to vote to support the Arana Gulch Master Plan, which includes the City's proposed multi-use trail that is accessible to bikes, pedestrians, and wheelchairs. Connecting Broadway and Brommer would vastly encourage commuting by bike as well as recreational use of the paths.

We believe that public access to Arana Gulch, from the east (Live Oak) and from the west (eastside Santa Cruz), as well as public access through Arana Gulch to the Harbor and the beaches will not only reduce car traffic, but also encourage biking and walking, as well as invite the wheelchair community to use these paths.

In short, we support the access it will offer the mobility-impaired as well as people like us (and our teenage children) who would bicycle more if there were a SAFE way to get around that was car-free. We would like to use alternative methods to auto and bus transportation for both ecological reasons as well as health and exercise benefits.

Please add your voice to those already supporting the Arana Gulch Plan.

Thank you!

Best regards,

Dion Farquhar, Ph. D.

Marsh Leicester, Ph.D
(People Power Members and Voters)

Th8a

Susan Craig

From: geri lieby [glieby@gmail.com]
Sent: Tuesday, October 05, 2010 8:39 AM
To: Susan Craig; editorial@santacruzsentinel.com
Subject: Fwd: Arana Gulch

---------- Forwarded message ----------
From: **geri lieby** <glieby@gmail.com>
Date: Tue, Oct 5, 2010 at 8:35 AM
Subject: Arana Gulch
To: mark.stone@co.santa-cruz.ca.us

Dear Mark Stone,
Please support the city's plan for Arana Gulch. I'm a diehard environmentalist and outdoor enthusiast. I look deeply at proposals that will impact our open spaces. The city plan best protects the tarplant and the open space as a whole while ensuring that its uniqueness can be enjoyed by not only the physically fit but by those with disabilites and or other mobility issues such as wheelchair and stroller dependency.
Please, don't block this chance for another environmental gem in Santa Cruz.
Thank You,
Geri Lieby

Th8a

Mark Stone

From:	eric grodberg [ericgrodberg@yahoo.com]
Sent:	Tuesday, October 05, 2010 8:19 AM
To:	Mark Stone
Cc:	scraig@coastal.ca.gov
Subject:	Arana Gulch Plan

Dear Supervisor Stone,

I am a long time resident of the City of Santa Cruz. I support the City's proposed Arana Gulch Master Plan. Though not an expert myself, I agree with the Coastal Commission's professional staff's assessment that the City's Plan would result in numerous benefits - including an improved environment for the tar plant.

Please take the advantage of the extensive study on this issue by seasoned professionals and approve the plan as recommended by your own staff.

Sincerely,

-Eric Grodberg

Th8a

Susan Craig

From: Peter [beckmann@baymoon.com]
Sent: Tuesday, October 05, 2010 9:21 AM
To: mark.stone@co.santa-cruz.ca.us; Susan Craig; editorial@santacruzsentinel.com
Subject: Arana Gulch Coastal Commission Meeting

Dear Mark,
I am writing to you to encourage you to support the passage of the Arana Gulch Plan. This is a project, where the public benefits far outweigh all the critics' objections. Countless hours of public agency staff and volunteer commissioners have brought the project to this point of (almost) completion. I myself have dealt with the issue in many meetings during my eight years as a Santa Cruz City Transportation Commissioner, and many years later we are still in debate. The main objection from (mostly NIMBY) critics has been the health of the tarplant. However, even the Coastal Commission's own biologist, as many others in the past, supports the plan, because it will *help* the tarplant to thrive.
Thanks for representing your community's interests -
Peter
--
A simple rule for investing:
Be fearful when others are greedy, and be greedy when others are fearful.
(Warren Buffet, October 17th, 2008)

Peter Beckmann
1019 - 3rd Street #6 (Up-stairs on the right)
Santa Cruz, CA 95060
Home: 831-426-3610
Cabin: 831-687-0190 (with solar-powered answering machine!)
Work: 831-423-9242 x22
Cellular phone

Website
Facebook

Th8a

Mark Stone

From:	Michael Levy [levysantacruz@gmail.com] on behalf of Michael Levy [mlevy@baymoon.com]
Sent:	Tuesday, October 05, 2010 11:00 AM
To:	Mark Stone
Cc:	editorial@santacruzsentinel.com; scraig@coastal.ca.gov
Subject:	Yes on the Arana Gulch Master Plan

Dear Mr. Stone and Coastal Commission members:

According the Coastal Commission's biologist, the tarplant is in serious danger if something is not done soon. The Arana Gulch Master Plan, although not perfect, will do a good job of protecting the tarplant and addressing its needs. City staff has put many hours of work into the plan, and who knows when they will be able to do that again?

This is one case where the perfect is clearly the enemy of the good. Please vote to approve the plan.

Sincerely,
Michael Levy

--

Michael Levy
225 Prospect Hts.
Santa Cruz, CA 95065
831-427-9916

)0

Th8a

Susan Craig

From: Brian Corser [bcorser@calcentral.com]
Sent: Tuesday, October 05, 2010 12:00 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: Support of SC City Plan for Arana Gulch

Dear Mr. Stone,

I would like to encourage you support the Santa Cruz City Plan for public access to Arana Gulch. As I understand it the Commission's professional staff has already concluded that the City's proposed Arana Gulch Master Plan meets all the requirements of the Coastal Act.

Thank you,

Brian Corser
114 Ladera Drive
Santa Cruz, CA 95060

2

Th8a

California Coastal Commission
Central Coast Office
725 Front Street, Ste. 300
Santa Cruz , CA 95060
Attn: Dan Carl

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OCT 07 2010
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Dear Commissioners,

We are writing to you to urge you to support the City's revised Arana Gulch Master Plan and support the staff's recommendation.

We have been following this project for many years and believe the time is right to support this project and allow it to move forward. Our family has been living in Santa Cruz for 15 years and we are raising our family here. The City's plan will allow us and other members of the public to enjoy Arana Gulch while ensuring that the area's unique natural resources will be protected. This plan is in fact the only insurance that the natural resources in Arana Gulch will be preserved.

Arana Gulch is a precious coastal resource that needs a protection plan. And as a publicly owned coastal open space, the public has a right to enjoy it. The City's revised plan makes both possible in an environmentally sensitive manner.

Please support the plan.

Thank you,

Rachel Dann and Simon Black
331 Walnut Ave
Santa Cruz CA
95060

Th 8a

HUGH AND CHRIS MCISAAC
809 ISBEL COURT
SANTA CRUZ, CA 95060

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CENTRAL COAST AREA

October 1, 2009

Hugh and Chris McIsaac
809 Isbel Crt.
Santa Cruz, CA 95060

The Coastal Commission

Re: Ariana Gulch Plan, Support

Dear Commissioners,

We support the plan to upgrade the Ariana Gulch with walking trails and other improvements.

This unique, beautiful, undeveloped land would benefit from these walking trails and other additions increasing accessibility as outlined in the current plan before you. The available funding will be well spent an provide years of enjoyment for our generation and generations to follow.

Currently, the land is relatively unused. Fortunately, we have this pristine piece of the undeveloped land which has not been turned into housing and other uses limiting public access. Since funding is available, it would be foolish to let this valuable resource go to waste. We know you will do the right thing and vote to approve this project.

Very truly yours,

Hugh & Chris McIsaac

Hugh and Chris McIsaac,

HMcI:fs

PHONE: (831) 427-3219
hmcisaac@igc.org

14

Th8a

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CENTRAL COAST AREA

FAX

To: California Coastal Commission **Fax Phone No.** 427-4877

From: Hugh & Chris McIsaac

Subject: Ariana Gulch - Approve

Date: 10/7/10 **No. Pages:** 2

This transmission is confidential and is meant for the person named above. If this fax is received in error, please destroy it. The sender may be reached at (831) 427-3219

Comments: Approve the Plan!!

Th8a

Public Comment to the California Coastal Commission
Oct 4, 2010

CDP 3-09-068 Item Th8a
Takashi Yogi
in favor

I have reviewed the CCC staff report on the Arana Gulch Master Plan and concur with the recommendations of the report to approve the revised application. I am a resident of Santa Cruz and attended the March 11 meeting of the CCC. I agree with the report that the proposed plan meets the requirement for being resource dependent. I appreciate the point that additional benefits provided by the plan (namely transportation) do not negate the fulfillment of resource dependency. The precedent of the Seaside/Monterey multi-use path shows that habitat protection, education, and transportation can coexist.
I see the plan as compatible with the long-term objective of the Commission to plan for a sustainable future.

I am concerned about ensuring access for people with disabilities. For this group, the area is presently inaccessible. Therefore for this group, the plan is clearly resource dependent; they would not be able to access the resources without an ADA path.

I am concerned with the fate of the tarplant. It is clear to me that doing nothing will result in extinction. I think the revised plan has carefully studied all impacts of the path and is the best approach for ensuring the survival of the tarplant.

Takashi Yogi

Takashi Yogi
1940 17th Ave
Santa Cruz, CA 95062
yogi@cruzio.com

7 1 0

10-07-10

SUPPORT:
ARANA GULCH MASTER PLAN

Th8a

TO: SUPERVISOR MARK STONE
701 OCEAN ST - ROOM 500
SANTA CRUZ, CA 95060

FROM: CAROLYN GREENE
115 PASEO BALLENA
APTOS, CA 95003

RE: SUPPORT FOR THE ARANA GULCH MASTERPLAN & MULTI-USE TRAIL

I REGRET THAT I AM UNABLE TO ATTEND THE CALIFORNIA COASTAL COMMISSION MEETING ON OCTOBER 14TH IN OCEANSIDE, AS I DID WHEN IT WAS HELD IN SANTA CRUZ.

I WISH TO EXPRESS MY SUPPORT FOR THE REVISED ARANA GULCH MASTER PLAN. THIS PLAN NOT ONLY PROTECTS THE ENVIRONMENT, THE TAR PLANT AND SURROUNDING HABITAT; IT PROVIDES ACCESS TO THIS AREA FOR WALKERS, CYCLISTS AND HANDICAPPED PERSONS. IT CREATES AN EDUCATIONAL EXPERIENCE FOR SCHOOL GROUPS AND OTHERS LIVING IN NEARBY NEIGHBORHOODS.

I AM A SENIOR CITIZEN OF 84 YEARS. I ENJOY THE SAFETY OF WALKING MANY OF OUR BEACHES. THIS PLACE SHOULD SERVE AS A DESTINATION POINT FOR MANY OF THE ELDERLY SEEKING A SAFE PLACE OF SOLACE AND BEAUTY WITHIN AN URBAN SETTING.

PLEASE VOTE FOR THE PASSAGE OF THIS PLAN.

CC: SUSAN CRAIG - CALIFORNIA COASTAL COMMISSION

10h

Th8a

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Jim Warner
215 Trescony St
Santa Cruz, Ca 95060

8 October 2010

California Coastal Commission
Central Coast Office 725 Front Street, Suite 300
Santa Cruz, Ca 95060

I support proceeding with the Santa Cruz City plan to add a path through the Arana Gulch parel.

I believe the tar plant will be better with this project than without it. I believe that the plan fully addresses conservation and that it has significant public recreation and health benefits.

Thank you.

-jim warner

Th8a

Judy Warner
215 Trescony Street
Santa Cruz, CA 95060

October 6, 2010

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CENTRAL COAST AREA

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

Attention: Dan Carl

Dear Commissioners:

I support the Arana Gulch Master Plan and hope you will approve it when it comes to you next Thursday. Like many residents, I've been following the fate of Arana Gulch for years and appreciate the city's revised plan that addresses the Coastal Commission's earlier concerns.

In Santa Cruz, we're proud and protective of our open spaces, and we want this unique, 68-acre greenbelt to include coastal access, habitat protection, and an interpretive program to help young and old alike learn about and enjoy the area.

The plan before you provides for superior stewardship of Arana Gulch.

Sincerely,

Judy Warner

Judy Warner
City Planning Commissioner
Former General Plan Advisory Committee Member

Th8a

Dan Carl
c/o California Coastal Commission
725 Front St.
Santa Cruz, Ca 95060

Dear Mr. Carl,

Please make this letter a part of the official record pertaining to the Revised Arana Gulch Plan.

I strongly support a bike and wheelchair accessible path through the Arana Gulch. I bicycle to work and do my errands by bicycle every day. I try to avoid busy Soquel Avenue because it feels so dangerous and the car exhaust is so strong. A completed path through Arana Gulch would be a safe corridor from the Westside where I live to 41st Av. Please vote to approve the Aran Gulch Master Plan and its multi-use trails.

Arana Gulch is a valuable green space in our town, but it is in danger of becoming a dusty vacant lot if not preserved by some type of Park agency. Mountain bikes and irresponsible pet owners have carved a myriad of dusty paths paths through the Gulch, destroying its natural flora and eroding the soil.

I've been watching the Ken Burns documentary about the formation of our National Parks. He pointed out the the natural beauty of these lands would have been destroyed by the exploitation of others if the government did not come in and preserve them. It is the same with Arana Gulch. A well kept bike path and regular maintenance by a Parks Service will preserve the Arana Gulch and still provide a safe passage for bicycles and pedestrians from one side of town to another. It will encourage more bicycling and walking and reduce traffic on other roads.

Thank you for considering this idea,

Patrick Teverbaugh MD
707 California St.
Santa Cruz, CA 95060
pteverba@juno.com

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CENTRAL COAST AREA

Th8a

Madelyn McCaul
123 Liberty Street
Santa Cruz, CA 95060

October 7, 2010

California Coastal Commission
Central Coast Office
725 Front Street, Ste. 300
Santa Cruz, CA 95060

Attention: Dan Carl

Re: Arana Gulch

As the mother of a disabled son, I am looking forward to the day when we are able to visit this wonderful part of the Santa Cruz greenbelt. We've fought hard over the years not only to create and maintain our greenbelt but also to ensure that at least some of these protected areas would be available to our citizens who are not able to hike normally in more challenging terrain.

Please follow the will of the citizens of Santa Cruz, especially those who will be most impacted if this space is forbidden to them, and make Arana Gulch the park we have worked for.

Thank you,

Madelyn McCaul

Madelyn McCaul

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CENTRAL COAST AREA

9.4

October 7, 2010

Th8a

California Coastal Commission
Central Coast Office
725 Front Street, Ste. 300
Santa Cruz, Ca 95060

Dear Commission Members,

I urge you to approve the Arana Gulch Master Plan that will be on your calendar October 14 when you meet in Oceanside.

This plan has been recommended by your staff which has done the research to determine that it meets the requirements of the Coastal Commission and would be an improvement to the park land in the city of Santa Cruz. The plan has been 15 years in the making and has broad community support. It will improve and restore the habitat for the federally and state protected tarplant. As it is the land is much degraded with trails everywhere and the tarplant population very much diminished.

On a personal note, I find myself discouraged with the non-function of our government bodies and I know this feeling is shared by many members of the public. A small minority of people can impede the public process for years and drain the community of resources and prevent positive actions such as the improvement of Arana Gulch for the benefit of all, including the native flora and fauna.

I urge you to do the right thing for the community and the land itself and approve the plan as presented by the city of Santa Cruz.

Sincerely,

Carol Fuller
513 Olive St.
Santa Cruz, CA 95060

Susan Craig

From: Robert Vorce [bobvorce@mac.com]
Sent: Thursday, October 07, 2010 10:42 PM
To: Susan Craig
Subject: arana gulch pathway

Th8a

Please make the pathway across arana gulch a reality. I'm seventy and utilize a bike for transportation. Getting from Broadway to Brommer with safety would be wonderful for the entire community. Please hurry, I'm old.

Bob Vorce
318 Everson 95060

b

[redacted]

Th8a

Susan Craig

From: Lee Overbeck [leever11@hotmail.com]
Sent: Thursday, October 07, 2010 11:04 PM
To: Susan Craig
Subject: Arana Gulch

A bike trail across Arana Gulch is long over due. this is to the point of being ridiculous. There are bike trails all over the U.S. through sensitive habitat, I know I have ridden many of them. With proper design we can ensure the endangered habitat is not damaged.

Secondly this bike trail will provide a direct route across town connecting lightly traveled streets and avoid more heavily traveled roads. Many people will opt to bike rather than drive if the bike route is more direct and safe, and more people will ride for recreation. I ride a bike frequently in Santa Cruz but never ride on such a heavily traveled road as Soquel and rarely on Murray. The Arana Gulch trail would eliminate the previous mentioned roads and provide safer access across town.

Third, Arana Gulch in its present status is only enjoyed by mountain bikers and the homeless. A paved bike path would open it up for all especially the handicapped.

Incidentally I have been a member of the Sierra Club for over 10 years and do not support their opposition to the bike trail.

I strongly urge you to support the Arana Gulch bike path.

Lee Overbeck
Ben Lomond

Th8a

Susan Craig

From: Judy Warner [judy.warner@sbcglobal.net]
Sent: Thursday, October 07, 2010 11:45 PM
To: Susan Craig
Subject: Arana Gulch

Judy Warner
215 Trescony Street
Santa Cruz, CA 95060

October 6, 2010

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

Attention: Dan Carl

Dear Commissioners:

I support the Arana Gulch Master Plan and hope you will approve it when it comes to you next Thursday. Like many residents, I've been following the fate of Arana Gulch for years and appreciate the city's revised plan that addresses the Coastal Commission's earlier concerns.

In Santa Cruz, we're proud and protective of our open spaces, and we want this unique, 68-acre greenbelt to include coastal access, habitat protection, and an interpretive program to help young and old alike learn about and enjoy the area.

The plan before you provides for superior stewardship of Arana Gulch.

Sincerely,

Judy Warner
City Planning Commissioner
Former General Plan Advisory Committee Member

100

Susan Craig

From: Jim Lewis [lewis@chemistry.ucsc.edu]
Sent: Friday, October 08, 2010 10:25 AM
To: Susan Craig
Subject: Endorsement for City of Santa Cruz plan

Th8a

Dear Coastal Commissioners,

I write to urge your adoption of the City of Santa Cruz plan for Arana Gulch. I believe that the City has thought through the possible impacts and arrived at the best approaches. When I visited it was clear that this area offers significant coastal access which could be impeded by adjoining parcel owners. Only a democratic public entity has freedom from conflict of interest to decide what the best plan is for an area like this.

Sincerely,

James W. Lewis
Research Chemist
Department of Chemistry and Biochemistry
University of California at Santa Cruz
1156 High Street
Santa Cruz, CA 95064

lewis@chemistry.ucsc.edu

Phone (831) 459-4007
FAX (831) 459-2935

UCSC is "committed to promoting and protecting an environment that values and supports every person in an atmosphere of civility, honesty, cooperation, professionalism and fairness." Denise D. Denton

The opinions expressed are those of the author and should not be assumed to be those of UCSC or its Department of Chemistry and Biochemistry. Title and affiliation are given solely for the purpose of identification.

[redacted]

Mark Stone

From: Nancy Lenz [nanlenz@cruzio.com]
Sent: Wednesday, October 06, 2010 5:15 PM
To: Mark Stone
Cc: scraig@coastal.co.gov
Subject: Arana Gulch

Dear Supervisor Stone,

Please support the revised Arana Gulch Master Plan with a Multii-Use Trail.

I've spent 20 years in Santa Cruz, volunteering at Long Marine Lab and the Santa Cruz Natural History Museum, encouraging children and adults to be environmental stewards of our oceans and lands. I currently head a volunteer project to remove invasive English ivy and Himalayan blackberry from Pilkington Creek on the grounds of the Santa Cruz Natural History Museum and create a more natural habitat with California native plants.

I live in the City of Santa Cruz within walking or biking distance of Arana Gulch. My tax money went to pay for this open space and I would like to see it available for use by families with children in strollers, wheelchair bound citizens and older citizens like myself.
When I first moved to Santa Cruz I was 59. Now I am 79 and hope to walk through Arana Gulch someday on the Multi-Use Trail.

I care about preserving the tarplant and educating the public about this area. The revised plan addresses these issues.

Thank you for considering my opinion,

Nancy S. Lenz
230 Pilkington Avenue
Santa Cruz, CA 95062

Susan Craig

From: Jack Johnson [jdj@baymoon.com]
Sent: Tuesday, October 12, 2010 12:24 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: Arana Gulch

Dear Mr. Stone,
Arana Gulch is an important part of the green belt system within Santa Cruz county. In its present condition it appears there is a lack of concern for its preservation and protection. By providing walkways and interruptive information educational opportunities to demonstrate the importance of the area and provide for its protection. Also by providing walkways it allows for greater access for all regardless of their age and/or physical condition.

Please vote to approve the Arna Gulch Master Plan.

Thank you,
Jack Johnson

Dan Carl, District Manager
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95062
10/21/11

RECEIVED

OCT 25 2011

California Coastal Commission,
Central Coast Area

To whom it may concern:

I have been coming to visit Santa Cruz during the summer since the 1920's. I will be 90 on October 29. My husband and I purchased property in Seabright in 1968. I encourage your approval of the Arana Gulch Master Plan and its multi-use path.

It will afford recreational opportunities for seniors, walkers, bicyclists and handicapped people to enjoy the area. Many seniors and those in wheelchairs just can't get into Arana Gulch Greenbelt. I know the Commission weighs heavily in favor of access for those with mobility problems. It will also provide access to the Harbor which is important because it affords thousands of people enjoyment near the ocean.

I know that some are proposing that the multi-use trails be diminished. Pavement is the best, dirt trails are no improvement at all for access. The ADA portion is already modest and shouldn't be cut back.

Sincerely,

Marilyn K. Larson
222 2nd Ave.
Santa Cruz, CA 95062

cc Mark Stone
cc Mary Shallenberger

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OCT 19 2011

California Coastal Commission,
Central Coast Area

Dan Carl
District Manager
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
10/17/11

Commissioners:

I have been a professional caregiver for over 20 years I have three people I take care of, I find my work very rewarding. I am a commissioner on The Elderly and Disabled Transportation Commission. We advise the Supervisors

My main idea is that we take our mobility for granted, we have such wonderful places to visit in California, beautiful beaches, parks and public places with nature. We can get there and many cannot. For a moment please imagine what it would be like to have access to these places taken away from you. As a caregiver I can tell you how important it is for Seniors and those in wheelchairs to get outside. It is equally good for them mentally and physically. I can also tell you that opportunities for access are greatly limited. The ADA compliant trails of the Arana Gulch Master Plan will provide much needed access in a fantastic location close to many Seniors and the mobility impaired.

While I have you, please do not diminish the scope of the ADA portion of the plan, the plan is already modest in scope. Specifically please do not change the Agnes (Northern) entrance from a through trail to a narrow loop. This will greatly diminish the usefulness of the ADA trail system. Make sure it continues to go all the way through as in the City's Plan. Also for this portion of the trail system, pavement is best, decomposed granite is OK but dirt is definitely not OK.

For the benefit of the aged and mobility impaired please vote yes on the Arana Gulch Master plan.

Thank you for protecting the coast:

Patti Shevlin

Patti Shevlin
2655 Brommer
Santa Cruz, CA 95062

Dan Carl
District Manager
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
October 13, 2011

RECEIVED

OCT 14 2011

California Coastal Commission,
Central Coast Area

Dear Commissioners:

I am a Senior living at La Posada Senior Residence, I use a cane. I am writing in support of the Arana Gulch Master Plan because it would be such an enormous asset to all of our residents many of whom use walkers and some wheelchairs. Most of us can't get into Arana Gulch now or are hesitant because of the condition of the trails.

The residents of Las Posada have already submitted a petition to the Coastal Commission which was signed by 88 of our residents. From that petition:
"*This will be the first and only trail in any of the City's four Greenbelt Parks designed with wheelchairs and walkers in mind, to which we say: It's about time... We urge that this plan be approved not only for us, but for all elderly and disabled who live in the area of Broadway and Frederick Streets.*

We can use the ADA trails for our weekly outings that are organized by La Posada. I also know that one gentleman, David Casterson, a retired biology teacher, has volunteered to lead nature hikes catering to Seniors, and those with canes, walkers and wheelchairs.

Some opponents of the plan are suggesting an ADA loop trail to substitute for the planned trail from the Agnes Street (North) entrance. This suggested trail would not connect with the other ADA trails. Please don't allow this. The ADA portion is already just barely big enough.

Sincerely,

Margaret Knight

Margaret Knight
La Posada apt 246
609 Frederick
Santa Cruz, CA 95062

Susan Craig

From: Shalom Compost [shalom.compost@gmail.com]
Sent: Tuesday, October 12, 2010 6:44 PM
To: mark.stone@co.santa-cruz.ca.us
Cc: Susan Craig
Subject: Please support the City of Santa Cruz proposal for Arana Gulch

I urge you to follow your staff's recommendation and approve the multi-use path path for Arana Gulch.

This plan provides the best chance for protecting the endangered tarplant.

Doing nothing will cause further degradation to the tarplant habitat.

Shalom Dreampeace Compost
106 Rey Ct
Santa Cruz, CA 95062

Oct. 12, 2010

Coastal Commission
Charles Lester, Senior Deputy Director
725 Front Street, Suite 300
Santa Cruz, CA 95060-4508

Dear Mr. Lester:

Let's address one of the root problems surrounding the Arana Gulch plan. The debate over the building of paved bike and pedestrian paths has gone on well over a decade.

This was a hot topic when I was on a Sierra Club committee, in the late 90s, and a big chunk of every meeting was dedicated to impassioned comments. The same people are still involved and still impassioned, and that is the problem.

This has been these people's defining issue for years. They have dedicated a big piece of their lives to it, and should the issue be solved, there would be a huge gap in their lives. As a result, nothing that the City of Santa Cruz might propose will ever satisfy them, other than walking away and turning the whole thing over to Friends of Arana Gulch.

Pavement, well placed, doesn't destroy habitat nearly as much as a series of unofficial and undefined dirt trails, which is what is there currently.

This issue needs to be solved, the pave path needs to be built.

Meade Fischer
614 Washington St.
Watsonville, CA 95076
(831) 763-2660

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OCT 13 2010
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

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COASTAL COMMISSION
CENTRAL COAST AREA

Supervisor Mark. W. Stone
Board of Supervisors
701 Ocean Street, Room 500
Santa Cruz, CA 95060
10/2/10
CC: Dan Carl, District Manager

Dear Mark,

I encourage your approval of the Arana Gulch Master Plan and its multi-use path.
The California Native Plant Society is leading you down the Garden Path. I hope you will be able to recognize that their advice is flawed.
You made the motion to evaluate their plan at the hearing in March because it was supposedly less steep for the wheelchairs and better for the environment. You said specifically that it "would allow for a much less steep gradient for ADA access". It is in fact substantially steeper than the City's plan. I think you were fed the incorrect information about the steepness by CNPS. It is still on their web site in a letter to the Coastal Commission submitted March 3, 2010 which says. "This would also create a less steep grade for wheelchair access..... The currently proposed alignment has a grade too steep for many who use wheelchairs". I'm amazed that they haven't corrected that. The exact opposite is true.

As for being better for the environment, the only group that the CNPS plan is better for is the cement contractors. Construction-wise it is twice the project of the City's Arana Gulch Master Plan.

I'm hoping you realize now how badly they misled you and that you will follow the shining recommendation of your staff and support the City's Arana Gulch Master Plan. If you stick with the CNPS plan or cause further delay, it will lead me to wonder about your intentions towards Arana Gulch.

Yours Sincerely,

Helena J. Ivatt

Helena J. Ivatt
524 B Ocean View Ave.
Santa Cruz 95062

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OCT 0 6 2010
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

AGENDA ITEM 7a
PERMIT NUMBER 3-09-068
MATTHEW WARD
IN FAVOR

October 06, 2010

Coastal Commission District Office, Santa Cruz
Charles Lester, Senior Deputy Director
725 Front St, Suite 300
Santa Cruz, CA 95060-4508
FAX 831.427.4877

RE: OCTOBER 14, 2010 MEETING

Mr. Lester,

I am writing to express my support for the City of Santa Cruz's request to develop a multi-use path through the Arana Gulch Open Space.

In 1971 I came to Santa Cruz with my bicycle, and have been using it as my primary mode of transportation ever since. The City's proposal will provide an important link for bike commuters who are currently forced to use the main traffic arteries (Capitola Road/Soquel Avenue, and Murray/Eaton) between the City, and the Live Oak area. At this time bike commuters do use the Arana Gulch via the dirt trails that connect the Upper Santa Cruz Harbor with Hagemann Avenue. This works fine when the weather is dry, however during the rainy season the trails deteriorate and become all but impassable for my little folding bike.

As a lifelong environmentalist I can appreciate the determined effort by the opponents of the trail, to further the cause of the endangered tarplant, which flourished when the property was a dairy farm. Their strident opposition to the path has resulted in a modification to the City's plan, which will require pasture fencing, and grazing in the "Open Space". While this seems a little over the top to me, if that's what it takes to win approval of the multi-use trail, then I'll go with it.

I urge you to approve the City's plan. Bicycle commuters, and the tarplant, can share the Open Space. The City's plan will benefit the survival of both.

Thank you,

atthew Ward
8 Harrison Avenue
ıta Cruz 95062

Susan Craig

From: Joanna Gonda [seascape8@comcast.net]
Sent: Wednesday, October 13, 2010 7:10 AM
To: mark.stone@co.santa-cruz.ca.us; Susan Craig
Subject: Arana Master Plan

Please vote to approve the Arana Master Plan. I am one of the many Santa Cruz County cyclists who use our bikes to do small errands, commute, or just ride for health and pleasure. Approving the Arana Master plan would make our cycling safer and encourage more cycling which lowers use of cars, reduces pollution, provides a beautiful greenbelt area, and improves the health and fitness of our citizens. This plan also encourages runners and walkers as well. I am a healthy 71 year old resident of Aptos.

Sincerely,

Joanna Gonda
156 Camino Pacifico
Aptos, CA 95003

October 18, 2010

California Coastal Commission
725 Front Street
Santa Cruz, Ca. 95060
Suite 300

Dear Members,

Thank you for rejecting the latest iteration of the plan by the City of Santa Cruz for the Arana Gulch transportation corridor. This thinly disguised asphalt path was intended solely as another bike path bridging east and west. In a one mile north to south measurement stretching from Soquel Avenue to the Murray Street bridge, there are now three east west alternative paths. I am including using Broadway joining up through the Frederick Street Park.

This plan in no way protects the tar plant or any other living thing. Please do not consider revisiting this issue. There are three corridors east to west and the proposed path would make it four. We absolutely do not need this additional path.

Sincere thanks,

Peter and Michele Card

Pete & Michele

Peter Card
336 Harbor Drive
Santa Cruz, Ca 95062

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OCT 20 2010
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CENTRAL COAST AREA

June 8, 2011

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CENTRAL COAST AREA

California Coastal Commission, Central Coast District Office
Charles Lester, Senior Deputy Director
Members of the California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060-4508

Dear Charles Lester and members of the California Coastal Commission,

As a resident of the City of Santa Cruz I am writing you in support of the proposed Arana Gulch bicycle path and pedestrian walk. I am an avid environmentalist. I understand the importance of preserving open space and protecting endangered species. I have also enjoyed walking the crisscrossing dirt paths of Arana Gulch's open fields and tree lined perimeter. Admittedly your decision is a tricky balancing act.

An equally essential environmental obligation is to encourage alternative modes of transportation to the automobile. I feel a bicycle/pedestrian path through Arana Gulch would do just that. It's safety and convenience would encourage folks to use their bicycles and it could become an important (non-automobile) alternative connection between the Seabright and Live Oak neighborhoods of Santa Cruz.

I urge all members of the California Coastal Commission to support the development of an environmentally sensitive, intelligent, and thoughtful path to connect these two neighborhoods. If done properly, this could be an important symbol of Santa Cruz's commitment to an environmentally sustainable future.

I urge you to vote YES to support the Arana Gulch path project.

Most Sincerely,

Thomas E. Ellison

Thomas E. Ellison
202½ Ocean View Avenue
Santa Cruz, CA 95062-3334

Cc: SC City Council; SC County Board of Supervisors

Susan Craig

From: Michael Becker [cruzfire@gmail.com]
Sent: Friday, October 08, 2010 9:12 AM
To: Susan Craig
Subject: Please approve Arana Gulch Master Plan

Th8a

Dear California Coastal Commission,
I am writing to encourage you all to please approve the City of Santa Cruz's updated Arana Gulch Master Plan.
My wife and I enjoy walks through the area and believe that the revised plan provides for a perfect balance that will both protect the beautiful and rich environment and will allow visitors to the Gulch enhanced enjoyment long into the future.

Thank you,

Michael Becker
Santa Cruz, CA

Jonathan Wittwer
William P. Parkin
Ryan D. Moroney

WITTWER & PARKIN, LLP
147 SOUTH RIVER STREET, SUITE 221
SANTA CRUZ, CALIFORNIA 95060
TELEPHONE: (831) 429-4055
FACSIMILE: (831) 429-4057
E-MAIL: office@wittwerparkin.com

OF COUNSEL
Gary A. Patton

November 15, 2011

RECEIVED
NOV 15 2011
California Coastal Commission,
Central Coast Area

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

Re: Master Plan for Arana Gulch

Dear Mr. Carl and Ms. Craig:

This office represents the California Native Plant Society (CNPS) and submits the following additional comments on the above referenced project. All previous comments, including our correspondence dated February 17, 2010 attached hereto, are hereby incorporated by reference for inclusion into the administrative record. Additionally, we submit the attached June 9, 2005 letter from the Coastal Commission to the City of Half Moon Bay regarding a proposed bicycle and pedestrian trail through ESHA which states:

> Under [City of Half Moon Bay] LCP Policy 3-4 only "resource dependant or other use which will not have a significant adverse impact in sensitive habitat" would be permitted in ESHA. **Construction of a bicycle and pedestrian trail would not be considered a resource-dependent use and would therefore not be allowed in ESHA under the LCP. Moreover, the California Court of Appeal (*Bolsa Chica Land Trust v. Superior Court* (1999) 83 Cal.Rptr. 850.) has confirmed that impacts to ESHA from non-resource dependent uses are prohibited under the Coastal Act and corresponding LCPs.**

CNPS submits that the above analysis is consistent with CNPS's position regarding the proposed project and compels that the project, as currently proposed, be denied by the Commission as prohibited by the Coastal Act and inconsistent with the City of Santa Cruz LCP.

Thank you for your consideration of these comments.

Very truly yours,
WITTWER & PARKIN, LLP

Ryan M for
William P. Parkin

Encl.

CALIFORNIA COASTAL COMMISSION
NORTH CENTRAL COAST DISTRICT
45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105- 2219
VOICE AND TDD (415) 904- 5260
FAX (415) 904- 5400

June 9, 2005

Don Dakins
Senior Planner
City of Half Moon Bay
501 Main Street
Half Moon Bay, CA 94019

RE: PDP-23-05, Bicycle and Pedestrian Trail within Caltrans Right of Way

Dear Mr. Dakins:

Thank you for the opportunity to comment on the proposed bicycle and pedestrian trail within the Caltrans right of way. We support the City's efforts to improve bicycle and pedestrian access and to reduce vehicle dependency and traffic impacts generated by local vehicle trips. The purpose of this letter is to address the biological resources issues regarding the proposed development. Despite conclusions in the biological report that excluded the four drainages found within the project area as LCP jurisdictional wetlands, it is Commission staff's position that sufficient evidence has not been provided to support the dismissal of the drainages as wetlands, and that there is a possibility that the proposed project is within 100 feet of a wetland, and therefore within the Coastal Commission's appeal jurisdiction pursuant to Section 30603(a) of the Coastal Act. At this time, Commission staff has the following comments regarding the proposal:

1. **Wetlands**

The Biological Review performed by Biotic Resources Group concluded that the four drainage ditches on-site are not LCP jurisdictional wetlands based on the grounds that 1) the Coastal Commission guidelines exempt drainage channels, if constructed in upland areas, from LCP wetland requirements, and that 2) no wetland vegetation were found in the drainage ditches.

With respect to the Commission's Wetland Interpretive Guidelines, Commission staff would like to clarify that the Coastal Commission adopted the Guidelines to serve as a guidance document only for areas in the Coastal Zone *without* a certified LCP and that they were not intended to be used in post-LCP certified areas. The guidelines do not have the legal status of a statute or a regulation, and they do not define or modify the definition of wetlands under the certified Half Moon Bay LCP. As the Commission's Guidelines cannot be used to provide the wetlands exemptions for the constructed drainage ditches, the drainage ditches would be subject to review under the City's certified LCP wetland policies, if they meet the wetlands definition.

