

Nichols • Berma  
Environmental Plannir

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# **GENERAL PLAN FOR THE NORTH COAST BEACHES**

## **FINAL ENVIRONMENTAL IMPACT REPORT**

**Prepared for the  
County of Santa Cruz**

**Comments  
and  
Responses  
Addendum**

**July 1989**



## TABLE OF CONTENTS

### General Plan for the North Coast Beaches Final EIR

INTRODUCTION	1
RESPONSE TO COMMENTS	
State of California Office of Planning and Research	3
Association of Monterey Bay Area Governments	5
Santa Cruz Metropolitan Transit District	7
Santa Cruz Metropolitan Transit District	10
Santa Cruz County Transportation Commission	13
EDAW	17
City of Santa Cruz	26
Save Our Shores	31
Santa Cruz County Farm Bureau	56
Fellow Feathers	58
Tim Arai	60
Frederick Hutchinson	62
Tom Cumming	64
South Bay Naturists	66
Marin County Hang Gliding Association	69
William Rick	71
Andrew Whitehill	73
The Kolar Family	75
The California Native Plan Society	81
Sierra Club	83
May 23rd Board of Supervisors Meeting	101
MITIGATION MEASURES MASTER LIST	103



## INTRODUCTION

Under the State CEQA Guidelines, the County of Santa Cruz is required, after completion of a Draft Environmental Impact Report (EIR), to consult with and obtain comments from public agencies having jurisdiction by law with respect to the proposed project, and to provide the general public with opportunities to comment on the Draft EIR. The County also is required to respond to significant environmental points raised in the review and consultation process. This Final EIR has been prepared to respond to the public agency and general public comments received on the General Plan for the North Coast Beaches Draft EIR circulated for review between April 15 and June 1, 1989. It responds to both written comments received by the County and oral testimony presented at the May 23, 1989 Board of Supervisors meeting.

The Final EIR has been prepared in the form of an attachment or addendum to the Draft EIR as allowed by the State CEQA Guidelines. This document and the Draft EIR, herein incorporated by reference, constitute the Final EIR.

This Final EIR presents a copy of each written comment received on the Draft EIR followed immediately by County (lead agency) responses to significant environmental points raised in the letter. A summary of public testimony received at the Board of Supervisors meeting, and response to significant environmental points raised, is also presented.

In several instances the written and oral comments address the merits (not the environmental effects) of the proposed General Plan; thus no response is necessary in the Final EIR. These comments have, however, been included in the Final EIR. Inclusion of these comments in the Final EIR will make the commentator's views available to public officials to take into account when they make decisions on the General Plan and the content of that plan.

A master list of mitigation measures recommended in the EIR is included as the final section in the Final EIR.





## ICE OF PLANNING AND RESEARCH

EARTH STREET  
SANTA CRUZ, CA 95814

June 5, 1989

Pete Parkinson  
County of Santa Cruz  
701 Ocean Street, Room 400  
Santa Cruz, CA 95060Subject: General Plan for the North Coast Beaches  
SCH# 88101121

Dear Mr. Parkinson:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The state agency review period is now closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please contact Loreen McMahon or Marilyn Nishikawa at 916/445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse regarding this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

A handwritten signature in black ink, appearing to read 'David C. Nunenkamp'.

David C. Nunenkamp  
Chief  
Office of Permit Assistance

RESPONSE TO COMMENTS OF DAVID C. NUNENKAMP, STATE OF CALIFORNIA,  
OFFICE OF PLANNING AND RESEARCH

Comment 1.

Comment acknowledged; no response necessary.





ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

MAIL ADDRESS P O BOX 190 MONTEREY CALIFORNIA 93942 • TELEPHONE (408) 373-6116  
OFFICE LOCATION 977 PACIFIC STREET

May 24, 1989

Pete Parkinson  
Environmental Coordinator  
County of Santa Cruz  
701 Ocean Street  
Santa Cruz, CA 95060

Re: MCH #058912 - Draft EIR  
General Plan for North Coast Beaches

Dear Mr. Parkinson:

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

- ① The AMBAG Board of Directors considered the project on May 10, 1989 and had no further comments at this time.

Thank you for complying with the Clearinghouse process.

Sincerely,

Nicolas Papadakis  
Executive Director

NP:bp

RESPONSE TO COMMENTS OF NICOLAS PAPADAKIS, ASSOCIATION OF MONTEREY  
BAY AREA GOVERNMENTS

Comment 1.

Comment acknowledged; no response necessary.

Santa Cruz Metropolitan  
Transit District



May 24, 1989

Mr. Pete Parkinson  
Environmental Coordinator  
Santa Cruz County Planning Department  
701 Ocean Street  
Santa Cruz, CA 95060

RE: DEIR on the General Plan for Six North Coast Beaches

Dear Mr. Parkinson:

This letter constitutes a single consolidated District response to the DEIR. It incorporates by reference the earlier comments made by the District Route & Service Planning Department (Attachment A - May 11, 1989 letter by Linda Fry, Service Planning Supervisor).

In her letter, Ms. Fry recommends that in the "Summary of Principal Findings" the mitigation to the "Traffic and Circulation" listed on page 14, be amended to include provision of bus turnouts, stops and shelters consistent with District standards.

It is necessary that the mitigation measures be adopted with that specificity. If only reference is made to "provide well marked bus stops at beaches as they are improved" (page 120, 6th paragraph), it will be impossible to implement such a program. As these stops are located along a State highway, Caltrans will, as they have in the past, expect that complete bus turnouts be constructed according to State standards. No State encroachment permits are given for the installation of bus stop signs without this provision of a dug-out that gets the bus out of the travelled right-of-way. The cost of an "average" turnout with amenities ranges from \$15,000 - 25,000 depending on the surrounding terrain.

Construction cost for 12 improved bus stops (6 in- and 6 outbound), may vary from \$180,000 to \$300,000. These improvement costs should be included in the total project cost if transit is to be used to enhance the use of these beach areas and provide mitigation of the cumulative traffic/circulation impacts.

The second point related to the second overall mitigation measure (page 120, paragraphs 8 and 9), suggesting the use of the existing Southern Pacific Railroad for passenger rail service to the beaches.

As you may be aware, the District is currently conducting a feasibility study on the use of the so-called "suburban corridors" in Santa Cruz County for commuter and recreational

Mr. Pete Parkinson  
May 24, 1989  
Page 2

purposes. This study will be completed this summer and includes the Santa Cruz to Davenport rail line. It will, among other things, review the concept of using large private parking facilities in Santa Cruz during the weekends as a staging area/park & ride point to the North Coast beaches by train.

We would recommend that you make reference to this study and its potential as well as its need to incorporate accessible boarding platforms (in and outbound) with seating and shelters in both the environmental and capital cost sections of the plan.

Thank you for the opportunity to review and comment. If you need more information or clarification, please contact me at 425-6022.

Sincerely,



ED VAN DER ZANDE  
Director of Strategic Planning  
and Development

EVDZ:lp

cc: Linda Fry  
Scott Galloway  
David Konno

RESPONSE TO COMMENTS OF ED VAN DER ZANDE, SANTA CRUZ METROPOLITAN  
TRANSIT DISTRICT

Comment 1.

As this comment states, Caltrans will require that complete bus turnouts be constructed to State standards before bus stops can be made at the beaches. Accordingly, it is recommended that bus turnouts be added to the plan's mitigation measures. It should be noted, however, that this mitigation measure is not required to reduce project induced impacts to insignificant levels.

It should be noted that providing bus service to the beaches would potentially improve traffic operations on Highway 1 by reducing the number of people who drive. Therefore, it would not be unreasonable for Caltrans to share in the cost of the required bus turnouts.

The construction cost of these bus turnouts, as noted in the comment, could range from \$15,000 to \$25,000 (but could be higher, depending on the magnitude of work required, at specific locations). Each beach would require two bus stops, one for northbound stops and one for southbound stops. In addition to the stops, cross walks would be required for northbound bus passengers to cross Highway 1.

An alternative to building bus stops could be routing buses through each beach's parking lot, and unloading passengers there. This alternative is not recommended because it would take a significant amount of time and would require buses to turn across travel lanes into and out of the parking lots. It would also interfere with parking lot operation.

Comment 2.

The comment states that a study entitled "Suburban Corridors Study" by the Santa Cruz Metropolitan Transit District is currently being done on using rail rights-of-way for recreational transit service. The study will include the Santa Cruz to Davenport rail line and will be completed in the Summer of 1989. While this type of transit service has a strong potential for increasing transit access to the North Coast beaches, it is premature to plan the specific facilities required to implement it. These types of facilities are more appropriately studied as part of the rail service planning effort. However, care should be taken to ensure that nothing proposed in the General Plan would preclude the opportunity for accessible boarding platforms (in both directions), passenger shelters, and other requirements for train service. Furthermore, implementing this transit service should be encouraged as part of the beaches development plan.

Santa Cruz Metropolitan  
Transit District



May 11, 1989

Environmental Coordinator  
Santa Cruz County Planning Department  
701 Ocean Street  
Santa Cruz, CA 95060  
ATTN: Mr. Pete Parkinson

RE: DEIR on the General Plan for Six North Coast Beaches

Dear Mr. Parkinson:

Thank you for the opportunity to review and comment on the DEIR on the General Plan for North Coast Beaches.

In the discussion of the mitigated alternative, the plan calls for developing an "environmentally sensitive means of access." The first means of achieving this goal is a discussion of more frequent service on Santa Cruz Metro's Route 40 Davenport. This section also suggests a number of other measures that might be taken to make transit "more attractive to potential patrons". One of these measures is to "provide well marked bus stops as they are improved."

As these beach facilities are improved and upgraded, demand for transit service will inevitably increase.

The DEIR states that the transportation improvements in the plan are consistent with the Regional Transportation Plan.

The first two of three primary goals of the RTP are:

1. To provide safe, efficient, energy-conserving, convenient, comfortable, coordinated, and healthful modes of travel for all people and goods.
2. To establish a transportation system consistent with the community's ability to pay and to promote the wise and prudent use of all resources, particularly energy and clean air resources.

In light of these goals, which should be prime directives guiding the development of the plan, I believe that the emphasis on capital improvements for access to beaches should be considerably strengthened in the area of provision of adequate bus turnouts, stops, shelters, and pedestrian safety amenities. In terms of bus stops, the plan calls only for bus stops that are "well marked." The plan, in this area, is inadequate and is inconsistent with the RTP.

(2) Specifically, there is a need for turnouts with acceleration-deceleration lanes, with pavement specifications that are adequate for bus traffic. There should be provision of pads and shelters that are designed to accommodate wheelchair loading, with adequate access to shelters for wheelchair riders. Bus loading spaces should be of sufficient length to accommodate a bus equipped with a bike rack. There should also be careful design of a means for pedestrians to cross the highway. Moreover, there should be bus stops on both sides of the highway, whenever possible.

In the "Summary of Principal Findings" (on page 14), the plan lists only one impact and mitigation related to transit services in the entire section on "Traffic and Circulation." This section reads as follows.

IMPACT

Although the plan identifies bus stops at each beach there are no programs to increase the use of transit services of beach patrons.

LEVEL OF SIGNIFICANCE

(3) Without mitigation: Less than significant  
With mitigation: Less than significant

MITIGATION

Programs should be implemented to increase the use of transit services by beach patrons.

I would suggest that the level of significance of this impact be upgraded to significant, given the Regional Transportation Plan's emphasis on the provision of energy-conserving modes of travel, and the wise use of energy and clean air resources.

(4) I would also suggest that the mitigation be amended to include provision of bus turnouts, stops, and shelters consistent with District standards.

Thank you again for the opportunity for review and comment.

Very truly,



LINDA S. FRY  
Service Planning Supervisor

LSF:se

cc: Scott Galloway  
David Konno

RESPONSE TO COMMENTS OF LINDA S. FRY, SANTA CRUZ METROPOLITAN  
TRANSIT DISTRICT.

Comment 1.

This comment discusses transit service and consistency with the county's Regional Transportation Plan (RTP). As discussed above (see Response to Comment 1 of Ed Van Der Zande, Santa Cruz Metropolitan Transit District), it is recommended that additional facilities be provided at bus stops for each beach. Furthermore the EIR recommends (DEIR pages 119 - 121) several transportation strategies designed to meet the RTP's goals. These recommendations include improved bus service, recreational rail service (see Response to Comment 2 of Ed Van Der Zande, Santa Cruz Metropolitan Transit District), and improved bicycle facilities.

Comment 2.

As discussed above, bus turnouts should be provided at each beach as it is developed. The turnouts should be designed to State standards and should include provisions for wheelchair passengers. Bus stop planning must include safety considerations for passengers crossing Highway 1 (see Response to Comment 1 of Ed Van Der Zande Santa Cruz Metropolitan Transit District).

Comment 3.

Implementation of the General Plan would not be expected to generate significantly increased vehicular traffic because additional visitorship at North Coast beaches is projected to result primarily from greater interest in recreational activities by the public in general and from population growth in urban areas with access to the program area. Thus, there would not be a significant adverse environmental impact expected for which mitigation would be required in order to reduce the severity of (or eliminate) impacts. Because it may be desirable from a public policy standpoint and would be commendable from an environmental perspective to implement programs which would increase the availability and use of public transit in the North Coast beaches' area, such a mitigation measure is included in the EIR for consideration by County decision-makers. Those decision-makers can direct that this measure is incorporated into the General Plan; because the County ultimately takes "authorship" of the EIR before certifying it as complete, those decision-makers also can determine that the impact addressed in this comment has local significance and can require implementation of the recommended mitigation measure.

Comment 4.

As discussed above in Response to Comment 1 of Ed Van Der Zande Santa Cruz Metropolitan Transit District, bus turnouts consistent with State standards are now recommended for inclusion as mitigation measures for the project.



June 1, 1989

Pete Parkinson  
Environmental Coordinator  
Santa Cruz County Planning Department  
701 Ocean Street  
Santa Cruz, California 95060

RE: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) ON THE GENERAL PLAN  
FOR SIX NORTH COAST BEACHES

Dear  Mr. Parkinson:

Santa Cruz County Transportation Commission (SCCTC) staff has reviewed the DEIR on the General Plan for Six North Coast Beaches, and commend the consultant and county on a good document. We have the following general comments:

- ① o The DEIR should note that the Santa Cruz County Service Authority for Freeway Emergencies (SAFE) is developing a plan to install motorist aid call boxes along state highways in the county. Highway 1, from the Santa Cruz city limits to the San Mateo County line, has tentatively been identified by the SAFE to receive call boxes.
- ② o It is not clear which agency will be responsible for the mitigations noted in the traffic section. Since this has been a topic of discussion between the Transportation Commission, County and Caltrans, some acknowledgement of the unresolved issues is necessary.
- ③ o The Final EIR should describe whether bicycle facilities (posts, lockers) will be provided at each beach location.
- ④ o The Transportation Impact Study for the plan should be included as an appendix to the Final EIR.

Thank you for the opportunity to review the DEIR for the General Plan Six North Coast Beaches. If you have any questions, please contact S. Ted Lopez of my staff at (408) 425-2776.

Sincerely,  


Linda Wilshusen  
Executive Director

LW/TL  
cc: AMBAG

RESPONSE TO COMMENTS OF LINDA WILSHUSEN, SANTA CRUZ COUNTY  
TRANSPORTATION COMMISSION

Comment 1.

Comment noted. The following text should be added to the EIR (DEIR page 101 after paragraph 5).

"The Santa Cruz County Service Authority for Freeway Emergencies (SAFE) is developing a plan to install motorist aid call boxes along state highways in the County. Highway 1, from the Santa Cruz City limits to the San Mateo County line has tentatively been identified by the SAFE to receive call boxes."

Comment 2.

Responsibility for traffic mitigation measures would be as follows:

Bus Service Improvements: Santa Cruz Metropolitan Transit District, as part of a general County-wide program to increase transit use.

Bus Turnouts: Caltrans/County, bus turnouts will improve traffic operations on Highway 1 and responsibility for implementing them should be shared by the County and the State.

Parking Restrictions - Signs: County, as part of individual beach improvement programs.

Parking Restrictions - Enforcement: California Highway Patrol, as part of their normal responsibilities supplemented with additional personnel when possible.

SP Davenport Line Rail Service: Study is currently being performed.

North Davenport Landing Road/Highway 1 Intersection: County, as part of Davenport Landing Beach Development Plan.

Pedestrian Crossing Signs: County, as part of individual beach development plans.

Comment 3.

No provision for bicycle racks or lockers is included in the General Plan. It was believed that most bicyclists would prefer to keep their bikes with them rather than lock them up at a beach parking lot. However, bicycle racks could be provided if desired.

Comment 4.

As noted in the EIR (DEIR page 101), the Transportation Impact Study prepared for and excerpted in the EIR is on file with and available for public review at the Santa Cruz County Planning Department, Governmental Center, 701 Ocean Street, Santa Cruz.

