

May 20, 2010

From: Vince Cheap, Conservation Committee

CALL TO ACTION

We are asking all California Native Plant Society (CNPS) members to once again write letters to the California Coastal Commission (CCC) staff on behalf of our many years of effort to protect the listed Santa Cruz tarplant population at Arana Gulch Greenbelt from a City of Santa Cruz proposed east west bike connection. The letters must be received at well before the July 7, 2010 CCC meeting. Below is a summary of the issues.

The Santa Cruz Chapter of CNPS has devoted years of effort and advocacy to protect the Arana Gulch Greenbelt population of the Santa Cruz tarplant (a state and federally listed plant) from the City of Santa Cruz's project to construct a paved east-west bike connection as part of a transportation network directly through the tarplant's environmentally sensitive coastal prairie habitat. The resulting fragmentation of this population and the destruction of the species' sensitive prairie habitat, including potential negative changes to hydrology, are unacceptable threats to the restoration and long term viability of this genetically unique population.

On March 11, 2010 the City's project came up for review by the California Coastal Commission (CCC). At that public meeting, CNPS presented to the Commissioners an alternative route on the Arana Gulch Greenbelt that would go around the tarplant and its habitat instead of through it. Several Commissioners were not satisfied that the City's proposed plan was even allowable/legal under the Coastal Act which excludes transportation projects in Environmentally Sensitive Habitat Areas (ESHA) like the tarplant habitat. Several other Commissioners asked that the City review and analyze the CNPS alternative route and other alternatives that would offer better protection to the tarplant. CNPS Santa Cruz gathered together a group of our experts who produced a fully characterized biological plan for our southern alternative route and have sent it to the CCC and the City of Santa Cruz on May 11, 2010. I have previously sent that to the entire Board, but will send that to any who request it.

At the upcoming July 7-9, 2010 CCC meeting in Santa Rosa the City plans to present their findings as directed by the Commission. We will present our findings before the Commission at that time as well. I am asking that any and all chapter members submit written comments supporting our advocacy. The issue here is one of great importance to all our local native plants and ecosystems that are protected by the California Coastal Act. CNPS membership must make it clear to the California Coastal Commission that they must adhere to and enforce the protections provided by the Act and its ESHA provisions. The Commissioners are appointed from all the different coastal communities and areas within California and thus it is very effective and informative when that they hear not only from the CNPS plant experts but also from any and all local resident CNPS members.

To aid in writing your comments and for your information, below is a copy of the letter that was submitted to the Commissioners on behalf of CNPS for the March 11, 2010 CCC hearing. Much more extensive comments (nearly 10 minutes) were submitted orally at the same hearing by our attorney William Parkin and our consulting expert Dr. Grey Hayes, including a power point presentation. Send your letters at least a month before the July 7, 2010 meeting to make sure they get included as part of the staff report to the Commissioners. Address as follows:

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

Letter below submitted March 3, 2010

Dear Commissioners:

The California Native Plant Society (CNPS) supports the Americans with Disabilities Act (ADA) access to Arana Gulch AND an east-west bike link. ADA access is not an issue because wheelchair paths can easily be built around the Santa Cruz tarplant habitat and Arana can be enjoyed by persons in wheelchairs. The east-west bike link has a number of alternatives, even off site, which could be just as quick and effective as the one through the middle of sensitive habitat at Arana Gulch. All we ask is that the path goes around the habitat instead of through the middle of it. Throughout the Arana negotiations, CNPS has proposed alternatives that would not bisect the Santa Cruz tarplant population both off site and on site. According to bicycle proponents, one alternative (see attached map), which would simply take the road to the south of its current proposed location, would add approximately 14 seconds to the commute for a normal bicycle rider. This would also create a less steep grade for wheelchair access while simultaneously producing a superior 'coastal' experience, with views from the ocean to the mountains. The currently proposed alignment has a grade too steep for many who use wheelchairs and does not have good areas for viewing the coast.

Most people involved in this issue agree that the area in question is an Environmentally Sensitive Habitat Area (ESHA) and the City's own EIR admits that there is a significant impact to the habitat. Clearly, because of this and the fact that the California Coastal Act gives paramount protection to ESHA preventing ANY non-resource dependent development that would impact the habitat, the current Broadway Brommer project within the Arana Gulch Master Plan cannot be squared with the Coastal Act. The City has created a false choice between bicycle transportation and preserving an endangered species.

Thanks for your time and consideration.

Vince Cheap, CNPS Conservation Committee