The Half Moon Bay LCP Zoning Code Sec. 18.38.020.E defines wetlands as follows:

> *Wetlands. As defined by the US Fish and Wildlife Service, a wetland is an area where the water table is at, near, or above the land surface long enough to bring about the formation of hydric soils or to support the growth of plants which normally are found to grow in water or wet ground. Such wetlands can include mud flats (barren of vegetation), marshes, and swamps. Such wetlands can be either fresh or saltwater, along streams (riparian), in tidally influenced areas (near the ocean and usually below extreme high water of spring tides), marginal to lakes, ponds, and man-made impoundments. Wetlands do not include areas which in normal rainfall years are permanently submerged (streams, lakes, ponds, and impoundments), nor marine or estuarine areas below extreme low water of spring tides, nor vernally wet areas where the soils are not hydric.*

In addition, Section 18.02.040 states:

> *Wetland: The definition of wetland as used and as may be periodically amended by the California Department of Fish and Game, the California Coastal Commission and the US Fish and Wildlife Service.* [Emphasis added]

Accordingly, Section 13577b.1 of the Commission's regulations states:

> *Wetland shall be defined as land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and shall also include those types of wetlands where vegetation is lacking and soil is poorly developed or absent as a result of frequent and drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salts or other substances in the substrate. Such wetlands can be recognized by the presence of surface water or saturated substrate at some time during each year and their location within, or adjacent to, vegetated wetlands or deep-water habitats.*

The biological report indicates evidence of flow for the drainages but concludes that the drainages are upland habitat due to the absence of wetland vegetation. However, according to the above definitions for wetlands, especially the one in the Commission's regulations, the presence of **any one** of the three criteria (hydrology, hydric soils, and hydrophytic vegetation) should be used to delineate wetlands, and that the absence of one criteria (vegetation) does not mean that the other criteria are absent as well or that the area does not qualify as a wetland. As the applicant's biological report used vegetation as the sole indicator of wetlands and did not assess hydrology or soils, it has not adequately established the presence/absence of wetlands in the project area based on criteria required by the LCP. To analyze for consistency with applicable LCP wetlands policies, Commission staff recommends that the City request a wetland delineation based on the criteria in the LCP to determine the extent (if any) of wetlands in the project area and the extent (if any) of potential wetland impacts that would result from the proposed project.

If wetlands that meet the LCP definition were found, then construction of a bicycle and pedestrian path that would fill wetlands would not be a permitted use according to Section 18.38.080 of the Zoning Code that states:

Wetlands

A. Permitted uses
1. *Education and research.*
2. *Passive recreation such as bird-watching.*
3. *Fish and Wildlife management activities.*

B. Permitted uses with approval of a Use Permit.
1. *Bridges.*
2. *Pipelines and stormwater runoff facilities.*
3. *Improvement, repair or maintenance of roadways.*

...

2. ESHA

Your June 9, 2005 staff report states "While there was not any observances of wetland vegetation during the field survey, the recent occurrence of special status species must be assumed during the site analysis of any project that will have the potential to be within a close proximity to drainage watercourses—whether natural or constructed." It is unclear which special-status species is referenced in this statement, however, if any special status species is assumed to be present within and close to the drainages in the project site, then those drainages and any additional areas close to the drainages would qualify as environmentally sensitive habitat areas (ESHA) under the City's LCP Policy 3-1:

> *Define sensitive habitats as any area in which plant or animal life or their habitats are either rare or especially valuable and as those areas which meet one of the following criteria: (1) habitats containing or supporting "rare and endangered" species ...*
>
> *Such areas include riparian areas, wetlands, sand dunes, marine habitats, sea cliffs, and habitats supporting rare, endangered, and unique species.*

As the assumption of presence of special-status species leads to the designation of the drainages and areas close to the drainages as ESHA, the proposed project must then be reviewed for conformity with the applicable ESHA policies in the City's LCP. Under LCP Policy 3-4 only "resource-dependent or other uses which will not have a significantly adverse impact in sensitive habitat" would be permitted in an ESHA. Construction of a bicycle and pedestrian trail would not be considered a resource-dependent use and would therefore not be allowable in ESHA under the LCP. Moreover, the California Court of Appeal (*Bolsa Chica Land Trust v. Superior Court* (1999) 83 Cal.Rptr. 850.) has confirmed that that impacts to ESHA from non-resource dependent uses are prohibited under the Coastal Act and corresponding LCPs.

If the City does not intend to consider all of the drainages and areas close to the drainages as ESHA, Commission staff then recommends that instead of assuming the presence of special-status species in all of the drainages, that the City request a more precise biological assessment to determine the presence or absence of special-status species in each of the drainages so that the

extent of ESHA in the project area could be more accurately described and that the proposed development could be adequately evaluated for consistency with the ESHA policies of the LCP.

We hope that these comments are of assistance to your project review. Please contact me at (415) 904-5260 with any questions.

Sincerely,

YinLan Zhang
Coastal Program Analyst
North Central Coast District

Cc: Paul Nagengast, Half Moon Bay Public Works

Jonathan Wittwer
William P. Parkin
Ryan D. Moroney

WITTWER & PARKIN, LLP
147 SOUTH RIVER STREET, SUITE 221
SANTA CRUZ, CALIFORNIA 95060
TELEPHONE: (831) 429-4055
FACSIMILE: (831) 429-4057
E-MAIL: office@wittwerparkin.com

OF COUNSEL
Gary A. Patton

July 19, 2011

SENT VIA E-MAIL AND U.S. MAIL

Ms. Juliana Rebagliatti
Ms. Dannette Shoemaker
City of Santa Cruz
Planning Department
809 Center Street, Room 107
Santa Cruz, CA 95060
E-mail: jrebagliati@cityofsantacruz.com

Re: Arana Gulch Master Plan

Dear Ms. Regbagliatti and Ms. Shoemaker:

We received your letter of June 2, 2011 concerning the Arana Gulch Master Plan. The California Native Plan Society (CNPS) has been disheartened by the City's continued characterization of CNPS's proposals as unworkable and your letter, while widely disseminated, leaves out critical details in the latest CNPS proposal. It should be noted that CNPS previously met to discuss an alternative alignment of the east-west bikeway with the City to avoid critical Tarplant habitat. That was deemed financially and practically infeasible by the City. Now CNPS has attempted to put forth another proposal that would allow the City to build an east-west bikeway as proposed, but your response leaves out critical components of CNPS's proposal and mischaracterizes what CNPS is asking in return for dropping its challenge to the east-west bikeway.

The North-South Trail: CNPS has offered to drop any challenges to the east-west bikeway in its proposed location if the City would make the north-south trail a more narrow pedestrian path. CNPS has proposed this pedestrian path option to end this dispute and allow the City to bisect the tarplant habitat with the east-west path. By deleting the north-south bike path, which appears less critical to the bike network, and making it pedestrian only, greater options for Tarplant management are possible. Deleting a bike path in the north-south location would maximize the possibility of the Tarplant's success, and minimize the spread of invasive weeds throughout the site. Indeed, as we stated in our meetings, paved bike paths will increase the spread of invasive weeds.

As we stated clearly in our meetings, we were not envisioning an eight-foot wide decomposed granite surface. Moreover, we stated in our meetings that the pedestrian trail should be in the proposed alignment for the north-south paved trail you currently propose. However, in response to the CNPS proposal, the City is proposing to complete an eight-foot wide decomposed granite trail in the current location of the informal footpaths right through the center of a meadow. The City conveniently ignores our disagreement on this point in its letter.

We previously proposed an alternative alignment for the east-west bikeway that would preserve both the east-west bikeway and the north-south paved path. But, the City has

resoundingly rejected that alternative. CNPS has been trying to offer yet another solution. The City, however, wants its cake and eat it too. As clearly articulated in the City's response, the City is reserving its rights to pave the north-south path at a later date in any event based on "an objectively verifiable degradation baseline." Nothing that CNPS proposes will be acceptable to the City, and the City acts as if CNPS should simply drop its objection in exchange for minor changes to the Master Plan. The City is not offering anything of substance in this regard that would increase the comfort level of CNPS.

Finally, you fail to mention that CNPS has proposed that in exchange for deleting the north-south bike path, CNPS would support an interpretive loop for wheelchairs on the northern part of the property that is more useful to the disabled community than a trail that it must share with speeding cyclists. CNPS would also be willing to consider other amenities for wheelchair accessibility in the southern part of the property. CNPS suspects, however, that it is not the interests of wheelchair accessibility that is driving the City's decisionmaking. Wheelchair access has always been an afterthought in this process.

Funding for Tarplant Restoration: CNPS has asked that the City commit to providing the funding necessary for tarplant restoration and management. The City's response with respect to its inability to assure funding necessary to meet the proposed conditions of approval of the Master Plan are troubling. The City is obligated in any event to comply with any conditions of approval. But, as with so many conditions imposed by agencies, many are routinely ignored. CNPS is asking that the City make the commitment to the resource up front. The City has stated that for legal reasons, without providing any authority, that it simply cannot commit to the funding required. Your response in your letter is simply asking CNPS to trust that the money will be there later. If the east-west path is built, CNPS needs assurances that money will be available to restore, enhance and maintain the habitat given the significant impacts the bike path will cause. The City's argument to the Coastal Commission and in your letter is that the project must be permitted to go forward in order to preserve the Tarplant. Otherwise, there is no money for restoration and management of the habitat. This is simply a ruse unless the City is willing to actually commit the necessary dollars for the restoration, management, and mitigation for the impacts that will occur as a result of construction of the project.

Success Criteria for Tarplant Restoration: Finally, your letter completely mischaracterizes CNPS's request for success criteria. Your response, by focusing on best management practices and the adaptive management program, attempts to twist the facts to make CNPS's proposal appear unreasonable. However, CNPS is simply requesting that we agree as to what the success criteria will be, not how success will be achieved. CNPS simply asks the City to agree to what is considered "success" for recovery of the species on the site. This is not a function of the management and how best to achieve success. This is simply agreement on what we will all consider a successful result. Moreover, the City's assertions that we were requesting the imposition of a penalty that would fall on the backs of taxpayers is conjured from thin air. CNPS did not request such a penalty. It only requested that success criteria would be developed sooner rather than deferred until after approval of a Master Plan by the Coastal Commission. Indeed, one of the proposed conditions of approval for the proposed approval of the Master Plan

by the Commission was that success criteria be developed prior to the issuance of Coastal Development Permit (CDP) for the Project. (See proposed Condition 3.(g)). Your response only increases the level of suspicion within CNPS that once the City is granted permission by the Commission to proceed that it will not adequately meet the conditions of approval. It is not a hardship to begin developing and agreeing with CNPS as to success criteria now when they must be developed prior to the issuance of a CDP in any event.

It seems that the City and CNPS are still at an impasse in resolving this dispute. That is unfortunate. CNPS has tried, to no avail, to come up with now two alternatives as an offer of compromise. It is clear to CNPS that nothing it proposes will be acceptable to the City. Thus, CNPS has no further proposal to make. This does not mean that CNPS would not consider a proposal from the City. But, any such proposal must offer significant advantages over the current proposal, not mere window dressing. The City can only demonstrate a true commitment to the resource by funding restoration and management and agreeing to success criteria.

Very truly yours,
WITTWER & PARKIN, LLP

William P. Parkin

cc: Mayor and City Councilmembers
Supervisor Mark Stone
Supervisor Neil Coonerty
Supervisor John Leopold
Susan Craig, California Coastal Commission
Martin Bernal, City Manager

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California Coastal Commission
Central Coast Area

Santa Cruz Sunflower at Arana Gulch
Restoration Cost Estimate

Central Coast Area

April, 2011, revised November, 2011

Prepared by the CNPS

To obtain an improved understanding of the scope, complexity, and cost of restoration of the Federally listed endangered Santa Cruz Sunflower (*Holocarpha macradenia,* the Santa Cruz tarplant) at Arana Gulch, a group of CNPS members met with two Certified Rangeland Managers (CRM) on April 11, 2011. The meeting was focused on the proposed cattle grazing with some discussion of mowing as described in the California Coastal Commission staff report, TH8a, filed 2/5/2010 (the CCC staff report).

This report provides a summary of some of the issues and a rough cost estimate for restoration activities. The cost estimates presented here are intended to help understand the amount of funding required, especially with regard to cattle grazing. A completed Habitat Management Plan (HMP) with a detailed Grazing Plan will be needed. Detailed cost estimates will be based on the HMP. The CNPS intent here is to develop a rough estimate for planning purposes and a minimum funding goal. To see the minimum funding estimates, see Table 4 on page 4. Other restoration infrastructure and activities identified by the Sunflower Adaptive Management Program and restoration activities for other species and the coastal prairie at Arana Gulch are not included in this report and would require additional funding.

1. Mowing alternative

It was generally concluded that mowing is not likely to be as effective as cattle grazing at Arana Gulch because:

1) *Holocarpha macradenia* seed germination requires bare, sun-lit ground surfaces which are difficult to achieve with mowing,
2) Mowing produces a uniform-height growth pattern which is expected to produce less bare ground and less structural diversity of habitat than would grazing or no management.
3) Multiple mowing treatments would be required per year, and these may be costly ($5K-10$K per treatment) and difficult to time correctly to avoid damage to growing Santa Cruz Sunflower plants.

Multiple years of City mowing with little *Holocarpha macradenia* germination appears to confirm the ineffectiveness of this approach at Arana Gulch. This conclusion is not meant to imply that mowing would never be used within the scope of an adaptive management plan, but rather that such a plan must include other options including a fully-developed and funded, best practices grazing plan.

2. Grazing

Several modifications to the City's proposed cattle grazing plan (as described in the CCC staff report) need to be considered to make it a best-practices plan. The modifications would improve the grazing viability of the site and influence cost estimates. Some additional conditions imposed by the CCC staff would have significant cost implications.

2.1 CRM recommended modifications to City grazing plan

Modifications to the City grazing plan fall into five categories: 1) removal of as much fencing as possible, 2) a change in the class of cattle, and 3) development of an additional non-habitat grazing area for proper grazing management, 4) cattle watering facilities, and 5) public outreach.

2.1.1 Minimize fencing

The CRMs made it clear that useable grazing area at Arana Gulch is already near the lower limit for successful, practical grazing. For grazing purposes the CRMs identified the CNPS bike path alternative around the edge of the habitat as the superior choice since it provides one large grazing area. But for the purposes of our meeting we assumed that the Broadway-Brommer bike path would be built and that the Santa Cruz Sunflower habitat would be permanently bisected by the path, which CNPS has opposed due to the significant impact to the Sunflower's habitat.

The CRMs confirmed that this configuration has negative impacts on the grazing feasibility of the site by reducing the contiguous grazing area. This may be mitigated with additional City staff time devoted to (possibly daily) management activities such as moving cattle between areas. In addition, it was conclusively felt that the habitat north of the bike path should not be subdivided further, and in particular, **the fence that isolates Santa Cruz Sunflower population D must be eliminated**. That fence creates two areas which are deemed too small for practical cattle management. For example, if the feed within the resulting smaller units is exhausted, the cattle will become stressed and, as experience has shown, break down fences to reach other areas. Only costly and continuous monitoring and movement of the cattle could prevent this from happening. It was also pointed out that small areas are difficult and costly to mow due to the practical limitations of maneuvering a mower.

Removal of the fence along the bisecting bike path was also discussed. From a grazing perspective this would be preferred. Removal of these fences would require cattle guards at both ends of the bike path as well as special "air-lock" gates for ADA access. Since the fences are as much for control of visitors to the Gulch as for cattle control, removal of the fences may be practically impossible. CNPS needs to consider this further before recommending this fence removal.

The CRMs stated that the city-proposed 12-foot cattle gates are not generally wide enough for proper control of cattle and that experience has shown narrow gates are subject to damage when trying to herd cattle. He recommended 16-foot gates. We assume 16-foot steel gates in our cost estimates.

The City proposed a 100-foot by 75-foot corral near Agnes St. The CRMs said that permanent corrals are unnecessary, and this necessary function could be provided temporarily each grazing period by a portable steel-panel corral supplied by the cattle lessee. Therefore the corral fencing and gate are not cost items. If water is needed at this site (which the CRMs indicated) that would have to be planned and funded. A parking and turn-around area for the cattle truck near the corral must also be planned and funded.

The CRMs indicated that in the dense urban setting of Arana Gulch dogs will be a nuisance and could kill cattle, especially if there are only a few cattle. Dog-proof fencing would drive up the cost, would be generally unfriendly to wildlife, and would have negative visual impacts on the area. A discussion of the trade-offs is needed.

2.1.2 Class of Cattle

The City proposed to use cow/calf pairs for the grazing at Arana Gulch. However, because the grazing at Arana Gulch must be carefully timed to coordinate with the life cycle of the Santa Cruz Sunflower, this is not the best choice according to the CRMs. Late-term cows and young calves cannot be transported safely. In order to have the cow/calf pairs available when needed (roughly December through April), it might even be necessary to have the calves born on-site at Arana Gulch. A more practical and less expensive choice would be to use "stocker" steers and heifers, which are generally available when they are needed. We will assume "stocker" cattle are used to avoid the added cost and complexity of using cow/calf pairs.

2.1.3 Non-habitat Grazing Area

The CRMs repeatedly stressed the need for a non-habitat grazing area for proper habitat management. This area needs to be as large as possible. It would be used for: 1) relocation of cattle if feed becomes depleted in the grazed habitat areas during below-normal precipitation years or if the herbaceous mass exceeds the capacity of the cattle in the habitat areas during above-normal precipitation years, 2) a holding area for cattle to account for the time delay (up to several weeks) between when the City requests that cattle be removed and when they actually are removed, 3) a holding area for cattle during periods when fence maintenance or other activities are needed within the grazed habitat area, 4) a holding area for newly introduced cattle to help avoid the introduction of invasive weeds directly into the habitat areas. The only area that might be used for this non-habitat grazing is the area just south of Agnes Street. In our cost estimates below we account for the additional costs of the new grazing area separately. The Coastal Commission imposed special conditions (CCC staff report, condition 2b) that may limit fencing in the area near Agnes St., so these conditions might need some additional discussions with CCC staff. For our rough cost estimate we assume 1600 linear feet of fencing, one 16-foot gate, and a water trough with available water for this non-habitat area.

2.1.4 Watering facilities

Water troughs will be needed in each separately fenced area, including the corral. The placement and design of the troughs within the fenced area must be carefully considered to avoid negative impacts of cattle activities (such as excessive trampling) near the troughs and to avoid negative impacts on birds, bats, and other animals attracted by the water. This should be considered in the Cattle Grazing portion of the HMP. Therefore it is not appropriate to assume (as the City does) that the best place to tap into a water supply is at the Harbor. The CRMs suggested that portable water troughs should be considered for initial installation in order to better evaluate impacts. This would be part of the adaptive management activities. They also stated that permanent placements probably should be done with some hardening of the surrounding area -- an activity that would necessarily imply some destruction of Santa Cruz Sunflower habitat. This must be addressed in the HMP.

2.1.5 Public Outreach

The CRMs stated that public outreach will be essential to the success of any grazing activities at Arana Gulch. Failure to achieve and maintain public support for the goals and grazing practices in the Arana Gulch urban setting could jeopardize the program and the restoration of *Holocarpha macradenia*. The outreach must be designed to increase support for the restoration activities and to minimize harmful public activities at Arana Gulch (off-leash dog use, bikes off trail, pedestrian sort-cuts, infrastructure damage, etc.). The public outreach activities need to be fully funded for the first three years of the program, but should be continued at a reduced level thereafter.

2.2 Rough cost estimates

Costs can be divided into two broad categories, initial infrastructure installation and ongoing restoration management.

The following tables include initial infrastructure cost estimates. For the fencing the tables show the expected range of costs as estimated by the CRMs. The CCC staff requirement for 4" round wooden posts is at the high end of the estimate. This is something the City and CC staff might want to revisit. For water cost the tables use average costs from the report *www.ianrpubs.unl.edu/epublic/live/ec821/build/ec821.pdf* with all costs in that report multiplied by 2 on the assumption that all costs in California are higher than in Nebraska (factor of 1.5) and to account for inflation (3.5% per year since 2002).

Table 1. Habitat grazing area cost estimates

Item	Cost (or range)	Notes
Fencing	$27250 - $109000	Range: $5-$20 per foot. T-bar is near the low end, 4" wooden post (or 3" steel post) is near the high end of the range. Total length: 5450 ft.
Steel gates	$3000	16' steel. Total of 3 gates required (1 for area A, 2 for area C-D).
Watering trough	$1400	Total of 2 required (1 for area A, 1 for area C-D).
Water Development	$5770	2000' of pipe + trenching @ $2/foot (length estimated from AG maps), and 3 trough connections including hydrant, float valve, and misc. hookup. The 3 connections are for area A, area C-D, and the corral.
Total	$35,420 - $117,170	

Table 2. Non-Habitat grazing area cost estimates

Item	Cost (or range)	Notes
Fencing	$8000 - $32000	Total length: 1600 feet (rough estimate from the AG maps)
Steel gate	$1000	16' steel. 1 gate required.
Watering trough	$700	1 required.
Water Development	$1390	400' of pipe + trenching @ $2/foot (length estimated from AG maps), and 1 trough connection including hydrant, float valve, and misc. hookup.
Total	$11,090 - $35,090	

If temporary troughs with above-ground plumbing are used initially in addition to the permanent troughs, then $2000 should be added to the estimated cost to fund these items.

Total estimated infrastructure cost is $48,510 at $5 per foot fences and $154,260 at $20 per foot fences. To this one should add 20% contingency. Rounding to the nearest $10K gives a range of **$60,000 to $190,000**. If a separate cattle truck parking and turn-around area must be developed near Agnes Street, an additional $10K to $30K may be needed. This is not reflected in the totals given below in Table 4.

Table 3. Other cost estimates

Item	Cost	Notes
Grazing plan	$20,000	Needed just once before infrastructure can be thoroughly defined but must be submitted to CCC before any trail work or fencing work is started. Assume this plan will take 6 months to develop. The cost listed assumes significant contributions from City staff and others.
Yearly habitat monitoring	$12,000	Evaluation of overall habitat
Yearly species specialist monitoring	$4000	This is cost per species specialist.
Yearly water quality monitoring	$2000	Could be more if multiple tests are needed each year.
Yearly Public Outreach	$30,000	$10,000 per year for 3 years.
Total	$68,000	Yearly total after year three would be $18,000

There are probably other yearly costs not accounted for here, such as support for the Technical Advisory Group, occasional mowing, or other restoration activities. In addition to the one-time grazing plan, the yearly budget for the first three years probably should be $60,000[1]. After year 3 the yearly budget should be $25,000[2] not counting City staff time. *These are 2011 dollars.* There should be an expectation that these totals may change (and increase) depending on the outcomes of the Adaptive Management Program, cost of living increases, and other long-term factors. In addition to all of these costs significant City staff time will be required for supervision of the grazing lease and interactions with the planner, monitors, and technical representatives of concerned public entities. We estimate at least 1/2 full-time-employee (FTE) for these activities plus 1/2 FTE for public outreach for the first three years. Commitment by the City of less than this may jeopardize the restoration program.

[1] Monitoring and outreach estimates + 20% contingency, rounded up to nearest $5K.

[2] Monitoring estimate + 20% contingency, rounded up to nearest $5K.

3. Conclusions

There are various ways to group the estimated costs depending on when the expenses are anticipated to happen. For our purposes of arriving at a rough estimate this is not too important. Therefore for Table 4 we have assumed that all of the fencing expenses occur in the first year.

Table 4. Total cost estimates (2011 dollars)

Year	Cost	Notes
1	$140,000 - $270,000	$60K-$190 fencing + $20K grazing plan + $60K monitoring and outreach. (Add $30K if cattle truck parking and turn-around must be developed.)
2-3	$60,000	$60K monitoring and outreach
Total for years 1-3	**$200,000 - $330,000**	
Year 4 - and beyond	**$25,000**	$25K monitoring.

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California Coastal Commission,
Central Coast Area

November 15, 2011

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

RE: Master Plan for Arana Gulch/ Broadway-Brommer Bicycle Path

These comments are submitted on behalf of the Santa Cruz Chapter of the California Native Plant Society (CNPS).

CNPS remains deeply concerned that the resubmitted project remains primarily a nonresource-dependent transportation project with significant impacts to ESHA.

1. The Coastal Commission's Conditions of Approval for the 2010 Staff Report moved the Arana Meadow Trail to the west. At the October 2010 Coastal Commission meeting, Commissioners noted that moving this trail west would increase the grazing and restoration area. The current application ignores both the Commissioners' directions and the Coastal Commission's former *Conditions of Approval* and re-sites the Arana Meadow Trail to the east on the pretext that the original alignment provides an "access experience into the property in the northern area." Moving the path to the west as the Commissioners wished would still provide an access experience. However placing the trail in the middle of the ESHA unnecessarily bisects and degrades coastal prairie habitat, increases edge effects, and reduces ease of management since there would be coastal prairie habitat on both sides of the fence.

2. CNPS is concerned about the City's ability to pay for mitigation, restoration, and management to offset the impacts this transportation project would incur. The City claims the Frederick Street Property is valued at over $1Million. This appraisal is dated June 20, 2005. Property values have dropped 30% since then. (Zillow Home Value Index) It is possible that the property is worth only $700,000 or less now. After the $420,000 local match that would leave only $280,000 for long-term restoration and management. To achieve a $25,000/year return and keep the endowment intact, one would have to get 8% interest. If the $280,000 is not an endowment and would be used up, it would last less than 11 years if management cost $25,000/year. Certified range managers have estimated that the grazing component alone would cost that much.

3. To ensure proper oversight of restoration of abandoned paths CNPS suggests the following wording be added to Coastal Commission's *Conditions of Approval*:

Exhibit M

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All abandonment/restoration measures shall be reviewed and approved by the Adaptive Management Working Group prior to implementation.

4. CNPS insists that more specific direction be given regarding success criteria for the restoration of Arana Gulch habitats. The Coastal Commission's conditions of approval from October 2010 do not contain the wording below from the March 2010 Conditions of Approval.

Wording from March 2010:

(g) Final success criteria for each habitat type, including, as appropriate:

• Species diversity, including total number of taxa, number of native taxa, and number of invasive non-native taxa.

• Percent cover of total vegetation, percent cover of native vegetation, and percent cover of invasive non-native taxa.

• Wildlife usage as evidenced by incidental observations.

• Erosion control. • Control of invasive non-native plant taxa.

• Maintenance of suitable habitat for sensitive species or other individual "target" species.

• Requirement that success be determined after a period of at least three years wherein the study site has been subject to no remediation or maintenance activities other than weeding.

5. To resolve any conflicts between public access and habitat management, CNPS recommends adding the following sentence to the Coastal Commission's Conditions of Approval:

If conflicts arise between the Public Access Management Plan and the Habitat Management Plan, protection of the habitat shall be the highest priority and the Habitat Management Plan shall prevail.

6. At the October 2010 Coastal Commission meeting, Commissioners verbally brought up issues that the City has not addressed in the present application. These issues include

• Impact of planned culvert replacement for Arana Creek (not part of the project and no funding source identified),

• Conducting a pilot restoration (more than mowing) before paved paths are built,

• Inclusion of a "reopener clause" in the Coastal Commission's *Conditions of Approval* so Coastal Commission can intervene in the future should restoration not be carried out.

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7. Cattle grazing details in the City application do not agree with methods identified by Certified Range Managers consulted by CNPS. (See attached report) For example, Certified Range Managers recommend "stocker" cattle instead of cow-calf pairs to coordinate with the life cycle of the Santa Cruz Sunflower. Other differences include elimination of the fence isolating area D, width of the cattle gates, and need for public outreach about grazing in an urban setting.

8. CNPS recommends more specificity with regard to mitigation for this project. As presently described, the City will rely on a future loosely-defined adaptive management planning process to assure mitigation success. The details of this strategy are woefully inadequate compared to previous Coastal Commission mitigation requirements for private land developers. The Arana Gulch process would rely on a team of unnamed experts who would *"advise"* the City on future management. This advisory body would have no clear authority and no defined governance process, voting structure, or documentation procedure. As such, the lack of process creates a strong potential to fail as evidence by a similar Coastal Commission mandated Citizen Advisory Committee for public access and conservation during the addition of Gray Whale Ranch to Wilder Ranch State Park—a process that led to neither increased public access nor improved resource management.

9. CNPS is concerned that the City of Santa Cruz has misrepresented the CNPS position numerous times in its application for approval of the Arana Gulch Park Master Plan, October 2011. The so called "CNPS Alignment" is used as a straw man which the City dismisses in its application. CNPS explained at length at the October 2010 Coastal Commission meeting that it did not advocate the alignment analyzed and dismissed by the City. Additionally, CNPS never opposed grazing at Arana Gulch as claimed by the City in its application (City of Santa Cruz Interim Tarplant Management, 1995-2011, p. 3). Rather CNPS opposed implementing grazing without a grazing plan and appropriate monitoring. Other misrepresentations will be clarified at the hearing.

Thank you for your consideration,

Vince Cheap

Vince Cheap, Conservation Chair,
Santa Cruz Chapter, CNPS

Brett Hall

Brett Hall, CNPS State President

Protecting California's native flora since 1965

Exhibit M

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California Coastal Commission,
Central Coast Area

California Coastal Commission
725 Front Street
Santa Cruz, CA 95060

Re: City of Santa Cruz, Arana Gulch Master Plan
Hearing date: December, 2011

Dear Commission Members:

The following comments restate and supplement the comments previously expressed in Sierra Club letters to you dated February 22, 2010, and October 6, 2010, when this project was first considered by your Commission. I have also included the language from a resolution passed by the California Conservation Committee on July 13, 2011, at the request of the Sierra Club California Coastal Committee.

Sierra Club opposes the transportation portion of this project, both at the local and statewide level, for the following reasons.

The proposed project encompasses two issues that are entirely independent of each other and, therefore, should be examined independently. One part of the project provides for the protection of endangered plant species in this Environmentally Sensitive Habitat Area (ESHA). We support this part of the project as it is long overdue.

But we strongly oppose constructing a paved roadway for bikes through the ESHA. The real issue is that this project is primarily a transportation project that will bisect the ESHA for the purpose of providing a bike throughway to connect parts of the City that are outside the ESHA.

The fact that the bikeway through the ESHA is a transportation project is confirmed by the plan to fund the project with regional transportation funds. It should also be clear that these transportation funds could be applied to alternative routes outside the ESHA. I have included an email from RTC Executive Director, Mr. Dondero, dated April 2, 2010, in response to public inquiry by one of our members. Construction of the bike throughway and its funding are not in the least dependent on the ESHA and the proposed improvements to its habitat.

The addition of a few interpretive and educational signs to the bikeway is an overt attempt to characterize a transportation project as a *resource-dependent development.*

Although your staff has indicated that the Commission has approved projects where a transportation project and ESHA protection were comingled, we found none that were comparable to the Arana Gulch case; none were projects that so clearly bisected an ESHA unnecessarily, and none were so clearly separable, i.e. each could be carried out to meet its full objectives independently of the other, as in the Arana Gulch case.

This paved roadway will necessitate substantial land form alterations, construction of switch-backs, construction of major bridges over two creeks, construction in riparian areas and buffer zones, retaining walls, fences, and other appurtenances that will drastically alter the natural habitat of this otherwise undisturbed natural preserve. It will introduce an extensive amount of concrete and steel necessary for its construction (including bridges and retaining walls) in an area that has all the attributes and characteristics of an ESHA and is identified in the City's General Plan as an ESHA.

We support the implementation of the ESHA enhancements mentioned in the revised submission; they can and should be carried out independently of the bike throughway. However, the transportation project should be examined by itself, and, in light of the restrictions of Sec. 30240 of the Coastal Act, it should be denied.

For all of these reasons, we strongly urge that you sever the bikeway project from the Master Plan, reject the Bikeway Project and approve the rest of the Master Plan.

Thank you for your consideration of these comments.

Sincerely,

Vicki Lee

Vicki Lee, Chair
Sierra Club California

Attached:

April 2010 Email from George Dondero, RTA
Sierra Club California resolution re: Arana Gulch

Note: The following is the April 2, 2010 email from RTC Executive Director, G Dondero

From: "George Dondero" <gdondero@sccrtc.org>
Date: Fri, 2 Apr 2010 11:41:10 -0700
To: "Jean Brocklebank" <jeanbean@baymoon.com>
Cc: "John Leopold" <john.leopold@co.santa-cruz.ca.us>, <neal.coonerty@co.santa-cruz.ca.us>, "Luis Mendez" <lmendez@sccrtc.org>
Subject: RE: Funding and AG management - resending

Dear Ms. Brocklebank:

In response to your question,

"*Will the SCCRTC answer this question about whether or not funding for the Broadway-Brommer project can or cannot be applied to another alternative alignment, either within or outside of the Arana Gulch ESHA?*"

The funding currently programmed by the RTC for the Broadway-Brommer project could be applied to an alignment alternative to the current one.

However, if the scope of the project were to change to the extent that the benefit/cost of the project were to significantly diminish (i.e.: the transportation needs would not be met as effectively), then the RTC could determine to reconsider the project for funding with new staff recommendations based upon the new conditions of the project. The RTC would then vote to 1)retain the funding, 2)re-program part or all of the existing funds to other projects, or 3)de-program the project.

Without knowing exactly what new alignment(s) are to be proposed by the City, we cannot know if such an alignment would be reconsidered by the RTC for funding. If you should have any other questions regarding RTC funding on the project, please feel free to contact me.

George Dondero

ARANA GULCH CNRCC RESOLUTION PASSED July 13, 2011

The California Nevada Regional Conservation Committee of the Sierra Club supports the Coastal Commission's continued designation of the Arana Gulch Greenbelt as an Environmentally Sensitive Habitat Area [ESHA] in the Coastal Zone in Santa Cruz.

Th 8a

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SANTA CRUZ COUNTY GROUP
----------Of The Ventana Chapter----------
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COASTAL COMMISSION
CENTRAL COAST AREA

October 6, 2010

California Coastal Commission
725 Front Street
Santa Cruz, CA 95060

Re: Application No. 3-09-068, Arana Gulch Master Plan, City of Santa Cruz
Hearing date: 10/14/2010 – Agenda Item No. Th 8a

Dear Commission Members:

We have examined the Commission's staff report on this application and want to submit the following comments as an addition to the comments previously expressed in our letter to you dated February 22, 2010

The staff has framed the issue incorrectly when it states in its Report (page 2) that:

The main issue raised by the proposed project is addressing potential conflicts between protecting environmentally sensitive habitat areas (ESHAs) and providing public access because all of the Arana Gulch greenbelt area is ESHA.

The staff has created an artificial conflict between two issues that are entirely independent of each other and, therefore, should be examined independently. We support enhancing protection for the ESHA, and we support providing public access to the ESHA, but not through it. The real issue is whether public access should be provided in the form of a transportation project that bisects the ESHA primarily for the purpose of providing a bike throughway to connect parts of the City that are outside the ESHA.

The fact that the bikeway through the ESHA is a transportation project is confirmed by the plan to fund the project with regional transportation funds. It should also be clear that these transportation funds could be applied to alternative routes outside the ESHA. (see attached RTC Executive Director, Mr. Dondero, e-mail of 2 April 2010 in response to public inquiry). Construction of the bike throughway and its funding are not in the least dependent on the ESHA and the proposed improvements to its habitat. The addition of a few interpretive and educational signs to the bikeway are a ridiculously paltry attempt to camouflage a transportation project into a resource-dependent development.

Although the Commission's staff has indicated that the Commission has approved projects where a transportation project and ESHA protection were comingled, we found none that were comparable to the Arana Gulch case; none were projects that so clearly bisected an ESHA unnecessarily, and none were so clearly separable, i.e. each could be carried out to meet its full objectives independently of the other, as in the Arana Gulch case.

We support the implementation of the ESHA enhancements mentioned in the revised submission; they can and should be carried out independently of the bike throughway. However, the transportation project should be examined by itself, and, in light of the restrictions of Sec. 30240 of the Coastal Act, it should be denied.

For all of these reasons, we strongly urge that you sever the bikeway project from the Master Plan, reject the Bikeway Project and approve the rest of the Master Plan. Thank you for your consideration of these comments.

Sincerely,

Aldo Giacchino

Aldo Giacchino, Chair
Sierra Club--Santa Cruz County Group

Attachment: e-mail dated 2 April, 2010 from RTC Executive Director, G Dondero

From: "George Dondero" <gdondero@sccrtc.org>
Date: Fri, 2 Apr 2010 11:41:10 -0700
To: "Jean Brocklebank" <jeanbean@baymoon.com>
Cc: "John Leopold" <john.leopold@co.santa-cruz.ca.us>, <neal.coonerty@co.santa-cruz.ca.us>, "Luis Mendez" <lmendez@sccrtc.org>
Subject: RE: Funding and AG management - resending

Dear Ms. Brocklebank:

In response to your question,

"Will the SCCRTC answer this question about whether or not funding for the Broadway-Brommer project can or cannot be applied to another alternative alignment, either within or outside of the Arana Gulch ESHA?"