May 26, 1989

Ben Angove  
 SCSPCS  
 701 Ocean Street, Room 220  
 Santa Cruz, California 95060

Landscape Architecture  
 Planning  
 Urban Design  
 Environmental Analysis  
 Site Engineering  
 Graphic Design

Dear Ben:

I have reviewed the DEIR for the North Coast Beaches General Plan and offer the following brief comments for your consideration.

Page 6

- ① It should be clarified that the 30-vehicle parking lot at the north end of Scott Creek has not been included as a development cost; that the plan considers it only as a potential future item for further consideration if at some point in time in the future the need for it resurfaces. This clarification may allow you to argue that the Plan will therefore have no significant impacts relative to this particular item.

Pages 9, 40, 75 & elsewhere

It should be pointed out that while some coastal scrub habitat may be removed with expansion of parking at Scott Creek and Bonny Doon Beaches, that the Plan also proposed to reestablish coastal scrub at various locations at three of the beaches (Scott Creek, Bonny Doon and Yellowbank) and to further plant T&E species at Scott Creek.

- ② It is suggested that the 110-vehicle parking lot at Scott Creek "cannot be mitigated to a less than significant impact level as presently proposed" but does not explain how this conclusion was drawn. I believe Harvey and Stanley would not agree with this. (They are reviewing this).

The County could consider building a parking lot that is smaller (50 to 80 vehicles). This is less than current capacity along the highway, but fewer cars may park at the more remote south end.

Page 10

- ③ The fencing "gap" at Laguna Creek accommodates the Creek flowage across the beach; not a likely source for human entrance into the wildlife area. The gap can be adjusted as the creek changes. Additional signs could help minimize potential human intrusion.

Page 11

- ④ The DEIS that "the only way to reduce environmental impacts to a less than significant level would be to eliminate policy to remove flashboard dams and similar diversion structures." The following should be added "if the analysis does in fact indicate that the removal of such structures will have a significant adverse impact."

EDAW, Inc.  
 753 Davis Street  
 San Francisco, CA 94111  
 415 433-1484 Telex 340604  
 FAX 415 788-4875  
 License No. 1947

San Francisco  
 Alexandria  
 Atlanta  
 Fort Collins  
 Irvine  
 Seattle  
 Phoenix  
 San Bernardino

Page 12

- ⑤ I question the need for such a large (50-foot) buffer setback of trails from agricultural fields.

- ⑥ In regard to visual impacts: the parking lot cut slope at Scott Creek will not have any visual impact because it won't be seen except from the parking lot. No cutting is proposed at Davenport Landing. The existing cut slope at the Laguna Creek parking lot is already an eyesore; the proposed expansion will actually significantly reduce this visual impact.

Page 13

- ⑦ If the County does not want parking along Bonny Doon Road, "no parking" signs should be proposed along the road for several hundred feet back from Highway 1.

Page 15

- ⑧ If necessary, it could be explained that overpasses and underpasses were considered and discarded as viable options due to opposition from Caltrans (underpass), high costs, high visibility, and as "too developed" for the rugged coastline setting.

Page 39, 4th paragraph

- ⑨ Contrary to the DEIR, regular garbage collection is proposed. Before recycling facilities at each beach are recommended, you might investigate whether or not this has been successful at similar places.

Bottom page 46

- ⑩ Run-off from the parking lot at Scott Creek could be handled with a channel to the beach that is rock lined in a natural appearing way, or vegetated with a dense native groundcover.

Page 48, 2nd paragraph

- ⑪ The DEIR infers that artificial sandbar breaching at Scott Creek is being caused by recreationists, when it is reportedly being done by farmers who are trying to minimize flooding upstream. The whole discussion about temporary picket fencing to control foot traffic on the beach seems pointless.

Page 49, paragraphs 3 & 4

- ⑫ The new road into the proposed parking lot at the south end of Scott Creek should have a culvert. I was aware of this need and neglected to specifically mention this as part of the highway improvements. Many of the highway improvements will require some drainage modifications; highway civil engineers will determine precisely what is needed during the design and engineering phase.

Page 51, Fire Rings

- ⑬ Management would need to remove fire rings each season; that is easily done.

Page 52. Stairways

- (14) The consultant evidently overlooked the discussion of rehabilitation of the cut slope at the Bonny Doon parking lot (page 49, NCB General Plan).

Page 60. Widening, last paragraph

- (15) A drop box culvert pipe system and asphalt lined ditch is not necessarily an appropriate drainage improvement at Yellowbank Beach or elsewhere. Less expensive, more natural solutions are preferable, as described above. Whoever does the eventual drainage engineering should be directed accordingly.

Top of page 62

- (16) Again, a simple stair system is preferable to a concrete ramp in this rural and remote natural setting.

Page 76. Laguna

- (17) A pipe fence barrier along the entire length of the railroad right-of-way is excessive and unnecessary.

Bottom of page 80

- (18) Currently used pesticides are not highly toxic according to representatives of the Farm Bureau who attended the meeting held several months ago to discuss agricultural impacts.

Exhibit 12. Photo A

- (19) This photo misleads readers into thinking that the parking lot will be seen in this viewshed when, in fact, it will be behind the hill in photo B.

Page 116, bottom of page

- (20) If alternatives to the designated location for the 110-vehicle parking lot at Scott Creek are not acceptable, and neither is the existing situation, then more credit should be given to the proposed solution which has the least amount of impacts, particularly visual.

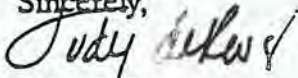
Page 121, paragraphs 5 & 6

- (21) Attention to cultural resources should be completely avoided, including suggested fencing and signs.

Page 122. Irreversible

- (22) Loss of rare plant and coastal scrub habitat will not be irreversible because of proposed planting and rehabilitation.

Sincerely,



Judy deReus  
Planner

## RESPONSE TO COMMENTS OF JUDY DEREUS, EDAW

### Comment 1.

The 30-vehicle parking lot referred to by this comment and addressed in the EIR (DEIR page 6) is shown on Exhibit 3 (DEIR page 24) as "30 Future Parking Spaces". In accordance with the California Environmental Quality Act (CEQA), EIRs are required to assess the impacts of all facets of a proposed project, including a series of actions set forth in a public policy or planning document which may occur over a period of time but which are contemplated as part of the "project". The reason for including the entire project is to disclose all of the probable effects which could be attributable to the proposed action and for which mitigation measures may need to be identified and incorporated into the project's design, implementation, or operation. In the case of this EIR, it is a "Program EIR", thus an environmental document designed specifically to anticipate and address a series of related actions in a defined geographical area.

Every EIR, whether a "Program EIR" or not, is required to be an objective, public disclosure document which does not take a position in favor of or opposed to the project examined. The purpose of EIRs, therefore, is not to diminish the significance of the environmental effects of projects but to inform decision-makers and the public about the consequences of proposed activities in order to permit officials to make informed decisions. Upon examination of the analyses presented in an EIR, decision-makers may determine that the benefits of a proposed project outweigh the unavoidable adverse environmental effects, in which case "the adverse environmental effects may be considered 'acceptable'".

### Comment 2.

The restoration of coastal scrub habitat at several of the North Coast Beaches is, in theory, responsive to the needs of impacted scrub communities. However, revegetation programs specifically designed for restoring this community type have not yet been attempted to date. There is correlative evidence that rocky road cuts or railroad bed cuts (for example along Highway 1) will naturally recover to this community type over time. The length of time required for this to occur is not known. The preparers of the EIR believe that before such a large cut and removal of habitat is considered that restorative recovery be demonstrated at sites currently in need of rehabilitation (for example, Bonny Doon Beach). Until such time that successful revegetation of this community has been demonstrated, the impact of the proposed 110-vehicle parking lot at Scott Creek Beach can not be reduced to "Less than Significant".

### Comment 3.

It is unclear why fencing to protect the Snowy Plover nesting area is designed with a gap where the creek flows across the beach. It is true that the gap can be adjusted as creek flows change. However, by closing the fencing entirely it would afford the nesting population further protection from dogs and other feral species that might access the area through the creek. It was also observed that beach users did access this portion of the beach by wading through the stream.



Comment 4.

Comment acknowledged. Based on the information presently available and discussed in the EIR text (DEIR pages 86-87), however, there does not appear to be a way to reduce the impact on agriculturalists to insignificance short of eliminating the proposed policy on flashboard dam removal from the General Plan.

Comment 5.

Comment noted. This distance was recommended by local farmers who were contacted during the preparation of the EIR. The commentor is referred to the EIR text discussion of this issue (DEIR page 84).

Comment 6.

The EIR text (DEIR page 94) states that "the cutslope [at the 110-vehicle Scott Creek Beach parking lot] would, however, be visible to users of the parking lot", as noted in this comment. Due to the subjective nature of visual and aesthetic impacts, this alteration could be seen by some viewers in the parking lot as an adverse visual impact, as acknowledged by the EIR.

The EIR text (DEIR page 94) states that "the General Plan recommends grading along Davenport Landing Road ..." and concludes (DEIR page 99):

Assuming that efforts for revegetation of the cutslopes are undertaken and are successful, such grading would result in a "cleaning up" of the existing conditions resulting in an overall improved visual quality at this location.

Due to the subjective nature of visual and aesthetic impacts noted above, some viewers of the Laguna Creek Beach parking lot may agree with the comment that the existing conditions constitute an eyesore, and some may not. The EIR text (DEIR page 99) discusses the possibility that expansion of this parking lot could "reduce the adverse visual impact of the existing cutslope", noting that this would depend on the amount of grading ultimately involved and the extent to which the resulting cutslope could be revegetated. The net visual effect of the parking lot's expansion still would vary from viewer to viewer.

Comment 7.

The comment does not relate to the EIR text (DEIR page 99) or Summary of Principal Findings (DEIR page 13) discussions of probable visual impacts at Bonny Doon Beach in which no mention is made of parking on Bonny Doon Road. It should be noted in response to this comment, however, that placement of "no parking signs" on Bonny Doon Road for several hundred feet from Highway 1, as suggested by the comment, could be interpreted by some viewers as resulting in visual impacts, in which case, a measure to mitigate one impact could cause another impact.

Comment 8.

Comment noted. Inclusion of this comment in the Comments and Responses Addendum will make this information available to decision-makers and the public. It should be recognized, however, that the EIR addresses the potential impacts of an overpass or underpass on Highway 1 which "would likely have its own environmental impacts. ... If such an overpass or underpass is further considered, the potential impacts would also need to be further studied" (DEIR page 117).

Comment 9.

Comment acknowledged. One of the objectives of the General Plan is to (Plan page 6):

Promote a clean, enjoyable, and well-managed recreational environment by providing sanitary/garbage collection services and facilities.

The General Plan lists the proposed provision of "trash containers at various locations" (Scott Creek, Bonny Doon, Yellowbank, and Laguna Creek Beaches) or "at the beach and trailhead" (Panther Beach), as noted in the EIR (DEIR page 39). The proposed General Plan further implies that garbage would be collected; the amount of \$40,000 shown in Tables 13 and 14 (Plan page 68) for "sanitary services" includes "garbage collection and vault toilet pumping by private contractors".

The recommendation in the EIR to encourage recycling (DEIR page 39) was made in response to adopted County policies already contained in other documents so that the proposed General Plan for North Coast Beaches would be consistent (conform) with this existing public goal. In that context, the success (or not) of recycling at other beach locations is not germane. Source separation of recyclable materials from non-recyclable refuse, however, has been found to reduce the volume of the solid waste stream substantially. In as environmentally conscious a community as Santa Cruz County, it could be expected that provision of containers where beachgoers could separate and dispose of their recyclable materials and non-recyclable garbage would be welcome and would encourage (or reinforce) source separation by integrating recycling in recreational activities to the same extent that recycling is customary and automatic at home or work.

Comment 10.

The slope, on which the existing crude trail to the beach is located, is the location of the proposed stairway to the beach as well as the most likely location for discharge of parking lot runoff. This slope is presently in excess of 100 percent gradient. It may be possible to construct a rock-lined drainage channel here, but the rocks would probably have to be set in concrete to prevent their being carried downslope during peak runoff. It may also be possible to establish native, dense groundcover vegetation on this slope, however, a biologist experienced in establishing vegetation in a runoff channel should be consulted for effective means of accomplishing this task.

Comment 11.

The EIR (DEIR page 47) discusses the sand bar that forms across Scott Creek every year. As stated in the EIR the trail from the proposed 30-vehicle parking lot leads to the spot on the beach where the sand bar is most sensitive to breaching. Furthermore, the General Plan does recommend construction of a semi-portable log bridge where Molino Creek and Scott Creek meet and flow across the beach to prevent beach visitors and others from artificially breaching the lagoon. Therefore, regardless of who has caused the artificial sandbar breaching at Scott Creek in the past there is a concern that beach goers in the future may cause artificial breaching of the sand bar across the mouth of the creek.

The comment seems to imply that it will be futile to try to use structural means to prevent artificial breaching of the sand bar by beach goers. The comment may very well be correct. The EIR, however, was responding to a concern raised in the General Plan that an attempt be made to stop the artificial breaching.

Comment 12.

It is agreed that the new road into the proposed parking lot at the south end of Scott Creek would likely require a culvert to take care of drainage.

Comment 13.

The EIR (DEIR page 58) does acknowledge that the General Plan does state the need to remove the fire rings from Davenport Landing Beach each fall and replace them each spring.

Comment 14.

It is assumed that the cutslope referred to in the comment is the existing cutslope between the parking lot and the railroad tracks. The proposed rehabilitation measures for the eroded gullies on this cutslope were not overlooked in the EIR.

According to Southern Pacific Railroad maintenance personnel, the existing erosion is a severe problem and all of their efforts to mitigate the use of the trails have failed, including the placement of large boulders in the trails. It is the opinion of the preparers of the EIR that the use of "snow fences", such as proposed for the rehabilitation areas at Scott Creek and Laguna Creek beaches would be a good addition to the rehabilitation efforts proposed for the cutslope at Bonny Doon Beach. Furthermore, it is the opinion of the preparers of the EIR that unless a third stairway is built in the center of the parking lot there is a high potential that beach goers will take the quickest path to the beach, up the rehabilitating erosion gullies.

Comment 15.

It is possible that a rock lined ditch or dense groundcover vegetation would suffice to mitigate erosion from the parking lot runoff. The effectiveness of these measures should, however, be evaluated on a site specific basis.

Comment 16.

It is true that a simple stairway would be aesthetically preferable to a concrete ramp in this setting. The concern, however, is that wave runup and coastal erosion considerations would render such a stairway unacceptable from a geologic hazard standpoint. Even the concrete ramp could become damaged by natural forces, however, it is the experience of the EIR preparers that concrete structures withstand extreme natural coastal forces better than a wood structure.

The location of the proposed access stairway or ramp would be situated in a location where it would be exposed to intense wave action during major winter storms such as occur along the Pacific Ocean coastline in Santa Cruz County on the average about every five years.

Whatever form of structural access is designed for this site, an engineering geologist knowledgeable in design of coastal structures should review the design and evaluate its adequacy under the potentially extreme adverse conditions that it would be required to withstand.

Comment 17.

The barrier should be of sufficient length to prevent vehicular access via the railroad right-of-way from entering the marsh area by the existing farm access road. It is not necessary for it to be along the entire length of the beach.

Comment 18.

Pesticide use has long been a controversial issue both within the agricultural community itself and between farmers and non-farmers whose opinions about toxicity, environmental consequences, health risks, and other concerns differ dramatically. In examining land use conflicts, this EIR addresses and discloses but cannot resolve those differences.

Current practice, however, whereby agricultural workers stay out of artichoke fields for four to five days after pesticides have been sprayed (a somewhat shorter time in Brussels sprout fields), suggests that these compounds pose some risk to human health or welfare (see DEIR page 81). The General Plan itself states that "many of the pesticides used in the cultivation of Brussels sprouts are extremely toxic to humans and fish. They are particularly toxic for at least several days following application" (emphasis added) (Plan page 37).

Comment 19.

The caption for Exhibit 12-A notes that the view shown in this photograph is "near" the parking lot but, contrary to the comment, shows the location of the 110-space parking lot west (left) of the bluff pictured in the foreground of this exhibit. The comment is correct in noting, however, that the proposed 110-space parking lot would be located west (right) of the hill shown in Exhibit 12-B.

Comment 20.

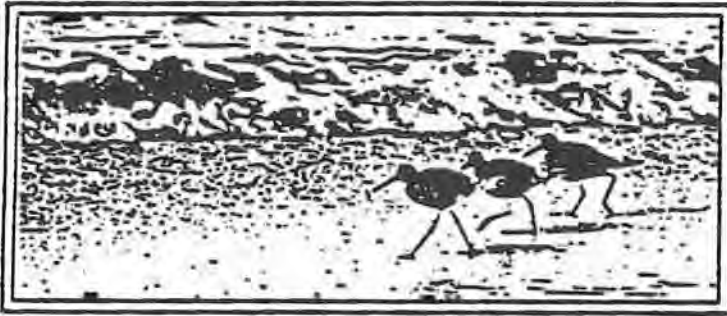
Comment noted; it addresses the merits of the proposed General Plan, not the adequacy of the environmental analysis, thus no response is needed.

Comment 21.

The mitigation approach suggested by this comment -- to avoid drawing attention to cultural resources (implying that this would reduce the potential for disturbance or collection) -- conflicts with the recommendation of the EIR archaeologist and with the EIR's finding that "cultural deposits can be disturbed by the most well-meaning visitors" (DEIR page 119).

Comment 22.

Contrary to the comment, the loss of existing biotic habitat (flora) would indeed be irreversible, notwithstanding the availability of mitigation measures which potentially could reduce the severity of (or eliminate) the impact. The effectiveness of restoration activities to mitigate that impact would depend on many factors, however, such as substrate conditions, soils types, textures, fertility, depths, and other site environmental characteristics as noted, for instance, on DEIR page 70.



## City of Santa Cruz

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SANTA CRUZ, CALIFORNIA 95060  
PLANNING AND COMMUNITY  
DEVELOPMENT  
TELEPHONE (408) 429-3555

May 25, 1989

Pete Parkinson  
Environmental Coordinator  
County of Santa Cruz  
701 Ocean Street, Rm. 400  
Santa Cruz, CA 95060

Re: Draft Environmental Impact Report on the General Plan  
for Six North Coast Beaches

Dear Mr. Parkinson:

Thank you for the opportunity to comment on the draft EIR. The City has comments in two areas.

One concern relates to water. Part 4.5 "Land Use - the Impacts", pg. 86, correctly indicates that the loss of Laguna Creek as a source of supply to the City of Santa Cruz would constitute a significant impact, not only in drought years, but in all years. Laguna Creek has been a major source of water supply for the City since 1890, at which time the City purchased downstream riparian rights to the waters of Laguna Creek. This source currently represents 12½% of the City's annual supply, and is the best quality water in the system. For these reasons, the City has been very protective of this source for the past 100 years.

The discussion of the elimination of creek diversions also indicates potential significant impacts on coastal farmers. The City's concern is with the conclusion that "... loss of irrigation water would reduce land in production." This may not be the only result. It is equally likely that farmers would try to find water elsewhere, e.g. from the City of Santa Cruz Water Department's system or from increased well production. Either of these alternatives would have consequences potentially more unattractive than current practices.

As established customers of the City of Santa Cruz Water Department, the irrigation accounts on the North Coast occasionally place a heavy demand on the City water system. During these occasions, very little of the coastal water is available to other customers. For short durations, this use can be accommodated. For longer periods, this practice would represent a vastly increased burden on the system.

The other avenue which farmers might pursue is increased well production. A recent examination of well data relating to the North Coast indicates a deposit of

Santa Margarita aquifer of limited extent, into which most irrigation wells are tapped. This aquifer, during mid to late summer, is in a state of overdraft. Its location along the coast poses the continual threat of sea water intrusion should it be continued to be mined.

In Part 4.9, "Land Use - Mitigation Measures," pg. 87, the City of Santa Cruz is in agreement with the maintenance of the City's rights on Laguna Creek. Further, as indicated by previous comments, it is the City's position that preventing the continued use of the coastal streams by farmers could be very problematic.

① If the General Plan for Six North Coast Beaches ultimately proposes the elimination of flashboard dams which farmers use to divert water for purposes of irrigation, then the final EIR must evaluate the potential impact on the City water system, and the potential impact on groundwater extraction. It is probable that before a farmer will take land out of production, he or she will attempt to substitute water from other sources. Thus the potential loss of City water to North Coast farming should be evaluated in terms of the potential environmental impacts resulting from the need to find water elsewhere. It is clear that the City could not absorb the loss of significant amounts of water. Substitute sources would have to be found.

The final EIR should also evaluate the substitution of groundwater for water lost through General Plan policy. Significant adverse impacts may result from increased ground water extraction resulting from any prohibition of North Coast farmers to use flashboard dams and surface diversions for irrigation.

② The second concern relates to public safety. In response to the Notice of Preparation of the draft Environmental Impact Report, the City expressed a concern relating to public safety impacts. While in a strict sense impacts on City police services may not represent physical impacts on the environment, the City's concern nevertheless involves physical impacts on North Coast beaches. Both the existing level of beach use, and an increased level of beach use which is likely as a result of proposed improvements, will have physical adverse impacts because these beach areas are not policed or only minimally policed. There is a good probability that these areas will suffer increased and ongoing vandalism and destruction unless they are better supervised. An obvious mitigation measure to protect natural features and other conditions of the physical environment is an increased police presence along the North Coast. To the extent that such a mitigation measure is implemented, it would address the City's concern about demand on its own police services.

The final EIR should evaluate and recommend increased police service as a mitigation measure to the impact of use on the physical environment. There was a suggestion in the City's response to the Notice of Preparation that "highway emergency phones", might also be placed at strategic points at various beach locations. This suggestion was not included as a mitigation measure in the draft EIR.

Pete Parkinson, County of Santa Cruz  
RE: Draft EIR, Six North Coast Beaches  
Page -3-

Thank you for considering these points in the preparation of the final EIR. Please let me know when the Board of Supervisors will consider the final EIR.

Sincerely,



PETER KATZBERGER  
Director of Planning and  
Community Development

cc: Water Director  
Chief of Police



RESPONSE TO COMMENTS OF PETER KATZLBERGER, DIRECTOR OF PLANNING  
AND COMMUNITY DEVELOPMENT, CITY OF SANTA CRUZ

Comment 1.

The comment is correct in observing that program area farmers would be likely to increase use of groundwater in the event that surface supplies were eliminated with removal of flashboard dams. The effect on the aquifer of increased groundwater pumping for agricultural use has not been determined as part of this EIR's analysis. The increased use of groundwater resources would be expected to contribute cumulatively to depletion of groundwater resources and, therefore, would constitute a cumulative impact of the General Plan's implementation. It is too speculative at this time, however, to estimate how much water would be used for agricultural irrigation either from groundwater sources or from City water supplies. Consequently, it also is too speculative to assess the severity of that potential on the City of Santa Cruz.<sup>1</sup>

The EIR does recommend mitigation measures related to the removal of flashboard dams and similar diversion structures plus the General Plan's policy regarding water diversion from Scott Creek or Laguna Creek. These measures are recommended to mitigate environmental impacts other than those on groundwater extraction raised in this comment.

Comment 2.

While beach use is not expected to increase as a direct result of the General Plan or from implementation of General Plan programs or facilities per se, some increased recreational demand is expected at North Coast Beaches to correspond with population growth in the South Bay Area and increased enrollments at the University of California (Plan pages 11-14). According to the General Plan (Plan page 14):

Once this plan is implemented, there will be essentially no unmanaged beaches remaining in the area. Initially, use likely will decline, and the type of user may change from young singles to family members.

In this context, the change in composition of beach-goers, if used by proportionately more families than singles as expected, could reduce the number of calls to the County Sheriff's Department. In addition, increased beach management, including the presence of parking or sanitation personnel, could off-set police protection impacts ordinarily attributed to increased beach use which more parking and better beach access could generate and which, in turn, would increase police calls overall.

The Program Area is located within the Santa Cruz County Sheriff's Department "beat" which extends from Live Oak to the San Mateo County line and serves a 30,000-person population.

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<sup>1</sup> According to the State CEQA Guidelines (Section 15145), "If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact".

One officer per shift is assigned to this beat but does not patrol north coast beaches, giving priority instead to residential areas and only responding to specific calls from the Program Area, as noted by the comment. The Department also has a three-person Coast Patrol which operates on Fridays, Saturdays, and Sundays; the Coast Patrol's efforts focus on illegal parking, not the beaches per se.

According to the Sheriff's Department, its two major problems at north coast beaches are safety and litter. Safety problems are worse at night than during the day (uniformed officers do not go to the beaches alone at night) and include serious crimes (rape, murder, etc.). Criminal activity tends to be associated with beach-goers who have been drinking or using drugs. North coast beach users who currently account for the most problems reported to the County Sheriff's Department are predominantly non-Santa Cruz County residents from Santa Clara and San Mateo Counties ("over the hill"). According to the Sheriff's Department, these visitors use North Coast Beaches because of the minimal policing there and do not use City of Santa Cruz beaches which are better policed.

The City of Santa Cruz Police Department is not involved in policing north coast beaches which are outside City jurisdiction. There may be occasions periodically when the County Sheriff's Department would ask for assistance in an emergency. The Sheriff recognizes that the City Police Department cannot spare personnel and has its own police priorities, and the Sheriff's Department would call on other nearby Counties for assistance if needed in an emergency.

The effects of the General Plan on either the County Sheriff's or City Police Departments would not be expected to constitute significant adverse impacts for which mitigation measures would be required. Furthermore, while the County still could incorporate the mitigation suggested by this comment in the General Plan, funding would be required to pay for expanded police protection services or facilities in addition to funds needed for the routine beach operation and maintenance envisaged by the General Plan. Such management would increase the presence of people at the beaches which, in turn, would discourage the types of behavior and activities that result in police calls.

Also see Response to Comment 1 of Linda Wilshusen, Santa Cruz County Transportation Commission regarding the plan to install motorist aid call boxes along state highways in the county.



**save  
our  
shores**

Box 1560 · Santa Cruz, California · 95061

May 22, 1989

Environmental Coordinator  
Santa Cruz County Planning Department  
701 Ocean Street  
Santa Cruz, CA 95060

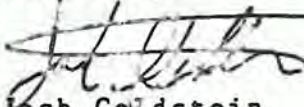
SUBJECT: DEIR ON NORTH COAST BEACHES PLAN

Dear Planning Staff and Nichols/Berman EIR Consultants,

Save Our Shores has studied the DEIR and listed its comments on the following pages attached to this letter. In summary, our organization commends the DEIR for addressing several issues which were not addressed adequately in the North Coast Beaches Plan. The DEIR presents information which makes substantial modifications of the Plan necessary for it to be a useful and supported document. Our comments include statements where we emphasize concurrence as well as statements where we believe the DEIR needs more work before it can be certified as complete. The analysis on geology and soils is the strongest part of the DEIR in our view and quite impressive. The visual analysis is the DEIR's weakest area. It not only needs expansion but needs to consider the proposed visual changes more relative to their setting which results in more significant visual impacts than the DEIR professes as now written.

As always, we are available for your comments or questions. Please provide us with two copies of the final EIR and any other information on the Plan.

Sincerely,



Josh Goldstein  
Chairperson

Attachment

A. GENERAL

1. Page 17, footnote and

Page 21, Exhibit 2 (and several other pages)

We appreciate the DEIR's recognition of incorrectly named beaches in the North Coast Beaches Plan (NCBP). For the record, we wish to reiterate that Chimney Rock Beach is incorretly named "Panther Beach" by the NCBP and that Panther Beach is referred to in the NCBP by its less common name of "Yellowbank Beach."

2. Page 35, Paragraph 2 (and several other pages)

The DEIR refers to the NCBP as the "Proposed General Plan" which is incorrect terminology and confusing to the lay public. A General Plan is the primary land use policy document of a city or county which typically contains policies which are applicable on a city-wide/county-wide basis. The NCBP is actually a Specific Plan, which is a document that contains more detailed (more specific) land use policies than the General Plan and typically applies to a specific geographical area or subregion within the General Plan's jurisdictional boundaries.

3. Page 38, Last Paragraphs

We endorse the DEIR's recommendation of 4 additional

policies for inclusion in the NCBP, but we believe that recommended Policies 3 (access trails) and 4 (pesticide use) need more clarification to be useful. For example, Policy 3 gives no direction towards creating the proposed 50 foot buffer setback and conflicts with Policy 1 statement of retaining the maximum amount of producing farm land in agricultural production. Policy 4 does not even hint at how the Agricultural Commissioner should work with local farmers or what type of actions should transpire.

③  
4. Page 39, Paragraph 4

We applaud your recommendation to also include a policy to promote recycling within the NCBP. We believe that restating all the DEIR's proposed additional policies together in a single list will create a more easy reference tool for local policy makers who will be taking action on the NCBP. Possibly adding this listing to the summary would be most effective.

④  
5. Pages 28 - 39, Several paragraphs

We believe that a sixth additional policy should be included within the NCBP which better addresses the concern of visual impact. We propose the following:

⑤  
Improve the existing and future visual quality of the beaches, access trails and parking areas by working with CALTRANS to

minimize signing along Highway 1 and by removing remnants of former development which are unsightly and no longer in use (e.g., concrete slab).

This type of policy would make the NCBP a document which promotes visual enhancement of the beach areas to a greater degree than currently written.

6. Page 42, Paragraph 1

The statement in this paragraph is accurate but terse. We believe one of the goals of the NCBP is to create a program that is consistent with the County General Plan/LCP. To do otherwise would undercut the public hearing and decision-making process which formulated the General Plan/LCP. This idea should be included within this paragraph.

B. SOILS AND GEOLOGY

1. Pages 46 - 48, All paragraphs and Page 57, Paragraph 3
- Excellent description of the geologic impacts of the proposed 30 vehicle lot north of Scott Creek Beach. This provides a good argument for deleting this proposed improvement as one of the first prerequisites for NCBP adoption. The erosion problems on the trail which will be created by this parking lot are implied but not stated. We suggest stating this problem, which would

further impair safe pedestrian use of the proposed lot-to-beach trail beyond the description provided on Page 47, Paragraph 4 and 5.

2. Pages 48 - 49, All paragraphs

Good description of the problems associated with the proposed 110 vehicle lot at Scott Creek Beach. This provides a good argument for either deleting or modifying this proposed improvement. DEIR should examine a modification of this proposed lot that phases its construction into two or three separate phases or reduces the size of the lot. Would either modification reduce the significance of the stated environmental impacts? Also see comment C.4.

3. Pages 46 - 49, All paragraphs

There is no mention of NCBP proposed road widening for deceleration and turning lanes into proposed 110 vehicle lot. The geological (and vegetative and surface water) impacts of the proposed roadway filling and grading should be addressed.

4. Pages 50 - 41, All paragraphs and Page 58, Paragraph 2.

Good description of the detriments created by proposed parking along the coastal edge of Davenport Landing Road. We believe this presents an adequate argument for restricting all parking to the inland side of Davenport

Landing Road.

5. Page 53, Paragraph 8

DEIR recognizes the proposed filling of a drainage swale near Bonny Doon Beach parking but fails to discuss the impact. What will happen to the surface drainage? Is there an alternative to filling the swale? Could drainage improvements be installed to continue surface water flow prior to filling?

6. Page 59, Paragraph 4

DEIR recommendation for a third stairway at Bonny Doon Beach Parking Lot better meets the NCBP objective to minimize erosion. We agree that the NCBP should be revised to incorporate this particular improvement as one of the most important towards eliminating erosion problems at beach accesses.

7. Pages 59 - 60, All paragraphs and Page 53, Paragraph 3

The excessive length of the proposed parking lot for Bonny Doon Beach needs to be explained. A 900 foot long lot is about 200 feet longer than required to park a single row of 80 standard sized or compact vehicles.

C. VEGETATION AND WILDLIFE

1. Page 70, Paragraph 3



The term "rare" would be more useful if it were better defined here. Are these plants classified by either the state or federal government as "rare and endangered" plant species? If so, what are the implications of removing these plants in regards to federal or state law? In regards to sensitive habitat policies of the County's General Plan/LCP?

14  
2. Page 75, Paragraph 2

The DEIR's idea of using test plots presents a beneficial mitigation measure, but the DEIR's explanation creates several unanswered questions: When would monitoring occur, before or after grading? Are there suggested monitoring intervals? How useful will test plots be if it may take 10 years to determine revegetative progress (as the DEIR suggests)? We believe an expanded discussion on this topic could clarify these questions.

15  
3. Page 75, Paragraph 5

The statement recommending revegetation of the cut slopes contradicts the statement on Page 70, Paragraph 3, that the cut slopes for the 110 vehicle lot will be difficult to revegetate. These contradicting statements should be resolved.

16  
4. Pages 75 - 76, All paragraphs

17  
If the EIR determines revegetation test plots are

workable (see comment C.2), then could this concept be applied to either of our suggested modifications to the Scott Creek Beach 110 vehicle lot? (See comment B.2)

#### D. VISUAL AND AESTHETICS

##### 1. Page 40, Paragraph 1

We disagree that the visual policies of the NCBP are consistent with the County's General Plan/LCP and believe this statement represents a major inadequacy of the DEIR. The amount of road signs proposed by the NCBP (See DEIR, Page 33) would not be considered by most residents as consistent with LCP policies G.4.1 and 6.4.2 which seek to minimize signs along Highway 1. CALTRANS has already placed an excessive number of repetitive identical signs along many portions of the designated scenic road which detract from its scenic characteristics. The NCBP as now written would add even more signs, many of which would be repetitive identical "no parking" signs. The NCBP should promote visual enhancement of existing "problems" concurrent with parking and access development. The DEIR fails to adequately analyze both the existing and proposed oversigning situation on the North Coast portion of Highway 1. In short, let's not make one of the most scenic road corridors in the nation a sign circus replicating Burma Shave Land.