The funding currently programmed by the RTC for the Broadway-Brommer project could be applied to an alignment alternative to the current one.

However, if the scope of the project were to change to the extent that the benefit/cost of the project were to significantly diminish (i.e.: the transportation needs would not be met as effectively), then the RTC could determine to reconsider the project for funding with new staff recommendations based upon the new conditions of the project. The RTC would then vote to 1) retain the funding, 2) re-program part or all of the existing funds to other projects, or 3) de-program the project.

Without knowing exactly what new alignment(s) are to be proposed by the City, we cannot know if such an alignment would be reconsidered by the RTC for funding. If you should have any other questions regarding RTC funding on the project, please feel free to contact me.

George Dondero

Item Th8a, Application 3-09-068
Center for Biological Diversity
OPPOSED to E-W Paved Path

CENTER for BIOLOGICAL DIVERSITY
Because life is good.

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

Th8a

via electronic and US mail

October 8, 2010

RECEIVED
OCT 11 2010
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

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

Re: Item Th8a, Application 3-09-068 – 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 Hagemann Gulch is removed, or reconfigured to avoid significant disruption of endangered species habitat values.

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. The Commission acknowledges that the east-west paved path will "cover a portion of the habitat area with pavement" and create "disruption of habitat values." California Coastal Commission. 2010. Coastal Development Permit Application 3-09-068. Arana Gulch Management Plan at 44-45. ("CDP Application").

The Commission should not approve a project with such significant impacts on tarplant habitat within the Arana Gulch Environmentally Sensitive Habitat Area ("ESHA"). Because the east-west paved path is not resource-dependent, and because it will cause significant disruption of habitat values, the Commission should not approve the Project until a less destructive alternative is proposed and favored by the City; one which accomplishes the City's goal of improving the Arana Gulch trail system for users with various mobility methods while still protecting endangered tarplant habitat.

Jonathan Evans, Staff Attorney
351 California St., Ste. 600 • San Francisco, CA 94104
tel: (415) 436-9682 x 318 *fax:* (415) 436.9683 *email:* jevans@biologicaldiversity.org
www.BiologicalDiversity.org

Exhibit M

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. 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. Arana Gulch is a crucial critical habitat unit for the Santa Cruz tarplant. The Arana Gulch critical habitat unit 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.[1] 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.[2]

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 the Commission 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 tarplant habitat."[3] 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.

The Commission Must Not Approve Projects in EHSAs that 1.) Result in Significant Disruption of Habitat Values and 2.) Are Non-Resource-Dependent

The Coastal Act prohibits "any significant disruption of habitat values" in "environmentally sensitive habitat areas." PUB. RES. CODE § 30240(a). Despite the significant impacts to the Arana Gulch ESHA from the paved multi-use path, the Commission has recommended approval of the Project and erroneously asserted that, contrary to the Environmental Impact Report ("EIR"), no significant disruption of habitat would result from the Project.[4] The Commission cannot selectively adopt portions of the EIR while rejecting other portions of the EIR where convenient.

The Draft EIR for the Arana Gulch Master Plan recognizes that the expanded trail system, including the east-west paved multi-use path, would result in a significant and

1 USFWS 2008 BiOp (1-8-07-F-46).
2 USFWS 2008 BiOp (1-8-07-F-46).
3 CDP Application at 28.
4 CDP Application at 45.

Exhibit M

unavoidable impact to the Santa Cruz tarplant and its habitat.[5] In analyzing the impacts to the Santa Cruz tarplant and its habitat, the EIR recognized that that impacts from the Project's trail components "would remain significant and unavoidable because it cannot be fully ensured that all tarplant habitat would be protected."[6] The City has some recognition of the importance of avoiding tarplant habitat, as the location of the proposed paved Arana Meadow Trail was modified to avoid historic tarplant area C, and further modified to minimize damage to tarplant habitat by being situated over existing hard packed trails.[7] The City likewise here, should recognize that the east-west paved multi-use path through the middle of the meadow, an area where there is not currently even a hard packed trail, will result in significant destruction of tarplant habitat. A "net enhancement of tarplant habitat values"[8] due to tarplant management and other trail removal does not negate this significant habitat destruction. The disruption and destruction of habitat must be recognized by the Commission, and pursuant to PUB. RES. CODE § 30240(a), should not be approved by the Commission.

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." PUB. RES. CODE § 30240(a). 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."[9] However, the current location of the paved east-west path is not a condition precedent to accomplishing these goals. The City's position – that in order to enable access to such resources, a paved, multi-use path *in this particular location* must be built – is tantamount to permitting a road within a wetland ESHA as long as interpretive signage describing the filled wetlands is displayed at a roadside stop, or permitting the development of an educational institution within an ESHA as long as that institution includes some educational discussion of the resources that were destroyed to permit its development.

This type of justification must be flatly rejected. Interpretive uses can be facilitated for persons with all mobility levels without this particular transportation-oriented path. For instance, visitor platforms adjacent to Arana Gulch, or boardwalks to facilitate wheelchair accessibility while limiting surface disturbance. Even if the City finds that other proposed alternatives are not satisfactory[10], due to gradient complications or other factors, it is still incumbent upon the City to develop alternatives for path systems that accomplish the City's goals, without destroying habitat for species protected under the federal and state endangered species acts. Likewise, it is

---

5 City of Santa Cruz 2006, Arana Gulch Master Plan DEIR at 4.2-43.
6 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.
7 CDP Application at 33, 43.
8 CDP Application at 45.
9 CDP Application at 43, 53.
10 *See* CDP Application at 53-55 for a discussion of the California Native Plant Society alternative, which the City disfavored.

incumbent upon the Commission to not approve the Project until the City has done so.[11] Instead of permitting the destruction and adverse modification of tarplant habitat, the Commission should stipulate that the City adopt one of the many feasible alternatives, or develop new alternatives. The Commission's obligations to adopt reasonable and prudent alternatives to the adverse modification of critical habitat cannot be disregarded.

Conclusion

The Center strongly urges the Commission to follow the requirements of the Coastal Act and not approve the Project as currently proposed. The Commission must not approve a project such as this, which is not resource-dependant, and which will result in significant disruption of endangered tarplant habitat values. PUB. RES. CODE § 30240(a). There are many feasible and reasonable alternatives to avoid the significant impacts engendered by the east-west paved multi-use path on the endangered Santa Cruz tarplant and its habitat. The Commission should not approve the Project until the City's properly protects and enhances endangered species habitat within the ESHA, while implementing 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.

Sincerely,

Jonathan Evans
Center for Biological Diversity

Nicole DiCamillo
Law Clerk

11 The state legislature has declared that "stage agencies should not approve projects as proposed which would... result in the adverse modification of habitat essential for the continued existence of the species, if there are reasonable and prudent alternatives available" that would conserve the species essential habitat. CAL. FISH AND GAME CODE § 2053.

Exhibit M

California Native Plant Society
2707 K Street, Ste. 1 • Sacramento, CA 95816-5113 • (916)447-2677 • Fax (916)447-2727

February 2, 2011

City of Santa Cruz
Planning and Community Development
809 Center St., Room 206
Santa Cruz, CA 95060

RECEIVED
FEB 07 2011
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Attn: Juliana Rebagliati, Director

Dear Ms. Rebagliati:

The California Native Plant Society (CNPS) remains committed to working with the City to develop an alternative route in the Arana Gulch Greenbelt that will satisfy the California Coastal Commissioners, preserve ESHA, and provide ample and long term protection for Arana's population of Santa Cruz sunflower/tarplant, *Holocarpha macradenia*, (Federally listed as Threatened and State-listed as Endangered), its population of artist's popcorn-flower, *Plagiobothrys chorisianus* var. *chorisianus* (CRPR 1B), coastal prairie, and ephemeral wetlands.

CNPS recognizes the need for ample time for this negotiation to take place and we are concerned about the impending end of the City's waiver-extension. The CNPS approval process requires adequate time for review and approval by our local chapter board and our state Board of Directors as well, consultation with many experts. Therefore, we are concerned that CNPS is not being consulted early enough for anything fruitful to take place.

Finally, please let the CNPS know if the City is rescinding its November 2010 offer and request for such a meeting.

Thanks for your time and consideration and we look forward to hearing form you as soon as possible to schedule a meeting. When we discussed this during the November Coastal Commission hearing in Santa Monica, you expressed genuine interest in meeting with us.

Sincerely,
Brett Hall

Brett Hall
CNPS State Board President
Arboretum UCSC
Santa Cruz, CA
95064
brett@ucsc.edu (831) 212-4853

cc Susan Craig, California

Comments on Proposed Council Policy
by Michael Lewis and Jean Brocklebank
8 November 2011

Regarding the policy before you, allow us a brief history: Over 11 years ago, California Coastal Commission staff wrote to the City and said "As directed by the City's Local Coastal Program, the preferred approach" (in planning for Arana Gulch) "would be to prepare a specific management plan for the greenbelt prior to consideration of a Broadway-Brommer Bicycle Pedestrian Path project." The recommendation was for a separate Master Plan **first**, followed by an application for Broadway Brommer (BB) **second**. The City ignored this advice and four years later the City Council instead directed the Department of Parks & Recreation to include the BB project in the Master Plan document, thus assuring that BB became the Master Plan and vice versa. There has been nothing but confusion and controversy ever since, especially since more than half of the BB project is not even in the greenbelt.

The Staff Report on the proposed Council Policy before you is called "The Arana Gulch Public Trust Fund." But it is really a trust fund for Broadway Brommer, as well as for Arana Gulch. The policy is really for **two separate projects.** Unfortunately, those two projects were submitted as **one** to the Coastal Commission, continuing the confusion. So, $400,000 of that trust fund is earmarked to match Federal and State transportation money allocated through the Santa Cruz County Regional Transportation Commission, leaving whatever is left over for Arana Gulch's natural resource management.

Our concern is that money from an Arana Gulch Public Trust Fund Account be available for tarplant restoration and management, as has been stipulated by the City for years, whether or not BB is allowed to proceed. How might that happen? Simple. The Coastal Commission may deny the application just submitted, as it denied it a year ago. The City may then decide that it should do as suggested a decade ago and first resubmit the Arana Gulch Master Plan without BB. Such an application, without the controversial transportation project through "critical habitat" of an endangered species would no doubt receive unanimous approval by the Coastal Commission.

If this policy is passed, as written and intended, and the Coastal Commission denies approval for the application as submitted (with two projects rather than one), then funding for continued endangered tarplant management is basically held hostage to the BB transportation project. We want to make sure that this policy is written to allow riparian and coastal prairie habitat restoration and management, including the recovery of the endangered Santa Cruz Tarplant, whether or not BB is built, whether or not BB is included in the Arana Gulch Master Plan that is finally approved by the California Coastal Commission.

Would Council be willing to edit the draft policy to stipulate that funds from this trust fund will be available for tarplant management, whether or not BBis built? The policy would then read as follows (with suggested edit bolded):

COUNCIL POLICY 12.12

POLICY TITLE: ARANA GULCH PUBLIC TRUST FUND ACCOUNT

Exhibit M

Future proceeds from the sale of the property formerly known as "Broadway-Brommer Road Right-of-Way," located between Frederick Street and Hagemann Gulch, shall be placed in an account of the Public Trust Fund for use on implementation of the Arana Gulch Master Plan, including Santa Cruz Tarplant habitat, riparian and coastal prairie habitat restoration and management. **Furthermore, funds from the Arana Gulch Public Trust Fund will be used for tarplant management, whether or not the Broadway Brommer project is included in the approved Master Plan.**

Susan Craig

From: Jean Brocklebank [jeanbean@baymoon.com]
Sent: Tuesday, November 15, 2011 12:45 PM
To: Susan Craig; Dan Carl; Charles Lester
Subject: Fwd: Arana Gulch Tarplant - good news

Susan ~

I would like this email to John Dixon included in the staff report. Please note that when I wrote Dixon I mentioned "at least 40" individual tarplant specimens had been found. You have already received the accurate inventory of 32 plants with 84 flower heads that I sent.

Jean

Begin forwarded message:

> **From:** Jean Brocklebank <jeanbean@baymoon.com>
> **Date:** November 6, 2011 11:28:51 AM PST
> **To:** John Dixon <jdixon@coastal.ca.gov>
> **Cc:** Mark Stone <mark.stone@co.santa-cruz.ca.us>
> **Subject: Arana Gulch Tarplant - good news**
>
> Dear John ~
>
> Do you recall that there was great concern last year, including yours, when **no** tarplant (*Holocarpha macredenia*) was found in Arana Gulch?
>
> At the time I wondered out loud if that might be due, in part, to the three previous years of drought. Tarplant seed seems to have some creative strategies built in to wait for just the right circumstances for germination. Clever ancient species!
>
> Whether or not my theory has been tested and found probable, after a moderate increase in rain in the winter of 2009 - 2010 and then a major rain event in the winter of 2010 - 2011, we have a resurgence of Tarplant this season. I am proud to report that Friends of Arana Gulch found a dozen plants that the City's inventory initially missed. When our finds were added to the City's, at least 40 plants were discovered. One of them is a beauty (see attached), reminiscent of past years production.
>
> Additionally, *Madia sativa molina* was found in association with tarplant in Area A and one *molina* was even found in Area B this year! This is also good news, as *molina* is another coastal terrace prairie tarweedy species found in Arana Gulch for years (I have pictures from 10 years ago). *Molina*, along with *Hemizonia* (Coastal Tarweed), have both also been missing from Arana Gulch during the three recent drought years. *Molina* used to be found consistently in north Area A and east of Area B. So we still have a healthy habitat of coastal terrace prairie at Arana Gulch.
>
> One other bit of good news for you is that Friends of Arana Gulch, a volunteer

group that has worked with the City for years (initially so noted in the City's 1997 MOU with the CA DF&G) did some extra field work and research this past August. FOAG looked at two other coastal terrace prairie habitat areas (Tarplant Hill above Struve Slough in Watsonville) and Twin Lakes State Park above Schwann's Lagoon in Live Oak) and found some management prescriptions that worked amazingly well at Tarplant Hill (sponsored by the Watsonville Wetlands Watch organization). We interviewed their botanist, John Pritchard.

We asked for, and received, an opportunity to present our findings and recommendations to the City's Superintendent of Parks & Recreation (P & R), Mauro Garcia, and P & R arborist, Leslie Keedy, who coordinates management of tarplant at Arana Gulch. We met together for an hour. They were very interested in our report, accompanied with pictures. They said they were not aware of Tarplant Hill or the tarplant there. They said they thought the information we had would be very useful. And indeed it was! We made three distinct recommendations based on our observations. We are pleased to report that all three were implemented this fall -- the first time in history that the City used this specific combination of treatments.

Our association with Parks & Recreation is very cordial and collaborative. We are proud that they feel we have shared a "win" with them (their word!) regarding the excellent scientific management prescriptions undertaken this fall.

We are very optimistic about next year's inventory, as a result of this change in management, plus another winter of potentially good rains. Best of all, prescriptions this fall did not require any new infrastructure. Just some different procedures. Same mowing...except this time they mowed the entire grassland, every stitch of it (with one exception), acknowledging that seed bed had not been cleared outside Area A, B, C, or D in their mowing in years past. Another change from years past, a la Tarplant Hill, was NO mowing of the areas where tarplant was found this season. It also included three small test scrap patches, rather than just one huge area. Additionally, the City is allowing FOAG volunteers to hand rake thatch (City will collect), alleviating the problems in the past when the City had thatch raked mechanically and inadvertently sent soil (seedbed) to the dump.

Last but not least, John, the take home good news is that, as we have maintained all along, building a transportation project through "critical habitat" is not necessary to "save the tarplant!" This year's management, paid for by standard P & R fees as in years past, did not utilize Regional Transportation Commission grant money. And the City is proposing to formalize a policy of its intention to use sale of City property for a dedicated fund for tarplant restoration. Personally, I have always believed they would use the sale of property for a dedicated fund for Santa Cruz Tarplant, riparian and coastal prairie habitat restoration and management. Apparently they want to assure the Coastal Commission and that's fine by me!

If you would like any further digital pictures of what we found at Tarplant Hill or this year's AG Tarplant, let me know and I will be happy to send them to you.

All the best,
Jean Brocklebank
Friends of Arana Gulch

Blueprint for a Resolution to the Arana Gulch Controversy
By Michael Lewis and Jean Brocklebank
14 November 2011

In this blueprint, we go forward toward a resolution of the conflict created by the Arana Gulch controversy. Science, data and the laws of the land, as well as our heartfelt desires, inform all decisions.

Keeping minds open to creative solutions to problems and conflicts helps to end contentiousness and allows us to move forward, carefully as well as swiftly.

This blueprint is divided into three parts: goals, recommendations, and a potential timeline for implementation.

Goals:

- to facilitate the restoration and recovery of an endangered species and its habitat

- to facilitate the restoration and recovery of Arana Creek and its endangered species

- to allow the Coastal Commission to approve the City's Master Plan for the Arana Gulch Greenbelt and encourage appropriate public use of an environmentally sensitive habitat area (ESHA)

- to acknowledge that there is support for a 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 acknowledge that everyone, in a way, can be involved in a community solution to the current controversy

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

- to allow multiple projects, both inside and outside the greenbelt, to go

forward, which, taken together, should give everyone involved something but not all.

Recommendations:

The Coastal Commission has recommended that the City "prepare a specific management plan for the Arana Gulch greenbelt prior to the consideration of a Broadway-Brommer Bicycle Pedestrian Path project." ***

The City re-submits it Arana Gulch Master Plan application, without Broadway-Brommer (See Annotated Master Plan), as recommended, for a hearing in December 2011 in San Francisco, for unanimous approval by the Coastal Commission.

The AGMP management prescriptions for tarplant habit restoration and recovery will include newly established procedures for mowing, raking and low impact treatment of areas with established tarplant populations, and with low impact temporary fencing (no concrete footings) for grazing/mowing-scraping and/or prescribed burning.

*** As recommended by Coastal Commission staff in a January 11, 2000 letter from Charles Lester to Ted Lopez, Transportation Planner, Santa Cruz City Public Works Dept.

Timeline

November 2011 -- City withdraws current application and resubmits its AGMP application (without Broadway-Brommer)

December 2011 -- City wins approval of its AGMP (minus Broadway-Brommer) from the Coastal Commission.

Jan - March 2012 -- City, County and S.C Port District form a team to study a reconfiguration of the harbor culverts to initiate 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 Street Seismic Retrofit project that

includes widened bike lanes and a widened pedestrian sidewalk.

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

Possibilities:

2011 - 2015 -- Rail Corridor (Monterey Bay Sanctuary Scenic Trail corridor) segments in planning and design for bicycle and pedestrian paths, especially from 7th Avenue to Seabright

2015 -- City submits application to Coastal Commission for a Broadway-Brommer east-west connection through the Arana Gulch greenbelt, if it chooses to pursue the project

This statement is inaccurate. The City Council directed that a Master Plan be prepared and that it include the Broadway-Brommer Bike Ped Connection.

In 2002, the entire Arana Gulch Greenbelt property was designtaed by US Fish & Wildlife Service as Citical Habitat for the endangered Santa Cruz tarplant.

This paragraph is inaccurate. The bridge over Arana Creek has been replaced with a raised ramp and steel bridge span in SC Harbor property.

Council provided new direction that there would be no residential development within Arana Gulch. During preparation of this Master Plan, the City Council reconsidered the possibility of potential future development options, as discussed in the following section.

A proposal for a multi-use pathway connecting Broadway Avenue and Brommer Street through Arana Gulch has also evolved over the past decade. The City's *General Plan* (1992) and the *Greenbelt Master Plan* (1994) identified the concept of an east-west bicycle/pedestrian connection between the City and County of Santa Cruz. In 1995, an initial Scope of Work for this bicycle/pedestrian path connection was prepared. Since that time, the proposed pathway and alternative routes have undergone several rounds of environmental evaluation and view.

In May 2003, the City Council certified the environmental document—*Broadway-Brommer Bicycle/Pedestrian Path Connection Environmental Impact Report/Environmental Assessment*—but did not take action on the project itself. The City Council provided direction to prepare the long-term Master Plan for Arana Gulch, with the proposed east-west multi-use trail through Arana Gulch to be included in the Draft Master Plan.

This Master Plan has reduced the scope and scale of the proposed east-west multi-use trail originally evaluated in the certified *Final EIR/EA*. There is no longer a bridge proposed over Arana Gulch Creek and the multi-use trail has been decreased in width. Additionally, the plans for the proposed bridge spanning Hagemann Gulch have been redesigned to further minimize impacts.

Arana Gulch Master Plan

In late 2003, the City began the planning process for the *Arana Gulch Master Plan*. As an initial step, the Parks and Recreation Department sought direction from City Council regarding the specific uses for Arana Gulch. In October 2003, the Council directed that the following uses be included in the Draft Master Plan: resource enhancement and protection, ~~a trail system that includes an east-west multi-use trail, interpretive displays and overlook areas.~~

Most ~~These~~ uses were based on the concepts identified in the 1994 Greenbelt Master Plan, though the scope of uses was substantially reduced to include passive, rather than more active, recreational uses. This Master Plan does not include a sports field, playground parking lot, and restroom. Further, from the City's understanding of the combined factors of declining enrollment and school closures, a school site is no longer included.

In addition to providing guidance on uses in October 2003, City Council also provided direction to exclude an area 300 feet from the northwest boundaries of the property (approximately 5.7 acres) from the Master Plan. This area was to remain "undesignated" until the Draft Master Plan was completed and brought to the Council for consideration. This "undesignated area" was later included back into the Master Plan boundaries, as discussed below under Environmental Review.

This Master Plan was prepared by the City Parks and Recreation Department. The *Santa Cruz Tarplant Adaptive Management Program*, included as Appendix A, was prepared by BMP Ecosciences. Planning and detailed design for the east-west multi-use trail was prepared by RRM Design Group, in coordination with the City Public Works Department.

Environmental Review

Early in the Master Plan process, the City determined that the proposed uses for Arana Gulch may have a significant effect on the environment. In accordance with the California Environmental Quality Act (CEQA), a decision was made to prepare an Environmental Impact Report (EIR). An environmental consulting team led by Amy Skewes-Cox was contracted by the City to prepare the EIR. The Draft Master Plan and EIR were prepared concurrently.

Exhibit M

Delete this paragraph. It describes projects outside the boundaries of the Arana Gulch Master Plan.

Exhibit M

General Goals for Arana Gulch

The future of Arana Gulch open space will be guided by the following general goals:

Resource Protection and Enhancement

- Protect and enhance sensitive habitat areas, including coastal prairie, riparian woodland and scrub, and wetlands.
- Implement an adaptive management program to ensure the long-term viability of the Santa Cruz tarplant within Arana Gulch.
- Educate the public about natural resource protection and enhancement through interpretive displays and programs.
- Reduce sedimentation through stabilization and restoration of eroded areas, trail improvements, and other Best Management Practices.

Public Use

- Provide a trail system that allows public access within habitat areas in a manner that does not result in significant degradation of habitat values.
- ~~Provide trail connections through Arana Gulch that provide access from adjacent communities to the coastline and the Monterey Bay National Marine Sanctuary Trail. Provide multi-use trail connections that would comply with the Americans with Disabilities Act (ADA) requirements, and provide pedestrian, wheelchair and bicycle access.~~
- Provide areas for nature viewing and interpretive displays. Design the interpretive displays to complement and blend with the natural environment.
- To protect sensitive habitat areas, restrict dogs to on-leash use at all times on designated trails.
- Close unauthorized, non-designated pathways.
- No new vehicle parking with the Arana Gulch boundaries will be provided, as there is adequate existing parking near the entrances.

3.2 MANAGEMENT AREAS

Management Areas have been designated within the approximately 67.7-acre Arana Gulch open space based on natural resources. The intent of designating these areas is to more effectively focus resource management and enhancement efforts. The three Management Areas include Coastal Prairie/Tarplant, Arana Gulch Creek Riparian and Wetland, and Hagemann Gulch Riparian Woodland. Specific management guidelines have been developed for each Management Area. These Management Areas are briefly highlighted below and described in more detail in the following sections.

With views of open prairie and the summer bloom of the Santa Cruz tarplant, the Coastal Prairie/Tarplant Management Area exemplifies the natural beauty and diversity found by visitors coming to Arana Gulch. A key goal within this approximate 30-acre area is to enhance the tarplant and other native prairie species populations, while reducing the abundance of invasive non-native grasses. This area offers opportunities for visitors to enjoy meadow views and observe prairie habitat.

Arana Gulch Creek and the broad floodplain along the eastern portion of the property comprise the second Management Area. The Arana Gulch Riparian and Wetland Management Area, totaling approximately 34.5 acres, features valuable habitat for aquatic species and birds. A pedestrian trail along the western edge offers overlooks of the creek and coastal marsh. To protect wildlife habitat, public access within the wetland habitat areas would be prohibited.

Along the southwestern boundary of Arana Gulch is the smallest of the Management Areas, Hagemann Gulch Riparian Woodland. Though the habitat value is lessened by the number of invasive species, this 3-acre wooded canyon features a mix of riparian trees and scrub. ~~While~~ the steep terrain considerably limits public use, ~~a proposed bridge would provide a key trail connection between Arana Gulch and the adjoining neighborhoods. This bridge over Hagemann Gulch would offer an interpretive overlook into the canyon and tree canopy, but would not provide access into the gulch.~~

watershed may also be contributing to the channel widening. Restoration of the stream banks and prevention of future head cutting are important goals for this Management Area. To identify possible solutions, more research into the causes of excessive head cutting and bank erosion is needed. The detailed hydrologic analysis and actual repair is beyond the scope of this Master Plan; however this Plan includes goals to move forward with additional analysis and eventual restoration.

A gully in the northern portion of Arana Gulch has also been identified as a priority for restoration. This gully, located at the end of Agnes Street and the alleyway, has experienced accelerated erosion due to storm water runoff from the adjacent streets. By employing a bioengineering solution, restoration and stabilization of the gully would focus on reducing sedimentation while visually blending with the natural setting.

In addition to stream bank and gully restoration, resource management in this area will focus on removing non-native invasive vegetation. Unlike the Coastal Prairie/Tarplant Management Area, the wetlands and willow stands do not need active management such as mowing or controlled burns. The riparian habitat areas would also be excluded from any future grazing within Arana Gulch.

Public use would be limited within this Management Area to minimize impacts to wildlife species. No trails would be located within the wetlands or willow stands along the riparian corridor. Improvements to an existing informal path along the western edge of this area would provide a pedestrian trail overlooking the creek and floodplain. Formalizing this trail along the Arana Creek riparian corridor would increase visibility into the creek area and introduce appropriate public use. Camping and other illegal activities have resulted in habitat degradation and public safety concerns in this area. ~~Within the Port District property along the southern boundary of this Management Area, a new multi-use trail is proposed. This trail route would provide an overlook and interpretive opportunities for the tidal reach of Arana Gulch Creek (see Section 3.4.2).~~

Outside the scope of the Master Plan.

Specific guidelines regarding natural resource management and public use for the Arana Gulch Creek Riparian and Wetland Management Area are listed below:

Resource Management Guidelines

- Conduct further hydrologic analysis regarding accelerated head cutting and bank erosion along the tidal reach of Arana Gulch Creek. Design and implement a bank restoration project that reduces sedimentation and enhances fisheries and wildlife habitat along Arana Gulch Creek.
- Restore the eroded gully in the northern portion of Arana Gulch. Design and implement a restoration project that reduces sedimentation and blends with the natural setting.
- Remove non-native invasive vegetation.
- Close unauthorized pathways within the wetland and riparian habitat areas.
- Monitor impacts of trail users near sensitive wetland and riparian habitats. As needed, install fencing, signs, or implement other strategies to deter off-trail use.

Public Use Guidelines

- Enhance the existing trail along the western boundary of this Management Area. The trail shall be pedestrian-only.
- To avoid disturbance to wildlife, primarily waterfowl, prohibit dogs within the riparian and wetland habitat of Arana Gulch Creek and on the pedestrian trail.
- Conduct non-toxic mosquito abatement as needed in a manner that minimizes impacts to the wildlife species.

Exhibit M

3.2.3 HAGEMANN GULCH RIPARIAN WOODLAND MANAGEMENT AREA

Hagemann Gulch Riparian Woodland Management Area is a steep-sided canyon with a seasonal drainage. This 3-acre area features a dense canopy of trees and scrub, though the habitat value has been degraded by a number of invasive species. The upper slope is comprised primarily of coast live oak woodland, California bay, and an understory of poison oak and California blackberry. Riparian scrub and woodland occurs on the lower slopes. Non-native trees such as poplars and eucalyptus are also found in the canyon. Larger trees within the canyon can provide roost and perching sites for raptors, such as red-tailed hawk. Some nesting has also been documented in years past.

Non-native species such as ivy and broom dominate much of the understory. Due to the steep canyon sides and soil erodibility, the feasibility of removing non-native vegetation is particularly challenging. The terrain also limits the opportunities for trails and public access. ~~The canyon has effectively served as a barrier between the Arana Gulch open space and the neighborhoods to the west.~~

Beyond the scope of the Master Plan.

~~A key public access goal for Arana Gulch is to provide a western entrance, which would require a new bridge across Hagemann Gulch. Designed to minimize impacts to the habitat values of Hagemann Gulch and blend with the natural setting, the new entrance, bridge and trail would accommodate pedestrian, wheelchair and bicycle use. The overlook into Hagemann Gulch from the bridge would provide a unique opportunity to educate visitors about riparian and oak woodland habitats. The new trail and bridge are described further in Section 3.4.~~

Along the upper eastern slope of Hagemann Gulch is a row of "Rose of Castile" roses. These roses, believed to have originally been planted over 150 years ago, are considered heritage shrubs and should remain undisturbed to the extent feasible. The heritage roses and history of the site is discussed further in Section 2.2.3, Historic Resources.

Specific guidelines regarding natural resource management and public use for the Hagemann Gulch Riparian Woodland Management Area are listed below:

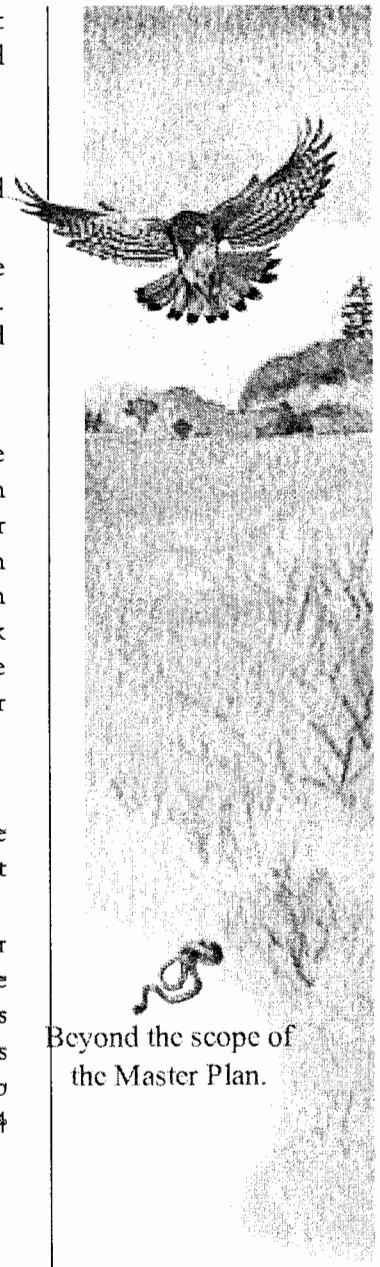
Resource Management Guidelines

- Remove non-native understory species, such as broom and ivy, to the extent feasible.
- Contain expansion of the eucalyptus trees and reduce the fire hazard within Hagemann Gulch through various treatments. These may include pruning lower branches of eucalyptus, and removal of smaller trees and saplings.
- Close unauthorized pathways within Hagemann Gulch.
- Preserve the "Rose of Castile" heritage roses located on the upper slope of Hagemann Gulch. Relocate the roses within Arana Gulch in the vicinity of existing roses, only if no other alternative is feasible for development of the Hagemann Gulch Bridge. Any relocation should be done in consultation with the Central Coast Heritage Rose Group. Removal of oak saplings in the immediate vicinity of heritage roses may be needed. Oak saplings may be replanted as feasible in another location.

Public Use Guidelines

- ~~Establish a new west entrance at Hagemann Gulch to provide a trail connection between Arana Gulch and the Seabright neighborhood of Santa Cruz.~~
- ~~Provide a new multi-use trail and bridge crossing over Hagemann Gulch, featuring an interpretive overlook. The bridge shall be designed to minimize impacts to heritage trees and habitat values, and to blend with the natural setting as much as possible. The new multi-use trail would be open to pedestrians, wheelchair users, and bicyclists (see Section 3.4 for further trail and bridge information).~~

* Reconfigure existing entrances for ADA compliance.



Beyond the scope of the Master Plan.

Exhibit M

3.3 INTERPRETIVE THEMES AND PROGRAMS

Arana Gulch's setting offers opportunities for two primary interpretive themes:

- Preservation and enhancement of the Santa Cruz tarplant/ coastal prairie habitat, and
- Riparian/wetland wildlife viewing and nature observation.

These themes are discussed in greater detail below. Future educational programs, interpretive displays, and brochures will convey educational information about these resources. There are no developed facilities, such as educational centers or group seating areas, proposed within Arana Gulch.

Interpretive displays would be designed to complement the natural setting. These displays would benefit both self-guided and docent-led tours. Brochures would also be created to enhance the educational experience. Volunteer-docent led walks could potentially be established in the future, similar to the "Wetland Walk"—a program created for the City's Neary Lagoon Wildlife Refuge. This program, developed in cooperation with the Santa Cruz Museum of Natural History, offers interactive outdoor exploration for elementary school children. The proximity to several public, private, and home schools makes Arana Gulch convenient for outdoor education programs. The immediate proximity of Harbor High School to Arana Gulch could allow for development of a more advanced educational program.

One of the primary interpretive themes will focus on efforts to ensure the long-term viability of the Santa Cruz tarplant and coastal prairie habitat. Interpretive displays and programs will highlight the importance of preserving this unique tarplant population. Management strategies, such as grazing, controlled burns, scraping, and mowing will also be explained. The history of the property's land use, notably cattle grazing, and its impact on the habitat area will also be presented. Interpretive displays, brochures, and programs will also emphasize the importance of being a responsible visitor and abiding by the park regulations to ensure the tarplant and other coastal prairie species are not harmed.

The second interpretive theme will focus on the riparian and wetland habitat areas along Arana Gulch Creek and Hagemann Gulch. ~~The proposed Hagemann Gulch Bridge and~~ a number of trail overlooks would provide opportunities for nature observation and wildlife viewing. These overlooks would benefit birdwatching in particular. Interpretive displays and brochures would highlight the tidal reach area of Arana Gulch Creek and the importance of preserving and enhancing the creek for fisheries habitat, focusing specifically on steelhead trout. Although the young fish rearing potential and steelhead habitat values are at low levels relative to other streams in the Santa Cruz Mountains region, the close proximity to schools offers a unique learning opportunity. The Arana Gulch Watershed Alliance (AGWA), Harbor High School and several other agencies collaborated to install a fully functional fish ladder and sediment pond upstream of Arana Gulch. Similar opportunities exist within Arana Gulch to develop educational projects in the future that would enhance steelhead habitat.

3.4 TRAIL SYSTEM

An interpretive trail system is the focus of public use within Arana Gulch. ~~The proposed trail system, totaling approximately 2 miles, would provide public access for pedestrians, wheelchair users, and bicyclists. A key goal of the trail system is to provide visitors of all abilities with a place for outdoor observation and education about sensitive habitats. This trail system would be developed and maintained in a manner that does not result in significant degradation of habitat values.~~ Another important goal it to close and restore informal or unauthorized pathways within Arana Gulch.

Contradicts the EIR

~~The existing trail system provides access for pedestrians and bicycles; however there are no trails accessible to wheelchair users. The proposed trail system~~ would include trails that are fully compliant with the Americans with Disabilities Act (ADA), affording public access to a City greenbelt property by

Trail systems would include...

Exhibit M

This statement is irrelevant to the Master Plan.

visitors of all abilities. Within the City's other greenbelt properties, the steep terrain and site constraints have precluded developing ADA compliant trails.

Beyond the scope of the Master Plan.