18

2. Page 93, Paragraph 8

How will parking on the road shoulder be eliminated without creating the visual impact of excessive repetitive signing along the road? If excessive signing is the only answer, then this impact needs to be reconsidered. The visual impact of vehicles parked along the road shoulder is only temporary, usually limited to weekend afternoons during the warmer months. Road signing is a permanent visual impact every hour of every day all year long. There are instances where the long-term and cumulative visual impacts of excessive signing are more significant than several vehicles parking on the road shoulder.

19

3. Page 94, Paragraph 3

The proposed 110 vehicle lot for Scott Creek Beach will not, by itself, eliminate parking along the nearby portion of Highway 1. Does the DEIR mean construction of the lot in addition to no parking signs will eliminate road shoulder parking? If so, please refer to the previous comment.

20

4. Page 94, Paragraph 6

We disagree with the DEIR's statement that proposed fencing would not result in a significant visual impact.

21

It depends upon the type and height of fencing used and if its provacative enough to be vandalized. The visual impact of fencing the large lagoons at Laguna Creek and Scott Creek Beaches is not addressed in the DEIR. We believe the hundreds of yards of fencing required to enclose both lagoons would create a visual impact that would detract from the natural and wilderness character of these wetlands. Before deciding such fencing is necessary to protect the lagoon habitats, we suggest the San Mateo County Office of State Parks be contacted to determine why Pescadero Marsh has never been fenced and to ascertain the viability of that marsh habitat with its designated hiking trails. In short, several hundred yards of continuous fencing may create more impacts than it's attempting to mitigate.

5. Page 99, Paragraph 7

We have not been able to determine any policy in the NCBP which promotes a construction style or color of proposed structures that visually blends with the surrounding natural landscape. The DEIR should make this recommendation rather than relying solely on the "small size of the individual structures ... would minimize their visual impact ..."

6. Pages 93 - 100, All paragraphs

23 The DEIR should specify landscaping of the roadside edge

of parking areas as an additional visual mitigation measure. Use of native drought-tolerant shrub species would require minimal maintenance and not grow to heights that would create traffic sighting or safety problems. Such planting would also enhance the natural appearance of those parking areas proposed to be located adjacent to Highway 1.

#### E. TRAFFIC AND CIRCULATION

##### 1. Page 107, Paragraph 1

The DEIR's only stated methods to reduce or eliminate road shoulder parking is increased signs and issuing citations. As discussed in comment D.2, the visual impact of more signs has not been discussed. Are there <sup>(24)</sup> other ways to eliminate or reduce road shoulder parking without creating a negative visual impact? How is this problem solved along Highway 1 in San Mateo County?

##### 2. Page 109, Paragraph 2

The idea of placing wood bollards along the road shoulder of Highway 1 is a good method to reduce or eliminate road shoulder parking at Scott Creek Beach. Affixing signs to every sixth or eighth bollard is a method of "no parking" <sup>(25)</sup> signing that has less visual impact than the type of signing proposed by the DEIR. DEIR should extend this bollard signing concept to other beaches as a preferred

method of signing. Are there any near-beach areas of Highway 1 or Davenport Landing Road where this concept is infeasible? If so, Why?

3. Pages 111 - 113, All paragraphs;

Page 120, Paragraph 2 & 3; and Page 121, Paragraph 3

The DEIR wisely mentions expansion of bus service and provision of bus stops at each of the 6 beaches as mitigations to lessen the traffic impact. We support these recommended measures, but believe that more discussion of this use of bus transportation is necessary for decision makers to give it worthy consideration. For example, bus stops inside the designated parking will eliminate the safety problems of pedestrians crossing Highway 1. Are there environmental impacts (positive or negative) connected with this idea? The excellent list of bus transit improvements on Page 120 should include a provision for each bus to carry bicycles. The third provision (relax restrictions on large objects) is only workable by obtaining new bus vehicles which have cargo compartments.

4. Pages 111 - 113, All paragraphs and

Page 120, Paragraph 8 - 9

Again, the DEIR wisely recommends passenger use of the existing rail line, but the discussion is too terse to provide for worthy consideration of this recommended

mitigation measure. Are there any negative impacts of using rail transit which need to be avoided? If so, what are they? Has this type of transit worked in similar situations in North America? Should the North Coast Beaches Plan be expanded to investigate this measure in more detail or can it be done within the EIR process?

#### F. CUMULATIVE IMPACTS

1. Page 121 - 122 and Page 123, Paragraph 4

The list of unavoidable significant impacts should include the visual change created by the a) number of roadway signs and (to a lesser extent) number of dispersed signs within the parking and trail head areas and b) the yards of continuous fencing surrounding the Scott Creek and Laguna Creek Lagoons. While the authors of the DEIR may not think these are significant from their standpoint, it must be remembered the study area is a natural rural area of wilderness beaches and undeveloped roadsides. It is the natural character of this area together with its panoramic views of marine terraces and the Pacific Ocean which make the area unique and to cause most local residents and visitors to cherish it as "special." A "small" visual impact in this setting would be considered significant to most local residents, beach users and Highway 1 travelers. It is for these reasons that we strongly disagree with the DEIR conclusion on

Page 123 that the Plan would not conflict with the scenic element of the County General Plan/LCP.



RESPONSE TO COMMENTS OF JOSH GOLDSTEIN, SAVE OUR SHORES

Comment 1.

Comment acknowledged; no response needed.

Comment 2.

The comment refers to General Plans in conformance with State planning law which requires local government to prepare a General Plan consisting of nine mandatory elements. In that context the comment would be correct: a plan for a distinct geographical area, the contents of which supplement or are more detailed or site-specific than the public policies adopted for the jurisdiction as a whole, normally is referred to as a Specific Plan or Specific Area Plan.

The General Plan for North Coast Beaches, however, was prepared in accordance with standards of the California Department of Parks and Recreation "so that it may eventually be considered for adoption by the State Parks and Recreation Commission", as noted in the EIR (DEIR page 23) and Plan (Plan page 2). Thus, the title of the General Plan and reference to it in the EIR are correct.

Comment 3.

As noted above in response to a similar comment, the distance of 50 feet was recommended by local farmers. In the land use discussion of this setback, the EIR acknowledges (DEIR page 84:

Although it is true that farmers generally oppose fences and vegetative screening because they usually result in a reduction of total tillable area, farmers would likely support such recommendations in this situation in order to reduce conflicts with the contiguous agricultural operations.

Due to the issues discussed in the EIR's land use analysis (DEIR pages 84-85), "Policy 4" was left ambiguous intentionally in order to permit some flexibility or latitude in addressing this conflict between pesticide use and beach access in the future. These issues require more discussion and negotiation than can be accomplished under the umbrella of an EIR which is designed to investigate and reveal environmental information but is not expected to resolve issues on which there are substantive differences of professional judgment and on which experts disagree widely.

Comment 4.

Comment noted; a master list of mitigation measures identified in the EIR is included in this Comments and Responses Addendum.

Comment 5.

The General Plan contains the following recommended policy (Plan page 33):

No site improvements shall be permitted that detract from or contrast with the existing scenic quality of the area.

The General Plan also recommends (Plan pages 24-25) the:

...full or partial removal of the concrete slab at Scott Creek Beach and rehabilitation of the gullies and old access road near the slab.

Both of these proposed General Plan policies address the concern raised by the comment. The County could elect to incorporate the measure contained in this comment into the General Plan, however, during its review and approval process.

Comment 6.

The EIR analysis of the proposed General Plan's relationship (conformance) to public plans addresses the extent to which the project would support or achieve the public policy goals and programs established by adopted County plans, principal among which is the Santa Cruz County Local Coastal Program (LCP) (DEIR pages 34-41). The reference to the California Coastal Commission noted by this comment is to an administrative action required to be taken before the proposed General Plan could be adopted and implemented. The concerns addressed by the comment would be taken into account by the County's planning process in reviewing and adopting the General Plan, if adopted, after which the Coastal Commission would assess the proposed General Plan's consistency with that agency's adopted policies before making its decisions.

Comment 7.

All of the problems associated with the trail that are discussed in the EIR (DEIR pages 46 through 48) are potential problems. They are not certain to occur. Given the number and potential severity of these problems, however, it is the opinion of the preparers of the EIR that the access trail from the 30-vehicle parking lot should be removed from the General Plan. If the parking lot is built signs should be placed near the top of the trail that clearly state the hazards associated with using the trail and indicate that beach goers should only use the trail at their own risk.

Comment 8.

From a geologic standpoint the 110-vehicle parking lot is the best option for pedestrian access to Scott Creek Beach. The parking lot itself is not associated with any geologic hazards, and placing a culvert under the new access road to the parking lot would be a minor task. The creek which flows out at the south end of Scott Creek Beach was quite small when it was observed in

December, 1988. It is the opinion of the preparers of the EIR that safe pedestrian access can be provided to the beach from this parking lot.

From a geologic standpoint it would not be necessary to scale down the size of this parking lot or construct it in phases. The EIR did not identify significant geologic impacts associated with the construction of this parking lot.

From a biotic standpoint without a specific modification proposed for this parking lot it would be to speculative at this time to state whether or not biotic impacts could be reduced to a less than significant level.

#### Comment 9.

The existing slopes and surface drainage in the vicinity of the proposed entrance to the 110-vehicle parking lot at Scott Creek Beach where Highway 1 would be widened to allow a turning lane and a deceleration lane would not present any potential adverse geologic or drainage problems. The road widening would involve grading of existing cutslopes on both sides of Highway 1. The cutslopes are presently stable and they should remain stable after the widening of Highway 1. There is presently a turnout on the east side of Highway 1 which would make any road widening relatively easy.

#### Comment 10.

The mitigation section of the EIR recommends that parking be allowed only on the inland side of Davenport Landing Road and not along the coastal side as proposed.

#### Comment 11.

There is a concern regarding what would happen to surface drainage if the existing swale on the west side of Highway 1 at the north end of Bonny Doon Beach is filled in to accommodate proposed improvements.

The impacts of filling the swale are negligible if proper measures are implemented to maintain good surface drainage. In the mitigation section (DEIR page 60) it is stated that the existing concrete drop box here must be raised up to ground level when the fill is placed in this swale. Then, surface water should flow into the drop box as it currently does. The drainage engineer who designs the new drop box should take into account the potential high flow velocity of surface water that drains from north of the parking lot off Highway 1. Here, there is an approximate one-half mile section of paved road that is inclined down to the south between Panther and Bonny Doon Beaches. Half of this road runoff flows on the west side of Highway 1 and enters the swale at the north end of Bonny Doon Beach. If the swale is filled in until there is level ground in the area of the swale, then surface runoff could overrun the drop box. Therefore, filling of the swale should involve grading a depression around the drop box to ensure that surface runoff flows into the drop box.

Comment 12.

The mitigation section of the EIR recommends the construction of a third stairway approximately midway between the other two proposed stairways.

Comment 13.

The estimated length of the Bonny Doon parking lot was based on the proposed improvements and exhibits contained in the General Plan.

Comment 14.

The more appropriate term would be "habitat supporting plant species of special concern". The term "rare" is specifically defined under State CEQA Guidelines section 15380 as either a plant or animal although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or the species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered "threatened" as that term is used in the Federal Endangered Species Act.

A species of animal or plant shall be presumed to be rare if it is listed in Title 14 of the California Administrative Code; or Title 50 of the Federal Endangered Species Act or species not included in state or federal listing but can be shown to meet the criteria discussed in the preceding paragraph.

The sensitive species located in the proposed Scott Creek 110-vehicle parking lot are not listed on any state or federal lists but are listed by the California Native Plant Society as "Plants of Limited Distribution". These plants cannot be called "rare" according to statewide criteria; however, they are uncommon enough that their status should be monitored regularly by the society and botanical community. These plants of limited distribution are not afforded protective mitigations under either state regulations or County LCP and Sensitive Habitat Ordinances. Removal of the two species at Scott Creek would not constitute a violation of these ordinances at this time.

Comment 15.

The directives in the EIR regarding the use of test plots for evaluating the appropriate techniques for revegetation in dune communities were meant to provide a method for evaluation the success of the dune restoration program in the General Plan. Monitoring would take place following planting. The monitoring intervals identified in the General Plan (Plan page 48, spring and summer) are appropriate for evaluating success and viability of plantings. Checks of revegetation sites might be in order during periods of the winter following significant storm events to assess the need for further protection or stabilizing measures.

Test plots are useful in that they provide a way of assessing those techniques which will provide the best and quickest success of recovery. They provide a semi-quantitative method for evaluating success of the program ultimately reducing costs. It typically takes 10 years to fully evaluate the long-term success of revegetation/restoration efforts. However, trends can be evaluated at shorter intervals of two to five years for selected species that indicate viability and natural reproductive capabilities of selected species or those techniques which achieve restoration goals in the quickest manner.

Comment 16.

These statements are not contradictory. Data is not available to support the finding that revegetation of these slopes will be successful, expedient, or result in the same community type and structure that previously occupied the site. Without specific engineering plans and final slope contours it is difficult to know how steep the cuts would have to be. Never the less, it is possible that the gradient may be such that it would be difficult to revegate. This does not mean, however, that should the improvement be built that no revegetation be attempted simply because the data is not available to support it. No slopes should be left devoid of vegetation cover over a winter period.

Comment 17.

Yes, the test plot method can, and should, be utilized for any location where successful revegetation or restoration techniques are untested or unknown.

Comment 18.

The visual impact and the magnitude of impact of existing signs in the program area is a highly subjective matter, and there probably would be as many opinions and judgments about either the severity or lack of impact as the number of people asked about the subject. Consequently, whether the signs are "excessive" in number, "repetitive" in content, "detract" from the scenic character of the program area must be determined by readers individually. The General Plan would not recommend removal of existing signs related to traffic and circulation (directional signs, "no parking" signs, etc.) which are posted by Caltrans and are outside County jurisdiction to place or remove.

The General Plan, however, would result in the posting of new signs related to parking, to indicate the location of trails, to caution about hazards or provide other information. In this context, the comment goes to the heart of the public access dilemma which ultimately is the purpose of the General Plan -- how to let the public know that the area's beaches are accessible, thus available for use by the public and how to direct visitors to trails, thus to minimize environmental impacts, land use conflicts, and safety hazards without being visually intrusive in providing this information? Past solutions to these types of questions normally involved limiting the numbers of signs, for instance, placing the signs which are installed efficiently (to make the most of each sign) and with sensitivity to their visibility, designing signs (sizes, colors, materials,

etc.) according to some uniform standards while ensuring legibility. Such steps could be expected to be considered satisfactory, visually unobtrusive, or, perhaps, a beneficial effect of the project while the same effects could be seen by others to constitute adverse visual impacts. Together with the EIR and this comment, it will be up to members of the public and decision-makers to determine the visual impacts of the project for themselves and put that judgment in perspective with the other beneficial or adverse effects of the proposed General Plan.

Comment 19.

With reference to the immediately preceding comment and response the visual impact of roadside traffic signs (in this instance, "no parking" signs) and the visual impacts of parked cars may elicit quite different responses from various viewers. The comment makes the distinction between permanent signs on one hand and vehicles which are parked along the road temporarily on the other hand. Another viewer, however, could just as readily make a distinction between the size and amount of visual interference (how much total area is blocked in the viewshed) represented by roadside signs compared with that of cars parked along the road, the light and glare reflected off car windows and chrome, etc. Thus there may not be agreement among readers of the EIR or visitors to the program area about what constitutes an adverse visual impact and whether or not visual impacts of the project would be significant.

Comment 20.

Provision of "off-street" parking in lots, as proposed by the General Plan, would be effective in reducing roadside parking on the Highway 1 shoulder if:

- The availability of parking was marked within a sufficient approach distance to permit drivers to decide to turn off the through road and into the lot.
- The access (entrance) to the parking area was clearly visible by and/or understandable to drivers so they could make (and feel comfortable about making) the turning movement safely.
- The capacity of parking lots was adequate to accommodate the demand for spaces.
- Any prohibition on on-street (roadside) parking was enforced.

Improvement of each beach's parking supply (with or without expansions or new parking provided by the proposed General Plan) can be expected to reduce roadside parking which currently occurs in locations not proposed to be used for parking in the future. No one can state definitively, however, that construction of the proposed 110-vehicle parking lot at Scott Creek Beach and placement of "no parking" signs on Highway 1 would eliminate roadside parking.

Comment 21

The EIR reports that proposed fencing would be visible. The extent to which the visibility of fencing would constitute an adverse impact in and of itself and the extent to which such an impact would be significant would depend on individual viewers and also would be influenced by fence height and materials. Both of those features would affect the extent to which views through or beyond fences would be obstructed. (Unless designed properly, however, fences intended to minimize interference with views potentially could become safety hazards.) Nevertheless, fences could be designed to discourage or limit vandalism, in accordance with the General Plan proposal that "facilities will be vandal-resistant" (Plan page 46).

Roads immediately border Pescadero Marsh on three sites, so pedestrians cannot get much nearer to the marsh than the pavement without stepping in deep water.<sup>2</sup> The deep water and marsh vegetation (such as tules) appear to discourage people from entering the marsh. Trails have been built on levees on the fourth side of the marsh along Highway 1, and people appear to tend to stay on these designated trails. The only problem with visitors leaving marked trails has been in upland areas away from the marsh.

The lack of fences around Pescadero Marsh does not seem to constitute a conscious management decision by the State Department of Parks and Recreation. The marsh was not fenced when the State acquired it, and there subsequently has been no reason to install a fence. Furthermore, while the deep water seems to discourage people from entering the marsh on foot, use of non-motorized boats is permitted, but boats generally are used only by Park Department personnel and by researchers.

The situation, therefore, at Pescadero Marsh is not exactly similar to the situation at Scott Creek Beach and at Laguna Creek Beach. For example, at Laguna Creek Beach the existing unpaved farm road on the southwest-facing slope below the railroad grade at the eastern end is providing ORV access to the beach by way of the marsh.

The comment raises the issue of the effects which can occur from mitigating one impact. Whether the secondary (visual) impact of mitigating another (biotic) impact is significant remains a subjective judgment. Nevertheless, one purpose of an EIR is to disclose the effects not only of the project but also to assess the effects of measures which may be recommended to mitigate project-induced effects.

Comment 22

The comment is correct in observing that the proposed General Plan presently does not provide design guidelines, apart from recommending that "all off-highway signs will have a consistent motif" (Plan page 47). One objective of the General Plan which could be interpreted as addressing the concern expressed in this comment, however, is to (Plan page 6):

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<sup>2</sup> Nichols • Berman conversation with Jean Ferrei, California Department of Parks and Recreation, Central Coast Division, Monterey, June 1989.

Maintain the existing rural scenic character and perpetuate the environmental quality of the natural and cultural resources, particularly wildlife habitat and coastal vegetation, on both private and public property.

It should, however, be noted that all structures constructed in the North Coast beaches area would need to meet the design criteria specified in County Code section 16.20.130. One objective of this criteria is to insure a building's compatibility with its surrounding setting.

Comment 23.

Low-growing, drought-tolerant landscaping planted along Highway 1 and in program area parking lots, as suggested by this comment, would provide a visual amenity assuming that soil, climate, proper installation and maintenance, and other factors were propitious and taken into account. Provision of additional landscaping as part of the General Plan's implementation potentially could be considered desirable by members of the community and, thus, could be incorporated into the Plan or Plan-recommended programs. The costs of buying and planting landscaping would need to be added to the development costs which have been estimated for each beach; annual operating costs also would need to be increased to account for maintenance expenditures over and above those already estimated which would be attributable to new landscaping.

Comment 24.

"No parking" signs or a red painted curb are the accepted demarcations for no parking zones in the State of California. Unfortunately, it is impossible to enforce parking regulations without signs or a red curb. It should be noted that the project does not include placing signs all along Highway 1. Specific sign locations are shown in the EIR (DEIR Exhibits 3 through 7); the number of signs at each beach is summarized in DEIR Exhibit 8.

In regard to parking signs Caltrans does not have a minimum spacing requirement. Section 4-03 of the Caltrans Traffic Manual discusses regulatory signs. In the discussion of placement of signs controlling parking restrictions, section 4-03.4 states "where the zone is unusually long, supplemental signs are desirable at intermediate points within the zone".

As shown in DEIR Exhibit 8, the beaches with a relatively large number of "no parking" signs are Scott Creek, (11); Bonny Doon, (7); and Laguna Creek, (3). Furthermore, several of these signs are already in place at the beaches.

Implementing parking restrictions on Highway 1 would be the responsibility of the Santa Cruz County Board of Supervisors. The procedure would be as follows:

First, the Santa Cruz County Board of Supervisors would have to pass a resolution restricting parking in certain areas on Highway 1. Second, the County Department of Public Works would prepare a drawing showing the location of the no parking zones and the location of the "no parking" signs. Then, the County would apply to Caltrans for permits to install "no parking"



signs. After review by Caltrans an encroachment permit would be issued to the County to allow the installation of the signs. With the issuance of the encroachment permit the County Department of Public works would be responsible to install the signs.

Comment 25

"No parking" signs could be placed on wood bollards in locations which bollards would be placed. Where possible, "no parking signs" should be placed on wood bollards instead of on a separate sign post. It should be emphasized that the bollards would be placed outside the shoulders of the road so they will not, by themselves, prevent vehicles from parking on Highway 1 shoulders. It is likely that installing bollards (with "no parking" signs) would be feasible at most locations. However, this could not be determined until engineering studies of individual beaches were performed. Furthermore, the presence of a continuous line of bollards along the side of Highway 1 will have its own visual impacts.

Comment 26

As discussed in Response to Comment 1 of Ed Van Der Zande, Santa Cruz Metropolitan Transit District, buses should not drop off passengers in parking lots. This would interfere with bus schedules, require buses to turn across traffic lanes, and would interfere with parking lot operations. Furthermore, many of the parking lots would be unable to accommodate the required bus movements.

As part of the bus stop construction program (discussed in Response to Comment 1 of Ed Van Der Zande Santa Cruz Metropolitan Transit District) steps would be taken to improve safety for pedestrians crossing Highway 1 at bus stops. These steps can not be specified until detailed engineering studies of improvements at each individual beach are completed. However, they should include cross walks, warning signs, and sight distance analysis at a minimum.

Currently, most weekday (six trips out of nine) and all weekend (six trips out of six) bus service on SCMTD Route 40 (to the North Coast Beaches) is equipped to carry bicycles. A mitigation measure could be added to recommend that all future bus service to the North Coast Beaches be equipped to carry bicycles. Responsibility for this mitigation measure could be shared by the County and SCMTD.

Relaxing the restriction for large objects on buses might require purchase of new buses. Alternatively, selected existing buses could be reconfigured to carry specific objects desired by beach patrons such as picnic baskets, small surfboards, etc. These buses could then be used on the North Coast beaches route. Reconfiguration could include ideas such as removing some seats, placing racks on the bus roof, or adding a trailer. These changes would not be easy for SCMTD to implement quickly, however they should be considered in future efforts to increase ridership. They could be funded by a combination of the County, SCMTD, and State and Federal demonstration programs for increasing transit use. Because the North Coast Beaches Improvement Program is, by itself, not expected to increase travel demand significantly, funding these mitigation measures should not be a project related requirement.

Comment 27.

Rail transit has been discussed above (see Response to Comment 2 of Ed Van Der Zande, Santa Cruz Metropolitan Transit District). It is important to emphasize that the impacts of the North Coast Beaches Project is not expected to increase traffic significantly. Therefore, rail transit use was not analyzed in detail. With this understanding, the following responses are provided. Rail transit could have the following potential negative impacts:

- Attracting more people to use the beaches.
- Noise.
- Visual impacts.
- Safety.
- Vibration.

However, all these issues can be mitigated through proper design of the facilities and operations planning.

The most appropriate place for discussion of impacts and mitigation measures of rail service is in its own complete environmental impact study.

Recreational use of transit has been successful in certain North American situations. However, successful is a relative word. Some services carry a large number of people, but still require substantial subsidy. Some examples of these are:

- San Francisco cable cars;
- San Francisco Historic Trolley Festival; and
- New Orleans waterfront streetcar.

It is important to note that these are relatively short distance, all day services in high tourist demand areas.

Longer distance rail excursion service to scenic locations also is provided in some U.S. locations. This type of service is frequently operated by private businesses on a limited schedule. It, therefore, probably carries enough passengers to make money but might not serve as a model for regular rail service on the Davenport line.

It is beyond the scope of this EIR to evaluate the environmental impacts of rail service on the Davenport line. It is likely that any such rail service will undergo a separate environmental review. Furthermore, it should be noted that implementation of the General Plan does not require rail service to mitigate its traffic impacts.

Comment 28.

The significance of the project's effects will be determined by Santa Cruz County decision-makers based on information contained in the EIR and local experience. The County could interpret the EIR findings to conclude that the proposed General Plan would result in significant adverse impacts within the context of Santa Cruz County community standards. The County's determination will be made before the EIR is certified as complete, and findings of significance of environmental impacts can be included in the certification resolution.



# Santa Cruz County Farm Bureau

"Working For The People Who Work The Land"

May 30, 1989

Mr. Pete Parkinson  
Environmental Coordinator  
Planning Department  
County of Santa Cruz  
Governmental Center  
701 Ocean Street  
Santa Cruz, CA 95060

Dear Mr. Parkinson:

Our legislative committee has reviewed the draft EIR on the general plan for the six north coast beaches.

While the EIR addresses most of the issues, we do have some concerns such as:

- ① a) The mitigation and question of trespass on adjacent farmland, i.e., fencing and maintenance of such.
- ② b) Flashboard dam removal policy must be eliminated.
- ③ c) Breaching of Scott Creek to prevent flooding of farmland. Suggest contacting Pajaro River Task Force for solution that was worked out for Pajaro River.
- ④ d) Concerns about pesticide use near beaches and possible conflicts with public.
- ⑤ e) Parking would have to be adequately controlled so as not to infringe on properties next to access.

These are a few of the comments we feel must be addressed prior to enactment of any development of the north coast beaches. If you have any questions, please contact our office at 688-0748.

Sincerely,

Steven Siri  
President

SS/br

- 56 -

RESPONSE TO COMMENTS OF STEVEN SIRI, SANTA CRUZ COUNTY FARM BUREAU

Comments 1-5.

This letter does not raise concerns with the environmental analysis contained in the EIR. Rather the concerns expressed by these comments are among the issues addressed in the EIR, as follows:

- A. Trespass and fencing -- See DEIR pages 79-80, 84, and 87.
- B. Flashboard dams and water supply -- See DEIR pages 82, 86, and 87.
- C. Sandbars and flooding -- See DEIR pages 82-83, 86, and 87.
- D. Pesticide use -- See DEIR pages 80-82, 85, and 87.
- E. Parking -- See DEIR page 84.

Further discussion of these issues, as requested by these comments, would relate to the proposed provisions and implementation of the General Plan. Inclusion of this letter in the EIR, however, will make public officials aware of the Farm Bureau's concerns.

# FELLOW FEATHERS

FORT FUNSTON HANG GLIDER  
PILOTS ASSOCIATION

214 Lake Merced Hill  
San Francisco, CA 94132  
(B) 415/433-6670  
(H) 415/337-0350

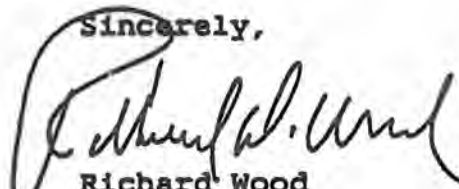
Santa Cruz County  
Board of Supervisors

As the President of Fellow Feathers/Fort Funston Hang Glider Pilots Association, I would like to express the Bay Area pilot communities interest in the General Plan for North Coast Beaches as it relates to Scott Creek and Bonny Doon Beach along Highway #1 near Davenport.

① These two beach areas provide excellent training and recreational facilities for pilots at all skill levels. Student-novice pilots use the site to learn; advanced pilots use the site to hone their flying skills. The weather, terrain and prevailing wind conditions are ideal for these purposes.

Our pilot community has historically been very concerned about preservation of natural areas and we wish our sport to be consistent with environmental preservation. However, some of the enhancements to the dune areas at these beaches as proposed in the General Plan would eliminate flying activities and deny pilot access. Therefore, we would like to cooperate in any way possible to find alternate enhancements for this area that would benefit all concerned and include hang gliding access, environment protection and public convenience.

Sincerely,

  
Richard Wood  
President

RESPONSE TO COMMENT OF RICHARD WOOD, FELLOW FEATHERS

Comment 1.

Comment acknowledged. The comment addresses the merits (not the environmental effects) of the proposed General Plan insofar as recreational use by hang-gliders is concerned; thus, no response is necessary in the EIR. Inclusion of this comment in the EIR, however, will make the writer's views available to public officials to take into account when they make decisions on the General Plan and the content of that plan.

142 Smith Rd  
Donville Ca  
94526

415-837-2852

TO: SANTA CRUZ COUNTY BOARD OF SUPERVISORS.

DEAR Supervisors:

I am writing to you on behalf of the Hanggliding Community and myself. I am a certified instructor and am ~~under~~ concerned for our only Northern California instructing sites. It has been brought to my attention that the County is planning a  
① restoration project at Scotts Creek and Bonny Doon Beach. As the proposed plans have been drawn, they would eliminate the use of Hanggliding at these two sites. With slight revisions in the plans the County and Hanggliding Community will be able to ~~more~~ mutually benefit the restoration pro.

Before any final plans are drawn, please consider the Hanggliding community and our sport.

Sincerely  


USHGA - BASIC INSTRUCTOR



RESPONSE TO COMMENTS OF TIM ARAI

Comment 1.

Comment acknowledged. As noted in response to the immediately preceding comment, this comment addresses the merits (not the environmental effects) of the proposed General Plan insofar as recreational use by hang-gliders is concerned and no response is necessary in the EIR. Inclusion of this comment in the EIR, however, will make the writer's views available to public officials to take into account when they make decisions on the proposed General Plan.

DEAR SANTA CRUZ COUNTY BOARD OF SUPERVISORS

I AM A UNITED STATES HANG GLIDING ASSOCIATION  
CERTIFIED INSTRUCTOR. I HAVE JUST BEEN  
INFORMED ABOUT YOUR GENERAL PLAN FOR  
THE NORTH COAST. I AM CONCERNED ABOUT THE

① LOSS OF TRAINING SITES FOR HANG GLIDING. FOR OUR  
SPORT TO CONTINUE WE NEED SAFE TRAINING SITES.  
SCOTT CREEK AND BONNY DOON ARE THE ONLY  
TWO TRAINING SITES BETWEEN MARINA AND  
SAN FRANCISCO PLEASE DON'T SHUT US DOWN.

Thank You Frederick Hitchina

RESPONSE TO COMMENTS OF FREDERICK HUTCHINSON

Comment 1.

Comment acknowledged. As noted in response to the previous comments, this comment addresses recreational use of the program area by hang-gliders. Although no response is necessary, inclusion of this comment in the EIR will make the writer's views available to public officials when they take action on the proposed General Plan.

May 30, 1989

SUBJECT: Comments concerning the General Plan for North Coast Beaches.

I do not like the General Plan for North Coast Beaches, but I also feel that the "partyers" have pushed us into a corner and there may be no other option. The big problem with the plan though, is that while "gentrification" of the beach may discourage the "partyers", The very people that use the beach on a regular basis, who love and care for the beach the most, are also the people that will be literally outlawed from using it. I have been going to Bonny Dune beach for more than 9 years, I have friends that have been going there for more than 20. I feel hurt and disappointed that my friends and myself after years of picking up other peoples trash, contending with drunken teenagers, and really caring for "our" beach, are the very people that the General Plan is going to discourage.

① My understanding is that only one beach is to be designated as a clothes optional beach with an additional dollar added to the price of parking. If the state takes over there will be no clothes optional beaches at all. We need to encourage people that have a love of nature, of the sun and the ocean, and people who "express their options" are very people that care the most. We do not need to encourage a bunch of drunken kids from San Jose who's idea of a beach is a place to get drunk. There are many people who don't go to the north county beaches because of the trash and "weirdos on the cliff", not because these beaches are clothes optional and they are afraid of seeing nude people.

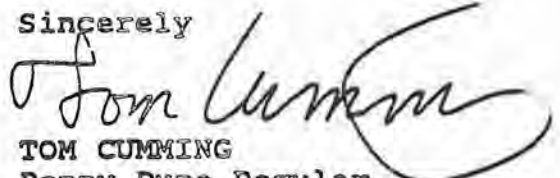
Please, keep all of the north county beaches clothes optional. Disrespect for the environment is the problem, not nudity. Nudity has never been a problem on these beaches, and even with more people using them there will not be a problem in the future.

Keep the control of "our" beaches in "our" hands. Do not turn control over to the state.

Legalize alcohol at city beaches. The alcohol problem moved from the city beaches to the north coast beaches that already had an alcohol problem.

Sell one year parking permits to encourage regular use by caring people. Let the "one timers" pay for the improvements.

Sincerely



TOM CUMMING  
Bonny Dune Regular,  
Taxpayer, Voter,  
Software Engineer  
Boulder Creek

RESPONSE TO COMMENTS OF TOM CUMMING

Comment 1.

Comment acknowledged; see responses above. It should be noted, however, that Santa Cruz County decision-makers do not have jurisdiction over City of Santa Cruz beaches.

South Bay Naturists  
P.O. Box 23781  
San Jose CA 95153



Thursday, May 25, 1989

Ben Angove  
Parks, Open Spaces, and Cultural Services Dept.  
County of Santa Cruz  
701 Ocean St.  
Santa Cruz CA 95060

Dear Mr. Angove:

This letter comments on the draft environmental impact report and the North Coast Beaches General Plan. I am sorry that I was not able to personally attend the Board of Supervisors meeting on Tuesday. Unfortunately, our group was not aware of the planned discussion until after the fact, when it was reported in Wednesday's *Sentinel*. The South Bay Naturists is an educational and social organization dedicated to ecology and body acceptance, as described in the enclosed statement of Principles. We have participated (and plan to continue participating) in the Coastal Commission's "Adopt-A-Beach" cleanup plan. Many of our members are frequent visitors to the North Coast beaches.