~~In addition to providing opportunities to view nature and wildlife, the Arana Gulch trail system would also provide trail connections from adjacent communities through Arana Gulch to the coast and the Monterey Bay Sanctuary Scenic Trail. Envisioned as a continuous trail along the coastline of Monterey Bay, the Sanctuary Scenic Trail provides an interpretive and recreational trail for walkers, joggers, bicyclists, local residents, and visitors.~~

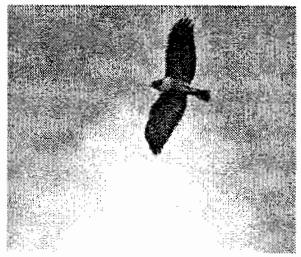
Within Arana Gulch, an existing north-south unpaved trail provides access for pedestrians and bicyclists from the Agnes Street entrance to the Upper Santa Cruz Harbor. The proposed trail system would improve this north-south trail route to provide for wheelchair users. ~~The new trail system would also feature a new west-east trail connection between the Seabright neighborhood and the Harbor.~~

The existing trail system and trail-related issues at Arana Gulch are discussed in following Section. A detailed description of the proposed trail system is presented in Section 3.4.2, Trail Alignments and Improvements. The proposed trail system is depicted in Figure 7. The final section includes Trail Design and Management Guidelines.

3.4.1 EXISTING TRAILS

Prior to the City's ownership of Arana Gulch, the meadow area featured numerous cattle paths. These paths are visible on aerial photographs taken over the past several decades. When the City acquired the property in 1994, several informal pathways continued to exist. Many of these appear to have originally been cattle paths.

The *Arana Gulch Interim Management Plan*, adopted by City Council in 1997, identifies only one of these informal pathways as a "designated trail" to be maintained by the City Parks and Recreation Department. This unpaved trail, less than ¼ mile in length, is the primary north-south connection between Agnes Street and the Santa Cruz Harbor. The Interim Plan also identifies this north-south trail as a maintenance/emergency vehicle access route. Pedestrian and bicycle use are allowed on this trail, with dogs limited to on-leash use only. The southernmost segment of this trail has experienced substantial erosion due to the steep gradient of the trail route and needs to be realigned.



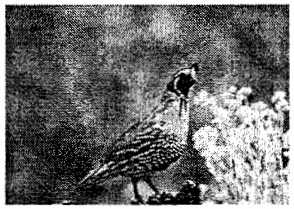
Since the City approved the Interim Management Plan, an unpaved loop trail along the perimeter of the meadow area has become increasingly popular with pedestrians. Much of this loop trail, approximately 0.8 miles in length, appears to have existed previously when cattle were grazed on the property.

At present, the existing trail system maintained by the Parks and Recreation Department totals approximately 1.2 miles (Figure 2, Existing Setting). This includes the north-south trail and loop trail encircling the meadow area. Neither of these existing trails is accessible to wheelchair users due to the unpaved, rough surface and steep gradients in some trail sections.

In addition to these designated trails, there are numerous unauthorized pathways crossing the coastal prairie and tarplant habitat areas. These pathways are either used as cut-through routes by pedestrians and bicycles, or for illegal off-leash dog use. The Parks and Recreation Department has made efforts to close these undesignated pathways and enforce leash laws, but available resources and management actions have been limited under the *Interim Management Plan*. A key goal of this Master Plan is to close unauthorized pathways and discourage off-trail use to better protect sensitive habitat areas.

Along Arana Gulch Creek there are also problems with undesignated pathways and illegal activities, including camping. The dense riparian vegetation helps to shield unauthorized users from public view. In addition to closing undesignated pathways within the riparian and wetland habitat areas, there is a need for a designated trail along the edge of the corridor that would increase visibility into the area and encourage appropriate public trail use and nature viewing.

Exhibit M



3.4.2 TRAIL ALIGNMENTS AND IMPROVEMENTS

This section describes the proposed Arana Gulch trail system, totaling approximately 2 miles. The system would feature two types of trails: multi-use trails and pedestrian-only trails. Most of the trails, approximately 1.4 miles, would be limited to pedestrian use only, with dogs restricted to on-leash use at all times. Multi-use trails would be designed for pedestrian, bicycle, wheelchair, and on-leash dog use. Less than one-third of the total trail system within Arana Gulch would be multi-use trails.

The multi-use trails would include Arana Meadow, Creek View, and Canyon Trails. These trails would enable visitors of all abilities to experience and learn about the different habitat areas: the coastal prairie, Arana Gulch Creek, and Hagemann Gulch. These trails also provide key trail connections between adjoining neighborhoods and the coastline. Together, Canyon View and Creek View Trail would provide a continuous west-east trail connection through the Arana Gulch property and Upper Harbor.

Multi-use trails would feature a hardened surface and gradient that is compliant with the Americans with Disabilities Act (ADA) requirements. The trail width would be no greater than 8 feet wide, except for the proposed bridge over Hagemann Gulch and Arana Gulch Creek overlook which may be wider to accommodate interpretive displays and nature viewing areas.

Pedestrian-only trails would include the Coastal Prairie Loop Trail and Marsh Vista Trail. These pedestrian trails would be maintained as narrow, earthen footpaths. Most of the pedestrian trails in the trail system presently exist, though some realignments and improvements are necessary for erosion control and to enhance interpretive opportunities. The trail bed width for pedestrian trails would be approximately 18 to 24 inches.

Interpretive overlooks and displays would be located along the trail routes at locations that minimize impacts to sensitive habitats. Seating would be provided at scenic overlooks, but the number of benches would be limited. To discourage off-trail use, fencing and signs would be installed as needed. The amount of fencing would be limited to those locations where off-trail use cannot be controlled through other measures. No lighting would be installed along the trails within the meadow area of Arana Gulch. If deemed necessary for public safety, low level lighting may be installed at the Hagemann Gulch bridge and Upper Harbor area.

Multi-Use Interpretive Trails

Arana Meadow Trail (0.3 mile)

Arana Meadow Trail provides access to the coastal prairie habitat from the northern entrance at Agnes Street. The existing earthen trail is open to bicyclists, pedestrians, and on-leash dogs. During the rainy season, the trail surface is often muddy and rutted. This trail would be improved to meet ADA requirements to provide for wheelchair use. Improvements would include a hardened surface, not to exceed 8 feet in width. This would provide a fully accessible trail connection to Creek View Trail, and ultimately the upper Santa Cruz Harbor.

An interpretive display would be provided near the northern entrance to the trail. This display would focus on the resource values of coastal prairie habitat and Santa Cruz tarplant adaptive management. The display would also educate visitors about the importance of staying on designated trails and keeping dogs on leash at all times.

Creek View Trail (0.2 mile)

Creek View Trail is a new trail route, which would provide a fully accessible trail from Arana Meadow Trail to the Upper Harbor and Brommer Street. This trail route would be located on City and Port District property. Previously, the City of Santa Cruz had proposed constructing a pedestrian/bicycle bridge across Arana Gulch Creek, but this bridge is no longer being considered. Instead, the eastern segment of this trail route would be located along the north side of the Upper Harbor dry

Exhibit M

boat storage area, featuring an overlook of Arana Gulch Creek. This creek view would provide a unique opportunity to educate the public about coastal streams.

The proposed Creek View Trail segment within Arana Gulch would replace an existing earthen trail that is very steep and eroded as it descends the slope to the Upper Harbor. The existing trail route would be closed and the grassland would be restored on the steep slope. Approximately 575 linear feet of the new trail route would be located along the sloping meadow, while 600 linear feet of existing trail would be closed and restored to grassland habitat. Without the Creek View Trail, there would be no ADA compliant trail from the southern entrance of Arana Gulch.

Within the Port District property, the new trail route would follow the edge of the dry boat storage area for approximately 500 linear feet. An existing chain link fence separates the storage area from the proposed trail route. This corridor immediately adjacent to the storage area has been disturbed in past years and has limited habitat value, serving as a buffer between the Upper Harbor and the riparian habitat of Arana Gulch Creek to the north. Residents from nearby neighborhoods currently use this corridor as an informal pathway.

The new trail improvements within the Port District property would include an ADA compliant trail, approximately 8 feet in width along the perimeter of the storage area. At the eastern end of the storage area, a retaining wall would be needed in order to construct a new trail up the slope to the Upper Harbor entrance road. Improvements would also be made to the Upper Harbor entrance road to provide a safe connection to 7th Avenue and Brommer Street. An existing decomposed granite trail within the Port District property along the western edge of the dry boat storage area would continue to remain in place.

Creek View Trail would provide a unique opportunity in an urbanized area: a scenic overlook of a coastal stream in a more natural setting. At the overlook, interpretive displays would focus on birds, fisheries, and other wildlife that depend on the creek habitat. The displays would also explain the tidal influence in the lower reach of the creek, as well as broader information about the Arana Gulch watershed. This close up view of the creek is not possible from the other trails in Arana Gulch.

Canyon Trail (0.1 mile)

Canyon Trail would provide a new entrance and trail connection to Arana Gulch from the Seabright neighborhood area of Santa Cruz. This trail would feature a new bridge spanning Hagemann Gulch. Without a bridge, it is not feasible to create a multi-use, wheelchair accessible trail through the steep sided canyon. On the east side of Hagemann Gulch, the trail would continue through the meadow and connect with the other multi-use trails. The new bridge would also provide convenient access for visitors to the Coastal Prairie Loop Trail, a pedestrian trail encircling the meadow.

Access to the Canyon Trail entrance to Arana Gulch would be from the end of Broadway Avenue along a strip of property owned by the City of Santa Cruz. A multi-use trail, approximately 450 feet in length, would be developed at the end of Broadway. This new trail would connect to the proposed Hagemann Gulch bridge.

A new bridge spanning Hagemann Gulch would be designed to minimize impacts to native heritage trees and avoid substantial disturbance to the canyon. The bridge, approximately 330 feet in length, would avoid the need for structural supports within the steep canyon through cables anchored in abutments located at each end of the bridge. Minimal security lighting may be provided along the bridge as needed.

Views of the canyon from the Hagemann Gulch bridge would present opportunities for interpretive displays about riparian and oak woodland habitats, as well as bird watching. It would also provide a chance to share information about the challenges of managing invasive non-native vegetation in riparian habitat areas.

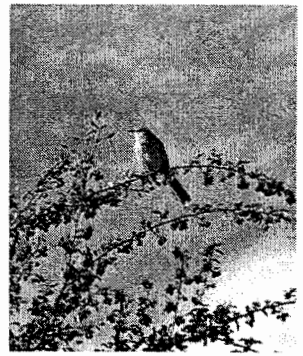
Exhibit M

3.6.1 PRELIMINARY PHASING PLAN

The preliminary phasing plan is organized into two phases, based on fiscal year cycles which begin in July of each calendar year. The first phase focuses on establishing the Tarplant Management Program and developing the multi-use interpretive trail system. The second phase largely focused on continued implementation of the Tarplant Management Program, management of the trail system, and restoration of eroded areas. The phasing plan is outlined below.

3.6.2 FUNDING SOURCES

Implementation of the *Arana Gulch Master Plan* is dependent on the availability of funding to accomplish various projects. Specific cost estimates for these projects, including trails and erosion control projects, are not included as part of this Master Plan. Cost estimates will be prepared separately as analysis and detailed designs are completed. Several funding sources will likely be utilized to fund projects, including federal, state and regional grant programs, and City funds. A brief discussion of these funding sources follows.



Preliminary Phasing Plan for Implementation of the Arana Gulch Master Plan

PHASE I (July 2006–June 2009)

Resource Management

- Establish Adaptive Management Working Group and conduct management actions under the Tarplant Management Program
- Pursue funding to conduct gully repair and to further analyze Arana Gulch Creek tidal reach erosion.
- Remove non-native vegetation within riparian habitat areas.

Trails

- Develop interpretive displays and educational programs.
- Close undesignated pathways throughout Arana Gulch.
- ~~Construct new Canyon Trail (multi-use), including Hagemann Gulch bridge.~~ Install interpretive displays.
- ~~Construct new Creek View Trail (multi-use) within Arana Gulch property. Creek View Trail segment through Port District property may be constructed in Phase II depending on available funding.~~
- ~~Construct improvements to Arana Meadow Trail (multi-use trail)~~
- ~~Construct improvements to Marsh Vista Trail (pedestrian only)~~

PHASE II (July 2009–ongoing)

Resource Management

- Conduct management actions under the Tarplant Management Program.
- Continue removal of non-native invasive vegetation within riparian habitat areas.
- Repair and restore eroded gully near Agnes Street.
- Conduct analysis of eroded tidal reach of Arana Gulch Creek and identify possible solutions. Implement stabilization of tidal reach.

Trails

- Monitor trail use and implement appropriate measures to ensure visitors do not degrade habitat areas through off-trail use or other unauthorized activities.

Exhibit M

~~Major multi-use trail improvements, including the Hagemann Gulch Bridge, Canyon Trail and Creek View Trail would be largely funded through federal and state grants previously received by the City. These federal and state grants were received in order to fund the east-west multi-use trail, including the new bridge over Hagemann Gulch. The grant funding totals approximately $1.6 million.~~

Future state and federal grant opportunities will also be pursued to help fund natural resource enhancement and erosion control studies and implementation. Some of the state grant programs that may be applicable include programs administered through the Resources Agency, Department of Parks and Recreation, and Department of Water Resources.

Local funding will likely be the source for implementation of minor trail improvements and on-going resource management. The City Council has previously determined that a portion of the revenue generated by the Parks and Recreation Facilities fees collected by the City would go toward the greenbelt properties. In addition, the City Council may consider utilizing the sale of City-owned property, such as the Broadway extension alignment outside of the Master Plan boundaries, to help fund implementation of the Santa Cruz Tarplant Adaptive Management Program and provide the local match for state and federal grants.

In order to ensure long-term management of the Santa Cruz tarplant, a sustained funding program must be established within the City. This program would be separate from the ongoing annual maintenance funding and Capital Improvement Projects. Ideally, the tarplant management program would be structured similar to an endowment program.

Exhibit M

Susan Craig

From: Jean Brocklebank [jeanbean@baymoon.com]
Sent: Tuesday, November 15, 2011 4:37 PM
To: Susan Craig
Subject: The Second Bridge

You will find description of the "raised ramp" and "steel bridge span" on page 3-17 of the Arana Gulch Master Plan Draft EIR paragraph 4). Since the plan (not yet engineered) requires an elevation climb from 10' above sea level (just behind the Dry Storage Yard on Port District
property) to 43' above sea level at the wooden Port District sign on Brommer Street Extension, there has to be some way to cross Arana Creek.

The description of the eastern portion of what is now called the Creek View Trail, on Port District property, is found in the Feb. 2006 AG MP draft EIR on page 3-17. On 3-6, 3-7, and 3-8 are architectural renderings that show the "trail footprints" varying from 8' 8" to 11' 7" to 15' widths and also show the ramping with retaining walls.

Since the route must meet ADA requirements and the elevation rise is the height of more than a three story building just to get over the creek and up to lower Brommer Street Extension, how could it not be a bridge?

It is true that Arana Creek flows through culverts and under the harbor parking lot but at the point the "trail" will cross the creek it will definitely be a steel span bridge as described in the EIR.

Additionally, the "trail" portion and raised ramp to Arana Creek on Port District property is entirely within the 100' riparian zone setback that the harbor was required to re-vegetate and leave unoccupied (by the Coastal
Commission) when it built its now current Dry Storage Yard. The steel span bridge is required to allow for flooding of the floodplain (spillover from the creek).

Most importantly, this cannot be a solid ramped crossing of Arana Creek at the culverts because the 100 year recurrence interval will have to be planned for, to allow flood waters to pass through any "bridge" or "span."

While it will not be the same kind of bridge planned for Hagemann Creek and is not the same bridge envisioned 10 years ago, how can it be called a "raised ramp" and steel span bridge" in the EIR and not be called a "bridge?"

Jean Brocklebank

Exhibit M

Susan Craig

From: Jean Brocklebank [jeanbean@baymoon.com]
Sent: Tuesday, November 15, 2011 4:40 PM
To: Susan Craig
Subject: Fwd: Arana Gulch - Port District

Please consider this information as you develop your staff report. I sent it to you on 1.31.10 and I resubmit it to you today for the new staff report. It is very important.

Jean

Begin forwarded message:

From: Jean Brocklebank <jeanbean@baymoon.com>
Date: January 31, 2010 10:52:36 AM PST
To: <scraig@coastal.ca.gov>
Cc: <mark.stone@co.santa-cruz.ca.us>
Subject: Arana Gulch - Port District

Hello Susan ~

We were recently informed that the City is pressing the Coastal Commission to place the Arana Gulch development application on the March meeting agenda in lieu of the La Bahia project.

Since there are so many outstanding concerns about the completeness of the City's application for the Arana Gulch development, including but not limited to the ones listed in your January 15, 2010 letter to Michael Ferry, it seems as though there is much to be done by Staff in time for Commissioners to be able to fully study this complicated application at a March hearing.

An additional important issue has been recently brought to our attention. The Santa Cruz Port District (a co-applicant with the City), through its Port Commission (an elected body) is very concerned about two potential problems associated with the Broadway-Brommer project portion of the Arana Gulch Master Plan. Although the Port Commission voted to support the Master Plan, Commissioners voiced concerns, thinking that they could be rectified somehow in negotiations with the City. These concerns can be reviewed in the Port Commission's December 15, 2009 meeting minute.

The two concerns are:

1. The Broadway-Brommer Bike/Ped Connection project will be built, as summarized in the Draft AG Master Plan (p. 47) in two phases and the **"Creek View Trail portion through Port District property may be constructed in Phase II depending on available funding."** The concern with an open-ended phased project is that increased bicycle traffic from added access to the greenbelt will then pour out, from Arana Gulch, onto the upper harbor roadway, which is narrow and is where much of the harbor maintenance and dredging machinery is frequently

staged. In addition, the added bicycle traffic coming downhill on Brommer Street Extension, and around the corner toward the same small area of upper harbor roadway will jeopardize working conditions and place the harbor in further risk of liability. One Commissioner was concerned enough to ask if the City could be required to build the Creek View Trail portion of the project first.

2. The second concern is related to Arana Creek and sedimentation. Of the thirteen sedimentation problem areas identified by the Arana Gulch Watershed Alliance's Bobbi Haver (at the same Port Commission meeting 12/15/09), two are found on or adjacent to the Arana Gulch greenbelt. The remainder are in the upper watershed, across Hwy. 1 and will not be affected by any greenbelt management decisions.

Of the two areas, one is a gully at the north end of the AG property and fairly simple to fix. *"By employing a bioengineering solution, restoration and stabilization of the gully would focus on reducing sedimentation while visually blending with the natural setting."* (see p. 36 of the AG Master Plan).

The other area, however, is the tidal reach of Arana Creek, just north of the culverts where Arana Creek flows to the upper harbor water and where tidal action creates a back & forth, back & forth flow of sea water. There, due in part to the channelization of Arana Creek through the culverts, bank cutting is a major contributor to sedimentation problems in the upper harbor. And it is not so easily fixed. In fact, some of the potential solutions already discussed might require raising the culverts, a situation that would be hampered by having the Broadway-Brommer "steel bridge span" over Arana Creek as planned at that location.

The City has acknowledged (p. 36 AG MP) that *"The detailed hydrologic analysis and actual repair [of head cutting and bank erosion] is beyond the scope of the Master Plan..."* The MP does add that it *"...includes goals to move forward with additional analysis and eventual restoration."*

It is this "future analysis" and "restoration" that represents the cart coming before the horse.

In its January 11, 2000 comments to the City on the DEIR for the Broadway-Brommer Bike/Ped Path Connection, CA Coastal Commission Staff told the City that because of the uniqueness of the small greenbelt area, it is **"more appropriate that larger management planning take place for Arana Gulch as a whole prior to individual development decisions that may eventually prejudice future decisions."** Presumably this concern is extended to all of the coastal zone area associated with the B-B project, whether on City or Port District property.

Allowing construction of the B-B raised ramp on the 100' riparian set back (north of the Dry Storage Yard) plus construction of the steel bridge span over Arana Creek will permanently compromise solutions for solving the problems associated with the existing culverts. This is a perfect example of Coastal Commission Staff's concern as stated in the January 2000 letter.

Lastly, since the Port District is a co-applicant on the City's application and since the paved and ramped Creek View Trail will be on the Port District's 100' riparian setback as required by the City's LCP, can the Port District (PD) be asked questions about the development as

Staff prepares its report to the Coastal Commissioners? By virtue of its permission to the City, the PD, after all, becomes a major developer on a coastal zone wetland. Almost one third of the structural mass of the total B-B project is on PD property.

Apparently, in exchange for permission to build on PD property, the PD will be requiring the City to take responsibility for all maintenance of infrastructure as well as liability on the B-B portion that the City will build on PD property (so stated at the 12/15/09 Port Commission meeting but not recorded in the minute). Shouldn't management and/or liability on PD property be established before the B-B project receives approval, so that the Coastal Commission knows for certain who is the responsible entity for resource management?

Sincerely,
Jean Brocklebank

17 December 2009

Dan Carl, District Director
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060

Dear CCC Staff ~

The City of Santa Cruz is preparing to submit an application for acceptance of its Master Plan (MP) for the Arana Gulch (AG) greenbelt.

In addition to general visions, goals and management directions, the MP also contains a specific development project (the Broadway-Brommer [B-B] bike/pedestrian path) that will cause "significant and unavoidable impact" to habitat of the endangered and threatened Santa Cruz tarplant (*Holocarpha macradenia*). The B-B project is the only specific project of the Master Plan that will adversely affect the "critical habitat" of an endangered species and which creates significant disruption of an Environmentally Sensitive Habitat Area .(ESHA) of the Coastal Zone.

Regarding the impact to *Holocarpha macradenia*, consider these comments from the USFWS Sept. 2008 Biological Opinion:

a. "Constructing the proposed bicycle-pedestrian pathway at the Arana Gulch open space would adversely affect approximately 65 acres of designated critical habitat for Santa Cruz tarplant."

b. "The potential effects associated with these activities include crushing, cutting, or otherwise injuring and killing of plants and/or seeds (through mechanical or foot traffic), surface disturbance and soil compaction, and erosion and/or changes in the hydrology."

c. "Probability of population extirpation increases as the number of individuals and the area of habitat decrease."

Consider also that the B-B portion of the Master Plan still involves diminishing "critical habitat" of a State endangered and Federal threatened species. Thus, this issue of pavement over critical habitat is more than a local coastal zone depredation. The Federal Endangered Species Act of 1973 (the conservation of ecosystems upon which species depend) and especially Sec. 4 (amended in 1978) that established critical habitat (protect and recovery goals) and Sec. 7 (to insure

that critical habitat is not modified) must be taken seriously by the California Coastal Commission. Promises of mitigation, with no dedicated funding for such mitigation is hardly the basis of approval for the B-B component of the Arana Gulch Master Plan.

Finally, consider that the inadequacies of the Environmental Impact Report, as well as the confusion of the exact nature of the "project" (a Master Plan or an east-west bicycle transportation project) has led to an ongoing lawsuit by the California Native Plant Society and Friends of Arana Gulch.

Friends of Arana Gulch, comprised of residents throughout the City and County of Santa Cruz, has the following recommendations for action with regard to the upcoming application from the City, County and Port District:

1. The City should be instructed to apply first for its LCP amendments and then for acceptance of its Master Plan because the Master Plan is in conflict with the unamended LCP. At the very least, LCP amendments should be submitted at the same time as the Master Plan.

2. Approval of the Arana Gulch Master Plan should be contingent on the removal of the Broadway-Brommer Bicycle Path Connection project (as found in six Public Use objectives on page 30 of the Draft Master Plan, as well as portions of Sec. 3.4), because the Broadway-Brommer bike/pedestrian project is not "resource-dependent," as required for development projects in an Environmentally Sensitive Habitat Area of the Coastal Zone (ESHA).

3. The City should be instructed to consider alternatives to east-west bicycle/pedestrian route(s) outside of Arana Gulch in any future application for that specific project within the Coastal Zone. Coastal Commission staff is on record for many years asking that alternatives to the B-B transportation project outside of Arana Gulch greenbelt be considered. To date, there has been no environmental impact report with analysis of alternatives outside of Arana Gulch

Our recommendations are based, in part, on the history of both the Arana Gulch greenbelt and the Broadway-Brommer Bicycle/Pedestrian project:

1. Although the record shows that Coastal Commission's District staff has stated over the years that the best practice would be to create a Master Plan first and then look at specific projects, the City of Santa Cruz (the City) ignored that advice.

2. Since 1995 the B-B transportation project has been the focus of plans for Arana Gulch. Consistently controversial, one City Council asked for a Frederick Street

addendum to the B-B EIR. It was never produced. And one City Council canceled the project altogether.

3. In 2002 the USFWS designation of Arana Gulch's coastal terrace prairie as "critical habitat" for the endangered and threatened *Holocarpha macradenia* added a new dimension to planning for the B-B project and management of the greenbelt.

4. To meet legitimate concerns from B-B transportation project opponents, the City, grasping at straws, has changed what it called the B-B transportation project. Its first new name was a "multi-use trail." Then it became an "interpretative trail" to make it sound "resource-dependent," as required for ESHA development by the Coastal Act. And finally the City currently refers to it as the only handicapped access to any of the City's greenbelts.

Master Plan or Transportation Project?

As can be seen by the letters of support generated by Master Plan proponents, the project is still an east-west bicycle transportation connection. One member of the Elderly and Disabled Commission spoke in public of seeing the project as a sidewalk across the greenbelt, not simply as one of access, hardly a "resource dependent" project. The SCCRTC's Bicycle Committee letter (28 October 2009) touts how the "multi-use trail" would "fill a gap in the regional east-west bicycle...network thereby increasing the ease and safety of bicycle...trips for transportation purposes..." The east-west Broadway-Brommer Bike/Pedestrian Connection Path is not a resource-dependent project. It is a transportation project dressed up to look like "access to the coastal zone."

Mitigation?

The proposed Broadway-Brommer Bike project (now called an "interpretive trail") will cause "significant and unavoidable impact" to habitat of the endangered and threatened Santa Cruz tarplant (*Holocarpha macradenia*).

The tarplant population in Arana Gulch has declined precipitously due to lack of management. In the Draft Master Plan document, the City ties management of tarplant habitat to the B-B Bike project, but the City has **no dedicated funding mechanism** to ensure long-term management of the Santa Cruz tarplant.

Funding

The "current cost estimate" for building the Broadway-Brommer bikeway project (from Chris Schneiter of Public Works to the City Council on November 24, 2009) is $3.6 million. However, per Mr. Schneiter on December 4, 2009, this estimate is

based only on the "preliminary design" as described in the 2006 Arana Gulch Draft Master Plan and its EIR. Looking at those documents shows only generalized dotted lines [one even shows the dotted B-B path going through the Dry Storage Yard (p. 41)]. The cost estimate is not based on any engineered plans for the physical infrastructure itself, because there are presently no engineered plans.

There is no funding mechanism identified for the Adaptive Management Plan, the restoration of the eroded gully at Agnes Street, nor for the stabilization and restoration of eroded creek banks in the tidal reach.

Sedimentation

In response to suggestions that the Master Plan provides the only way to properly manage the natural resource systems of the greenbelt, located within the Coastal Zone, we present the following comments (as sent to Save Our Shores by email and presented to the Port District Commissioner's meeting of December 15, 2009) for your consideration:

Previous support for the Arana Gulch Draft Master Plan has been based on the need to decrease sediment load in Arana Creek from two sources in the Arana Gulch greenbelt area -- the eroded gully in the northern portion of the greenbelt, near the intersection of Agnes Street and the alleyway and accelerated head cutting and banks erosion along the tidal reach of Arana Creek north of the tubes. Concern has been also expressed about sedimentation from eroding ad-hoc trails across the Arana Gulch grasslands.

But the Arana Gulch Draft Master Plan contains no detailed plans to deal with bank instability and collapse in the tidal reach of Arana Creek. On page 36, it states, "...detailed hydrologic analysis and actual repair is beyond the scope of this Draft Master Plan." This bank cutting is a function of the unnatural flow of Arana Creek, being squeezed into the culverts of the upper harbor. It can no longer spread or meander naturally. Instead its energy is pushed straight toward the tubes. The same thing happens at high tide. The intertidal water comes rushing through the tubes and its energy cuts more bank sediment. As long as those tubes squeeze water and its energy unnaturally, there is going to be bank cutting. The AG Master Plan cannot solve this problem.

While the "Preliminary Phasing Plan for Implementation of the Arana Gulch Draft Master Plan," on page 47, identifies plans to "conduct analysis of eroded tidal reach of Arana Gulch Creek and identify possible solutions" and to "implement stabilization of tidal reach", this Resource Management is found in Phase II. If this is so very critical, why is it not in Phase I? Furthermore, why hasn't it been

done under the City's 1997 Interim Management Plan which called for resource protection?

The eroded gully off Agnes Street likewise receives short attention, on page 36: "Restore the eroded gully in the northern portion of Arana Gulch. Design and implement a restoration project that reduces sedimentation and blends with the natural setting." However, there is no dedicated funding for this important project. Although this is found under Phase I, the plan says "pursue funding to conduct gully repair." The City's 1997 Interim Management Plan provided guidance, "outlining the actions necessary to manage and maintain the natural resources within Arana Gulch" greenbelt. Why the delay? The Master Plan was only for "land use decisions" (p.2 of the AG Draft MP), i.e., build a soccer field, build housing, build the B-B bikeway project. add new trails. etc. Resource protection did not, and does not, need the Master Plan, although its goals for resource protection are necessary, smart and laudable.

Concerns about run off and sedimentation from the paved and unpaved trails in the Arana Gulch grasslands are met in the Draft Master Plan with the statement, on page 45, "Provide drainage improvements along trails to include drainage dips and water bars." Sedimentation from paved trails in the Arana Gulch grasslands area is not a concern, since they do not drain to the creek. However, the Marsh View Trail, along the eastern border of the Arana Gulch grasslands does drain directly into the creek, and this trail would not be paved and therefore could continue to add sediment to Arana Creek after completion of the project.

Lastly, there is a great deal of sediment from the developed portion of the AG watershed at its cusp on 7th Avenue. All water from the right-hand downhill lane of Brommer St. Extension as well as the gravelly area between it and the Twin Fountains fence, flows downhill into the gully next to the road and directly into Arana Creek. Take a look at this drainage on a rainy day. Vehicle movement on the gravelly surface constantly breaks it down into fines, which also flow to Arana Creek. The AG Master Plan does not address this sediment source and the B-B bikeway project will not solve it. We are trying to get the County Redevelopment Agency to add roadway and drainage improvements on Brommer St. Extension to its 5 Year Plan. It would be great if the City RDA collaborated on that project. This would solve a sediment problem.

Tying watershed management of these critical waterways to the Broadway-Brommer Bike/Ped transportation project as well as the Master Plan makes little sense. The only dedicated funding the City has so far is possibly enough to build the B-B project: the bridge over Hagemann Creek, the paved bikeway through the grasslands area, the raised ramp on 8' to 15' width of the 100' riparian setback

behind the Dry Storage Yard for about 300 lineal feet, the second bridge over Arana Creek and the rest of the project up to 7th Avenue. And even that funding is not wholly secure. There is no dedicated funding for watershed management and solutions to critical sedimentation pollution. There is no dedicated funding for mitigation for impact to the "critical habitat" of an endangered species (Holocarpha macredenia).

In summary, the Arana Gulch Draft Master Plan provides no clear mechanism for reducing sedimentation into the Harbor from Arana Creek, and no plan or funding mechanism for stabilizing existing sources of erosion and sedimentation. Erosion and sedimentation projects can and should be funded and implemented with or without the Broadway-Brommer Bicycle Pedestrian Pathway Connection component of the AG Master Plan.

Recommendation Summary

We suggest that the Arana Gulch Master Plan could be accepted with the absolute removal of the specific Broadway-Brommer bikeway project, because the hugely expensive B-B bike connection jeopardizes critical environmental projects by drawing funding and administrative support to a project that does not benefit either Arana Creek, its wetlands or the ocean. The B-B transportation plan is not "resource dependent" and never has been. Without removal of the B-B transportation project from the Master Plan, we absolutely oppose acceptance of the AG Master Plan by the California Coastal Commission.

Sincerely,
Jean Brocklebank
Michael Lewis
On Behalf of **Friends of Arana Gulch**
1190 7th Avenue #5
Santa Cruz, CA 95062

Blueprint for a Resolution to the Arana Gulch Controversy

Presented by Michael Lewis and Jean Brocklebank

29 July 2009

In this blueprint, there are no winners or losers. We all go forward toward a resolution of the conflict. Options remain open. Science, data and the laws of the land, as well as our heartfelt desires, will inform all decisions.

Keeping minds open to creative solutions to problems and conflicts helps to end contentiousness and allows us to move forward, carefully as well as swiftly.

This blueprint is divided into three parts: goals, recommendations, and a potential timeline for implementation.

Goals:

- to facilitate the restoration and recovery of an endangered species and its habitat
- to facilitate the restoration and recovery of Arana Creek and its endangered species
- to allow the City to have its Master Plan for the Arana Gulch Greenbelt approved by the California Coastal Commission
- to allow and encourage appropriate public use of an environmentally sensitive habitat area (ESHA)
- to acknowledge that there is great support for a 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 acknowledge that everyone has to budge in the historical tug-of-war and that everyone, in a way, can be involved in a community solution to the current controversy
- to assure that the California Coastal Act remains the strong system of protection and conservation that it was intended to be

- to allow multiple developments and re-developments (both inside and outside the greenbelt) to go forward, which, taken together, should give everyone involved something but not all.

Recommendations:

- The Coastal Commission denies the current City application (3-09-68) if the application stays on the August 11 hearing agenda.

- The Coastal Commission recommends to the City that it re-apply for approval of its Arana Gulch Master Plan (AGMP) without the controversial non-resource dependent Broadway-Brommer east-west connection transportation plan (Creek View Trail).***

- The City re-submits it application (without Broadway-Brommer), as recommended, with a goal of a hearing in December 2010 in San Francisco and the Commission unanimously approves the application at that hearing.

- The AGMP will still include the management prescriptions for tarplant habit restoration and recovery, including fencing as is indicated on Map 4 of the revised application (3-09-68) for grazing/mowing-scraping and/or prescribed burning.

*** As recommended by Coastal Commission staff in a January 11, 2000 letter from Charles Lester to Ted Lopez, Transportation Planner, Santa Cruz City Public Works Dept.

Timeline

August 2010-- City withdraws its application or Commission denies the application

Sept. - November 2010-- City resubmits its application (without Broadway-Brommer)

Oct. - November 2010-- City uses mowing/scraping and/or prescribed fire to treat 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.

December 2010-- City wins approval of its AGMP (minus Broadway-Brommer) from Coastal Commission

Jan - March 2011 -- City, County and S.C Port District form a team to study a reconfiguration of the harbor culverts to initiate restoration and recovery of Arana Creek's tidal reach (which also addresses sedimentation into the upper harbor that requires dredging)

March 2011 -- County Redevelopment completes its bicycle-pedestrian safety improvements on Eaton Street, from Murray Street bridge to 7th Ave.

Spring - Fall 2011 -- City initiates the Murray Street Seismic Retrofit that includes widened bike lanes and a widened pedestrian sidewalk.

Spring - Fall 2011 -- The County Redevelopment Agency initiates a Brommer Street (from 7th Ave. downhill to the upper harbor) bike lane and pedestrian safety project design that also solves the current drainage sedimentation pollution into Arana Creek. This project benefits the County, the City and the Port District, as well as the public.

2011 - 2012 City Redevelopment Agency initiates repaired and enhanced Frederick Street Park stairway to facilitate bicyclists use of this route, widening the stairs slightly and the existing 9" bike ramp

2011 - 2015 -- Tarplant Management at Arana Gulch provides data to show recovery (or not).

Possibilities:

2011 - 2015 -- Rail Corridor segments in planning and design for bicycle and pedestrian paths, especially from 7th Avenue to Seabright

2015 -- City submits application to Coastal Commission for a Broadway-Brommer east-west connection through the Arana Gulch greenbelt

Restoration Alternative with Interpretive Trails

Proposed for the **Arana Gulch Greenbelt** to Santa Cruz Parks & Recreation Department
by Friends of Arana Gulch

7 April 2010

Goal: to protect and conserve the diverse habitat of Arana Gulch, providing for recovery of the endangered tarplant (*Holocarpha macredenia*), while also providing for public access, education, and enjoyment of the greenbelt (an Environmentally Sensitive Habitat Area).

Preface: Access to the Arana Gulch greenbelt is currently available from the north and the south. Both access entrances provide street parking. The south entrance, from the upper Harbor provides handicapped parking spaces. This entrance is reached through the upper Santa Cruz Harbor, from neighborhood streets as well as a major arterial (7th Avenue). An 8' wide pathway of decompose granite that is maintained by the Harbor permits access from the upper Harbor parking area to the greenbelt. The north access entrance is easily reached from many neighborhood streets as well as a major arterial (Soquel Avenue).