In general we are pleased with the plans to improve the facilities at these beaches. We recognize existing problems, especially litter, and believe and hope that the proposed improvements will abate such problems. For years, we have cleaned up litter left by drunken parties at Bonny Doon, and would welcome any assistance the County could provide.

We are especially pleased that the county recognizes the continued popularity and acceptance of nude use. We appreciate the department's desire to provide equal facilities for naturists, and to discourage voyeurs. We appreciate your recognition that naturists are generally sensitive, courteous beach users (loud radios, heavy alcohol consumption, and litter are not brought by naturists!). We appreciate your commitment to continued public access to all beaches as guaranteed by California law.

We would like to share some concerns, however.

We're concerned about the discriminatory effect of limiting nude use to just one beach at which a higher admission fee is charged. Presently, naturists share several North Coast beaches, peacefully and without problems. Why must this change? At each beach the naturists generally congregate at one end, out of the wind, and strive to avoid offending other users.

1989 MAY 25 AM 11:27  
P. A. S. C. S. DEPARTMENT

RECEIVED

Regarding your statement that a higher fee at the designated nude beach would discourage voyeurs, we wonder: If a voyeur were willing to pay \$3 to look, wouldn't he/she be willing to pay \$4? If a nudist were willing to pay \$3, would he/she be willing to pay \$4? Do you believe that nudists have fatter wallets than voyeurs? If for whatever reason it is desired to concentrate all nude use into a single beach, this effort is more likely to succeed if there is no economic incentive for nudists to use other (cheaper) beaches.

Although we object to the proposed new designation of five out of the six beaches as "clothing-required," if this must be, we would also welcome a role in selecting just which beach would be remain "clothing-optional." We hope that it would be one of the most popular nude beaches now (e.g. Bonny Doon, because of its convenient access and protective cliffs), rather than a desolate and wind-swept one which would discourage nudity altogether.

2) Finally, we're concerned about your proposal to surrender management responsibility to the State Parks and Recreation Department or to a private concessionaire. In this regard, we agree with Josh Goldstein of Save Our Shores. Our concern with management by the State is a fear of losing local control of the beaches. We have appreciated what your department has done for Santa Cruz County, and would prefer if you could continue to do it, rather than relinquishing control to Sacramento, where they may not have the sensitivity for local issues that you have. Our concern with a private concessionaire is that once the gate to the beach is in private hands, their profit motive is at odds with the state-guaranteed public access.

I hope that we can continue to be of service in the refinement of the General Plan. If I may be of further assistance, please do not hesitate to call me at (408) 227-1219 (home) or (408) 927-1811 (work). Thank you.

Sincerely,



Richard C. Pasco  
Coordinator

cc: Lee Baxandall  
The Naturist Society  
P.O. Box 132  
Oshkosh WI 54902

RESPONSE TO COMMENTS OF RICHARD PASCO, SOUTH BAY NATURISTS

Comment 1.

Comment acknowledged. The number of beaches and the ones to be designated as "clothing optional" beaches is not an environmental issue for analysis in an impact document and for which a response is necessary in the EIR. As noted in response to the previous comments, this comment discusses recreational opportunities in the program area by a specific user group. Inclusion of this comment in the EIR will make the writer's views available to public officials when they take action on the proposed General Plan.

Comment 2.

This comment addresses a concern also expressed by agriculturalists and discussed in the EIR but in the latter context (DEIR page 83). Possible transfer of management responsibility to the State and diminished local control, however, is a question related to the proposed General Plan itself and only relates indirectly to the environmental effects of implementing the Plan. The indirect secondary effects on the environment which might occur would be expected to involve operation and/or maintenance of facilities installed as a result of the General Plan, if adopted. The extent to which there could be adverse impacts at some undefined time in the future cannot be assessed in this EIR, however, without becoming speculative. Similarly, beach operations by private concessionaires would not constitute an environmental issue for analysis in the EIR. Nevertheless, any contract between a public (County or State) agency and a private concessionaire could include performance standards to be met by the contractor which, if not satisfied, would constitute cause for revoking the contract.





MARIN COUNTY  
HANG GLIDING ASSOCIATION  
#4 MANOR TERRACE  
MILL VALLEY, CA 94941

May 17, 1989

Dear Board of Supervisors, Santa Clara County:

The Marin County Hang Gliding Association strongly supports the continued use of the Bonny Doon and Scott Creek recreational areas for hang gliding instruction. The areas offer extraordinarily safe and unique conditions. It has been our experience with the Mount Tamalpais hang gliding program that hang gliding can and does co-exist safely with other public uses. In fact, hang gliding has become quite an attraction on the mountain and at Stinson Beach.

Unfortunately, the Bay Area has just about lost all of its training sites to development. This makes it extremely difficult for instructors to find safe places to teach. These two sites in question offer the ideal conditions necessary for first time pilots to taste the thrill of flight without getting over their heads.

It is our sincere hope that you will remember us in your future plans for these sites.

We would be more than happy to take you on a tour of our site and let you speak first-hand to state and federal park rangers and to watch more advanced pilots flying.

Thank you for your consideration.

Sincerely yours,  
*Arnetta Klockars / Davis*  
Arnetta Klockars  
Site Administrator



marin county hang gliding association

RESPONSE TO COMMENTS OF LAURETTA KLOCKARS, MARIN COUNTY HANG  
GLIDING ASSOCIATION

Comment 1.

Comment acknowledged. The comment addresses the merits (not the environmental effects) of the proposed General Plan insofar as recreational use by hang-gliders is concerned; thus, no response is necessary in the EIR. Inclusion of this comment in the EIR, however, will make the writer's views available to public officials to take into account when they make decisions on the General Plan and the content of that plan.

To Whom it may concern,

I am writing as a concerned citizen of Santa Cruz. I have been living and flying here for many years. As a sportsman of both hang gliding and windsurfing, I as well as many others would like to have some input into the planning concerning the coastal flying sites. We would like to work with you in the planning stages so that everyone's ~~needs~~ needs are met and future conflicts are diverted.

Sincerely

William Rich  
POB 7977  
Santa Cruz, CA  
95061  
458 1169

RESPONSE TO COMMENTS OF WILLIAM RICK

Comment 1.

Comment acknowledged. As noted in response to the immediately preceding comment, this comment addresses the merits (not the environmental effects) of the proposed General Plan and no response is necessary in the EIR. Inclusion of this comment in the EIR, however, will make the writer's views available to public officials to take into account when they make decisions on the proposed General Plan.

P.O. BOX 231  
San Geronimo, CA 94963  
May 02<sup>nd</sup> 1989

Santa Cruz County  
Board of Supervisors

I am writing this letter in regards to the proposed changes planned for the Scott Creek and Bonny Doon beach areas. I have spent many days enjoying the coastal access provided by these areas. These dune areas provide excellent training slopes for hang gliding. These two sites are the only areas available to hang glider pilots to safely practice flying techniques in a non-threatening and safe environment. These dunes are unique in that they provide access to gentle slopes facing the prevailing winds.

- ① The proposed changes would effectively obstruct the flight paths of these sites with fences, garbage cans, stairs, etc. I hope that we can work together to find some answers to these concerns as part of the General Plan for the North Coast beaches. Please keep me informed of your developments and let me know how I can be of assistance.

Andrew S. Whitehill

RESPONSE TO COMMENTS OF ANDREW WHITEHILL

Comment 1.

Comment acknowledged. As noted in response to the previous comments, this comment addresses the merits of the project not its effect on the environment and, therefore, no response is necessary. Inclusion of this comment in the EIR, however, will make the writer's views available to public officials when they take action on the proposed General Plan.

Pete Karkis Jr.  
To: County officials,  
Environmental Committee

(Page 1)  
April 24, 1989

Re: North Coast Beaches Plan (ENR) - Comments

From: The Kolar family.  THE KOLARS  
374 ROBLES DRIVE  
SANTA CRUZ, CALIFORNIA 95060

I am so excited about the county's plans for North Coast beaches. I would particularly like to commend the enhancement of Laguna Beach by creating Reserves for the wetlands and lagoon area and for the coastal cliff vegetation there around.

One important natural resource of the Laguna Beach environment has been overlooked.

① This is the Archeological site on the cliffs directly above Laguna Beach. (See Illus I)

This should be given the same protection and attention as the lagoon + wetlands areas.

This is one of the most important and largest midden sites in Santa Cruz County and perhaps in Central California. (See Illus 2 and 3).

Ninety (90) percent of access traffic to this site comes from Laguna Beach. The trail up to this site is near high water on the southern end of the beach (away from the Snowy Plover nesting area). Included in and around this site is a treasure chest of unique, local California native plant species. Due to topography this area has never been farmed and the only marks of civilization is that the 5 acre site is strewn with shell pieces, chert (flint) pieces, and fire marked rock, the works of a 1,000 to 2,000 year old civilization.

Obviously, this area cannot be overlaid.



The property on which the Midden site rests is not owned by Coast Dennis and Land but is rather owned by Lorenz / Zieher (see 11, 4+5). I believe immediate protection of this site is needed and I know the Santa Cruz Archaeological Society has already considered it, as well as the California Native Plant Society.

I believe a trail should be maintained, since it is a cliff used for whale watching, but later developed as a self interpretive native american and Native Plant and Midden site. This archaeological resource rivals and doubles the wetland + lagoon resource that Laguna Beach already is.

A second area I would like to comment on is the enhancement and development of the wetlands portion of Laguna Beach.

The portion of the wetlands area (see Illus 5) next to the lagoon is actually an unused farm field raised above lagoon level and protected by a small earthen dike. This is  
② an unnatural wetland height level and keeps the area from returning to its natural state.

I believe serious consideration should be given to excavating the former farm field to natural wetlands levels. My dream is that the extra dirt be used to form a predator safe island in the center of the wetland area and surround the island with a lagoon or marsh area. This

page 5

way bird nesting could go on in a special predator-free environment, and perhaps, if we planted the right trees (Redwoods etc) we could one day find Heron + Egret nests in the center of the Lagoon. Please inform me of ways in which I can contribute to or have input into the work on Laguna Beach area, as I and my family love it dearly.

Faithfully Yours,  
for All our relatives,

The Kolar family

Enclosed also is a survey of the natural resources in the bluff area just South of Laguna Beach, including the 3rd largest sea cave in California (see illus 7)

RESPONSE TO COMMENTS OF THE KOLAR FAMILY

Comment 1

The literature review prepared as part of this EIR did identify archaeological site CA-Scr-7. This site is located on Sand Hill Bluff, south of the Laguna Creek Beach study area. The importance of the site is well documented in the two following reports:

- Preliminary Cultural Resources Reconnaissance of a Portion of Parcel APN 59-023-08, Santa Cruz County, California, by C.R. Smith and G.S. Breschini, July 1988.
- Archaeological Test Excavations at Sand Hill Bluff, San Cruz County, California, by D.A. Jones and W.R. Hidebrandt, September 1988.

Because the site is on private property and outside the boundaries of the North Coast Beaches study area, it was not referenced in the EIR. Cultural resources management considerations for CA-Scr-7 is beyond the scope of this EIR.

Comment 2

Comment acknowledged. The suggestions for improving the wetlands have merit and should be further evaluated along with other additional suggested modifications designed to enhance and enlarge the marsh habitat.



# THE CALIFORNIA NATIVE PLANT SOCIETY

20 Kite Hill Road, Santa Cruz, CA 95060  
(408) 423-3168

31 May 1989

Ms. Susan Williamson  
Environmental Coordinator  
Santa Cruz County Planning Department  
701 Ocean Street  
Santa Cruz, CA 95060

RE: Draft Environmental Impact Report on the General Plan for  
Six North Coast Beaches

Dear Ms. Williamson:

I have reviewed the draft EIR on the General Plan for Six North Coast Beaches on behalf of the California Native Plant Society (CNPS), Santa Cruz County Chapter. We have the following comments:

- ① 1) The CNPS is concerned about the impacts of the 110-vehicle parking lot at Scott Creek, which will destroy habitat of the rare native orchid, Piperia michaeli. We urge you to consider alternatives to this potential development, including possible relocation of the parking lot.
- ② 2) Page 70 of the DEIR states that Monterey indian paintbrush would also be affected by the 110-vehicle parking lot. We believe this paintbrush at Scott Creek is actually not Castilleja latifolia ssp. latifolia (Monterey indian paintbrush) but is Castilleja wightii (also known as C. latifolia ssp. wightii), which is not a rare species.
- ③ 3) We support the mitigation measure cited on page 76 of the DEIR which states that a field survey should be conducted to locate rare species at each individual beach prior to initiation of proposed improvements or modifications. We suggest that the need to do such surveys during the appropriate flowering season be added to ensure the effectiveness of these surveys.
- ④ 4) We wish to note that another population of Piperia michaeli that occurs at Panther Beach needs to be protected. It is located on a slope overlooking the south end of the beach and appears to be a popular viewpoint for people, especially around the July 4 holiday when use is high. Kathy Lyons and Randy Morgan, both local botanists, are familiar with the exact location of this population.

Thank you for the opportunity to comment.

Sincerely,

Laurie Kiguchi  
Conservation Chair

RESPONSE TO COMMENTS BY LAURIE KIGUCHI, THE CALIFORNIA NATIVE PLANT SOCIETY

Comment 1.

Comment acknowledged. The EIR does state that a significant impact would result to rare plant habitat from construction of the proposed 110-vehicle parking lot.

Comment 2.

The species of Castilleja listed in Appendix A of the General Plan is C. latifolia. A complete field reconnaissance was not conducted as part of the preparation of the EIR to positively confirm the identification of this paintbrush species. This comment supports the need for additional rare plant clearance surveys prior to the initiation of proposed improvements or modifications, as recommended in the EIR.

Comment 3.

Agreed. The mitigation measure should be revised to state that field surveys conducted to determine the existence or absence of sensitive plant species should occur during the appropriate flowering season.

Comment 4.

Comment noted. The General Plan should be revised to reflect this comment.

SIERRA  
CLUB



SANTA CRUZ REGIONAL GROUP, VENTANA CHAPTER

P.O. Box 604, Santa Cruz, CA 95061

(408) 426-4453

June 1, 1989

Pete Parkinson  
Environmental Coordinator  
County of Santa Cruz  
701 Ocean Street  
Santa Cruz, CA 95060

Re: Draft EIR for the General Plan for  
the North Coast Beaches

Dear Pete:

The following comments on the Draft EIR for the North Coast Beaches General Plan are submitted on behalf of the Santa Cruz Regional Group of the Sierra Club, Conservation Committee.

Page 5 - The EIR is presented as a program EIR, pursuant to the CEQA Guidelines. However, it is evident throughout the EIR that sufficient environmental analysis on crucial issues of habitat impacts and wetland modifications is not contained in this EIR. Deferring mitigation measures to future studies is not permitted under recent case law (Sundstrom v. County of Mendocino). The EIR should, therefore, clearly provide that further environmental analysis, with public review, will be conducted prior to implementation of affected components of the North Coast Beaches Plan.

Page 29- The Scott Creek Beach project description states that "turning and deceleration lanes on Highway 1 may be required." If such modifications to Highway 1 are part of the project it should be clearly stated, and analyzed for environmental impacts in this EIR. If not, then it should be stated that further environmental review will be required if Highway 1 modifications are proposed at some future date.

Page 32 - The location of vault toilets at Laguna Creek Beach should be definitely stated and analyzed in this EIR; if that cannot be done, then both locations must be considered in the EIR.

Page 35 - The discussion of the Natural Systems Element should mention that LCP policy 1.4.1 limits uses within dunes and coastal strand to scientific research and educational instruction.

Page 38 - The discussion of Visual Resources here should mention that the 30-car parking lot at Scott Creek Beach is inconsistent with LCP policy 6.2.2. The language of LCP policy 6.2.2 should be stated here.

*...to explore, enjoy and protect the wild places of the earth.*

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PARKING DEPARTMENT

6 Page 42 - If it is proposed or suggested that any LCP policies be amended, then the specific policies should be listed here, and the environmental impacts, especially cumulatively, of amending those policies must be analyzed in the EIR.

7 Page 42 - Section 3.4.3 - If any highway improvements requiring encroachment permits are included in the project, the environmental analysis should take place in this EIR. Caltrans typically does not do environmental analysis with public review for its encroachment permits, nor is a public hearing usually provided for such permits. Caltrans will rely on this EIR if it is certified, therefore it is essential that environmental review of highway alterations occur in this EIR.

8 Page 47 - It is unclear from the discussion here whether it is being suggested that there are two trails from the proposed blufftop parking lot down to Scott Creek Beach. The location of the trails should be identified on a map.

9 Page 50 - Drainage from Davenport Landing Road. If analysis of culvert capacity is beyond the scope of this EIR, then the EIR must state that further environmental and public review will occur prior to project implementation that would create runoff impacting the culvert in question.