Santa Cruz County is considering a roadway and drainage project (for erosion control into Arana Creek) that will add bike lanes and sidewalks on Brommer Street Extension (.2 mile), as it comes into the Harbor from 7th Avenue. This upgrade will provide safety for bicyclists and pedestrians who come from the east to access the greenbelt and who now have to share a narrow roadway with vehicular traffic.

Elements and Actions of the Alternative:

1. The 2006 Arana Gulch Master Plan, with its vision and goals for restoration, rehabilitation and conservation of the "critical habitat" of the endangered tarplant, as well as its associated web of life species in Arana Gulch's coastal prairie grasslands minus the Broadway-Brommer link transportation project and the paved route from Agnes St.

2. The City sells its right-of-way property to create a dedicated fund for tarplant management. The tarplant Adaptive Management Working Group (AMWG) is formed and recovery of tarplant and its habitat begins in earnest as soon as the City receives its permit from the Coastal Commission. Construction of interpretive trails is not tied to funding for tarplant management.

3. The existing Agnes Street entrance is reconfigured to allow wheelchair access to the greenbelt. Handicapped parking spaces are established. An interpretive trail from the Agnes Street entrance that swings west and follows the western perimeter, made of either decomposed granite or a boardwalk type surface will be designed and engineered during

tarplant recovery efforts. This trail can be 6' wide to accommodate two way traffic, and can have some pop outs, with educational signage, that can also be used for right-of-way courtesies in case of many simultaneous trail users. It will continue on the western flank to just before historical tarplant population Area B, where there will be a small turnaround and interpretive signage.

4. Another interpretive trail will continue, south, from the turnaround area, through the old trees grove, and stay on the western perimeter of the greenbelt. It will also be 6' wide for two way traffic, and can have some pop outs with educational signage, that can also be used for right-of-way courtesies in case of many simultaneous users. This trail will continue to the Harbor overlook area, then swing back north and end at the existing Harbor entrance decomposed gravel pathway (which exits on Brommer Street Extension at the upper Harbor).

5. The existing footpath that goes northward from the Harbor entrance pathway will continue, as an interpretive trail, heading north as it currently does, bearing to the east and following the proposed "Marsh Vista Trail" of the AG Master Plan. This will keep users out of Area D, a recent historical tarplant population area.

6. Interpretive trails will be available to all users, who will police themselves with consideration & courtesy as the guiding principle.

7. The ancient oak tree adjacent to the trail will be fenced and the public will no longer be allowed access to it. This tree is being destroyed by students and other young people, using it as a hangout and carving deep scars into its vulnerable bark. Litter and graffiti abound.

8. There would be no building on the riparian zone behind the Dry Storage Area and fencing will be constructed to prevent short cuts as well as further east just past Arana Creek to prevent erosion. There would be no bridge (steel span) over Arana Creek.

9. Some or all foot paths that currently cross Arana Gulch will be closed as the interpretive trails are built. If necessary, fencing to keep users off the meadow will be built. Only access for restoration activities would then be allowed in the restoration/recovery areas.

Respectfully submitted,

Jean Brocklebank
Michael Lewis
on behalf of Friends of Arana Gulch

Exhibit M

Susan Craig

From: John Dixon
Sent: Thursday, July 01, 2010 2:15 PM
To: 'Vince Cheap'
Cc: Susan Craig; Dan Carl
Subject: RE: CNPS state/chapter requests meeting with you re:Arana Gulch project.

Hi Vince,

Thanks for the input. Unfortunately, I will not be able to make a special trip to discuss this issue with you and your colleagues. However, I'm always available for a conference call, if you would find that useful. I don't have time right now to give your recent submission the attention it requires, but when I have a chance to review it, I will probably have some questions.

Regards,

John

John D. Dixon, Ph.D.
Ecologist
California Coastal Commission
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707-445-5351
FAX: 707-445-7877
jdixon@coastal.ca.gov
htttp://www.coastal.ca.gov

From: Vince Cheap [mailto:vince@sasquatch.com]
Sent: Wednesday, June 30, 2010 8:01 PM
To: John Dixon
Subject: CNPS state/chapter requests meeting with you re:Arana Gulch project.

Hello Dr. John Dixon ~

This email is a followup to a phone message I left you on June 24th. The Santa Cruz Chapter of the California Native Plant Society (CNPS) is requesting a meeting with you regarding our Arana Gulch alternative route (see attachment). Our alternative route goes around the onsite listed Santa Cruz tarplant population and its coastal prairie habitat instead of through it as proposed by the City of Santa Cruz. CNPS be will be represented at this meeting by either our State CNPS Conservation Director Greg Suba or our State Board of Directors' President Brett Hall, myself (the local chapter Conservation Chair), and our chief consultant and biologist Dr. Grey Hayes. We believe our alternative route satisfies all the goals of the City's paved bike/pedestrian connector in the Arana Gulch greenbelt including its transportation connection between east and west Santa Cruz and access for the disabled and does so in a way that is environmentally superior. As you may remember from the March, 2010 Commission hearing we have strong scientifically based biological criticisms of the City's current plan to pave through the middle of the tarplant habitat and bisect/fragment the 4 subpopulations of the federally and state listed Santa Cruz tarplant. At the March meeting in the spirit of compromise we offered this alternative route that goes around the the tarplant habitat rather than through it and as I mentioned it still offers a paved transportation link for bikes, pedestrians, and the disabled. At that March hearing the Commission asked the City to withdraw their application and do an

analysis of our alternate route before they reapply to the CCC. I have attached a more fully characterized presentation of that alternate plan with scientific rationale and literature citations for your review - though you may have already seen it as we sent it to the CCC and the City on May 11, 2010.

We are requesting this meeting with you and CNPS state and chapter representatives and our biologist so that we can more fully explain the scientific basis for our alternate route and answer any questions that you may have.

Thank you for your time and consideration.

Vince Cheap, CNPS Conservation Committee Chair
Santa Cruz County Chapter
(831) 477-1660

Susan Craig

From: Jean Brocklebank [jeanbean@baymoon.com]
Sent: Thursday, May 13, 2010 12:35 PM
To: Dan Carl
Cc: Susan Craig; Charles Lester
Subject: Arana Gulch

Attachments: funding_myths.doc; foag_alt.doc

funding_myths.doc (64 KB)

foag_alt.doc (135 KB)

Dear Staff ~

Yesterday, at the Public Comment portion of the May hearing, I presented the attached information. Michael Lewis followed me and summarized it, adding a bit more information. Perhaps you can review that portion of the hearing on video to get a better sense of what we said.

I had printed copies of both of the attached documents for each Commissioner but I want to make sure that these go into the packet for the next hearing.
Having them electronically also makes it so easy to click on a web site url.

There are now two alternatives before the City: ours (Friends of Arana Gulch), submitted April 7th and the CA Native Plant Society alternative submitted earlier this week. Both of these alternatives have the same
goals: improved & enhanced access to the greenbelt for all visitors, recovery of the endangered tarplant and its associated native species, and maintaining the integrity of coastal ESHA's and the Coastal Act itself.

Sincerely,
Jean Brocklebank

Exhibit M

FUNDING MYTHS

by Jean Brocklebank
on behalf of Friends of Arana Gulch
12 May 2010

http://members.cruzio.com/~arana/articles/myths.html

Two funding myths have been clarified since the March 11, 2010 hearing. The following information is important for future informed decision-making regarding the City of Santa Cruz application for a permit to build a transportation project through a coastal ESHA.

Myth #1 Tarplant management is dependent on the Broadway-Brommer project

A main concern in supporting the Broadway-Brommer (B-B) transportation project through Arana Gulch's ESHA was that the project would provide desperately needed funds for recovery of the endangered tarplant. In other words, the health of the tarplant was tied to the B-B project. It turns out that B-B doe **not** provide any money for tarplant management.

I have now confirmed from three sources that there is no money for tarplant management at Arana Gulch (AG) in the SCCRTC budget for the B-B transportation project.

First, a transcript of the March 11th hearing establishes Chris Schneiter, Assistant Director of City Public Works, answering a question from one Commissioner in which he states that money for tarplant funding will come from the *sale of City property.*

Second, to confirm that statement, the City's Capitol Improvements Project (CIP) report for 2011 - 2013 shows SCCRTC money budgeted for the B-B project with a separate line item for the *sale of City property* in the amount of $391,434 (to be used for tarplant management)
http://www.cityofsantacruz.com/Modules/ShowDocument.aspx?documentid=13142

Third, at a meeting on April 7th, with the Parks & Recreation Dept. (the City's managers of the greenbelt) Steve Hammack confirmed that the money for an endowment (to last 20 - 30 years) for tarplant management was to come from *the sale of City property*. That property can be sold any time, of course, independent of B-B. In fact, that property could have been sold years ago to create an endowment for tarplant recovery and conservation in Arana Gulch.

Last, the City has been spening $10,000/year on tarplant management, according to Hammack, including some years with funds (and an MOU) from CA Fish & Game. I have recently shared digital pictures of tarplant over a 10 year period at Arana Gulch with your staff ecologist. Looking at the results of a resurgence of tarplant and other coastal prairie natives after the '06 - '07 mowing, shows that the City can do proper recovery management: http://members.cruzio.com/~arana/tarplant07.html/%22

Exhibit M

The pertinent point is that the money for tarplant funding is not tied to Broadway-Brommer, so there is no reason for anyone concerned about tarplant recovery & management to support a transportation project of any sort through the AG ESHA. The Master Plan, sans B-B, could be permitted at the next available CCC hearing and the City could begin immediately to plan recovery strategies while it sells its property.

Myth #2 The City cannot get funding for an alternative to B-B as proposed in the Arana Gulch Master Plan

At the March 11th hearing, the City stated that it had asked "its funders" and was told it could not get funding for the alternative routing as proposed by the CA Native Plant Society just days before the hearing. Historically the City has also said that it could not consider east-west connection routes outside of Arana Gulch because it could not get funding to do so. These statements turn out not to be the case. The City, the lead agency for the B-B project, has never asked to have B-B funds re-allocated, but that avenue is definitely open to it.

In an April 2, 2010 reply to my question to the B-B project funders (SCCRTC), Director George Dondero answered thusly (emphasis is mine):

Dear Ms. Brocklebank:

In response to your question,

"Will the SCCRTC answer this question about whether or not funding for the Broadway-Brommer project can or cannot be applied to another alternative alignment, either within or outside of the Arana Gulch ESHA?"

The funding currently programmed by the RTC for the Broadway-Brommer project could be applied to an alignment alternative to the current one.

However, if the scope of the project were to change to the extent that the benefit/cost of the project were to significantly diminish (i.e.: the transportation needs would not be met as effectively), then the RTC could determine to reconsider the project for funding with new staff recommendations based upon the new conditions of the project. **The RTC would then vote to 1) retain the funding, 2) re-program part or all of the existing funds to other projects, or 3)de-program the project.**

Without knowing exactly what new alignment(s) are to be proposed by the City, we cannot know if such an alignment would be reconsidered by the RTC for funding. If you should have any other questions regarding RTC funding on the project, please feel free to contact me.

George Dondero
Executive Director
Santa Cruz County Regional Transportation Commission

Restoration Alternative with Interpretive Trails

Proposed for the **Arana Gulch Greenbelt** to Santa Cruz Parks & Recreation Department
by Friends of Arana Gulch

7 April 2010

Goal: to protect and conserve the diverse habitat of Arana Gulch, providing for recovery of the endangered tarplant (*Holocarpha macredenia*), while also providing for public access, education, and enjoyment of the greenbelt (an Environmentally Sensitive Habitat Area).

Preface: Access to the Arana Gulch greenbelt is currently available from the north and the south. Both access entrances provide street parking. The south entrance, from the upper Harbor provides handicapped parking spaces. This entrance is reached through the upper Santa Cruz Harbor, from neighborhood streets as well as a major arterial (7th Avenue). An 8' wide pathway of decomposed granite that is maintained by the Harbor permits access from the upper Harbor parking area to the greenbelt. The north access entrance is easily reached from many neighborhood streets as well as a major arterial (Soquel Avenue).

Santa Cruz County is considering a roadway and drainage project (for erosion control into Arana Creek) that will add bike lanes and sidewalks on Brommer Street Extension (.2 mile), as it comes into the Harbor from 7th Avenue. This upgrade will provide safety for bicyclists and pedestrians who come from the east to access the greenbelt and who now have to share a narrow roadway with vehicular traffic.

Elements and Actions of the Alternative:

1. The 2006 Arana Gulch Master Plan, with its vision and goals for restoration, rehabilitation and conservation of the "critical habitat" of the endangered tarplant, as well as its associated web of life species in Arana Gulch's coastal prairie grasslands minus the Broadway-Brommer link transportation project and the paved route from Agnes St.

2. The City sells its right-of-way property to create a dedicated fund for tarplant management. The tarplant Adaptive Management Working Group (AMWG) is formed and recovery of tarplant and its habitat begins in earnest as soon as the City receives its permit from the Coastal Commission. Construction of interpretive trails is not tied to funding for tarplant management.

3. The existing Agnes Street entrance is reconfigured to allow wheelchair access to the greenbelt. Handicapped parking spaces are established. An interpretive trail from the Agnes Street entrance that swings west and follows the western perimeter, made of either decomposed granite or a boardwalk type surface will be designed and engineered during

tarplant recovery efforts. This trail can be 6' wide to accommodate two way traffic, and can have some pop outs, with educational signage, that can also be used for right-of-way courtesies in case of many simultaneous trail users. It will continue on the western flank to just before historical tarplant population Area B, where there will be a small turnaround and interpretive signage.

4. Another interpretive trail will continue, south, from the turnaround area, through the old trees grove, and stay on the western perimeter of the greenbelt. It will also be 6' wide for two way traffic, and can have some pop outs with educational signage, that can also be used for right-of-way courtesies in case of many simultaneous users. This trail will continue to the Harbor overlook area, then swing back north and end at the existing Harbor entrance decomposed gravel pathway (which exits on Brommer Street Extension at the upper Harbor).

5. The existing footpath that goes northward from the Harbor entrance pathway will continue, as an interpretive trail, heading north as it currently does, bearing to the east and following the proposed "Marsh Vista Trail" of the AG Master Plan. This will keep users out of Area D, a recent historical tarplant population area.

6. Interpretive trails will be available to all users, who will police themselves with consideration & courtesy as the guiding principle.

7. The ancient oak tree adjacent to the trail will be fenced and the public will no longer be allowed access to it. This tree is being destroyed by students and other young people, using it as a hangout and carving deep scars into its vulnerable bark. Litter and graffiti abound.

8. There would be no building on the riparian zone behind the Dry Storage Area and fencing will be constructed to prevent short cuts as well as further east just past Arana Creek to prevent erosion. There would be no bridge (steel span) over Arana Creek.

9. Some or all foot paths that currently cross Arana Gulch will be closed as the interpretive trails are built. If necessary, fencing to keep users off the meadow will be built. Only access for restoration activities would then be allowed in the restoration/recovery areas.

Respectfully submitted,

Jean Brocklebank
Michael Lewis
on behalf of Friends of Arana Gulch

http://members.cruzio.com/~arana/

Exhibit M

Susan Craig

From: Jean Brocklebank [jeanbean@baymoon.com]
Sent: Tuesday, November 15, 2011 12:45 PM
To: Susan Craig; Dan Carl; Charles Lester
Subject: Fwd: Arana Gulch Tarplant - good news

Susan ~

I would like this email to John Dixon included in the staff report. Please note that when I wrote Dixon I mentioned "at least 40" individual tarplant specimens had been found. You have already received the accurate inventory of 32 plants with 84 flower heads that I sent.

Jean

Begin forwarded message:

From: Jean Brocklebank <jeanbean@baymoon.com>
Date: November 6, 2011 11:28:51 AM PST
To: John Dixon <jdixon@coastal.ca.gov>
Cc: Mark Stone <mark.stone@co.santa-cruz.ca.us>
Subject: Arana Gulch Tarplant - good news

Dear John ~

Do you recall that there was great concern last year, including yours, when **no** tarplant (*Holocarpha macredenia*) was found in Arana Gulch?

At the time I wondered out loud if that might be due, in part, to the three previous years of drought. Tarplant seed seems to have some creative strategies built in to wait for just the right circumstances for germination. Clever ancient species!

Whether or not my theory has been tested and found probable, after a moderate increase in rain in the winter of 2009 - 2010 and then a major rain event in the winter of 2010 - 2011, we have a resurgence of Tarplant this season. I am proud to report that Friends of Arana Gulch found a dozen plants that the City's inventory initially missed. When our finds were added to the City's, at least 40 plants were discovered. One of them is a beauty (see attached), reminiscent of past years production.

Additionally, *Madia sativa molina* was found in association with tarplant in Area A and one *molina* was even found in Area B this year! This is also good news, as *molina* is another coastal terrace prairie tarweedy species found in Arana Gulch for years (I have pictures from 10 years ago). *Molina*, along with *Hemizonia* (Coastal Tarweed), have both also been missing from Arana Gulch during the three recent drought years. *Molina* used to be found consistently in north Area A and east of Area B. So we still have a healthy habitat of coastal terrace prairie at Arana Gulch.

One other bit of good news for you is that Friends of Arana Gulch, a volunteer

group that has worked with the City for years (initially so noted in the City's 1997 MOU with the CA DF&G) did some extra field work and research this past August. FOAG looked at two other coastal terrace prairie habitat areas (Tarplant Hill above Struve Slough in Watsonville) and Twin Lakes State Park above Schwann's Lagoon in Live Oak) and found some management prescriptions that worked amazingly well at Tarplant Hill (sponsored by the Watsonville Wetlands Watch organization). We interviewed their botanist, John Pritchard.

We asked for, and received, an opportunity to present our findings and recommendations to the City's Superintendent of Parks & Recreation (P & R), Mauro Garcia, and P & R arborist, Leslie Keedy, who coordinates management of tarplant at Arana Gulch. We met together for an hour. They were very interested in our report, accompanied with pictures. They said they were not aware of Tarplant Hill or the tarplant there. They said they thought the information we had would be very useful. And indeed it was! We made three distinct recommendations based on our observations. We are pleased to report that all three were implemented this fall -- the first time in history that the City used this specific combination of treatments.

Our association with Parks & Recreation is very cordial and collaborative. We are proud that they feel we have shared a "win" with them (their word!) regarding the excellent scientific management prescriptions undertaken this fall.

We are very optimistic about next year's inventory, as a result of this change in management, plus another winter of potentially good rains. Best of all, prescriptions this fall did not require any new infrastructure. Just some different procedures. Same mowing...except this time they mowed the entire grassland, every stitch of it (with one exception), acknowledging that seed bed had not been cleared outside Area A, B, C, or D in their mowing in years past. Another change from years past, a la Tarplant Hill, was NO mowing of the areas where tarplant was found this season. It also included three small test scrap patches, rather than just one huge area. Additionally, the City is allowing FOAG volunteers to hand rake thatch (City will collect), alleviating the problems in the past when the City had thatch raked mechanically and inadvertently sent soil (seedbed) to the dump.

Last but not least, John, the take home good news is that, as we have maintained all along, building a transportation project through "critical habitat" is not necessary to "save the tarplant!" This year's management, paid for by standard P & R fees as in years past, did not utilize Regional Transportation Commission grant money. And the City is proposing to formalize a policy of its intention to use sale of City property for a dedicated fund for tarplant restoration. Personally, I have always believed they would use the sale of property for a dedicated fund for Santa Cruz Tarplant, riparian and coastal prairie habitat restoration and management. Apparently they want to assure the Coastal Commission and that's fine by me!

If you would like any further digital pictures of what we found at Tarplant Hill or this year's AG Tarplant, let me know and I will be happy to send them to you.

All the best,
Jean Brocklebank
Friends of Arana Gulch

Susan Craig

From: Jean Brocklebank [jeanbean@baymoon.com]
Sent: Sunday, November 13, 2011 9:52 AM
To: Susan Craig; Dan Carl
Subject: Funding policy for AG
Attachments: policy.doc; ATT112071.htm

Hello Susan and Dan ~

Attached for your consideration is the Friends of Arana Gulch statement of concern to the City Council, presented at the 11.8.11 public meeting. We suggested a slight edit (seen at the bottom of our statement) asking that funding for tarplant will be assured whether Broadway Brommer is ever built through Arana Gulch. The Council ignored our request, but we feel it is an important enough concern that you will want to review it.

Thanks for all your hard work on behalf of the Coastal Act.

Regards,
Jean

Comments on Proposed Council Policy
by Michael Lewis and Jean Brocklebank
8 November 2011

Regarding the policy before you, allow us a brief history: Over 11 years ago, California Coastal Commission staff wrote to the City and said "As directed by the City's Local Coastal Program, the preferred approach" (in planning for Arana Gulch) "would be to prepare a specific management plan for the greenbelt prior to consideration of a Broadway-Brommer Bicycle Pedestrian Path project." The recommendation was for a separate Master Plan **first**, followed by an application for Broadway Brommer (BB) **second**. The City ignored this advice and four years later the City Council instead directed the Department of Parks & Recreation to include the BB project in the Master Plan document, thus assuring that BB became the Master Plan and vice versa. There has been nothing but confusion and controversy ever since, especially since more than half of the BB project is not even in the greenbelt.

The Staff Report on the proposed Council Policy before you is called "The Arana Gulch Public Trust Fund." But it is really a trust fund for Broadway Brommer, as well as for Arana Gulch. The policy is really for **two separate projects.** Unfortunately, those two projects were submitted as **one** to the Coastal Commission, continuing the confusion. So, $400,000 of that trust fund is earmarked to match Federal and State transportation money allocated through the Santa Cruz County Regional Transportation Commission, leaving whatever is left over for Arana Gulch's natural resource management.

Our concern is that money from an Arana Gulch Public Trust Fund Account be available for tarplant restoration and management, as has been stipulated by the City for years, whether or not BB is allowed to proceed. How might that happen? Simple. The Coastal Commission may deny the application just submitted, as it denied it a year ago. The City may then decide that it should do as suggested a decade ago and first resubmit the Arana Gulch Master Plan without BB. Such an application, without the controversial transportation project through "critical habitat" of an endangered species would no doubt receive unanimous approval by the Coastal Commission.

If this policy is passed, as written and intended, and the Coastal Commission denies approval for the application as submitted (with two projects rather than one), then funding for continued endangered tarplant management is basically held hostage to the BB transportation project. We want to make sure that this policy is written to allow riparian and coastal prairie habitat restoration and management, including the recovery of the endangered Santa Cruz Tarplant, whether or not BB is built, whether or not BB is included in the Arana Gulch Master Plan that is finally approved by the California Coastal Commission.

Would Council be willing to edit the draft policy to stipulate that funds from this trust fund will be available for tarplant management, whether or not BBis built? The policy would then read as follows (with suggested edit bolded):

COUNCIL POLICY 12.12

POLICY TITLE: ARANA GULCH PUBLIC TRUST FUND ACCOUNT

Exhibit M

Future proceeds from the sale of the property formerly known as "Broadway-Brommer Road Right-of-Way," located between Frederick Street and Hagemann Gulch, shall be placed in an account of the Public Trust Fund for use on implementation of the Arana Gulch Master Plan, including Santa Cruz Tarplant habitat, riparian and coastal prairie habitat restoration and management. **Furthermore, funds from the Arana Gulch Public Trust Fund will be used for tarplant management, whether or not the Broadway Brommer project is included in the approved Master Plan.**

Agenda Item #Th8a
Arana Gulch
Neil Conner
AGAINST

10/8/2010

Neil Conner
136 S Park Way
Santa Cruz, CA 95062

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

Re: Arana Gulch Master Plan

Dear Commissioners,

Please do not approve the City of Santa Cruz's Arana Gulch Master Plan. At its heart, it is a transportation project through an ESHA that is non-resource dependent, and is therefore a violation of the Coastal Act. Approval of this project would set a bad precedent that would significantly weaken protection of other ESHAs throughout the state of California for years to come.

The city has been deliberately deceptive in its primary argument that the funding required for the preservation of the Santa Cruz tarplant is dependent upon implementation of the Broadway-Brommer bike path (see Funding Myths. Jean Brocklebank, FOAG. Letter to the Santa Cruz City Council dated April 11, 2010. http://members.cruzio.com/~arana/articles/myths.html) . I am appalled at the City's multiple deceptions (funding myths, interpretive trail, etc.) and I hope you are as well.

A bike path through Arana Gulch is not the panacea People Power would have you believe. It would sit idle most of the time, being utilized by just a small fraction of bicycle commuters; worse, it would ultimately be abandoned by most of *that* tiny contingent in favor of the much more functional rail-trail (that is all but certain to be built). In it's wake would be an irrevocable scar on the last undeveloped plot of land on the east side of Santa Cruz, and possibly the demise of the Santa Cruz tarplant as well.

Please don't allow this boondoggle to be built. I urge you to vote NO.

Sincerely,

Neil Conner

RECEIVED
OCT 11 2010
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Susan Craig

From: Dan Carl
Sent: Monday, October 11, 2010 9:11 AM
To: Susan Craig
Cc: Diana Chapman
Subject: FW: Arana Gulch Master Plan

Th8a

From: Marilyn Fenn [mailto:marifenn@sbcglobal.net]
Sent: Thursday, October 07, 2010 8:09 PM
To: Dan Carl
Subject: Arana Gulch Master Plan

My letter is in the mail tomorrow but in case I'm too late, please note that although I appreciate your efforts, I am strongly opposed to paving and fencing in Arana Gulch. Lets smooth out that path and Keep It Dirt!!!!

sincerely,

Marilyn Fenn
408 Park Way, SC 95062
walker, biker, dirt lover

RECEIVED
OCT 07 2010
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

October, 7, 2010

Agenda Item No: Th8a
Permit Number: 3-09-068
CNPS Opposes the Project

Dan Carl, District Director
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060

RE: Revised Arana Gulch Master Plan, Permit Number 3-09-068, October 14, 2010

Dear Staff and Commissioners:

At the March 2010 Coastal Commission hearing, Commissioners requested the City of Santa Cruz consider alternatives that could meet the project objectives while avoiding environmental impacts identified by many experts testifying before the Commission.

At the March hearing the California Native Plant Society (CNPS) displayed a conceptual alternative depicted by an unsurveyed line on a map. The CNPS alternative skirted the periphery of the endangered tarplant habitat to avoid bisecting the habitat of the federally and state listed tarplant.

After the March meeting the City of Santa Cruz did not consult or collaborate with CNPS. Instead, the City interpreted the conceptual plan as literal, hired a GIS consultant to survey the conceptual alignment, and proceeded to discredit what they are calling the "CNPS alternative."

When CNPS asked to view the publicly-funded GIS data (not the consultant's report, just the data points), the City refused to provide the data. CNPS did not have the resources to conduct its own GIS survey. Thus no detailed CNPS alternative was ever developed or evaluated by the City or CNPS.

The result is that the City created a straw man alternative which they then proceeded to discredit. If CNPS had had the GIS data, the conceptual route could have been properly evaluated and adjusted to eliminate the extensive grading (and resultant cost and environmental degradation) attacked by the City in its report.

The revised plan submitted by the City does not meet the scientific and environmental standards of CNPS.

- The revised City plan still routes a paved trail through the middle of Arana Gulch tarplant grassland instead of going around the habitat as CNPS recommends.

- The City attacks the conceptual CNPS alternative for traversing some areas of common native grasses (*Danthonia*, *Nassella*), yet the City's revised plan has a paved, multi-use trail which traverses the more fragile and much more rare habitat for the endangered tarplant.

- Although the City's Master Plan contains an unpaved walking path (Coastal Prairie Loop Trail) on essentially the same route as the conceptual multi-use CNPS trail, the City attacks this alignment in its report stating that this alignment would be subject to

erosion and meander. The Coastal Prairie Loop Trial would be subject to the same impacts of erosion and meander, (indeed probably greater impacts as it would be unpaved) as a multi-use paved path replacing the Canyon Trail and the Creek View Trails which bisect the habitat.

- Routing a multi-use trail along the more southerly Coastal Prairie Loop Trail alignment would provide a superior experience for interpretation of the coast, harbor and gulch areas, affording better views and an overlook of the coast, especially for visitors in wheelchairs.

CNPS urges the California Coastal Commissioners to reject the City's revised Master Plan that ignores best practices of a science-based reserve design. This plan fragments the meadow and introduces long-term edge effects into the center of the tarplant management area. The project as proposed is still a non-resource dependent transportation project. The EIR admits that there is a significant impact to the habitat from the project.

The California Coastal Act gives paramount protection to ESHA, preventing any non-resource-dependent development. Access to this greenbelt for all—those in wheelchairs, pedestrians, bicyclists, dog walkers, elders, and children—can be provided with much less impact to the coastal prairie remnant.

It is regrettable that the City chose not to collaborate with CNPS in developing its revised plan. CNPS is still willing to work with the City to develop a route that achieves the City's objectives and follows best scientific practices for protecting endangered tarplant habitat.

Thank you for your time and consideration, Vince Cheap

Vince Cheap for the CNPS Conservation Committee, Santa Cruz County Chapter

4160 Jade St. #112

Capitola, CA 95010 (831) 477-1660

Th8a

Susan Craig

From: Debbie Bulger [dfbulger@cruzio.com]
Sent: Tuesday, October 05, 2010 8:19 PM
To: Susan Craig; Dan Carl
Subject: Arana Gulch

Application No. 3-09-068, Item No. Th8a

Debbie Bulger, opposed to project

Dear Coastal Commissioners,

Please protect the California Coast and enforce the Coastal Act. I urge you to approve the Arana Gulch Master Plan WITHOUT THE NON-RESOURCE DEPENDENT BROADWAY-BROMMER PAVED PATH.

The City of Santa Cruz has a responsibility to restore the degraded habitat for the endangered Santa Cruz tarplant. Restoration of the habitat must be their first priority.

Interpretive trails

There are many opportunities for interpretive trails on the Arana Gulch Greenbelt property. The best interpretative trail would be a loop, not a point to point trail, the primary purpose of which is transportation.

It is possible to build an ADA-compliant interpretive trail on this Greenbelt property without significantly damaging environmentally sensitive habitat. The fact that the City continues its campaign to build a transportation corridor while claiming that this point-to-point paved route is resource dependent, is a black mark on the reputation of the City.

Funding from transportation monies

The transportation purpose of the Broadway-Brommer connection is evident by its primary source of funds: A transportation grant.

I am disappointed to see that after the March 2010 Coastal Commission meeting, the City did not in good faith investigate alternative alignments for the bike connection nor design a true interpretive trail, but instead continued to push for unnecessary destruction of habitat of an endangered species.

Sincerely,

Debbie Bulger
1603 King Street
Santa Cruz, CA 95060

Th8a

10 October 2010

California Coastal Commission
725 front Street, #300
Santa Cruz, CA 95060

Re: Application No. 3-09-068 by City of Santa Cruz, County of Santa Cruz, and Santa Cruz Port District

Dear Commissioners:

Friends of Arana Gulch (FOAG) has been engaged with Arana Gulch as its volunteer caretakers for over fifteen years. We are listed in the City's first 1997 tarplant management plan as one of two volunteer groups to assist with its restoration plans. We walk our talk and were helping City Parks & Recreation staff as recently as this August.

We have also been a consistent opponent of the City's proposed east west bicycle connection route through the greenbelt ESHA, especially from 2002, the year that the entire greenbelt was designated by USFWS as "critical habitat" for the Santa Cruz tarplant (Holocarpha macredenia). We have an extensive historical library of documentation (1995 - 2010) of all aspects of the application for a development permit now before you.

FOAG asks that the Coastal Commission vote to deny the City's application as submitted. We recommend that the Commission, instead, encourage the City to return with a Master Plan that 1) does not violate the Coastal Act, 2) does not harm endangered species habitat, 3) contains designs for real interpretive trails and 4) contains effective environmental management of the Arana Gulch greenbelt property. This can be accomplished by removing the Broadway-Brommer (B-B) bicycle cross town connection project that just happens to go through the greenbelt from the otherwise excellent Draft 2006 Master Plan.

Our recommendation is based on the following facts:

1. Transportation elements (Broadway-Brommer) contained within the Master Plan, are not "resource dependent." The project application is therefore a violation of Sec. 30240 of the Coastal Act.

2. The hard-surface paving and shoulders of the transportation elements will create "significant disruption of habitat values." The route through ESHA in the greenbelt will consist of two bridges over two creeks, one of which is critical habitat for steelhead and tidewater goby, a paved 8' wide route (with 2' shoulders) that will cause "significant and unavoidable damage" (EIR) to an ESHA which is critical habitat of an endangered species, and will impact a riparian setback area. The project also includes paving a second north-south 8' wide route that intersects the east-west
route, thus trifurcating a CA Fish & Game "high priority habitat" for the state and federally listed Santa Cruz Tarplant The project application is therefore a violation of Sec. 30240 of the Coastal Act.

(continue to page 2)

3. In a May 10, 2010 Memorandum from the City of Santa Cruz to the CA Dept. of Fish & Game (CDFG), the City stated that "If all historical tarplant areas are avoided, CDFG probably will not have issues with the project." However, in its July 15th reply to the City, CDFG said "that statement is not true." CDFG reiterated that its 1997 MOU with the City established that the entire greenbelt grassland area is critical habitat for the SC tarplant. The CDFG also reiterated its concerns about habitat fragmentation and edge effects of the proposed transportation elements of the Master Plan on critical habitat of the endangered SC tarplant. (Exhibit M of staff report; July 15, 2010 email to the City of Santa Cruz and to John Dixon, CCC staff).

4. There are three, not one, endangered species at risk by the transportation elements of the Master Plan. Restoration of the tidal reach of Arana Creek to enlarge and/or raise the culverts that were improperly installed 30 years ago could restore steelhead trout and tidewater goby habitat. However, if allowed, the B-B steel span bridge over the Arana Creek culverts will likely foreclose such a restoration project. Although this major project is in the initial stages of design (City of Santa Cruz and Port District) and will require its own Coastal permit, it is "beyond the scope of this Master Plan..." (p. 36 of AGMP).

In fact, none of the impacts of the B-B project on Arana Creek, or on the tidal reach and the creek's eastern bank, or on the rest of the watershed continuing up the steep hill all the way to 7th Avenue have been analyzed in either the 1999 EIR, the 2006 Draft Master Plan or the July 2010 revised application from the City. These major impacts should have been included in the original application. Due to their absence, they were missed entirely by the Commission at the March 2010 hearing.

5. Despite repeated claims by City staff, funding for tarplant recovery and management is in no way tied to the transportation elements of the Master Plan. The City's reference to funding refers only to mitigation of damage to the habitat caused by the proposed paving. No paving, no damage. As stated by City staff at the March 2010 CCC hearing, the source of tarplant restoration funds will be the sale of excess city property, an action not linked to approval of B-B. In point of fact, tarplant management has been ongoing since 1997, beginning with a Memorandum of Understanding with the CDFG and financed by development fees paid to the City. According to Parks & Recreation staff, about $10,00 per year has been spent at Arana Gulch.

6. This greenbelt is presently used by city and county residents for a natural area/wildlife experience. It is already accessible from two entrances, one on a public street with bus access a block away, one from the upper harbor. Both entrances have ample parking, including handicapped parking spaces. Both entrances are accessible from all directions (north-, south-, east- and west-sides of the City and County). Minor modifications to existing entrances and to existing trails will facilitate access and use for mobility challenged visitors.

Please deny approval of the transportation element of this application.

Sincerely,
Michael Lewis and Jean Brocklebank
on behalf of Friends of Arana Gulch

Th8a

October 8, 2010

California Coastal Commission
Santa Cruz District Office
725 Front St.
Santa Cruz, CA. 95060
Attn: Ms. Susan Craig

RE: **Re: Application No. 3-09-068, Arana Gulch Master Plan, City of Santa Cruz**
Hearing date: 10/14/2010 – Agenda Item No. Th 8a

Dear Commissioners,

The 8 ft. wide, paved, multi-use pathway proposed to serve Arana Gulch ESHA's pedestrians, bicyclists, wheelchair users, strollers, dogs on leash and disabled persons with walkers, links two surface streets (Broadway, in the City of Santa Cruz with Brommer, in the county) on opposite sides of the ESHA property and can not be found consistent with sec. 30240 of the Coastal Act.

CCC staff, by citing the presence of interpretive signage to be installed along the paved, multi-use trail, claims that "resource dependence" is thus achieved. Additionally, staff claims that "...it is likewise intended to provide a much richer interpretive experience of the Arana Gulch area for a much wider spectrum of the general public than is currently the case." At the same time staff tries to downplay the motive force of the bikeway's cross-town connectivity which has been the primary goal for many years prior to the creation of this master plan. Extensive public testimony at the March meeting of the CCC demonstrates that the overwhelming desire for a Broadway-Brommer bicycle connection is anything but "elusive".

This interpretation of sec. 30240 is not supported by logic or any of the "Trail/Multi-Use Path Examples Within Sensitive Habitat Areas" cited by staff. Logically, if a finding of "resource dependence" requires nothing more than the placement of interpretive signage along a travel route, with no consideration given to the change in intensity of use or the degree of habitat degradation, then one could justify any number and size of transportation projects through ESHA. In line with this, cited examples of other paved pathways through ESHA consistently respect the existing levels of intrusion and intensity of use in order to preserve the nature experience while protecting the sensitive habitat. Where pre-existing intensity of use levels demand, it is consistent with sec. 30240 to provide facilities which take into account the needs of public safety while preserving habitat values. Such is the case with the Morro Bay Harborwalk. To provide for safe movement of visitors, both motorized and non-motorized, from the harbor to Morro Rock, the existing paved vehicle roadway was realigned through the dune habitat while the pre-existing, paved roadway was converted to a 12 ft. wide , two-way bikeway. Pedestrians were then provided with their own 8 ft. wide boardwalk, parallel to the bikeway. Compared to this example one can see that the multi-use trail envisioned for Arana Gulch attempts to justify its higher level of intensity of use (connecting two crosstown arterials) while not providing the infrastructure to safely handle the increased traffic. Staff suggests that some observers may find the multi-use path too narrow to safely handle the number and variety of users proposed. In fact, the design criteria for class I bikeways excerpted from the Highway Design and Traffic Standards manual

of the California Dept. of Transportation states in sec. 1003.1 that: "Section 890.4 of the Streets and Highways
Code describes Class I bikeways as serving 'the exclusive use of bicycles and pedestrians'. However, experience has shown that if significant pedestrian use is anticipated, separate facilities for pedestrians are necessary to minimize conflicts. Dual use by pedestrians and bicycles is undesirable, and the two should be separated wherever possible." Subsection (1)Widths, goes on to state: " The minimum paved width for a two-way bike path shall be 8 ft." and "Where heavy bicycle volumes are anticipated and/or significant pedestrian traffic is expected, the paved width of a two-way path should be greater than 8 feet, preferably 12 ft or more." Staff's response to those who question the adequacy of the proposed 8 ft. Multi-Use path is:
"...an 8-foot path width is a reasonable width to allow two-way use, including when pedestrians, bicyclists, wheelchair users, strollers, leashed dogs, and others are all using the path in question. In fact, some might argue that a wider path width is necessary to avoid potential user conflicts along the paved path segments, and that 8 feet is too narrow in this respect. In this case, the Commission finds that the proposed 8-foot-wide paved path width strikes a reasonable balance, and will allow adequate path utility while avoiding enough coverage as to avoid a significant disruption of habitat values. "
As a response to this contention by staff I quote the Highway Design Manual further: Sec. 1003.5 Multipurpose Trails, "If multipurpose trails are primarily to serve bicycle travel, they should be developed in accordance with standards for Class I bikeways. In general, multipurpose trails are not recommended as high speed transportation facilities for bicyclists because of conflicts between bicyclists and pedestrians. Whenever possible, separate bicycle and pedestrian paths should be provided. If this is not feasible, additional width, signing and pavement markings should be used to minimize conflicts." Clearly the design experts would not share staff's confidence in the adequacy of this project to serve its stated purpose.

The City of Santa Cruz is not unfamiliar with the concept of protecting and enhancing the access needs of its greenbelt visitors. The Pogonip area provides protection for its lower intensity pedestrian users by prohibiting bicyclists from using the 8 to 10 ft. wide Spring/Rincon trail. Likewise, the Neary Lagoon nature area does not allow bicyclists on the boardwalks crossing the lagoon. High season utilization of the multi-use pathway along W. Cliff Dr. on Santa Cruz' westside frequently causes bicyclists to divert to the roadway in order to avoid user conflicts with pedestrians, dogs on leash, strollers, etc. All of these examples present with physical limitations on the ability to widen the trails in order to achieve adequacy for their levels of intensity of use.

In the case of Arana Gulch, the limitations would be less physical than administrative. Section 30420 requires that habitat disruption be minimized when building in ESHA. Trying to meet the safety requirements cited in the design manual would require at least a 12 ft. wide paved trail with 4 ft of shoulder for a total 16 ft. width. This, as staff concedes, would clearly be at odds with the requirements of sec. 30240.

To conclude, staff has been left with a conundrum. In order to meet the consistency requirements of sec. 30240 and sec. 30210 while implementing the transportation element embedded in this master plan, for a 67 acre ESHA which they admit is currently "...a highly used public access area.", they must downsize a multiuse trail to avoid significant disruption of habitat values while simultaneously providing a size that will meet the safety needs of the broad spectrum of anticipated users. This does not appear to be possible. Since it has been established that access is not now deficient, the rationale which supports this drive to introduce a large population of bicycle commuters to the protected area loses its legitimacy. And, since none of the cited examples of pathways in ESHA share the same dynamics as the Arana Gulch transportation element, approval would set a precedent that handicaps sec. 30240's ability to protect ESHA in the future. I urge the commissioners to reject this transportation element of the Arana Gulch master plan while approving the tarplant restoration element that is so long overdue. The many problematic concerns raised by this transportation element within

the master plan have held up the Tarplant restoration process long enough. Re-design and construction of the drainage culverts that channel flows from Arana Creek underneath paved areas of the upper harbor needs to be done before any paved trail ramp is considered at that location. Endangered Steelhead Trout and Tidewater Goby populations continue to be threatened by the damage to their habitat caused by scouring and headcut of the creek banks. I recommend the Commission deny this master plan application. Please urge the City to return with a master plan that doesn't violate the Coastal Act and that contains an effective environmental management plan for the endangered Tarplant.

Thank you for your consideration,

Grant Weseman Santa Cruz, CA.

Susan Craig

From: Patti [paj999@yahoo.com]
Sent: Saturday, October 09, 2010 10:06 AM
To: Dan Carl; Susan Craig
Cc: paj999@yahoo.com
Subject: Arana Gulch Master Plan: AGAINST

Agenda Item #Th8a
Permit number 3-09-068
Arana Gulch
Patti Jazanoski
AGAINST

October 9, 2010

Patti Jazanoski
105 Hagemann Avenue,
Santa Cruz, CA 95062

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

Re: Arana Gulch Master Plan

Dear Commissioners,

Please do not approve the City of Santa Cruz's Arana Gulch Master Plan. It would pave a bikepath through environmentally sensitive habitat, and build a project through an ESHA that is non-resource dependent. This is a violation of the Coastal Act. For years, the Coastal Commission staff has recommended alternative bikepaths that have less environmental impact.

The City of Santa Cruz admits that they cannot mitigate the environmental damage.

This project is not needed. It was proposed and developed as an east-west bicycling corridor. Since the initial proposal, three other nearby cycling routes have been completed or begun:
1) Bike lanes have already been added to nearby Soquel Avenue,
2) The State of California has allocated funds to retrofit the nearby Murray Street bridge, including adding cycling lanes, and
3) The County of Santa Cruz has approved the purchase of the nearby Rail Trail
We don't need a fourth east-west cycling corridor if it will destroy environmentally sensitive habitat.

Because a fourth cycling corridor is hard to justify, advocates for the project have since reframed it as one that will provide wheelchair access. However the project was not changed. The goal of improving wheelchair access can be accomplished without damaging an ESHA.

This proposed project is not resource dependent. The project is not needed and the cost to the environment is too high. I urge you to vote NO on the City of Santa Cruz's Arana Gulch Master Plan and its flawed bikepath project.

Sincerely,

Patti Jazanoski

3-09-068

Th8a

Th8
Again

Dear Coastal Commissioners,

Please vote against the Arana Gulch Master Plan! This is just going to be road. There is no reason to destroy one of the only open spaces left when there are other noninvasive alternatives, which would be able to give the bike people what they are pushing for. Once you take away this beautiful open space, it can never recover. There are other places for bike paths but there are only limited spaces for endangered species and natural habitat.

Thank you for your immediate attention

Sincerely,

Dee Krulle
161 Hagemann Ave
Santa Cruz, CA
95062

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CENTRAL COAST AREA

RESPRESENTATIVE FORM
LETTER RECEIVED FROM 16
SEPARATE INDIVIDUALS

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Exhibit M

Th 8a

Dan Carl

From: Elene Johas Teener [elene@johasteener.com]
Sent: Monday, October 11, 2010 10:36 AM
To: Dan Carl
Subject: Arana Gulch

Coastal Commissioners:

To put this comment in perspective. I visit Arana Gulch several times each week. I ride my bike to a biweekly meeting through the Gulch every week I work. The picture of the couple in the paper strolling through the area is my husband, myself and our dog. My sons and I pick blackberries their every summer and we have had several Easter Egg hunts, tree climbing lessons, and hide and go seek adventures. My sons are now preteen and teenage they ride their bikes to friends houses and walk in the Gulch with peers.

Our family does not understand why this open space which is a destination would be turned into a pass through. There are many designer parks in town and they have their use. But true open space is rare. The Gulch is like nature art, there is the availability to have a sense of freedom from the conformity of perfect paths and designed uses. The imagination is allowed freedom to exist.

It seems to me that the new politically correct 'green advocacy' is bike transportation and the lobbying of this group. But I bike through the Gulch frequently as do many. There are a lot of routes. There is no way more people will ride if the Gulch is a pass through. But we will lose an open space with invasive paths.

Additionally I am against spending all that money. What are the priorities of this community and why is this minority pushing for spending it. My family and I and everyone I have ever talked to walking the Gulch is against the Arana Gulch Master Plan.

Please think hard in this economy in times such as this, when development and growth have squeezed the life out of us. Leave this space alone we love it just as it is.

Elene Johas Teener
23 Acacia Way
Santa Cruz, CA 95062
831 4251805

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Th8a

Susan Craig

From: Dan Carl
Sent: Monday, October 11, 2010 9:13 AM
To: Susan Craig
Cc: Diana Chapman
Subject: FW: Arana Gulch

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COASTAL COMMISSION
CENTRAL COAST AREA

From: McDaniFer@aol.com [mailto:McDaniFer@aol.com]
Sent: Friday, October 08, 2010 11:20 AM
To: Dan Carl
Subject: Arana Gulch

Hello-
As a homeowner and resident of Santa Cruz County for almost 24 years, I have recently discovered Arana Gulch!...How have I "missed" this gem?..Well, life happens and opportunities do not always permit us the "freebies" others take for granted!...In a nutshell, after living in a State Park residence for 17 years and then moving back into our house on the Eastside, I was thrilled to be involved with nature and its beauty once again. There are so many issues to this plea from so many involved. However, to paraphrase the old saying "if it ain't broke, don't fix it"...that is my request.
Sincerely,
Karen Poret
206 Pacheco Avenue
Santa Cruz, CA 95062

Th8a

Susan Craig

From: Dan Carl
Sent: Monday, October 11, 2010 9:15 AM
To: Susan Craig
Cc: Diana Chapman
Subject: FW: Arana Gulch open Space

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CENTRAL COAST AREA

From: kellyr0ss@comcast.net [mailto:kellyr0ss@comcast.net]
Sent: Friday, October 08, 2010 4:25 PM
To: Dan Carl
Subject: Arana Gulch open Space

Kelly Ross
18515 Main Blvd
Los Gatos, CA 95033 (Santa Cruz County)

Dear Coastal Commissioners;

I use the Arana Gulch open space quite often. Please add my name to the people who would like to keep the area as is. I'm sure others have expressed all the reasons for this request, mine is simply that there are so few natural spaces left on the coast it is a shame to reduce what little open space there is.

Thank you

Kelly Ross

Th8a

Susan Craig

From: Dan Carl
Sent: Monday, October 11, 2010 9:16 AM
To: Susan Craig
Cc: Diana Chapman
Subject: FW: Arana Gulch

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-----Original Message-----
From: Bruce [mailto:bnlarsen@cruzio.com]
Sent: Saturday, October 09, 2010 9:43 AM
To: Dan Carl
Subject: Arana Gulch

Hello,
I'm writing as a bicyclist and a nature lover who lives near the Gulch.
I don't think we need interpretive signs in our greenbelt areas, and we surely don't need the bike bridge and path through the center of this preserve. There is a path and stairway to the Yacht Harbor right now that goes through Frederick St. Park that serves the cross town bicycle community. It could be made more user friendly for a fraction of the bike bridge cost, and would not impact the unique coastal bluff environment that makes Arana worth preserving.
Let's keep the open spaces open. Upgrade the trails so that the handicapped have easier access, but leave the rest "natural". With some creative management, the tarplant will return.
Thank You,
Bruce Larsen

Exhibit M

42

Th8a

Susan Craig

From: Dan Carl
Sent: Monday, October 11, 2010 9:17 AM
To: Susan Craig
Cc: Diana Chapman
Subject: FW: Arana Gulch

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COASTAL COMMISSION
CENTRAL COAST AREA

From: Public [mailto:public@danielsfriedman.com]
Sent: Sunday, October 10, 2010 3:54 PM
To: Dan Carl
Subject: Arana Gulch

Dear Coastal Commission:

For over 10 years, a highly organized group of bicyclists (People Power) have flexed their political muscle to persuade the Santa Cruz City Council to build a bike road over Arana Gulch for them. When they started their campaign long ago, there was never a mention of people with disabilities. In response to resistance to their plan, they suddenly became avid disability rights proponents. Naturally, they enlisted people with disabilities to advocate for the bike road they wanted. Tellingly, no plan to accommodate people with disabilities in Arana Gulch is acceptable to them unless it includes the paved bike road that they covet.

There are already several viable east-west bike routes through Santa Cruz complete with dedicated bike lanes. At the urging of this same bike group, a bike lane with major road modifications was done a few years back on Soquel Ave. which is located just 2 blocks from Arana Gulch!

We hope the Coastal Commission will see through the attempts of this bicycle group to use people with disabilities as a front for their agenda of having yet another east-west bike route built especially for them.

Thank you.

Sincerely,

Daniel Friedman
Vinnie Hansen
1011 Bostwick Lane
Santa Cruz, CA 95062

Susan Craig

From: Michele Franzella [mafranzella@aol.com]
Sent: Monday, October 11, 2010 8:42 AM
To: Susan Craig

Th8a

I am writing to to let you know I am very against paving a bike trail in Arana Gulch. I enjoy running to the Yacht Harbor through the dirt trails of Arana Gulch.

I love having the field the way it is and would hate to see fences put around it. I know there are much better places to spend all that money, I can't believe this is even an option. I really hope actions towards fencing in Arana Gulch stop!!!

Thank you,
Michele Franzella
408 Trevethan Ave
Santa Cruz, CA 95062

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Exhibit M

[redacted]

Th8a

Susan Craig

From: Dan Carl
Sent: Monday, October 11, 2010 9:18 AM
To: Susan Craig
Cc: Diana Chapman
Subject: FW: Arana Gulch

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COASTAL COMMISSION
CENTRAL COAST AREA

-----Original Message-----
From: Michele Franzella [mailto:mafranzella@aol.com]
Sent: Sunday, October 10, 2010 6:46 PM
To: Dan Carl
Subject: Arana Gulch

Dear Coastal Commission,

I'm very disappointed to learn that my favorite place to run is soon to be paved over with a cement path. The fact that a perfectly natural dirt field bothers people enough that a government organization is willing to spend millions of dollars to change it, simply baffles me. Myself and many other local Santa Cruz citizens seem to enjoy Arana Gulch just fine the way it is, and would really prefer if you found a better use for these unspent millions of dollars that are about to be used to fix something that isn't broken.

Sincerely,
Michele Franzella
408 Trevethan Ave.
Santa Cruz, CA. 95062

4

Exhibit M

Th8a

Susan Craig

From: Dan Carl
Sent: Monday, October 11, 2010 9:18 AM
To: Susan Craig
Cc: Diana Chapman
Subject: FW: Arana Gulch project...

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COASTAL COMMISSION
CENTRAL COAST AREA

From: Rich Dandolo [mailto:rdandolo@comcast.net]
Sent: Monday, October 11, 2010 6:54 AM
To: Dan Carl
Subject: Arana Gulch project...

Dear Coastal Commission Decision Maker,

Just wanted you to know that I am very much opposed to the changes that are planned for Arana Gulch. There is nothing wrong with the way it is now, in it's natural state, and I'm very surprised that you can't find something better to do with the extra millions of dollars you have in your budget. How many miles of sidewalk do we already have in Santa Cruz? Do we really have to put another one through this open space also?
I know you're going to do whatever you want to do, but I just needed to let you know a lot of people enjoy that area just the way it is, and don't appreciate having it "upgraded" to your specifications.

Sincerely,

Rich Dandolo
Santa Cruz Suspension & Accessories
408 Trevethan Ave.
Santa Cruz, CA 95062
831-460-9434
http://www.santacruzsuspension.com/index.html

Susan Craig

From: Rich Dandolo [rdandolo@comcast.net]
Sent: Monday, October 11, 2010 7:06 AM
To: Susan Craig
Subject: Arana Gulch project....

Th8a

Dear Coastal Commision decision maker,

I'm pretty sure that your organization is going to go ahead and do, whatever you want to do with Arana Gulch, regardless of what the people who actually enjoy that area have to say about it. No doubt there are two sides to every issue and I'm sure there are plenty of "do-gooders" out there who would like to see nothing more than a big sidewalk going through our little open space
area there.

My wife and I enjoy Arana Gulch just the way it is, as do many, many others we see out there when we visit ... fences, signs and pavement, no thanks. Can't you find something else to spend those extra millions of dollars on that seem to have in your budget?

Sincerely,

Rich Dandolo
Santa Cruz Suspension & Accessories
408 Trevethan Ave.
Santa Cruz, CA 95062
831-460-9434
http://www.santacruzsuspension.com/index.html

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CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Application No. 3-09-068, Item No. Th8a

Debbie Bulger, opposed to project

October 4, 2010

Dear Coastal Commissioners,

Please protect the California Coast and enforce the Coastal Act. I urge you to approve the Arana Gulch Master Plan WITHOUT THE NON-RESOURCE DEPENDENT BROADWAY-BROMMER PAVED PATH.

The City of Santa Cruz has a responsibility to restore the degraded habitat for the endangered Santa Cruz tarplant. Restoration of the habitat must be their first priority.

Interpretive trails

There are many opportunities for interpretive trails on the Arana Gulch Greenbelt property. The best interpretative trail would be a loop, not a point to point trail the primary purpose of which is transportation.

It is possible to build an ADA-compliant interpretive trail on this Greenbelt property without significantly damaging environmentally sensitive habitat. The fact that the City continues its campaign to build a transportation corridor while claiming that this point-to-point paved route is resource dependent, is a black mark on the reputation of the City.

Funding from transportation monies

The transportation purpose of the Broadway-Brommer connection is evident by its primary source of funds: A transportation grant.

I am disappointed to see that after the March 2010 Coastal Commission meeting, the City did not in good faith investigate alternative alignments for the bike connection nor design a true interpretive trail, but instead continued to push for unnecessary destruction of habitat of an endangered species.

Sincerely,

Debbie Bulger

Debbie Bulger
1603 King Street
Santa Cruz, CA 95060

Th8a

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OCT 11 2010

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Application No. 3-09-068, Item No. Th8a

Richard Stover, opposed to project

Dear Coastal Commissioners,

In coordination with the International Year of Biodiversity, a recently published comprehensive analysis of the world's plants finds that 1 in 5 species are under threat of extinction and the primary cause is human-induced habitat loss. Habitat loss and the threat of extinction of the Federally listed Santa Cruz tarplant is the major issue in the Arana Gulch Master Plan.

Let us not be a party to extinction. Instead let's do the very best we can for the endangered tarplant.

The California Native Plant Society has been working tirelessly to use the best science to create the best possible restoration plan for the tarplant. Despite CNPS's efforts, the City of Santa Cruz continues to push a bicycle transportation project through the heart of the tarplant habitat. That is certainly not the very best we can do.

The City has failed to work cooperatively with CNPS to identify the best possible restoration plan. That is obviously not the very best we can do.

The City claims the bicycle path is really an interpretive trail. A quick glance at all of the letters received by the Coastal Commission shows that the vast majority identify the City's project for what it is - a commuter bike route. It is not resource dependent, and the City's claims to the contrary are not supported by the facts or anybody's expectations. The City isn't trying to do the very best for the endangered tarplant.

Especially in this Year of Biodiversity why must human exploitation take priority over endangered species protection?

Please reject the bike path proposal of the City of Santa Cruz. Approve the Arana Gulch Master Plan with the deletion of the east-west Creek View bike route.

As a further measure to insure the best possible tarplant restoration add one more condition of approval: **require that the CNPS be represented on the Adaptive Management Working Group.** This would help to insure that the City efforts do not back slide even farther from the best we can do.

Sincerely,

Richard Stover 10/6/10

Richard Stover
1603 King Street
Santa Cruz, CA 95060

Th8a

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Agenda Item# - **Th8a**
Application # **3-09-068**
Position – **Against**

Wes & Katie Musitelli
216 Harbor Dr.
Santa Cruz, Calif. 95062

To: Members of California Coastal Commission
Subject: Opposition to Arana Gulch Master Plan.
Via Fax (831) 427-4877

Although we are bicycle and open space advocates we feel that the master plan for Arana Gulch is flawed and should be modified to delete the construction of a bridge over Hagemann Gulch. Access to this open space can be accomplished through the feeder streets near Parkway or from Brommer St. A bicycle path and ramp could be built at the Fredrick St. Park and connect with Brommer through the Yacht Harbor Parking Lot. A second alternative for the bicycle trail is connecting with the Rail Trail and Rt. of Way that was just approved for purchase.

Wes ask that the Coastal Commission send this item back to the City for modification and review with regard to building the Bridge or bridges necessary to cross this area. The goal can be achieved by less invasive and expensive measures. The Rail Trail or Fredrick St. access will accomplish the same goals.

Thanks for your consideration.

Wes & Katie

Th8a

CALIFORNIA COASTAL COMMISSION
central coast district office
725 front street
Santa Cruz CA 95060

ITEM No Th8a
PERMIT No 3-09-068
Nathan Lawrence
OPPOSED

I'm writing this letter for the asphalt people, you know, their main concern is getting from point A to point B as quick as their wheels will take them.
It is also for the dirt folks. They, for the most part of their often busy lives, avoid streets and roads and enjoy strolling on trails and paths just breathing in the fragrance of grass, flowers, and even earth.
Unfortunately at times, these two groups come in conflict.
Recently, it's happening at Arana Gulch.
The "asphalt's" want to cut a paved road through the Gulch. To save maybe twenty minutes going from point A to B.
The "Dirts" would like to to save an hour out of their lives just digging the scene.
Well, the conflict is historic. Teddy Rosevelt and John Muir when trying to establish our National Parks, saw this same scenario with those who valued Nature for itself and those who would put expediency as higher priority.
So I hold this truth to be self evident that keeping asphalt out of our green belts is a very human value.

Nathan Lawrence
1855 17th Ave
Santa Cruz, Ca. 95062
(831) 475-6489

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Exhibit M

10/7/10

Th8a

ITEM # Th8A
3-09-08
FRANK SCHMIT
EVE EGAN
OPPOSED

DEAR COASTAL COMMISSION,

WE LIVE ON 17th AVE. AND RIDE OUR BIKES DOWNTOWN THROUGH THE HARBOR, USING THE STAIRS TO ROLL OUR BIKES BACK AND FORTH TO THE PATH AT FREDERICK ST. PARK.

WE ALSO LOVE AND CHERISH THE ARANA OPEN SPACE WHERE WE WALK OUR DOGS DAILY.

IT SEEMS LIKE OVERKILL TO US TO TEAR UP THAT WONDERFUL WILD AREA WHEN WE ALREADY HAVE A WAY THROUGH FREDERICK ST. PARK.

WE ENVISION A RAMP SWITCHBACK CONSTRUCTION REPLACING THE STAIRS AT THE PARK- HARBOR LINK WHICH WOULD MAKE CYCLING A LOT EASIER THROUGH THERE AND WOULD ALSO BE GOOD FOR THE ELDERLY AND PEOPLE WITH STROLLERS WHO WOULD LIKE TO GET DOWN ALONG THE HARBOR FROM THE PARK.

IT WOULD ALSO COST A LOT LESS.

THANKS,

Frank Schmit

FRANK SCHMIT

Eve Egan

EVE EGAN

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CENTRAL COAST AREA

Th8a

Dear Coastal Commissioners!

Please vote NO! on the Broadway-Bromar Bike Path!

This is going to be a road! No Bridge - no cement paths, and no Lights! We already have a Park 100 yards away! Keep this one of few open spaces left a beautiful, untouched one! We do dont need this Path,!

Please Vote No!.

Thank you

128 Forest Av
Sc Calif 93062

Garrett McDowell

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CENTRAL COAST AREA

Th8a

10/8/10

To Whom It May Concern:

I am primarily a bike commuter and am writing to strongly urge you to vote against the Arana Gulch paved trail.

It appears that there are other alternatives that allow a bike path without paving our only eastside open space, such as a path down from Fredrick Street Park. The Rail Trail will be a much better alternative, providing a path through town that will be useful for many commutes. The Broadway path bisecting the park will only help a small percentage of bike commutes, not alleviating the main eastside problems of the intersections of Soquel and Branciforte, and Soquel and Seabright. Broadway is also dangerous, with cars and bikes sharing little space between these intersections and downtown.

There is a difference between an open space and a park. An open space is a natural preserve in a city, a vestige of a time when more land was available for the public to experience. I presently walk and ride my bike through Arana Gulch quite often. It is presently enjoyed by many groups including hikers, bikes, kids, dog walkers, etc, and very harmoniously. It is a very fragile habitat for many animals. We have lots of parks with manicured lawns and fences but so few open spaces.

The Rail Trail will alleviate these problems by getting bikes OFF of the road and you will not ruin a rare open space in our beautiful town.

Please vote with the red tailed hawks, vote against this poorly conceived plan that once done can never be undone.

Sincerely yours,

Andria Gordon
Santa Cruz

207 Ford
SC CA
95062

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COASTAL COMMISSION
CENTRAL COAST AREA

Susan Craig

From: Tim Ledwith [tcledwith@gmail.com]
Sent: Saturday, October 09, 2010 5:07 PM
To: Dan Carl; Susan Craig
Subject: Please deny 3-09-068 Arana Gulch

Th8a

Dear Coastal Commissioners,

Please do not approve the Arana Gulch Master Plan. This plan changes the Arana Gulch open space into a transportation corridor. It violates the intent of the acquisition of the open space, and sets a dangerous precedent for all other open spaces (greenbelts, preserves) in Santa Cruz.

No amount of modifications to the plan can change the fact that this is a transportation project masquerading as a preservation project. The City Council is trying to address their previous lack of action regarding the preservation the threatened species by misapplying transportation grant monies.

There are several other well-known alternatives for locating a cross-town bike path. All are cheaper. There are no other alternatives for preserving endangered species within this island of nature inside of city boundaries.

Equally as important, the conversion of open space to a transportation corridor removes a critical buffer from urbanity. The citizens of Santa Cruz wisely recognized that a healthy society provides citizens with access to nature, away from the demands and challenges of urban environments. The access enables renewal, lowering of tensions, and a peaceful balance against the pressures of urban life. The people of the eastside of Santa Cruz lose that access, just to satisfy a well-connected bicycle/transportation lobby.

I am fine with providing access to disabled people. I am fine with providing paved paths (permeated asphalt) that steer people away from the endangered plants. My opposition is not opposition to increased access and use of the greenbelt. My opposition is solely to the east-west transportation corridor connector (currently positioned as a bicycle path).

Please do not approve a plan that contains an east-west bicycle transportation connector.

I have lived in Santa Cruz for 38 years. This is my home, I have raised a family here, and I care about this community. Please don't let the current funding shortages for local government be used as an excuse to tap transportation monies, with the result of the loss of a greenbelt. Once it happens here, the same lobbyists will apply the same pressure, to introduce transportation corridors across Pogonip and to the Moore Creek Preserve (near Western Drive).

thank you,

Tim Ledwith
246 Marnell Ave
Santa Cruz.

Susan Craig

From: Bruce Flatow [bruceflatow@gmail.com]
Sent: Friday, October 08, 2010 1:10 PM
To: Dan Carl
Cc: Susan Craig
Subject: Arana Gulch

Th8a

I wanted to let you know I strongly oppose any further development in Arana Gulch. Please don't pave it. We don't want it and we don't need it for so many reasons. Thank you for your consideration.
Regards,
Bruce Flatow
114 Mentel Ave
Santa Cruz, CA 95062

Th8a

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OCT 07 2010
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Richard & Andrea Criswell
422 Harbor Drive
Santa Cruz CA. 95060
831-423-8758
Richcris@hotmail.com

October 6, 2010

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

California Coastal Commissioners & Staff
RE: Arana Gulch Master Plan, City of Santa Cruz
Meeting 10-14-10 Item # TH8a
Oceanside City Council Chambers

Dear Coastal Commission Members,
We are against this plan. *Very simply put* ***no bridge over Hagemann Gulch.***
This plan although it can help Arana Park, is a good way for the City of Santa Cruz to try to get what it has wanted for 40 years. An east / west connection, between the city and county. Why else is the only MONEY set aside for this project coming from ***transportation funds****?*

We could go on and on with reasons for our opinion, but have already stated them in previous letters to you.

How can you sacrifice one sensitive habitat, Hagemann Gulch, with a Bridge and removal of trees etc. for another sensitive habitat, Arana Gulch?

Thank You,

Richard & Andrea Criswell

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OCT 07 2010
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COASTAL COMMISSION
CENTRAL COAST AREA

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Th8a

Dear Coastal Commissioners,

Keep the Aruna Gulch open space as it is. The Gulch is home to an abundance of natural habitat. If you destroy this safe haven the wild birds, plants and animals will disappear. At some point in our future this spaces will be gone. Take to heart what this irreversible project will do!

Sincerely,

Birgit Wilke-Meyer

Birgit Wilke-Meyer
409 Prospect Heights
Santa Cruz, CA 9506

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OCT 07 2010
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

3-09-06
Th 8a
agai

Dear Coastal Commissioners,

Stop the road that is being portrayed as a safe way to protect the tar plant! The "bridge" will go right through a beautiful untouched creek where so many birds and animals live. The open space was meant to be just that. Please keep this space for our children to enjoy nature and a place where the animals can truly call home.

Th8a

Susan Craig

From: Dee Kenville [ndwoods@cruzio.com]
Sent: Thursday, October 07, 2010 3:50 PM
To: Dan Carl
Cc: Susan Craig
Subject: Against Arana Gulch Bike Path

Dear Sir,

I have lived on Hagemann Ave near Arana Gulch since 1976. I have enjoyed the Gulch immensely over the years. I also have seen wildlife come and go due to human intrusion.

We once had a thriving population of nesting ducks above the upper harbor on the wetlands....no more.

We had a thriving population of owls...no more.

We still have red tail hawks, red shoulder hawks and various other birds in our gulch. We have coyotes and Blue Herons.

However, over the years I have seen these populations decrease when the old house was torn down and the cows taken out. Then the populations gradually started to come back many many years later in just the last couple of years. Once the equipment is brought in and the increased human population brought in from the accessibility of the bike path, these wildlife populations may never recover.

I beg of you to consider denying the bike path through this lovely natural area . We have no other green belt area like this on the east side!

I am an avid biker. I have spent 12 years commuting by bike to work! I ride all over this county....but I have never needed a bike path thru arana gulch! Please help us protect it.

And if the city is looking to find ways to spend this 4.5 million, I have asked for years for speed bumps on my street to no avail. They say there is no money for them....

Thank you!

Dee Kenville
161 Hagemann Ave
Santa Cruz, CA 95062

831 331-3931

Exhibit M

125

Th8a

Susan Craig

From: michael nellany [mnellany@gmail.com]
Sent: Wednesday, October 06, 2010 12:00 PM
To: Susan Craig
Subject: Arana Gulch comments

Dear Commissioner Craig,

Here are some thoughts on the Arana Gulch project. I hope I can express myself well and in a manner that is not reactionary or overly confrontational. I'm concerned by the development that I see as grossly inappropriate. I have used the Arana Gulch as both a byway for my bike and as green space to enjoy with my dogs. While I was was initially in support of the path as a very useful cycle way, the more I read about the plan the more it seemed like overkill. I envisioned a a simple gravel path that would allow easy access via bike through the area. When I discovered it was to include a paved path with light I was appalled.

I think we need to preserve what few wild green spaces we have. Untouched beauty of this type is so rare. My wife's high school students call Arana Gulch 'Little Africa" because it is so wild and beautiful. They are so rarely exposed to nature and this space affords them the opportunity to experience something their concrete world does not. Concrete and noise have encroached so completely that we have to take a real stand to say 'no' to the constant infringements that threaten our solitude.

I am a librarian and I have seen how badly we need a quiet place to read, study or just hang out. Cell phones have invaded every corner of our lives. I make the same argument at the library that I would make for Arana Gulch; Preserve what places we have for reflection and tranquility. Everyone needs a retreat from the pressure of the modern world. Arana Gulch is just one small place that afford the community the peace we deserve. Please consider voting NOT in support of the Arana Gulch plan.
While I think we need to support cyclists and safe travel, this plan is so overblown that it threatens something that should be inviolable. I believe some alternative bike routes have been suggested and these seems to me really practical.. The Frederick street park seems an ideal thoroughfare that could be easily and cheaply accommodated to meet our needs.

Thank you for your time.

Sincerely,

Michael Nellany

Th8a

Susan Craig

From: charles paulden [yogacharles@yahoo.com]
Sent: Wednesday, October 06, 2010 12:09 PM
To: Susan Craig
Subject: Agenda Item #8a, Oppose

Oppose
Application No. 3-09-068 (City of Santa Cruz, Santa Cruz Co.) Thursday, October 14 Agenda Item #8a

While I appreciate the local Coastal staffs, efforts to provide Coastal Access, I think that this project will do more harm then good.

I recommend that the City return to a Green Belt Plan that provides more of a natural environment and less paving and other man made elements.

As pointed out by Staff, this small open area is in a highly developed part of the County. The natural relief of looking across an undivided Coastal prairie is a great benefit to the many people who can access it now.

There are many Parks with sidewalks near to this last bit of undeveloped space.

Interpretive signs could be added at the two existing access points.

The existing trails could be left, rather then removed. Their loss will restrict access to the various points of interest.

There are a number of cross County connections very close to this open nature park.
The funding source, that seems to be driving this project, can be better spent for the County Coastal Trail, along the rail line. This trail will be 1 block from Brommer, one of the connecting points this project is pushing.
$5 million will go a long way in the creation of this Coastal Trail.

The undeveloped open space is a Coastal Resource that is highly valued by many members of our community and visitors to the coast.
Relief from Urban development is a great resource, which this project will adversely affect.

While I oppose this transportation project, masked as an interpretive trail, other options, that would be less damaging, are preferable to this one recommended by Coastal Staff.
The proposals that do not bisect the field, with a paved, 12 ft, high speed bike road are better then this project. Non-paved surfaces, which go along the edge of the park, will add vista points to the Harbor and the sea.
The Retaining wall, with an exit to the Harbor, will be less harmful then the proposed bike road through the center of the open space.

Please reject this transportation project through ESHA and preserve this precious undeveloped Coastal Resource

Thank you
Charles Paulden

Th8a

Susan Craig

From: Jean Brocklebank [jeanbean@baymoon.com]
Sent: Tuesday, October 05, 2010 12:30 PM
To: Susan Craig
Subject: ARANA GULCH: Goats 4 Hire

Why can't we do this (below) in Arana Gulch, instead of the industrial fencing project designed by the City in its revised Master Plan application?
Friends of Arana Gulch has been suggesting the City try goats for over10 years.

Sincerely,
Jean Brocklebank

http://www.santacruzsentinel.com/ci_16250845

Pasatiempo launches Operation Landscape Goat to help with restoration work By Kimberly White - Santa Cruz Sentinel 10/04/2010

SANTA CRUZ - The bearded brigade assembles at the canyon's rim and casts their collective gaze below, surveying the steep and rugged terrain through slitted eyes before committing to a line of attack.

Nearly 200 goats were deployed to the back nine at Pasatiempo Golf Club last week, using their cloven hooves to traverse the surrounding canyons in an operation dubbed Landscape Goat.

The cloven-hoofed calvary is expected to be stationed at the 18-hole championship course for 6-10 weeks, spending their days grazing in areas so overgrown with weeds, vines and plants that neither man nor machine can tackle.

"I've been looking at old photographs (from the 1920s and 1930s) of the property over the past two-and-a-half, almost three years that I've been here, and the ruggedness of this area, especially on the back nine, was pretty extreme ... The goal is to get back to that," said Paul Chojnacky, the golf course's superintendent.

He added that in the short time the goats have been grazing, they've cut down so much of the overgrowth that the individual peaks on the hills now can be seen as they once stood in those historical pictures.