10 Page 57 - We would support elimination of the proposed 30-vehicle parking lot at Scott Creek Beach as the only adequate mitigation measure for impacts identified.

11 Page 58 - Davenport Landing - How many spaces would be eliminated by removing the proposed parking from the coastal side of Davenport Landing Road?

12 Page 59 - Bonny Doon Beach - Another mitigation measure to reduce erosion hazards at the railroad crossings would be to reduce the length of the parking lot so that only two stairways across the railroad tracks would be needed.

13 Page 61-62 - We would support elimination of the structural staircase as a mitigation measure. However, it is unclear how a "rough surfaced concrete ramp" along the existing trail to Laguna Creek Beach constitutes a mitigation measure. Mitigation for what? Such a concrete surface would have visual and other impacts not analyzed here, and is utterly unnecessary since the trail crosses exposed rock much of its length.

14 Exhibits 10-11 - It should be clarified what species of plants and animal have actually been observed in the program area, and which are just predicted to occur.

15 Page 70 - Scott Creek Beach - The "site specific" studies proposed prior to dune restoration would need to be subject to public review as part of a further environmental review process for a specific dune restoration component of the program.

16 Page 71 - Scott Creek Beach - The "detailed analysis" proposed here would also need to be subject to public review as part of further environmental review for a specific hydrological modifications project



component of the overall program.

(17) Page 72 - Wildlife - The statement that the General Plan will not "significantly increase future levels of use at any of the beaches" is not supported by sufficient evidence. (See discussion below.)

(18) Page 75 - Vegetation - The proposed studies described in the first paragraph would need to be subject to public review as part of further environmental review of any vegetation enhancement or restoration project proposed in the North Coast Plan. The same comment applies to the "site specific studies" mentioned on this page in relation to Scott Creek Beach and the 110-car parking lot.

(19) Page 76 - Section 4.6.2 - The absence of a field survey renders questionable the vegetation and wildlife analysis in this EIR. If such surveys have not yet been done, then none of the North Coast Beach Plan project components can be approved or carried out without further environmental review and the necessary public review. Since plant and animal habitat impacts occur at almost every beach, the absence of actual field surveys means that effectively the North Coast Beaches Plan cannot be approved and carried out at this time, i.e., until the surveys are done and subjected to public review.

(20) Page 76 - Detailed studies recommended for the Scott Creek Beach wetland must undergo public review as part of further environmental review on a specific project component.

(21) Page 77 - Same comment as above re detailed studies recommended for the Laguna Creek wetland.

(22) Page 84 - Land Use Impacts. There is insufficient analysis or evidence to support the statement that approximately the same number of people would use the beaches after improvements as use them now. There is no statement in the EIR which quantifies either the number presently using the beaches or the number predicted to use them when the project is completed.

(23) Page 85 - If parking areas and access trails were closed when pesticides were being sprayed, how often and at what times of year would that occur?

(24) Page 86 - The last paragraphs alludes to acquisition of an upland buffer area at Scott Creek Beach, and construction of levees. Is that part of the project? If so, then the impacts of those proposals must be analyzed in the EIR.

(25) Page 87 - Same comment regarding further public and environmental review for any detailed hydrological study of impacts on water supply and agricultural land for the proposed mitigation measure.

Exactly what is the nature of the revision proposed for the trail at Laguna Creek Beach and the trail between Bonny Doon and Panther Beaches? The mitigation measure is unclear.

(26) Page 91 - What are the trail improvements referred to here at Laguna Creek beach which could impacts archaeological resources?

(27) Page 94 - The visual impact analysis of the 30-car lot at Scott Creek Beach should include an analysis of compliance with LCP policy 6.2.2. The text should also mention -85- proposed parking lot is directly

within the viewshed of northbound travelers on Highway 1; and that the view of Scott Creek Beach is the first full unobstructed view of the surf, beach, and coastal bluffs on Highway 1 as one travels north. And also that it one of the most spectacular views on the entire North Coast! The proposed parking would be an incredible eyesore and blight in the center of that view which could not be effectively mitigated by a screening. If fencing were to screen the cars it would necessarily have an adverse visual impact, contrary to the statement in the EIR.

28 Page 99 - Laguna Creek Beach - The EIR refers to a "final parking lot expansion plan", and appears to suggest that the plan might be altered after environmental review. The final plan should be reviewed in the EIR, and the amount of grading determined. If not, then it must be stated that further environmental review with public review would be required.

29 Page 100 - Any grading and landscaping plan for the 30-car lot must be subject to further environmental and public review. A simpler approach would be to eliminate the parking lot from the plan.

30 Page 101 - The Transportation Impact Study referred to here should be subject to public review and included in the Draft EIR as an appendix. Similarly, the Draft Route 1 Caltrans document referred to in Footnote 1 should be included as an appendix to the EIR.

31 This section on traffic and circulation does not include any cumulative impacts traffic analysis. However, it is known that a major project is proposed in San Mateo County on the Cascade Ranch, just beyond the Santa Cruz County line. Other projects which might increase traffic on the north coast of the County should also be listed and considered.

32 Page 107 and Exhibit 14 - Exhibit 14 appears to be the basis for the statement in the EIR that beach use will not be significantly increased by the Plan. However, the figures in Exhibit 14 clearly show a significant increase in parking capacity for Scott Creek Beach, Bonny Doon Beach and Laguna Creek Beach. The figure of 206 spaces available at Davenport Landing also seems like an extraordinary overestimate. The increase in parking capacity at Scott Creek Beach is particularly large and obvious. There is also no analysis of what capacity increase would occur if it proved difficult or infeasible to enforce the Highway 1 shoulder parking restrictions. What evidence is there that sufficient resources will be available to achieve such enforcement?

There is also no discussion or analysis of the whole concept of beach carrying capacity, and whether it is an adequate basis for determining the size of parking lots. The County LCP files include data on actual beach use in numbers of people. That information should be included and analyzed. The total number of people estimated to use each beach should be included, with a substantiated assumption as to the number of persons per vehicle that can be expected.

33 Page 111 - Scott Creek Beach - Yet another study, of bicycle needs, is proposed here. At what point would that be done, reviewed, etc.?

34 Page 112 - Use of the rail line along the north coast, while possible, very desirable, cannot be designated as a mitigation measure, since it involves yet another future -86-y, and could not possibly be implemented.

North Coast Beaches EIR - page five

as part of implementation of the North Coast Plan.

The other proposed mitigation measure - intersection improvements at Davenport Landing Road - are significant projects in themselves would require further environmental review and analysis. When would these improvements be proposed and reviewed?

Page 112 - How is it proposed to "encourage" use of existing bus service?

Project Alternatives - Page 115 ff.

This section is inadequate due to consideration of an insufficient number of alternatives. The "mitigated alternative" should be broken down into an alternative for each beach considered separately. In addition, the alternative of reducing parking lot capacity where specific environmental impacts have been identified should be considered, e.g., the 110-car lot at Scott Creek Beach, the expanded parking area at Bonny Doon Beach. For example, one alternative at Scott Creek Beach would be to eliminate the 30-car parking lot, reduce the size of the 110-car lot to a level that would adequately mitigate identified impacts if possible, and/or consider an alternative parking location east of Highway 1, as recommended by the North Coast Beaches citizens committee with a crossing under the bridge at Scott Creek. It would appear that the EIR writers have not looked seriously at any parking lot alternatives at any of the beaches.

Page 117 - As stated above, there is insufficient evidence to support the statement that approximately the same number of people will use the beaches after improvements are made. There is also insufficient analysis of the impacts that may occur on other beaches in the area once fees are instituted at the beaches included in this plan. For example, it apparently is not proposed that fees be charged at Greyhound Rock; and Waddell Creek and Four Mile Beach are under State Parks control. How much beach use can be expected to shift to such free beaches, or to other small pocket beaches along the coast? (This comment is directed to the discussion on pp. 118-9 under cumulative impacts.) There may be serious financial constraints to implementing the plan at more than one beach simultaneously, as suggested. If simultaneous fee charging is necessary than it should be stated as a mitigation measure.

Page 119 - We would dispute the conclusion that there will be not be a significant change to the visual character of the area if the plan is implemented. The number of signs, etc. should be tallied, along with landform alterations (cuts and fills). A mitigation measure that reduces the cumulative impacts by limiting such alterations in total should be formulated.

Page 119-121 - The transportation mitigation measures seem desirable, however, there is no timetable or other commitment actually to carry out these measures proposed in the EIR.

Page 122 - Some of the visual impacts resulting from grading for parking lots will also constitute irreversible environmental changes.

On the whole, the EIR is well written and thorough. Thank you for consideration of our comments.

Yours truly,  
Celia Scott-Von der Muhll  
Celia Scott-Von der Muhll

RESPONSE TO COMMENTS OF CELIA SCOTT - DER MUHLL, SIERRA CLUB

Comment 1.

As discussed on page 5 of the DEIR this is a Program EIR prepared in accordance with section 15168 of the State CEQA Guidelines. Program EIRs identify those probable environmental effects that can be identified. For those impacts that cannot be predicted without undue speculation, the lead agency (in this case the County of Santa Cruz) can defer specific analysis until later points in the program approval or implementation process.

As discussed in section 15168 of the State CEQA Guidelines, once the General Plan has been adopted by the County of Santa Cruz subsequent activities in the program must be examined in light of the Program EIR to determine whether an additional environmental document must be prepared. If the County of Santa Cruz, or a responsible agency, concludes that the later activities might generate environmental effects not analyzed earlier, the agency must prepare an initial study leading to either an EIR or negative declaration. The initial study may rely on the Program EIR for its conclusions. If the agency concludes that no new effects will occur or that no new mitigation measures are required, the agency may approve the activity as being within the scope of the project covered by the Program EIR. In such a case no new environmental document need be prepared.

The assertion in the comment that further environmental analysis will be conducted prior to implementation of specific components of the North Coast Beaches Plan is, therefore, correct. The decision as to whether or not an additional environmental document will be prepared will depend on the findings of the lead agency.

This EIR does not recommend that the General Plan be revised at some later date to incorporate needed mitigation measures recommended in a future study. This EIR analyses the probable environmental effects that may occur with adoption and implementation of the General Plan. In those instances where significant impacts have been identified the EIR recommends feasible mitigation measures. In some instances the EIR does recommend that additional, detailed studies be undertaken. The purpose of such studies is not for the purpose of establishing mitigation measures but rather to further detail the specific course of action to be undertaken.

Furthermore, as stated above, subsequent activities taken to carry out the program will be subject to environmental review. The undertaking of the studies as recommended in the EIR will, therefore, not preclude further public scrutiny and review by other agencies.

Comment 2.

The EIR project description (DEIR page 29) of land use and facility recommendations at Scott Creek Beach is identical to the project description presented in the proposed General Plan (Plan page 42) in stating that "turning and deceleration lanes on Highway 1 may be required". The EIR's traffic and circulation analysis addresses this issue as follows (DEIR page 107):

An additional 30-vehicle parking area north of the bridge is proposed to be constructed as additional parking becomes necessary. The parking lot would be located at the top of the hill just before Highway 1 begins its downgrade towards Scott Creek. The parking area entrance should not have sight distance problems; however, Highway 1 shoulders should be widened at the parking area entrance to allow vehicles to decelerate and turn into the parking area without interfering with Highway 1 traffic.

Also see Response to Comment 9 of Save Our Shores.

Comment 3.

The EIR is a planning level document which is acknowledged in Comment 1, above (in noting that the EIR is a Program EIR), and is discussed in the Introduction to the report (DEIR page 1). The EIR states (DEIR page 1):

A Program EIR should identify those probable environmental effects that can be identified. For those impacts that cannot be predicted without undue speculation, the lead agency can defer specific analysis until later points in the program approval or implementation program.

The EIR analysis cannot be more site-specific than the project it evaluates which for Laguna Creek Beach is described on DEIR pages 31-32 and is illustrated on Exhibit 7. As noted in the General Plan (Plan page 2):

A General Plan is intended only as a guide; the precise design of facilities, configuration of new use areas and nature of programs, and concession arrangements will be further refined when specific aspects of the General Plan are funded by the State Legislature for implementation.

Specific effects of the vault toilets are not evaluated for the proposed location or other potential sites for these facilities.

Comment 4.

Comment acknowledged; the EIR hereby incorporates reference to Local Coastal Program (LCP) Policy 1.4.1 which limits uses within dunes and the coastal strand to scientific research and educational instruction.

Comment 5.

As noted by the comment, LCP Policy 6.2.2 would apply to the 30-vehicle parking lot. The parking lot would be inconsistent with this policy which is hereby incorporated in the EIR in response to the comment.

Comment 6.

The EIR recommends amending or revising some proposed General Plan policies. However, the EIR neither proposes nor suggests amending any LCP policy.

Comment 7.

The EIR has been prepared to cover a number of actions, foremost among which is to provide information for use by the County in the planning process now underway. The EIR also will be used by other public agencies in order to fulfill their CEQA requirements and has been prepared with the need of these other agencies in mind. The administrative actions' sections of EIRs are included specifically to reveal which agencies in addition to the "lead agency" (the County for this EIR) would have jurisdiction or permit granting authority for the project and, thus, to let the public know all the administrative review and approval steps which may be required of a project before it can be implemented. For one reason, this informs members of the public when they will have opportunities to participate in the planning and environmental review process. Inclusion of this section in an EIR also ensures that an effort will be made to address the concerns of the agencies listed in the EIR (and to whom the reports are sent for review and comment) so that subsequent environmental analysis of the project can be minimized or expedited if not eliminated altogether.

When application is made to Caltrans for encroachment permits, the applicant (County or other agency) would be required to show that environmental review has been completed. This EIR could be presented to and could be used by Caltrans, but there also is the potential that Caltrans could require additional environmental review, as noted by this comment.

Comment 8.

There is only one trail to the beach from the area of the 30-vehicle parking lot at the north end of Scott Creek Beach. It is located in the same area that was proposed for a structural staircase.

Comment 9.

The EIR states (DEIR page 50) that although it was beyond the scope of this EIR to evaluate whether or not this existing culvert is properly sized relative to the size of the drainage basin which drains through this culvert during recent high rainfall periods the culvert apparently operated without plugging or showing signs that it is undersized.

No geologic problems or potential hazards associated with this culvert are anticipated as a result of the proposed improvements at Davenport Landing Beach. The EIR merely suggests that if any revisions are proposed in the future for this culvert that consideration be given to determining if the culvert is adequately sized to accommodate all potential flow volumes.

Comment 10.

The mitigation section of the EIR states that elimination of the significant impacts associated with the 30-vehicle parking lot at Scott Creek Beach can only be achieved by elimination of the parking lot.

Comment 11.

A total of 90 parking spaces is proposed along Davenport Landing Road. The exact number of spaces that would be eliminated if parking was not permitted along the coastal side of Davenport Landing Road is not known at this time. It is estimated, however, that approximately 35 parking spaces would be eliminated if parking was not permitted along the coastal side of Davenport Landing Road.

Comment 12.

The structural stairways are designed to mitigate erosion of the railroad crossings. From a geologic standpoint it makes no difference whether there are two or three stairways. As discussed in the EIR if only two stairways are built in the parking lot as proposed, beach goers would probably re-establish the trails that are currently causing severe erosion of the railroad fillslope.

Comment 13.

The intent of the mitigation measure recommending a rough surface ramp at Laguna Creek for access to the beach was to provide a method of access for people who could not cross the rocky area that exists just before the beach area. It is correct that such a ramp could be inconsistent with the natural conditions of the area. Existing access to Laguna Creek Beach is probably adequate and it is recommended that this mitigation measure be eliminated.

Comment 14.

Appendix A and Appendix B of the General Plan provide lists of plants and wildlife respectively that were observed or predicted to occur on the North Coast Beaches. On two rare plants were positively identified on the North Coast Beaches during General Plan studies, both are identified in the EIR (DEIR page 66). The EIR preparers are not certain, as noted on DEIR page 66, which of the Animal Species of Special Concern were actually observed during the course of field studies for the General Plan. Potential habitat exists for all these species at some place in the planning area and, therefore, they should be considered in all improvement plans.

Comment 15.

As individual projects recommended in the General Plan are proposed to be implemented, they would be subject to environmental review. If this EIR is found to be adequate in covering the probable environmental effects of the project, no further analysis would be required. The County could determine the need to prepare a Subsequent or a Supplemental EIR, however, such as if the project deviated substantially from that assessed in this EIR or if future environmental conditions differed significantly from those conditions expected in the EIR.

Comment 16.

See Response to Comment 15 above.

Comment 17.

The comment quotes the EIR out of context and, thus, distorts the meaning which in context is correct. The EIR states that "the General Plan's proposals are not designed to significantly increase future levels of use at any of the beaches" (emphasis indicates text omitted from the comment). Put another way, the purpose in commissioning the General Plan and the underlying intent of its formulation is to manage program area resources and to provide fundamental facilities for visitors to the beaches. Those activities would accommodate people who currently visit North Coast beaches; those activities also are expected to accommodate people who otherwise pass the beaches without knowing (in the absence of signs, for instance) that public access is permitted. Thus, the number of people who use program area beaches would be likely to increase in the future, but the General Plan does not recommend programs or facilities which would "promote" beach use in such a way that the number of users would increase significantly. Nor would General Plan programs or facilities be expected to result in different types of beach uses which could be interpreted as significantly intensifying land use.