In previous years, several members of the maintenance crew would go down into the canyons to clear out pampas grass and invasive species, but they could only cut so far into the formidable terrain. Whatever material they could clear out would have to be hauled up out of the canyon and put into big brush piles, and another company would then have to be hired to cut it into chips. No matter how hard the crews worked, Chojnacky said, everything would just grow back each spring, "so it almost looked like we hadn't done any work there at all. It was a rather frustrating schedule."

After pondering the situation, he discovered Brush Goats 4 Hire and contracted the company.

"You can already see in less than a week what they've done, and it would take us months to remove all that material and then having to haul it off,"
he said. "Plus, we'd have to go down there and spray chemicals, and we don't want to have to do that, either."

The goats belong to Ian Newsam and Lorraine Argo, a husband-and-wife team that operates Brush Goats 4 Hire, a 3-year-old company based out of Buellton. In addition to the roughly 170 goats, they also brought along two Anatolian shepherd dogs - code named Killer 1 and Killer 2 - to guard their charges from the predations of mountain lions and coyotes.

The goats - which Newsam said eat between 5 and 10 percent of their body weight each day -

Exhibit M 151

now are contained in an approximately two-acre area lined by a solar-powered electric fence, whose 10,000 volts also serve as a deterrent to any predators.

Pasatiempo is touting the goats as an environmentally friendly alternative to hiring a traditional maintenance crew, since they eliminate the need for chain saws, chippers and other heavy equipment that produce damage as well as noise. As well, Newsam said, the goats will be able to completely eradicate some species of vines in the canyons, thereby reducing the need to spray harmful chemicals that can irritate golfers and maintenance crews alike.

"There's a place for machinery and there's a place for man, but once you get on hillsides and areas that are a little bit dangerous for people - these guys are amazingly agile - then that's where we can come in to help out,"
Newsam said.

[redacted]

Th8g

Susan Craig

From: Terrence Willett [terrence.willett@calcentral.com]
Sent: Tuesday, October 05, 2010 2:47 PM
To: Dan Carl; Susan Craig
Subject: Arana Gulch Broadway Brommer Bridge Project

To the California Coastal Commission:

This letter is in opposition to the construction of a bicycle bridge and path through the Arana Gulch Greenbelt as it would significantly impact the threatened Santa Cruz Tarweed (*Holocarpha macradenia*). The minor changes the City of Santa Cruz had made to the plan since the last hearing appear to be minor and in my opinion do not adequately address the impact to the Tarweed.

I have been a regular bicycle commuter in Santa Cruz County for over 20 years and currently live near Arana Gulch and can attest that there are several viable alternative bicycle routes to the proposed Broadway-Brommer route that do not impact a threatened species in a rare and sensitive coastal prairie habitat.

There is a major road (Soquel Avenue) with a designated bicycle lane that runs to the north of the gulch. Several major improvements to this route have been implemented over the last few decades including most recently a dedicated bike path at the intersection of Soquel Avenue and Capitola Road at the north east boundary of the greenbelt.

A rider can also travel through the Santa Cruz Harbor, which provides a route between Soquel Avenue and Murray Street. Some riders also carry our bikes up a set of stairs that lead to Frederick Street Park and Broadway Avenue that connects to downtown. The harbor routes do involve steep hills or stairs but are used as routes by some though not all cyclists.

A third route around Arana Gulch is the road to the south of the gulch (Murray Street), which runs parallel to a set of railroad tracks that span the County.

I feel the preservation of the threatened Santa Cruz Tarweed outweighs the possible benefits of the Broadway-Brommer connection through Arana Gulch and ask that the gulch's coastal prairie habitat be protected.

Sincerely,

Terrence Willett
1305 Dougmar Drive
Santa Cruz, CA 95062

Th8a

Susan Craig

From: Marsea [marsea@got.net]
Sent: Tuesday, October 05, 2010 9:43 AM
To: Susan Craig
Subject: Arana Gulch

Why, why why does EVERY piece of land HAVE to urbanized in some way. Arana Gulch is this little treasure we have. A place where plants and animals can have a refuge and people can visit without disturbing. We don't need to put a bike highway through it. There is an equally wonderful alternative with the Rail Trail idea, as well as the recent revisions to the surrounding bike lanes that make it easier for bike commuters to get around.

The County of Santa Cruz should reconsider its support of the Broadway-Brommer project portion of the AG Master Plan. The County could encourage the City to withdraw its current application to the Coastal Commission and to re-submit a revised application for its Master Plan without the specific Broadway-Brommer transportation project. The Coastal Commission should JUST SAY NO!

Marsea Marcus
Santa Cruz, CA

Th8a

Dan Carl

From: Jan Landry [jan@mindfulnessprograms.com]
Sent: Monday, October 11, 2010 1:49 PM
To: Dan Carl
Subject: Long live the weeds and the wilderness yet

I am writing to urge you to allow Arana Gulch to remain as is, the beauty, the wildness, is a rare and precious commodity, please don't take it away. Please take to heart, the words below of Gerard Manley Hopkins,

"What would the world be, once bereft
Of wet and wildness? Let them be left,
O let them be left, wildness and wet;
Long live the weeds and the wilderness yet."

Gerard Manley Hopkins

Thank you for your consideration and hopefully preservation, Jan Landry

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CENTRAL COAST AREA

Susan Craig

From: Kit Birskovich [kitb@baymoon.com]
Sent: Saturday, October 09, 2010 9:01 PM
To: Dan Carl; Susan Craig
Subject: Arana Gulch Master Plan: AGAINST
[This text was also sent as a hard copy through US mail]

Th8a

Agenda Item #Th8a

Arana Gulch

Kit Birskovich

AGAINST

October 8, 2010

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

Dear Commissioners,

Please do not approve the City of Santa Cruz's Arana Gulch Master Plan as long as it contains plans for the "Broadway/Brommer bike path" through this unique coastal prairie. It is blatantly a transportation project through ESHA dressed up to look like "an interpretive trail."

The City of Santa Cruz's insistence on this project has continued throughout a decade of its pronounced neglect in caring for Santa Cruz Tarplant habitat. Occasional gestural mowings occurred, with little other attention to management; tarplant numbers have plummeted toward zero (in fact, no plants were found this season). At the same time, the city insists its "Tarplant Management" is directly tied to the receipt of money promised through the Transportation Department for the bikepath, which it most definitely is not.

This project is NOT ALLOWED by law, violating the California Coastal Act. Further, the City of Santa Cruz should be admonished for its mismanagement and instructed to make real and effective effort to provide appropriate stewardship of Arana Gulch, the Santa Cruz tarplant, and its Environmentally Sensitive Habitat Area.

Sincerely,

Kit Birskovich

528 Windham Street

Th8a

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

Opposed

Agenda number: **Th8a**
Application number: **3-09-068 Arana Gulch Master Plan**

I live one quarter mile from Arana Gulch (for 29 years) and I am a frequent walker and bicyclist in Arana Gulch. I am strongly opposed to paved paths and fencing in Arana Gulch. While I appreciate efforts that would deter homeless people from living in Arana Gulch I do not support fencing or paved paths.

Sincerely,

Marilyn Fenn

Marilyn Fenn
408 Park Way
Santa Cruz, CA 95062

Susan Craig

From: Joverde@aol.com

Sent: Wednesday, November 17, 2010 7:23 AM

To: joverde@aol.com; Dan Carl; Susan Craig; mstone@coastal.ca.gov; GreeneADR@aol.com

Subject: YOU WERE RIGHT ON ARANA GULCH

Dear Commissioners:

Your previous votes were correct re: Arana Gulch. It IS a transportation project wrapped up as a bike path/ADA access project.

Please consider this: The City owns enough land, width-wise, through this same proposed path, that it can build a road for cars some day. This is a step in that direction.

Please leave the Gulch unspoiled, undeveloped. It IS accessible to handicapped people and bikes CAN easily get from Brommer to town on existing dirt paths. A little annual grading is all that's needed to maintain it & this would not disturb the population of egrets & herons who nest in the eucalyptus grove which is smack dab in the path of the proposed bridge from Brommer.

Thank you for your continued vigilance on behalf of our beautiful coast.

Jennifer Greene
Attorney at Law
118 Hagemann Avenue
Santa Cruz, CA 95062

3-09-068
Tim Ledwith
=opposed=

Dear Coastal Commissioners,

Please do not approve the Arana Gulch Master Plan. (Permit 3-09-068) This plan changes the Arana Gulch open space into a transportation corridor. It violates the intent of the acquisition of the open space, and sets a dangerous precedent for all other open spaces (greenbelts, preserves) in Santa Cruz.

No amount of modifications to the plan can change the fact that this is a transportation project masquerading as a preservation project. The City Council is trying to address their previous lack of action regarding the preservation of threatened species by misapplying transportation grant monies.

There are several other well-known alternatives for locating a cross-town bike path. All are cheaper. There are no other alternatives for preserving endangered species within this island of nature inside of city boundaries.

Equally as important, the conversion of open space to a transportation corridor removes a critical buffer from urbanity. The citizens of Santa Cruz wisely recognized that a healthy society provides citizens with access to nature, away from the demands and challenges of urban environments. The access enables renewal, lowering of tensions, and a peaceful balance against the pressures of urban life. The people of the eastside of Santa Cruz lose that access, just to satisfy a well-connected bicycle/transportation lobby.

I am fine with providing access to disabled people. I am fine with providing paved paths (permeated asphalt) that steer people away from the endangered plants. My opposition is not opposition to increased access and use of the greenbelt. My opposition is soley to the east-west transportation corridor connector (currently positioned as a bicycle path).

Please do not approve a plan that contains an east-west bicycle transportation connector.

I have lived in Santa Cruz for 38 years. This is my home, I have raised a family here, and I care about this community. Please don't let the current funding shortages for local government be used as an excuse to tap transportation monies, with the result of the loss of a greenbelt. Once it happens here, the same lobbyists will apply the same pressure, to introduce transportation corridors across Pogonip and to the Moore Creek Preserve (near Western Drive).

thank you,

Tim Ledwith

Tim Ledwith
246 Marnell Ave
Santa Cruz.

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OCT 18 2010
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

3-0-9-068

Tha
Against

Dear Coastal Commissioners,

Keep the Arcana Gulch open space as it is. The Gulch is home to an abundance of natural habitat. If you destroy this safe haven the wild birds, plants and animals will disappear. At some point in our future this spaces will be gone. Take to heart what this irreversible project will do!

The docket says fences, and cattle grazing! Please keep this area free from construction, bridges, fences, and more. This is a small haven for people and most importantly, plants and wildlife. A "path" that bisects the park — made of cement — will allow bicyclists to have more ease of movement, but will make it harder for people, small children, and the plethora of animals. This space is lovely as-is — we don't need to "improve" it with irrevocable construction!

Sincerely

Thank you,
Rena Dubin

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CENTRAL COAST AREA
OCT 13 2010
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3-09-068

Th8a
against

Dear Coastal Commissioners,

Please vote against the Arana Gulch Master Plan! This is just going to be road. There is no reason to destroy one of the only open spaces left when there are other noninvasive alternatives, which would be able to give the bike people what they are pushing for. Once you take away this beautiful open space, it can never recover. There are other places for bike paths but there are only limited spaces for endangered species and natural habitat.

Thank you for your immediate attention

Sincerely,

Paul Henry

Brooke Elliott Kathryn Henry

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OCT 13 2010
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

DATE 10-01-10

RE: ARANA GULCH MASTER PLAN

RayLeClair:
OPPOSED
ITEM # Th 8a
PERMIT # 3-09-068

TO CALIF COASTAL COMMISSION:

→ IN SHORT I object to the CONSTRUCTION of A New bridge over HAGEMANN Gulch" ESPECIALLY since there ARE SO MANY OPTIONS other THAN "The bridge"! (ALL have been brought up previously) PLEASE RECONSIDER

Ray LeClair

I CALLED Coastal Commission for AGENDA # GOT NO reply SO I didn't know what the AGENDA # is.

Mr. Ray LeClair
104 S Park Way
Santa Cruz, CA 95062

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CENTRAL COAST AREA

Ms Joy Carey Leclair
104 S Park Way
Santa Cruz, CA 95062

10/2/2010

TO: THE CALIFORNIA COASTAL COMMISSION

I am writing to request that you do NOT implement the ARANA GULCH MASTER PLAN!

In particular, the bridge across Hagemann Gulch would cause untold and irreversable damage to this sensitive habitat.

I do ride my bike to work, and although the bridge would save me time and effort, there certainly are other options for transportation.

Thank you for your consideration, Joy Carey LeClair

Exhibit M

Duplicate

ITEM NO: Th 8a
Against

Dear Costal Commission

I was fortunate enough to attend your prior meeting on the Arana Gulch issue in the City of Santa Cruz. This meeting gave everyone that was concerned about the issue an opportunity to speak. This is what concerns me the most about the next scheduled meeting to discuss the Arana Gulch issue. We were informed 14 days before the meeting that it is being held 300 miles away. The only people that can afford or have time to attend the meeting are government officials that represent a minority of citizens. This was done intentionally so that the large majority of citizen those are against the cities proposal could not be represented. I ask at a minimum to postpone your decision until your next meeting in Northern California.

If this isn't possible, I would like you to remember the reason you denied the proposal originally. This road masqueraded as a bike path/park. If the city really wanted a bike path/park there is several excellent inexpensive options that can be used without destroying a beautiful natural park. Once the large bridges and paths have been built and the Tarplants have been destroyed. The next step will be to make it the Brommer road extension that they have always wanted but were unable to get because they called it a road. This will make the outgoing city council members happy but its only effect will be to destroy one of the cities last open spaces.

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SAN DIEGO COAST DISTRICT

Thank you for your time.

Dennis R McDowell

Dennis McDowell
128 Forest Ave
Santa Cruz Calif. 95062
(831) 818-9507

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RECEIVED
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COMMISSION
COAST AREA

RE: 3-09-068

October 08, 2010

Dear Coastal Commissioners,

Please do not approve a paved bike trail through Arana Gulch in Santa Cruz county. Arana Gulch has an abundance of wildlife and even rare plants. It is a unique piece of land and a joy to behold. Keep it as open space without pavement, lights and any development. There are roads and bike access on all sides of this parcel. It would be a great loss to alter its natural state for the convenience of saving a few minutes on a bike ride.

Thank you for your consideration.

Sincerely,

Lowell Fitch

Lowell Fitch II
90 Hagemann Court
Santa Cruz, CA 95062

✓

3-09-068
Th 8a
against

CA Coastal Commission
725 Front Street, Rm 300
Santa Cruz, CA 95060

October 10, 2010

Dear Coastal Commissioners,

As a senior who has impaired mobility, I frequently take walks along the upper Yacht Harbor right next to Arana Gulch because of the beautiful scenery, and the nice flat sidewalks. I don't walk through Arana Gulch now, and wouldn't even if it were paved. Let me explain why: Arana Gulch isn't flat, and it's hard for someone like me to walk up and down inclines. Also, the proposed path is to be shared with bicyclists, and I don't feel safe having cyclists whiz by me. In the seven years that I have walked with my walker at the Harbor, I have seen only three other people there with impaired mobility (2 people in wheelchairs and one with a cane) even though it's right next door to Arana Gulch, and you can see lots of the same wildlife, including the Santa Cruz Tarplant. Honestly, I don't think a paved path through Arana Gulch will be used by many mobility impaired people.
Encouraging a paved path for both cyclists and people with impaired mobility would not be safe for either, and I am sure that my hero, John Muir, would agree with me that this is not a good reason to develop a greenbelt area.

Sincerely,

Maureen Richardson

Maureen Richardson
P.O. Box 466
Soquel, CA 95073

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Th8a

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OCT 11 2010
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CENTRAL COAST AREA

09 Oct 10

CALIFORNIA COASTAL COMMISSION
Santa Cruz Office

Dear CCC Officers:

I want to say a few things about the Arana Gulch project which will show it is a both a bad idea for the land's fauna and flora and an intrusion of infrastructure which will despoil the land's original nature to the degree that completly ignores the terms by which the City acquired the acreage: to remain in it's original state.

There can be great amounts of human generated words to describe this land and how to downplay the true impact of the City's project. To visit this place however as you did last March provides one the actual nature and harmony of the terrain.If you stay there for awhile the land speaks to you in a sense and this delicate and subdued quality is what will be permanently lost to the proposed bike road and materials for human activity.

Every parcel has been built on in every direction from Arana Gulch out. The land deserves more respect than another open space to build something on. In the congested, built-out grid from the Upper Harbor to the DeLaveaga foothills preserving this last stretch of open space and its animal and plant lives is a far more prudent decision than subjecting it to a special interest project to benefit a few.

Can't we have a place to walk and enjoy and realize that its the same as it was 100 years ago? There really is no reason the bike road has to traverse the Arana land- the alternative route through the Upper Harbor is very practical and the construction would result in significantly less impact.
I do remember the Santa Cruz Harbor Master speaking at the March hearing and was strongly in favor of the bike road being located on Arana Gulch. In other words it would cause too much impact and activity for his upper harbor which is already under asphalt. Better to build the bike road on the nearby Arana Gulch land. The Harbor contains about 1100 slips at between 600 to 2500 dollars each month for occupants of these 1100 slips. Wouldn't you think the Harbor would want to give something back to the community instead of refusing a site for the bike road?

I am asking you to appreciate the value of this last open space and see what the proposed project by the City would do to its natural state. With two alternate bike paths this permanent damage to Arana Gulch need not come to pass.
Thank you for your attention.

Theodore F. Meyer III
191 Mountain View Rd.
Santa Cruz, CA 95065
P:h# 831 426 5960

Exhibit M

California Coastal Commission
Central Coast district office
725 Front street
Santa Cruz CA 95060

3-09-068
Th 8a
John Egan
AGAINST

This is how I see it: We create green belts to preserve open space for people to enjoy, as it is. It was not intended to be turned back to what it was. Were they to be left in a natural state, meaning the way they were originally? NO! As anyone can see who walks regularly in those areas they are, unnatural!
I happen to be one of the many "unnatural" people who enjoys strolling through unnatural Arana Gulch on the unnatural trails that wind through unnatural wild oats, wild radish, eucalyptus, and asorted unnatural grasses, and unnatural flowers. Along the way, I meet dog walkers, joggers, women pushing babies in three wheelers, bikers, bird watchers and just walkers. All of us "unnaturals", obviously not the original aborigines, enjoy this open unnatural and really beautiful area, and yes, with the tar plant.
Now it makes no sense to me to spend a million bucks, especially in these bad economic times trying to save the tar plant that's not necessarily going extinct any time soon. In fact, Twin Lakes Park has probably more tar plants than Arana Gulch!
Eliminating the existing trails, and replacing them with wide flat smooth paths that restrict access to places that most of us "unnaturals" enjoy now, is stupid.
So for Arana Gulch I say: Love it and leave it alone!

John Egan
1250 Soquel Ave. No4
Santa Cruz CA 95062

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CENTRAL COAST AREA

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10-10-10 3-09-068 Th8a AGAINST

Coastal Commissioners,

I walk Arana Gulch 4-6 times a week & enjoy the naturalness, watching the animals, trees & grasses going through their seasonal cycles. I feel a paved trail, lights & a HUGE BRIDGE would ruin this "green Belt." There are so few green areas in town with no paving & lights Arana Gulch is our community treasure *

In terms of access, there is Fredrick Street Park stairs which could be modified to for bikes & handicapped folks with alot less impact to Arana & serves the same purpose* The bridge plan goes right though one of the last refuges for wild animals & seems totally destructive to our "Green Belt."

When I walk my elderly Mother around the harbor 3-5 times a week we never see other handicap folks walking in this area, so I really dont feel there is a real need for handicap access to Arana* Being a caregiver for the elderly I feel it would be too hilly, curvy & quite difficult to maneuver for a wheel chair or walker, even paved.

Thank you for your reconsideration*

Jennifer Carson
PO 578 Capitola Ca 95010

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CENTRAL COAST AREA

Exhibit M

Dan Carl

From: Jan Landry [jan@mindfulnessprograms.com]
Sent: Monday, October 11, 2010 1:49 PM
To: Dan Carl
Subject: Long live the weeds and the wilderness yet

I am writing to urge you to allow Arana Gulch to remain as is, the beauty, the wildness, is a rare and precious commodity, please don't take it away. Please take to heart, the words below of Gerard Manley Hopkins,

"What would the world be, once bereft
Of wet and wildness? Let them be left,
O let them be left, wildness and wet;
Long live the weeds and the wilderness yet."

Gerard Manley Hopkins

Thank you for your consideration and hopefully preservation, Jan Landry

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CENTRAL COAST AREA

Susan Craig

From: John Golder [jhond@comcast.net]
Sent: Monday, January 03, 2011 3:34 PM
To: Susan Craig
Subject: City of Santa Cruz Housing Elements and Arana Gulch Master Plan objection.
Attachments: GMPFS rec uses Arana 94.jpg; Arana sportsfield map GBMPFS 7-94.jpg; Arana survey use preferences 1994 .jpg; SNASS field shortage study 4-13-94.jpg; Arana N Pk deficit 2005.jpg.jpg

Susan Craig, Planner
Jan. 3, 2011
Calif. Coastal Commission
Santa Cruz Office
725 Front St. Suite 300
Santa Cruz, CA 95060

Ms. Craig,

I am doing an extensive review of the City of Santa Cruz's parks planning process in relation to the draft 2030 Gen Plan.

I would like to review any SC City Housing Elements along with their CEQA studies/checklists from the current 2000-2007 Housing Element back as far as 1980, if you have copies.

Can you please contact me as to which Housing Elements and corresponding CEQA studies you have?

I have been much impressed with the quality of your records availability on past occasions, as well as the prompt, courteous and quality service you have offered, so your office is my first choice for this research.

Related to this matter, I would like to know if I can present written material as well as make a presentation regarding objection to any final decision on the Arana Gulch Master Plan in its present form when it next comes before the Commission.

My objection has no particular connection to the trail/tarplant/transportation project issues.

I am a long-time advocate for neighborhood/community parks and active recreation facilities, and served on the Greenbelt Advisory Committee in that capacity.
My objective would be to present probative evidence that the City's Arana Gulch Master plan process ignored all of its existing General Plan policies, programs, goals, specific plan requirement, Planning Commission recommendations, Greenbelt Master Plan recommendations, public opinion surveys, existing General Plan Land Use designations and existing zoning that strongly supported and called for provision of long needed neighborhood park amenities, modest acreage and active recreational facilities at Arana.

The land resource being denied by this Master Plan is about 4 acres of nearly level coastal terrace with no biotic restraints (including Tarplant buffer) in the NW corner of Arana Gulch. The development of sports fields and active recreation facilities is absolutely dependent on the few remaining parcels of vacant level coastal terrace land within the sphere of influence of the City. No other usable or feasible

land resource within that sphere was or is designated for parks or for community facility use. The environmental and cost restraints of developing active recreation facilities on sloped topography or purchasing and redeveloping developed urban land are infeasible to impossible.
This is not even true for trails, which can traverse considerable slope or even be carried over land on bridges, if necessary.

The overall parks planning and funding context for this exclusory legislative City action includes the following facts:

1) Santa Cruz has not done any park land or recreational facilities inventory since 1992
2) The City has not had any inclusive or comprehensive Parks Master Plan since 1983; that one expired in 1988.
3) The City has had a surplus (per referenced NRPA standard of 20 acres per 1000 population) of undeveloped open space protected park lands since 1983. That surplus, within city limits nearly tripled between 1989 and 1998. The regional protected open space acreage within 10 miles of the city limits exceeds 30,600 acres, or 185 acres of open space for every one acre of developed urban park.
4) The City has received over $20.75 million in park grants and Prop 70 state bond funded land gift since 1988.
5) The City has charged developers and spent at least another $4 million of special revenue funds intended solely for parkland acquisition, development and improvement (Quimby fees and Park Facilities Tax).
6) In spite of all funding and land gift mentioned, the City actually has less developed parkland currently than it did 30 years ago.(Parkland losses from development have exceeded developed acreage gain).
7) The City has had zero net gain in sports field area in more than 30 years while its population has grown by over 17,000. A very detailed sports field survey assessment in 1994 documented a field deficit of 30 acres (ten multi-use fields).
8) The City has continued to rely on dwindling school resources and dwindling school open space for half of its neighborhood park inventory for over 30 years.
9) The Lower Eastside (SE) planning area has a current neighborhood parkland deficit of over 7 acres. This deficit, recognized in every City General Plan since 1970, has been increasing with no parkland added for almost 40 years.

Can you advise me if this issue, which has not been heard by the Commission, will be heard and considered at this point in the process?
I can elaborate, if necessary on the reasons it was not presented previously. I will be fully prepared to present documentary evidence within less than a month. I would need about 5 to 7 minutes with screen presentation during the Commission's hearing.
I can send something substantial (say several dozen pages) in less than two weeks. I will gladly heed your advice on details, length and focus points of an effective presentation.

The attached docs are just a small portion of the available evidence.

If your answer is in the affirmative, can you advise me as to which, of the many points above, are issues the Commission would NOT use or consider in its deliberation?

Thank you kindly for your attention and response.

I may be reached at 831 704 7108 for any clarifications or questions regarding the above.

Sincerely,

John Golder

Recommended Public Uses for Arana Gulch

Recommended Public Use Program:

- Protection of views, habitats, watershed areas
- Hiking Trails
- Nature Preserve Areas
- Nature Trails
- Bike Trail
- Playground
- Sports Field
- Picnic Sites (2)
- Restroom
- Small Parking Area (20 spaces)

Phasing:

Phase One: Hiking trails and a small parking area. Minimum operations and maintenance level of effort.

Phase Two: Full Public Use Program. Full operations and maintenance level of effort.

Public Benefit Summary:

- Responds to General Plan Parks and Recreation Element identified need for neighborhood and community park land in Lower Eastside.
- Responds to General Plan policies encouraging recreational trails. Potential link with existing Harbor facilities and Broadway/Brommer bicycle/pedestrian path.
- Responds to need identified in Sports Fields Assessment Siting Study for more sports fields in city.
- Protects areas identified in General Plan as including sensitive species and habitat (riparian, wetlands, grassland). Use Program avoids tar plant buffer zones, fire hazard area, flood plain, liquefaction area and area of strongest shaking.
- Property would accommodate hikers, bikers, picnickers, children, sports field users and those who want to enjoy its natural diversity.
- ADA accessibility would allow those with disabilities to enjoy the property.

Exhibit M

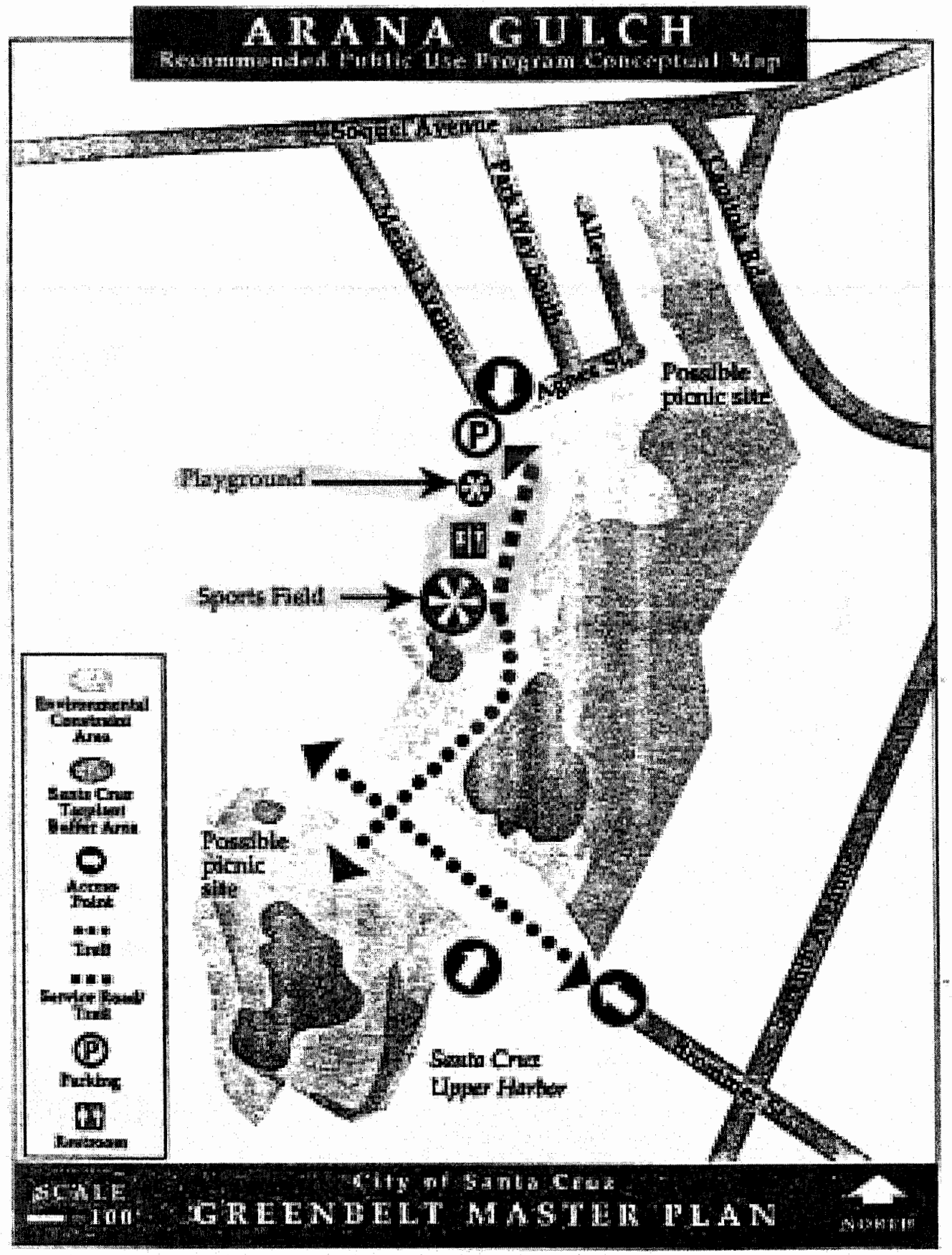


Figure 10

Exhibit M

15. Please indicate whether or not you think the following recommended uses are desirable for Arana Gulch:

[read scale as needed]	Very Desirable	Somewhat Desirable	Somewhat Undesirable	Very Undesirable	DK/NA
Nature Preserve Areas,	67%	20%	5%	8%	— n=290
	68%	20%	5%	8%	3% n=298
Hiking Trails	43%	37%	11%	10%	— n=285
	41%	35%	10%	9%	4% n=298
Nature Trails	46%	36%	9%	9%	— n=287
	45%	34%	9%	9%	3% n=297
Bike trails	30%	32%	17%	21%	— n=285
	28%	31%	16%	21%	4% n=297
Playground	39%	34%	11%	16%	— n=286
	37%	32%	11%	16%	4% n=299
Sports field	31%	27%	17%	25%	— n=283
	29%	26%	16%	24%	6% n=300
Picnic sites	29%	47%	10%	14%	— n=289
	28%	45%	10%	14%	4% n=300

17. If it were part of the greenbelt, are there any other uses you think would be desirable for Arana Gulch?

Item	# of Total Mentions	% of Total Mentions
Leave alone to protect wetlands	9	13
Development for tax base	8	12
Continue extension of road (Broadway-Brommer)	7	10
Education	7	10
School	5	8
Other	31	46
Totals	67	101

Exhibit M

Sportsfield Needs Assessment & Siting Study (SNASS) 1993

Santa Cruz has sports-field shortage, new study shows

By ROBIN MUSITELLI
Sentinel staff writer

4/13/94

SANTA CRUZ — At 6 p.m., the rush hour is on — not just on the freeways, but on the city's playing fields.

While the number of playing fields is adequate for team competition, another 10 fields are needed to accommodate practices and to let kids play earlier in the day, according to a city study on sports fields presented to the Santa Cruz City Council on Tuesday.

The most reasonable place to put them is on greenbelt property, should the city purchase the parcels bordering Santa Cruz city limits, the study found.

Among the study's conclusions:

- The city lacks sufficient sports fields, especially for practices;
- Improving existing fields, including Santa Cruz City Schools District fields, would make them safer, but would not address the shortage;
- 10 multi-use fields for both practices and league play are needed citywide. That is the equivalent of a minimum of 20 diamonds and 10 soccer fields;
- The proposed greenbelt properties are the most feasible sites, and are recommended by city's Greenbelt Committee as sites for new sports fields.

Some 10,000 people participate in organized youth and adult team sports inside city limits. Of those, about 72 percent are city residents, the study found.

The numbers have been fueled by an explosion of girls' programs, a continued expansion of boys' programs and growing popularity of soccer, girl's softball, ultimate Frisbee football and rugby.

But, no new fields have been built within the city in the past decade.

"The data confirmed the long-standing belief in the sports community that to find a field for practice during the spring or summer is almost impossible," the study said.

It's extremely difficult to find practice space close to home or school, or even by driving across town. Elementary-school age kids often have to wait until 9 or 10 p.m. on school nights to play. As the kids wait, they get bored and drop off the team, or their mothers' complain about the late hours, said Woody Bookout, a member of the sports fields assessment study.

Bookout said the needs for team competition and league games are being met, but not under the best circumstances. There aren't enough fields to host tournaments, and there are too many late night games.

The real crunch comes when individual teams compete for the same fields for practice sessions, and during overlap in seasons.

Soccer basically runs year around because there are youth spring and fall leagues, adult leagues happening at various times throughout the year, and rugby and football in the fall. It's the overlap time between soccer and diamond sports — baseball and softball — which creates the massive shortage of fields, according to the study.

On the bright side, fields at Harbor High have recently been improved, adding one more field. But the increase will be offset by the city reinstituting a policy to rotate one field out of use for maintenance purposes, said Bookout.

Bookout told the council that, should sites be found, volunteers could easily be found to build fields at no cost to the city.

Finding sites is the next step, the council agreed. Besides the proposed greenbelt properties, the benchlands in lower San Lorenzo Park is one city facility that isn't used for soccer practice, but could be, the study found.

The council agreed that should be considered further. At the suggestion of Councilwoman Cynthia Mathews, the council also agreed to pursue the possibility of cooperative use and development of fields with Santa Cruz City Schools.

Exhibit M

Neighborhood Parks

The General Plan Parks and Recreation Element provided analysis of neighborhood park needs for each of the six planning areas within the City. Needs were assessed within each area according to population projections and acreage, distribution and quality of existing neighborhood parks. Neighborhood parks serve the recreational needs of residents living or working within a neighborhood area. They are used for spontaneous recreation and include facilities such as children's play areas, picnic areas, athletic fields and outdoor basketball courts. The City's standard for neighborhood parks is 2.0 acres/1000 people with a service radius of 3/8 of a mile or five blocks.

Using the neighborhood park standard, the following table shows neighborhood park needs for the lower eastside of the City. The 2005 population projection was used in the General Plan to estimate future neighborhood park needs for the planning area. The lower eastside includes the area east of the San Lorenzo River, south of Soquel Avenue and west of the eastern city limit boundary.

Table 1 – Neighborhood Park Needs for Lower Eastside

Year	Population (Source)	Existing Neighborhood Park Acreage	Neighborhood Park Needs (Acreage)	Neighborhood Park Deficit (Acreage)
1990	10,423 (U.S. Census)	14.7	20.8	6.1
2000	11,117 (U.S. Census)	14.7	22.2	7.5
2005	10,812 (1995-2015 AMBAG Population Projection)	14.7	21.5	6.8

The table is an update from the analysis prepared for the General Plan in 1992 and shows the 2000 population from the Census for the area. The General Plan underestimated the increase in population for 2005. Using the census data the estimated neighborhood park deficit for the area is 7.5 acres. Within the lower eastside area the General Plan analyzed neighborhood park distribution deficit and concluded that there is a lack of parks in the Mental Avenue and South Park Way area.

Although the proposal will result in 67.7 acres of additional park land within the lower eastside of the City most of the site will be designated and used as natural area for resource protection and not active park space. The General Plan envisioned a neighborhood park in conjunction with school playing fields at Arana Gulch to help meet neighborhood park needs for the immediate area. The General Plan also provided direction to improve existing parks and explore the feasibility of developing parks in areas where existing park sizes are inadequate.

The development of a neighborhood park is consistent with the Natural Area/Parks land use designation for the property and will not preclude such a use in the future. The Master Park Plan, however, would need to be amended and additional environmental review is required.

School Site

During the preparation and adoption of the current General Plan/Local Coastal Program the Santa Cruz City School District had identified a need for a new elementary school within the area to meet enrollment projections. Since the adoption of the General Plan the combined factors of declining enrollment and school closures the school site at Arana Gulch is no longer needed.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:
2007-F-0087

September 15, 2008

Gary Ruggerone
Senior Environmental Planner
California Department of Transportation
50 Higuera Street
San Luis Obispo, California 93401-5415

RECEIVED
MAR 0 3 2009
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Subject: Biological Opinion for the Broadway-Brommer Pedestrian-Bicycle Path, Santa Cruz County, California (1-8-07-F-46)

Dear Mr. Ruggerone:

This document transmits the U.S. Fish and Wildlife Service's (Service) biological opinion based on our review of the California Department of Transportation's (Caltrans) proposed funding for the construction of a pedestrian and bicycle path at the Arana Gulch open space area and its effects on the federally threatened Santa Cruz tarplant (*Holocarpha macradenia*) and its critical habitat in accordance with section 7 of the Endangered Species Act of 1973, as amended (Act) (16 U. S. C. 1531 et seq.). Your June 22, 2007, request for consultation was received on June 25, 2007.

This biological opinion was prepared using information you provided in your letter requesting initiation of formal consultation, an environmental study prepared by the City of Santa Cruz (2007), the Arana Gulch Master Plan (2006), a report on a management program for Santa Cruz tarplant (Pavlik and Espeland 2005), an environmental impact report prepared by Brady and Associates, Inc. (1999), and information in our files. A complete administrative record for this biological opinion is available at the Ventura Fish and Wildlife Office.

CONSULTATION HISTORY

On August 26, 1999, the Federal Highway Administration (FHWA) requested formal consultation with the Service on the proposed Broadway-Brommer Bicycle-Pedestrian Path. Following discussions between Colleen Sculley, formerly of the Service's Ventura Fish and Wildlife Office, and FHWA staff, it was determined that the proposed project, with incorporated mitigation measures, was not likely to adversely affect the Federally threatened California red-legged frog (*Rana aurora draytoni*) or the Santa Cruz tarplant. On December 24, 1999, FHWA requested concurrence from the Service on their determination of not likely to adversely affect. In a letter dated February 1, 2000, the Service concurred with this determination.

CCC Exhibit N
(page 1 of 15 pages)

Subsequent to the February 1, 1999, concurrence, the Service designated critical habitat for the Santa Cruz tarplant in October 2002, and the California red-legged frog in April 2006. The Arana Gulch area was included in the critical habitat designation for the Santa Cruz tarplant, but was outside of the critical habitat designation for the California red-legged frog.

The City of Santa Cruz (City) decided to delay the Broadway-Brommer Bicycle-Pedestrian Path until they completed a Master Plan for Arana Gulch, the City-owned open space area that will be crossed by the proposed bicycle-pedestrian path. The Arana Gulch Master Plan was approved by the City in July 2006. The plan included a proposed adaptive management program for the Santa Cruz tarplant.

As a result of the Arana Gulch Master Plan process and the critical habitat designation for the Santa Cruz tarplant, the City made changes to the proposed Broadway-Brommer Bicycle-Pedestrian Path to minimize potential impacts to the listed species and designated critical habitat. In October 2006, Caltrans re-initiated consultation with the Service, requesting informal consultation on the changes of the proposed project and their effect on the Santa Cruz tarplant and the California red-legged frog. In a letter dated March 5, 2007, the Service concurred with your determination that the project was not likely to adversely affect the California red-legged frog, but did not concur the project was not likely to adversely affect the Santa Cruz tarplant and recommended that you initiate formal consultation for the Santa Cruz tarplant and its critical habitat. In making this recommendation, we revised our original concurrence in the letter dated February 1, 2000. We revised our recommendation due to a decline in the status of the Santa Cruz tarplant throughout its range and the designation of critical habitat for the Santa Cruz tarplant since our February 2000 letter. The Santa Cruz tarplant population declined from approximately 13,000 individual plants in 1998 to approximately 350 plants in 2006.

Since the initiation of formal consultation in 1999, FHWA assigned and Caltrans assumed responsibilities for consultation and coordination with resource agencies for most projects within the State of California. The delegation of authority stipulates that correspondence regarding consultations be addressed to Caltrans, even if FHWA initiated the consultation. Although our early consultation on the project was with FHWA, the most recent request for consultation was initiated by Caltrans. Therefore, in accordance with the delegation of authority and in response to the request for consultation by Caltrans, this consultation is between the Service and Caltrans.

BIOLOGICAL OPINION

DESCRIPTION OF THE PROPOSED ACTION

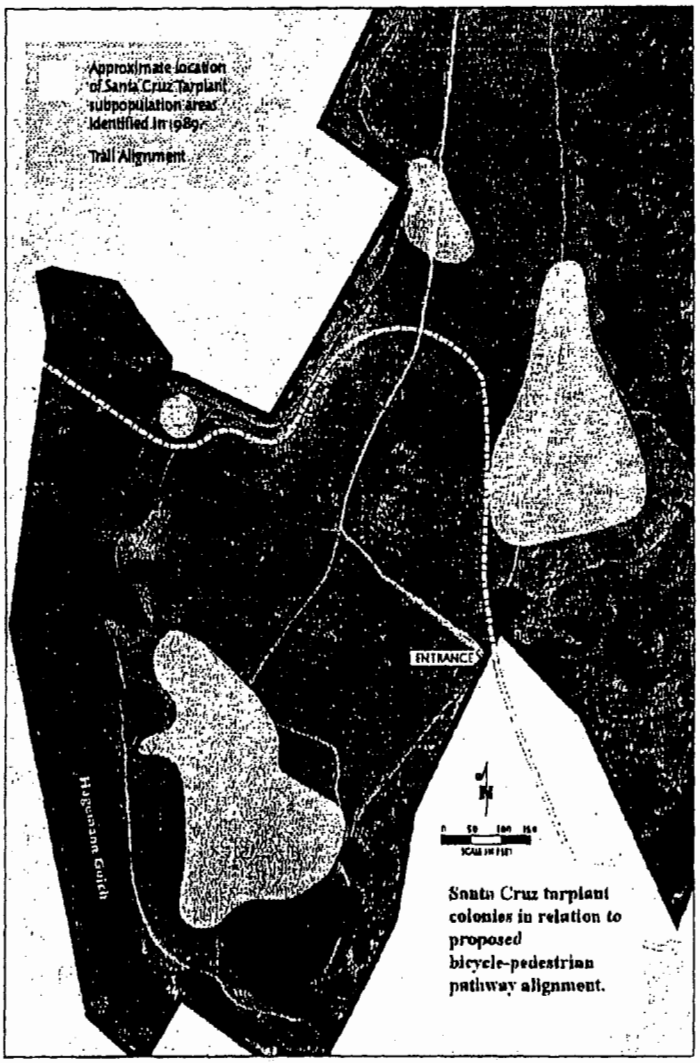
The City proposes to construct a paved multi-use bicycle-pedestrian path as an east-west connector between Broadway Street and Brommer Street through the Arana Gulch open space in Santa Cruz, California. The purpose of the path is to provide bicycle commuters with an east-west connection between Broadway Street in the city of Santa Cruz and Brommer Street/7th Avenue in the county of Santa Cruz. Currently, bicycle commuters have the option of using Capitola Road and Soquel Avenue to the north of Arana Gulch, or Murray Street to the south.

CCC Exhibit N
(page 2 of 15 pages)

Both of these routes carry high vehicle traffic volumes; many accidents have been documented along these two routes.

The proposed trail alignment is designed to avoid the four historic Santa Cruz tarplant colonies or subpopulations within the grassland habitat area of Arana Gulch (Figure 1) and minimize cut and fill along the eastern boundary of the open space, where one of the larger tarplant colonies is

Figure 1. The proposed trail alignment shown in relation to the four Santa Cruz tarplant subpopulations at Arana Gulch open space.



CCC Exhibit N
(page 3 of 15 pages)

located. Approximately 0.25 mile of trail would be paved through the coastal terrace/grassland area of Arana Gulch. The trail would be an 8-foot wide paved path, with maximum of 2 feet of additional ground disturbance on either side of the path. The trail would be constructed to minimize any changes in hydrology, including site drainage and runoff. To maintain natural surface runoff conditions on the site, the trail design would include out-sloping of the trail to diffuse the runoff downslope and more frequent discharge points that would minimize concentrations. To maintain the natural shallow subsurface flow conditions in the coastal prairie grassland area, the sub-base of the paved trail would be a permeable material.

Current site conditions include a network of unauthorized foot and bicycle trails running throughout the Arana Gulch open space. The City proposes to close these unauthorized trails to public use. The City will implement signage, interpretive displays, and ranger enforcement to ensure visitors remain on designated trails and do not disturb the tarplant population areas. Interpretive signage will be located outside of the tarplant colonies to minimize disturbance to tarplant habitat.

At Hageman Gulch, on the west boundary of the Arana Gulch open space, a 340-foot long by 10-foot wide, single span, stress ribbon bridge would be constructed across the gulch. The stress ribbon bridge would be supported by abutments located at either side of the gulch at the edge of the riparian forest. Cable ribbons would be strung across the span and anchored to each abutment. Precast concrete deck panels would be placed on top of the cable ribbons. Following placement of the precast deck panels, a cast-in-place concrete overlay would be placed on the top and then the cable ribbons would be tensioned. No supports will be constructed within the canyon, and there will be no construction vehicle access required in the canyon.

The City will fully implement the Santa Cruz Tarplant Adaptive Management Program (Pavlik and Espeland 2005), which was part of the approved Arana Gulch Master Plan (2006), as part of their site restoration and conservation efforts for the new paved multi-use pathway. The program would require the establishment of an Adaptive Management Working Group, comprised of qualified botanists and agency representatives, to oversee management actions, surveying, and monitoring of the Santa Cruz tarplant colonies in the Arana Gulch open space. The Santa Cruz Tarplant Adaptive Management Program would incorporate the following elements: 1) active management practices and techniques, including, but not limited to mowing with removal of cut material, prescribed burning, soil disturbance, and removal of invasive non-native plant species; 2) continued experimental research directed toward refining understanding of the management regime that maximizes long-term success of the Santa Cruz tarplant; 3) ongoing monitoring on an annual basis to determine the success of management measures, to monitor the overall well-being of Santa Cruz tarplant colonies on the site, and to identify potential threats to the Santa Cruz tarplant persistence on the site; and, 4) revision of the management prescriptions and remedial actions as appropriate to enhance long-term viability of the Santa Cruz tarplant on the site. A two-tracked program for improving overall habitat quality during the first 7 years would include semi-annual mowing with phytomass removal to reduce annual grass reproduction and cover, and experimental manipulations in designated areas of the Management Area to improve existing and develop new management actions. In subsequent years, a schedule of management

actions would be implemented as directed by the Adaptive Management Working Group. All management activities conducted under the Santa Cruz Tarplant Adaptive Management Program would receive guidance from the Service through representation the Adaptive Management Working Group and would be subject to review by the Service through the standard regulatory process.

Caltrans will ensure the City implements the following measures to reduce impacts to Santa Cruz tarplants:

1. Before any ground disturbance or other project activity work begins within the Arana Gulch open space, a Service-approved biologist will provide training to all project personnel. At a minimum, the training will include a description of the Santa Cruz tarplant and its habitat, the specific measures that are being implemented to conserve the Santa Cruz tarplant, and boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.

2. Prior to construction, temporary plastic mesh fencing will be placed along the trail alignment to prevent impacts outside of the proposed trail alignment and associated areas of disturbance. During construction, the fencing placement will be monitored by City staff or a qualified biologist.

3. No soils, materials, or construction equipment will be stored within the fenced trail corridor.

4. Construction staging and equipment storage will be within the developed area of the Upper Harbor and off-site in the vicinity of the Hageman Gulch bridge crossing. If materials for bridge construction need to be temporarily stored within Arana Gulch, the pre-existing concrete pads near the north boundary will be used. Temporary plastic mesh fencing will be placed around the staging area. Construction equipment access routes and staging areas will be submitted for Service approval prior to the start of construction.

5. Mechanized construction equipment utilized for grading and trail and bridge construction will be the minimum size necessary to complete the work.

6. Any soil that is removed near the historic Santa Cruz tarplant colonies during construction of the paved path will be mechanically scraped so that redistribution of the native soil could occur. Redistribution of the soil will occur under the guidance of a qualified botanist and will be coordinated with the Santa Cruz Tarplant Adaptive Management Program Technical Advisory Group.

STATUS OF THE SPECIES

Santa Cruz Tarplant

The Santa Cruz tarplant was federally listed as threatened on March 20, 2000 (65 FR 14898). Critical habitat for the Santa Cruz tarplant was designated on October 16, 2002 (67 FR 63968).

The Santa Cruz tarplant, an aromatic annual herb in the aster (Asteraceae) family, is one of only four species of *Holocarpha,* which are all geographically restricted to California. The genus name, derived from the Greek *holos* for whole and *karphos* for chaff, refers to the scales found among the florets on the receptacle (the structure that supports the florets in the daisy-like flower head). The plant is rigid, with lateral branches that arise to the height of the main stem, which is 4 to 20 inches tall. The lower leaves are broadly linear and up to 5 inches long. The upper leaves are smaller, with rolled back margins, and are truncated by a distinctive craterform gland. The yellow flower head is surrounded from beneath by individual bracts that have about 25 stout gland-tipped projections. The Santa Cruz tarplant is distinguished from other members of the genus by its numerous ray flowers and black anthers. However, as with all other members of the genus, Santa Cruz tarplant establishes seedbanks. Therefore, sites that support a population of this plant, particularly those that support small populations (fewer than 100 individuals), may not display individuals in any given year, but still have a viable population in other years.

Habitat for the Santa Cruz tarplant historically consisted of grasslands and prairies found on coastal terraces below 330 feet (ft) in elevation, from Monterey County, north to Marin County. In the 1800s, coastal prairies covered an estimated 865,000 acres. This coastal prairie habitat is becoming increasingly fragmented and restricted in distribution. Four major factors contributed to changes in the distribution and composition of coastal prairies: grazing; introduction of highly competitive, nonnative species; elimination of periodic fire; and cultivation. Currently, the California Department of Fish and Game's Natural Diversity Database (CNDDB 2007) lists just over 1,977 acres of high-quality coastal prairie remaining, of which less than 5 percent is Santa Cruz tarplant habitat.

The Santa Cruz tarplant populations occur on the alluvium resulting from the terrace deposits. Typically terrace soils are sandy clay soils; the clay component of these soils holds moisture longer into the growing season compared to the surrounding sandy soils. In the Santa Cruz area, Santa Cruz tarplant exists on the gently sloping terrace platforms that are separated by steep-sided "gulches," whereas in the Watsonville (Santa Cruz County) and Monterey areas, and on the east side of San Francisco Bay, the terraces are more extensively dissected.

Although the Santa Cruz tarplant is historically associated with native herbaceous species and grasses (including other tarplants (*Hemizonia* spp.), needlegrass (*Nasella* sp.) and California oatgrass (*Danthonia californica*)), nonnative grasses, such as wild oats (*Avena fatua*), Mediterranean barley (*Hordeum hystrix*), and bromes (*Bromus* spp.), have invaded its habitat. At some locations, Santa Cruz tarplant is found with other species that may be threatened or endangered, including the Ohlone tiger beetle (*Cicindela ohlone*; federally endangered), San

Francisco popcorn flower (*Plagiobothrys diffusus*; State-listed as endangered), Santa Cruz clover (*Trifolium buckwestiorum*; State-listed as a species of concern), and Gairdner's yampah (*Perideridia gairdneri*). Other locally unique plant species, such as Choris's popcorn flower (*Plagiobothrys chorisianus* var. *chorisianus*), triteleia (*Triteleia ixiodes*), coast coyote thistle (*Eryngium armatum*), and San Francisco gumplant (*Grindelia hirsutula* var. *maritima*) also occur in these areas.

Historically, the Santa Cruz tarplant was known from "low dry fields about San Francisco Bay." Around the San Francisco Bay, herbarium collections were made from Tamalpias in Marin County in 1934; near Berkeley, Oakland, and San Lorenzo in Alameda County as early as 1894; and Pinole in Contra Costa County. All of the native San Francisco Bay area populations have since been extirpated. The last remaining native population, known as the Pinole Vista population, was eliminated in 1993 by a commercial development.

In 1959, Keck noted the species in Santa Cruz County, but also added that the species could possibly be extinct. Fortunately, numerous collections were made from the Monterey Bay area in Santa Cruz County in the late 1950s and early 1960s. In 1966 and 1969, Hoover made the first collection of the species in northern Monterey County, just south of the Santa Cruz County line. Additional populations were found in Monterey County in the subsequent decades, although the lack of specific location noted on herbarium labels makes it difficult to determine exactly how many populations occurred there. According to CNDDB, nine populations in Santa Cruz and Monterey Counties have been extirpated by development. The most recent extirpation occurred in 1993 when a population in Watsonville (Anna Street site) was destroyed during construction of office buildings and a parking lot.

The Santa Cruz tarplant is currently known from a total of 20 populations; 12 of these are remaining native populations, and 8 are a result of experimental seedings. Eleven of the native populations occur in Santa Cruz County. Six occur around the city of Santa Cruz (Graham Hill Road, Twin Lakes, Arana Gulch, O'Neill/Tan, Winkle, and Fairway), and five occur around the city of Watsonville, scattered from Watsonville Airport to Hall Road (Watsonville Airport, Harkins Slough, Apple Hill, Struve Slough, and Spring Hills Golf Course). Only one population (Porter Ranch) occurs in Monterey County, just south of the Santa Cruz County line and the city of Watsonville. As stated earlier, there are years where few or no plants are present on a site, but a viable population is still probable due to the established seedbank.

The other eight existing populations of the Santa Cruz tarplant have resulted from experimental planting of seeds in Wildcat Regional Park in the east San Francisco Bay area. The names of the eight populations are as follows: Big Belgum, Big Belgum West, Upper Belgum, Mezue, Fowler, Nimitz Way, Upper Havey, and Lower Sather.

Santa Cruz tarplant seeds germinate in the fall after the first significant rainfall. Plants form a basal rosette of leaves that bolts from April to June. Flowering occurs from June to November, with seed maturation by late fall. Dispersal has been recorded to reach up to approximately 1.5 ft from the parent plant by air, and possibly much further assisted by small rodents (Hayes 2002).

The Santa Cruz tarplant is self-incompatible and therefore dependent upon outcrossing for seed production. Pollination requires pollinator intervention. Sixteen species of insects, including native bees, wasps, and flies, have been identified as floral visitors (Hayes 2003). Typical flight distance for these species is estimated at one-third of a mile (67 FR 63968), but it is not known with certainty. As an annual, Santa Cruz tarplant is completely dependent upon reproduction and the formation of a seed bank for population viability. Seed bank longevity has been variously estimated as 5 to 15 years (CDFG 1995; Pavlik and Espeland 2005). According to one report, seeds germinated after 6 to 9 years of storage at room temperature (Morey 1995 as cited in Pavlik and Espeland 2005).

The Santa Cruz tarplant is threatened primarily by historic and recent habitat alteration and destruction caused by residential and commercial development. Future loss of habitat may also result from recreational development, airport expansion, and agriculture. Occupied habitat that has been set aside in preserves, conservation easements, and open spaces also suffers secondary impacts from casual use by residents, introduction of nonnatives (e.g., French broom (*Genista monspessulana*), eucalyptus (*Eucalyptus* spp.), acacia (*Acacia decurrens, A. melanoxylon*), artichoke thistle (*Cynara cardunculus*), and grass species), and changes in hydrology; problems that are all exacerbated by the lack of management plans. In addition, smaller preserve areas with Santa Cruz tarplant suffer because they are cut off from the ecosystem functions that would be present in larger, more contiguous sites. More often, these smaller areas are left as open spaces, but without the benefit of the grassland management needed to sustain them. Finally, random disturbance, including unseasonable fires or a drought event, also threatens small populations of this species. Probability of population extirpation increases as the number of individuals and the area of habitat decrease.

With many Santa Cruz tarplant populations showing declining numbers, several management practices have been explored to promote short- and long-term population growth. Disturbance of the ground surface and control of non-native annual grasses are essential to the population health of Santa Cruz tarplant (Bainbridge 2003; Hayes 2002; Pavlik and Espeland 2005). Mowing and raking, grazing, fire, and scraping have been found to be successful for stimulating Santa Cruz tarplant expression and reproduction at the Arana Gulch and Watsonville Airport populations. From 1989 to 1995, following cessation of grazing, the Santa Cruz tarplant population at Arana Gulch declined from approximately 100,000 individuals to zero (Hayes 1998). Following scraping of the surface, the population rebounded in one growing season to 7,420. In the next 2 years, with the intervention of fire, it increased to 65,000 (Pavlik and Espeland 2005). Mowing and grazing have been used to stimulate and maintain expression of Santa Cruz tarplant at Arana Gulch and Watsonville Airport (Bainbridge 2003; Kiguchi 2003). Mowing combined with raking removes clipped material and accumulated thatch, exposing more soil surface, which may increase germination rates (Holl and Hayes 2006). In their management plan for the Arana Gulch tarplant population, Pavlik and Espeland (2005) suggest that scraping and fire may be considered as catastrophic management measures due to the large impact they have on soil characteristics and recommend using these two methods only when it is suspected that the seed bank is nearing the end of its longevity. The authors consider mowing and grazing to be sustainable and appropriate methods of restoring and maintaining Santa Cruz tarplant populations

Critical Habitat for the Santa Cruz Tarplant

Critical habitat for the Santa Cruz tarplant was designated on October 16, 2002 (67 FR 63968). The critical habitat encompasses 2,902 acres in Contra Costa, Monterey, and Santa Cruz Counties, California.

In accordance with section 3(5)(A)(i) of the Act and regulations at 50 CFR 424.12, in determining which areas to designate as critical habitat, we consider those physical and biological features (primary constituent elements) that are essential to the conservation of the species, and within areas occupied by the species at the time of listing, that may require special management considerations and protection. These include, but are not limited to: space for individual and population growth and for normal behavior; food, water, air, light, minerals, or other nutritional or physiological requirements; cover or shelter; sites for breeding, reproduction, and rearing (or development) of offspring; and, habitats that are protected from disturbance or are representative of the historic geographical and ecological distributions of a species.

For critical habitat of the Santa Cruz tarplant, we identified the following features essential to the conservation of the species: soils associated with coastal terrace prairies, including the Watsonville, Tierra, Elkhorn, Santa Inez, and Pinto series; plant communities that support associated species, including native grasses such as needlegrass (*Nassella* sp.) and California oatgrass (*Danthonia californica*); native herbaceous species such as members of the genus *Hemizonia* (other tarplants), Gairdner's yampah, San Francisco popcorn flower, and Santa Cruz clover; and physical processes, particularly soils and hydrologic processes, that maintain the soil structure and hydrology that produce the seasonally saturated soils characteristic of Santa Cruz tarplant habitat.

The Service designated critical habitat for the Santa Cruz tarplant consists of 11 units divided into 3 major geographic areas entitled Santa Cruz-Soquel Area Unit, Watsonville Area Unit, and the East Bay Area Unit (67 FR 63968). The Santa Cruz-Soquel Area includes six critical habitat units (B though H), totaling approximately 287 acres. The project-specific critical habitat unit is described in greater detail in the Environmental Baseline section of this document.

ENVIRONMENTAL BASELINE

The implementing regulations for section 7(a)(2) define the action area of a consultation as the area that may be directly or indirectly affected by the proposed action (50 Code of Federal Regulations 402.02). For the purposes of this biological opinion, we consider the action area to include all areas where people and equipment would be working or staging. Based upon the information provided to us, we identify the action area as follows: the entirety of the 67-acre Arana Gulch open space.

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Santa Cruz Tarplant

The Arana Gulch open space is located within the Santa Cruz city limits. The property is bounded on the west, east, and north sides by existing development and on the south side by the Santa Cruz Harbor. Huge population fluctuations have occurred on this site, ranging from 100,000 individuals in the late 1980s when the site was being grazed by cattle, to no plants in 1995 (K. Lyons, in litt. 2001). The City entered into a Memorandum of Understanding with the CDFG in 1997 to manage the Santa Cruz tarplant, which includes utilizing a variety of management techniques to enhance the population.

From 2000 to 2006, the number of individual plants ranged between 0, in 2006, and 10,230, in 2002. The annual totals are likely influenced by rainfall and other meteorological conditions, but in general appear to be in decline following the cessation of grazing at the site. Four primary sub-populations or colonies of Santa Cruz tarplant, identified as A, B, C, and D, have been mapped within the Arana Gulch open space (Figure 1). Colony A, the southernmost of the four colonies, has historically been the largest colony, representing 98.7 percent of the individuals counted in the Arana Gulch open space since 2000. Colony D, along the eastern boundary of the open space, has historically been the second largest colony. Colony B occurs along the western boundary of the open space, near Hageman Gulch and Colony C occurs along the northeastern boundary of the open space. Colonies B and C are the smallest sub-populations, with no plants being documented on either colony since 2000 and only 5 plants in B and 20 plants in C in 1998.

Status of Critical Habitat in the Action Area

The action area for the proposed project is within designated critical habitat for the Santa Cruz tarplant (67 FR 63968), and includes the entirety of critical habitat Unit-D (Arana Gulch Unit). The Arana Gulch Unit comprises approximately 65 acres (or 2.2 percent) of the approximately 2,902 acres of total habitat designated as critical habitat for the Santa Cruz tarplant. Unit-D is mapped from occurrence records at the time of listing and subsequent to the time of listing. The entire unit is on lands owned and managed by the City of Santa Cruz. It is bounded on the west, east, and north sides by existing development and on the south side by the Santa Cruz Harbor.

The Arana Gulch Unit is essential because it currently supports a population of Santa Cruz tarplant and because it is one of only seven populations in the cluster of populations that are found on the northern end of Monterey Bay. This unit and the Twin Lakes Unit occur at the lowest elevation of the native populations in the northern Monterey Bay area (40 to 60 ft) and are consequently the closest to the influence of the coastal climate. Moreover, these two units are within one-half mile of each other and therefore could retain connectivity between them. It is also essential for the recovery of the species because current management by the City has allowed this site to support the third largest standing native population of tarplant. Therefore, it contributes significantly to the seed bank reserve for the species and is large enough to support management activities that may be necessary to maintain the population at this site.

EFFECTS OF THE ACTION

Santa Cruz Tarplant

Activities conducted within the proposed project area that could directly or indirectly adversely affect the Santa Cruz tarplant include ground clearance, cut-and-fill activities, paving, mowing, scraping, and non-native species removal. The potential effects associated with these activities include crushing, cutting, or otherwise injuring and killing of plants and/or seeds (through mechanical or foot traffic), surface disturbance and soil compaction, and erosion and/or changes in the hydrology.

Construction of the paved pathway could result in injury or death of individual Santa Cruz tarplants through mechanical or foot traffic if workers travel outside of designated work areas. These effects will be minimized by fencing off the project area using temporary fencing to avoid traffic outside of approved areas. A worker education program will be conducted prior to the start of construction to ensure that all project personnel are aware of the Santa Cruz tarplant and its sensitive habitat areas.

Construction of the paved path could alter subsurface water flow, thereby impacting hydrology at the Santa Cruz tarplant colony sites. This effect will be reduced through the use of a permeable base for the paved path, which would allow normal subsurface water flow to continue.

Construction of a paved multi-purpose path is likely to increase public activity in the area. Unauthorized off-trail access in the vicinity of the Santa Cruz tarplant colonies could result in trampling or other forms of injury to individual plants. The Arana Gulch open space is regularly used by people walking their dogs. Although dogs are required to be on leashes, the City has frequently observed dogs off leash. Off-leash dogs could damage plants or disrupt the seed bank by digging within the Santa Cruz tarplant colonies. The effects of increased public activity will be reduced through the closure of the currently existing unauthorized trails, the installation of informational placards and signs, and enforcement by rangers or other City authorities.

Adaptive management program activities conducted within the proposed project area that could directly or indirectly adversely affect the Santa Cruz tarplant include mowing, scraping, and non-native species removal. The potential effects associated with these activities include crushing, cutting, or otherwise injuring and killing of plants and/or seeds (through mechanical or foot traffic). These potential effects will be reduced or avoided by forming an Adaptive Management Working Group, which will design and implement monitoring programs to evaluate progress and adaptively direct management to maximize the benefit to the four colonies of Santa Cruz tarplant at Arana Gulch. The working group will use qualified biologists to conduct or oversee all management activities.

The anticipated beneficial effects of the Adaptive Management Program include reduction in competition from non-native species and augmentation of Santa Cruz tarplant numbers, possibly reversing the current negative population trend. Mowing and hand-removal of non-native plants

could reduce competition on the Santa Cruz tarplant. Soil scraping could replenish the seed bank and encourage new plant growth. The long-term benefits of the proposed management actions are anticipated to outweigh the potential negative effects.

In summary, we expect that the adverse affects to Santa Cruz tarplant from the proposed project activities would be minor because: 1) the proposed trail alignment avoids all known Santa Cruz tarplant colonies within the project area; 2) Caltrans and the City proposed measures to minimize the adverse effects to Santa Cruz tarplant and its critical habitat from the project activities; and, 3) implementation of the Santa Cruz Tarplant Adaptive Management Program is expected to benefit the Arana Gulch population through habitat enhancement and removal of non-native species.

Santa Cruz Tarplant Critical Habitat

Constructing the proposed bicycle-pedestrian pathway at the Arana Gulch open space would adversely affect approximately 65 acres of designated critical habitat for Santa Cruz tarplant. The project would directly affect approximately 0.4 acre of critical habitat through the construction of the paved pathway. The remainder of the 65 acres of critical habitat at Arana Gulch could be indirectly affected by project activities.

The proposed trail alignment and its associated areas of potential disturbance contain one or more of the PCEs for this species and the construction of a paved pathway could alter PCEs in the project area. Soil compaction caused by the paved pathway could alter subsurface water flow, which would adversely affect the hydrologic processes that maintain the soil structure and hydrology that produce the seasonally saturated soils characteristic of Santa Cruz tarplant habitat. This impact will be minimized by using a permeable base for the pathway, which will allow normal subsurface water flow to continue.

We anticipate that the Santa Cruz Tarplant Adaptive Management Program will benefit the PCEs for Santa Cruz tarplant critical habitat within the Arana Gulch open space. The adaptive management program incorporates removal of non-native invasive plant species. This management activity could benefit the project area's plant community that supports native species associated with the Santa Cruz tarplant.

CUMULATIVE EFFECTS

Cumulative effects include the effects of future State, tribal, local or private actions that are reasonably certain to occur in the action area considered in this biological opinion. Future Federal actions that are unrelated to the proposed action are not considered in this section because they require separate consultation pursuant to section 7 of the Act. At this time, we are unaware of any non-federal actions that are reasonably certain to occur in the action area.

CONCLUSION

After reviewing the current status of Santa Cruz tarplant and its critical habitat, the environmental baseline for the action area, the effects of the proposed Broadway-Brommer Bicycle-Pedestrian Path project and the cumulative effects, it is our biological opinion that Caltrans' proposed funding of this activity is not likely to jeopardize the continued existence of the Santa Cruz tarplant or adversely modify its critical habitat.

We have reached these conclusions because:

1. Caltrans and the City have proposed a trail alignment that will avoid the Santa Cruz tarplant colonies within Arana Gulch;

2. The direct impacts of the project would only affect approximately 0.4 acre of the 65 acres of critical habitat at Arana Gulch;

3. Caltrans and the City have proposed measures to reduce the adverse effects of the proposed work on the Santa Cruz tarplant and its critical habitat;

4. The project may benefit the Santa Cruz tarplant and its critical habitat by improving Santa Cruz tarplant habitat quality at Arana Gulch through the implementation of the Santa Cruz Tarplant Adaptive Management Program.

INCIDENTAL TAKE STATEMENT

Section 9 of the Act does not address the incidental take of listed plant species. Consequently, this biological opinion does not include an incidental take statement, reasonable and prudent measures, or terms and conditions for Santa Cruz tarplant. However, protection of listed plants is provided in that the Act requires a Federal permit for the removal or reduction to possession of endangered or threatened plants from Federal lands. Furthermore, it is unlawful for any person to remove, cut, dig up, or damage or destroy a listed plant species in knowing violation of any law or regulation of any state or in the course of any violation of a state criminal trespass law [section 9(a)(2)(B) of the Act].

CONSERVATION RECOMMENDATIONS

Section 7(a)(1) of the Act directs Federal agencies to use their authorities to further the purposes of the Act by carrying out conservation programs for the benefit of endangered and threatened species. Conservation recommendations are discretionary agency activities to minimize or avoid adverse effects of a proposed action on listed species or critical habitat, to help implement recovery plans, or to develop information. To further the conservation of the Santa Cruz tarplant,

Caltrans should:

Support efforts to raise public awareness of the threat of non-native vegetation to native species and methods to manage this threat.

REINITIATION NOTICE

This concludes formal consultation on the Broadway-Brommer Pedestrian-Bicycle Path project at Arana Gulch. As provided in 50 CFR 402.16, reinitiation of formal consultation is required where discretionary Federal agency involvement or control over the action has been retained (or is authorized by law) and if: (1) new information reveals effects of the agency action that may affect listed species in a manner or to an extent not considered in this opinion; (2) the agency action is subsequently modified in a manner that causes an effect to the listed species not considered in this opinion; or (3) a new species is listed or critical habitat designated that may be affected by the action.

If you have any questions, please contact Douglass Cooper of my staff at (805) 644-1766, extension 272.

Sincerely,

For

David M. Pereksta
Assistant Field Supervisor

cc:
Dominic Hoang, Federal Highways Administration
Tom Edell, California Department of Transportation
Donn Miyahara, California Department of Transportation

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In Litt.

Lyons, K. 2001. FAX addressed to Connie Rutherford, U.S. Fish and Wildlife Service, Ventura, California, regarding tarplant data for Arana Gulch, dated July 12, 2001. Soquel. California.

-----Original Message-----
From: Suzanne Deleon [mailto:SDELEON@dfg.ca.gov]
Sent: Thursday, July 15, 2010 11:19 AM
To: Mike Ferry; John Dixon
Subject: Arana Gulch CESA information

Hello,
By this electronic message, DFG is responding to the questions the Coastal Commission has asked in their Memorandum dated May 10, 2010 and is clarifying the process and requirements of incidental take of a listed species under Section 2081 (b) of the Fish and Game Code.

Bullet #2: A) Provide a clear description of the impacts to area B if the trail alignment encroached on this historical habitat. B) If there is an impact, what would a complete mitigation measure be?

2A) Providing a clear description of impacts to the Santa Cruz tarplant (SCT) is the burden of the Project Applicant and should have been fully disclosed in the CEQA document. The Department believes that impacts of this project are not only affecting the mapped colonies of SCT but the entire SCT Management Area. The SCT Management Area is coastal prairie habitat, a DFG high priority habitat which is suitable habitat for the SCT. Historically, SCT did not just occupy the four mapped colony areas A-D but occupied all of the coastal prairie habitat in the SCT Management Area. The Draft EIR states, and the Department agrees, that due to the close proximity of the trails to the mapped colonies of SCT, the Project would result in permanent loss of that habitat within the width of the paved trail and any seedbank in that area would be lost. Indirect effects to the SCT include increased human and pet activities on either side of the paved trail and impacts from trail construction by large equipment moving soil and disturbing the seedbank. The Draft EIR also explains effects due to the change in hydrology from the paved trails and potential introduction of pathogens and exotics that will outcompete the SCT.

2B). The EIR states that all potential impacts can be decreased to a less than significant level except the impacts to the SCT.

"All potential impacts identified for the project could be mitigated to a less-than-significant level except for impacts to the Santa Cruz tarplant (SCT). Trail construction through or near the SCT areas, coupled with increased human activity in the area, may result in impacts on the SCT. A seed bank may still be present throughout historic areas of tarplant occurrence. Project activities such as trail construction would avoid areas that have been more recently noted (see Figures 4.2-4 and 4.2-5). However, construction of trails through any historic areas of tarplant would result in permanent loss of tarplant habitat within the width of the trail. Additional habitat for 1 to 2 feet outside the trail footprint could also be disturbed if pedestrians and bicyclists do not stay strictly within the trail width".

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effect from roads, trails and deforestation. The Department agrees with the many statements and evidence cited from studies in the CNPS Alternative paper provided to the City and the Commission.

5. Area D - existing unpaved path goes through the historical habitat of Area D. The City plans minor improvements to this unpaved path (smoothing out ruts, etc.). The City should ask CDFG staff if proposed improvements within the existing unpaved path configuration = take (this was not discussed on the site today).

Potentially yes. As stated above, the project activities that will affect the coastal prairie habitat on the property parcel should be included in the Project Description for the Incidental Take Permit and analyzed for impacts to the SCT and its habitat.

Please contact me if you have any further questions.
Suzanne

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