Other factors, primarily continued population growth in Santa Clara and San Mateo Counties, may account for greater numbers of people using program area and other Santa Cruz County beaches in the future, as acknowledged by the General Plan (Plan pages 11-14), but the General Plan is not designed specifically to accommodate or attract those visitors.

Comment 18.

See Response to Comment 15 above.

Comment 19.

It is understood that detailed field surveys were conducted during the proper phenological periods to identify and characterize biotic resources during development of the General Plan. Species lists and habitat characterizations included in the General Plan appear to be comprehensive and relatively accurate. It was beyond the scope-of-work, and the timing was not



appropriate, to reinventory the biotic resources of the North Coast Beaches. Review of the General Plan data based showed few gaps in the known literature and distribution of sensitive species in the region. The preparers of the EIR are confident that actual field surveys had been conducted as part of the preparation of the General Plan and that sufficient information was available to characterize General Plan impacts on biotic resources, except where specifically noted.

Comment 20.

See Response to Comment 15 above.

Comment 21.

See Response to Comment 15 above.

Comment 22.

The response to Comment 17, above, discusses the issue of the number of people who use and would use program area beaches now and in the future as a result of the General Plan's implementation. According to the General Plan (Plan page 11), use of Santa Cruz County beaches, including North Coast beaches, was estimated to be 3.3 million "visitor days"<sup>3</sup> in 1986 (the General Plan was prepared in 1987). "Visitor participation"<sup>4</sup> projections prepared by the California Department of Finance are presented in the General Plan for the years 1990, 1995, and 2000, according to recreational activity (picnicking, swimming, etc.) rather than by total "visitor days".

Comment 23.

Crops may be growing in fields during about eight months a year. As reported in the EIR (DEIR page 80), Brussels sprouts are transplanted to the fields in May and are harvested at one time in November, and artichokes begin sprouting in about September with harvesting sometimes extending into January. Pesticides normally are sprayed at night or in the early morning when winds are light (DEIR page 81), not during daytime beach-going hours. Agricultural workers are kept out of artichoke fields for four to five days after pesticides are used (which is less often than Brussels sprouts are sprayed). How frequently and for how long during the growing season parking areas and trails might be closed, however, would depend ultimately on the amount (or absence) of setback provided from agricultural operations by fences and vegetative buffers.

<sup>3</sup> The use of an area for a total of 12 person-hours by one or more people, either continuously or spread over several visits.

<sup>4</sup> A "participation day" is one person engaging in one recreational activity for any amount of time in one day; the General Plan does not present total participation days because recreationists frequently participate in more than one activity.

Comment 24.

The upland buffer referred to by this comment is discussed in the General Plan as part of a proposed biotic resource policy which recommends (Plan page 30):

The Department should consider purchasing in fee, or acquiring easements for, wetland preserves at the Scott Creek and Laguna Creek units. Consideration should be given to acquiring sufficient land for an upland buffer zone approximately 100 feet wide, and to eliminate the need for artificial sandbar breaching. ...

The area recommended to be acquired upland from Scott Creek as a "proposed wetland acquisition/easement boundary" is shown on Exhibit 3 of the EIR. This area constitutes part of the "program area" analyzed in the EIR's evaluation of vegetation and wildlife impacts.

Comment 25.

It is unclear what the comment is asking. If it is whether the mitigation measure is part of the project, the answer is no; the measure is recommended to mitigate an impact of the proposed project identified in the EIR. The General Plan policy (Plan page 20 and DEIR page 86) addresses habitat management and unspecified but "related impacts". The EIR analysis suggested the appropriateness of expanding the proposed General Plan policy to address agricultural water supply and land capability concerns.

Revision or modification of trails noted by this comment also are recommended by the EIR as a mitigation measure. The measure is recommended so that this concept can be considered for included in the final General Plan, but no alignment has been mapped at this stage in the planning and environmental review process. Information contained in the EIR will be used by the County to identify an alignment in the event that this measure is adopted and included in the General Plan.

Comment 26.

No direct impacts to either of the two archaeological sites at Laguna Creek Beach are anticipated as a result of the proposed improvements at Laguna Creek Beach. There will be no direct impacts on archaeological resources as a result of the proposed trail improvement.

The intent of the discussion in the DEIR on page 91 was merely to point out that if, at some time in the future, consideration was given to the improving some of the existing trails in the vicinity of the archaeological resource direct adverse impacts could occur. It is acknowledged, however, that no such improvements are contemplated by the General Plan.

Comment 27.

Comment acknowledged. As noted in response to Comment 5, above, the 30-vehicle parking lot would be inconsistent with LCP Policy 6.2.2(a).

Comment 28.

No project during initial planning phases -- when environmental review ordinarily occurs and is most productive -- is defined in sufficient detail to provide final plans, such as for parking lot layout or grading. The purpose of conducting environmental review of preliminary development plans or planning level conceptual plans is to identify the probable impacts early enough in the project's formulation so that measures to mitigate these impacts can be incorporated directly into the project. Put another way, it is more efficient to refine a project to take environmental considerations into account early in the planning process than it is to delay environmental review until after considerable effort and resources have been spent in defining a concept in detail.

Environmental review under CEQA provides ways, however, to account for and, if necessary, examine the effects of projects further as they progress and are defined in more detail -- something Program EIRs are designed to assist. Whenever a project evolves as the result of environmental input -- from information contained an EIR or developed through more detailed design -- it is reviewed to determine if the project departs substantially from the project analyzed previously or to determine if the environmental document is sufficient to cover the changed situation or altered project. A prior environmental document may cover a modified project; alternatively, it may be necessary to prepare a Supplemental or Subsequent EIR in order to analyze the elements of the revised project which differ from the prior project or to assess the effects of mitigation measures.

Comment 29.

As individual projects recommended in the General Plan are proposed to be implemented, they would be subject to environmental review. If this EIR is found to be adequate in covering the probable environmental effects of the project, no further analysis would be required. The County could determine the need to prepare a Subsequent or a Supplemental EIR, however, such as if the project deviated substantially from that assessed in this EIR or if future environmental conditions differed significantly from those conditions expected in the EIR.

The 30-vehicle lot is included in the proposed General Plan in order to give decision-makers and the public the full picture of what could occur at Scott Creek Beach in the future, beyond near-term development. Analysis of both short- and long-term development concepts in this EIR provides decision-makers and the public with comprehensive information versus piecemeal analysis of individual development concepts made over time -- a fundamental concept in both the planning and environmental review process.

The EIR analysis indicates, however, that unavoidable significant adverse impacts would be expected with construction of the 30-car lot. One approach to avoiding that impact would be to eliminate the lot from the General Plan. Another approach would be to modify the proposal for the lot in response to the environmental constraints present there, the effectiveness of which may or may not require further environmental review at a later time, depending on the solutions appropriate and proposed in the future.

Comment 30.

As noted in response to another comment, and as stated in the EIR (DEIR page 101), the Transportation Impact Study excerpted in the EIR is on file with and is available for public review at the Santa Cruz County Planning Department, as is customary with background reports of this nature. It is hereby incorporated in the EIR by reference, as is common practice in accordance with CEQA's recommendation to reduce the length of environmental documents.

Comment 31.

The traffic analysis does not include Cascade Ranch in San Mateo County. The reason for this is that the North Coast Beaches Project was not expected to increase traffic demand. Instead, the project is designed to provide facilities such as parking lots located off of Highway 1 and bus stops at beaches which are intended to serve existing beach users. The beach improvements are not expected to add significant traffic to Highway 1.

The specific impacts of other projects on Highway 1 traffic conditions should be addressed in the individual project's EIRs.

Comment 32.

This comment asks several questions. Each is addressed below.

Parking capacity increase at Scott Creek Beach: DEIR Exhibit 14 shows an increase from 10 available spaces to 110 under the Plan. This, it must be emphasized, is the increase in off-road parking, not actual observed parking at Scott Creek. As shown in DEIR Exhibit 14 average demand is defined as the actual number of vehicles parked at the beach during peak summer weekends (1987). Other surveys confirm that currently almost 100 vehicles park at Scott Creek Beach on peak weekends. The General Plan would simply make improvements to a parking area to increase safety on Highway 1. They are not designed to increase beach use.

Parking capacity increase at Fanny O'Connell Beach: DEIR Exhibit 14 shows that the number of off-road parking spaces would increase from 50 to 80 spaces as part of the General Plan improvements. The exhibit also shows that 100 vehicles park in the area to use the beach based on observations made in the peak summer weekends of 1987. The impact of the project will be to simply increase the amount of off-road parking for existing users which should not increase beach use significantly.

Parking capacity increase at Legunt Creek Beach: DEIR Exhibit 14 shows an increase in off-road parking from the existing 30 spaces to 60 spaces under the Plan. However, currently 50 vehicles park on peak summer weekends at this location off the road and on the sides of the road. The absolute increase in off-road parking (30 spaces) should not lead to significant increases in traffic, especially when it only adds about 10 spaces to actual observed parking patterns at the beach.

Davenport Landing parking capacity: DEIR Figure 14 shows 206 available parking spaces at Davenport Landing. This estimate includes parking on the sides of Davenport Landing Road which forms a loop on the ocean side of Highway 1. As part of the project, selected parts of Davenport Landing Road's shoulders would be improved to facilitate parking. The project proposes improving the shoulders to accommodate 90 vehicles, not the 206 shown in DEIR Exhibit 14.

Capacity increase if Highway 1 parking restrictions could not be enforced: The carrying capacity of the beaches was determined based on the beach size and an average comfortable amount of space (1,000 sq. ft.) per individual or party. (Plan, Pages 38-40). Thus, the carrying capacity of each beach has not been determined based on parking size.

At most of the beaches very little additional off-road parking is proposed. (The major exception being Scott Creek Beach where 100 additional off-road spaces are proposed). Thus, the difference between traffic attracted to the beach with the additional off-road parking and without it should be small.

Resources available to enforce Highway 1 parking restrictions: Parking regulations on California State highways are enforced by the California Highway Patrol (CHP). The CHP does not have the resources necessary to enforce parking restrictions on Highway 1 on a daily basis. However, the CHP will develop a regular program, working with the County, designed to effectively enforce parking restrictions necessary for safety reasons. It is important to emphasize that parking restrictions are not designed to limit beach capacity. They are intended to improve safety on Highway 1.

Concept of beach carrying capacity: Is it an adequate basis for sizing the parking lots? The parking lots proposed as part of the project were not sized to accommodate beach carrying capacity. They were sized based on physical ability of the site to accommodate parking and on the observed parking demand (DEIR page 107, and Plan Pages 38-40). This is also illustrated in DEIR Exhibit 14, in which carrying capacity is higher than targeted supply at four of the six beaches.

County LCP Files: Number of people using beaches: The improvements proposed as part of this project have been sized to meet existing demand and to be consistent with similar neighboring facilities. In terms of parking, this means that observations of the number of vehicles parking in the beach area, on typical summer weekends, was used to estimate the parking demand. This methodology should yield more accurate results, for purposes of estimating transportation impacts, than one which measures beach usage (in terms of numbers of people) and estimates the number of people who travel together in vehicles.

Total number of people who will use each beach: As discussed above, estimating traffic impacts by observing the number of attracted vehicles is more accurate than estimating the number of users and making assumptions as to the number of users per vehicle.

Assumption on number of people per vehicle: No assumption was made for the number of people who would travel in each vehicle to the beaches. The reason for this is that actual measurements were made of existing demand to evaluate the project's traffic impacts.

Comment 33.

As discussed in response to comments 1 and 29 above, as individual projects recommended in the General Plan are proposed to be implemented, they would be subject to environmental review.

Comment 34.

Use of the rail line is mentioned as a possible future improvement. As discussed above (See Response to Comment 33 above) rail service would require its own environmental review. The intent of mentioning rail service was to alert EIR readers and County officials the possibility of using the rail line and to ensure that nothing be done as part of the North Coast Beaches General Plan to preclude that possibility.

Comment 35.

Improvements at the Davenport Landing Road intersection with Highway 1 would be studied when specific engineering improvements are designed for the Davenport Landing Beach (also see Response to Comment 33 above).

Comment 36.

Bus transit use would be encouraged using the measures described in the EIR (DEIR page 120). These measures are not required because of the project, but to address cumulative traffic. These measures should be implemented by the County and SCMTD (Metro) as part of their program to increase ridership. No specific timetable is proposed.

Comment 37.

Considering each beach separately as suggested by the comment would diminish the purpose of the planning process to provide a comprehensive General Plan for the program area. The 30-vehicle and 110-space parking lots at Scott Creek Beach would be eliminated altogether under the Mitigated Alternative (DEIR page 116) because both are expected to result in unavoidable significant adverse impacts (DEIR pages 121-122). The commentator's concept of decreasing the size of the parking lot as an alternative in order to mitigate impacts of the project as proposed potentially could reduce but would not eliminate the effects of the project. The commentator's concept would avoid the alternative, however, of providing for parking elsewhere at Scott Creek Beach which would remove agricultural land from projection.

Comment 38.

In response to the commentor's concerns about the numbers of people who would use Program Area beaches upon implementation of the General Plan, reference is made to the responses to comments 17 and 22, above.

Experience in San Mateo County where "free" beaches are located near or adjacent to "pay" beaches suggests that charging at some beaches does not necessarily influence (increase) use levels at "free" beaches. Some beach-goers want and are willing to pay for a higher level of development or more services, such as restrooms or someone watching parked autos. (Fees in the past have varied according to the facilities or services provided, although one uniform fee is being instituted at all beaches.) The extent to which San Mateo County's experience would apply to Santa Cruz County's North Coast beaches, however, is not known at this time. Charging fees at Program Area beaches potentially could affect students and other beach-goers who have little money or for whom absence of facilities may be unimportant (but for whom the presence of facilities would alter the character of beach-going).

Comment 39.

The EIR reports that project implementation would result in cumulative changes in the visual character of the program area and discusses the introduction of signs and alterations also noted in the comment. The changes discussed in the EIR and addressed by this comment would occur in a 13-mile area and, thus, would not be concentrated in such a way as to be individually noticeable by the majority of viewers who will observe the program area on a regular basis.

The alterations of landform through grading would occur in an area previously affected by man's activities; in some cases, for instance, the proposed project would modify existing road cuts created when Highway 1 or the railroad were built, as opposed to resulting in grading of natural landforms. These changes also would occur in an area constantly subject to human agricultural activity which involves tilling of the land surface and the cyclic growing and cutting (harvesting) of vegetation (crops). Many activities in the program are constantly altering the visual quality of the landscape, just as natural processes are continually shaping and reshaping the shoreline and adjacent land in and near the program area. Although the predominant character of the program area is rural, that character is not untouched. In this context, the type of tally suggested by the comment would not contribute meaningfully to an understanding of the project's environmental implications.

Efforts to minimize further or more dramatic changes to the highly scenic character of an area so close to a major metropolitan area can be applauded. Apart from contributing incrementally to changing views -- largely for drivers and other people traveling on a State highway -- and identified as a cumulative impact in the EIR, the impact would not be "significant".

Comment 40

The comment is correct, but the mitigation measures would not be required because the impacts they address were not identified as significant adverse impacts.

Comment 41

Comment acknowledged. The project could result in irreversible visual impacts.



RESPONSE TO COMMENTS OF MAY 23RD BOARD OF SUPERVISORS MEETING

On May 23, 1989 the Santa Cruz County Board of Supervisors considered the General Plan for the North Coast Beaches Draft Environmental Impact Report. At that meeting four individuals made oral comments regarding the Draft EIR. Persons speaking and their comments were as follows:

Josh Goldstein, Chairperson Save Our Shores

Mr. Goldstein raised concerns regarding the geology and soils section, the visual and aesthetic considerations section, and the traffic and circulation section of the EIR. Mr. Goldstein's verbal comments were a summary of the comments contained in his letter of May 22, 1989 to the Santa Cruz Planning Department.

Response to Comments

See responses to comments of letter dated May 22, 1989 from Josh Goldstein, Chairperson to Environmental Coordinator, Santa Cruz Planning Department, no additional responses necessary.

Tom Killion

Mr. Killion stated that his concerns were similar to Mr. Goldstein's comments. Mr. Killion stated that he was primarily concerned with the visual impacts of the 30-vehicle parking lot proposed at Scott Creek Beach and the visual impact resulting from the installation of signs and structures associated with each beach improvement. Mr. Killion also expressed support for alternatives means of transportation in the North Coast Beach area to reduce the impacts of automobiles.

Response to Comments

See responses to comments of letter dated May 22, 1989 from Josh Goldstein, Chairperson to Environmental Coordinator, Santa Cruz Planning Department, no additional responses necessary.

Scott Thompson, Santa Cruz Board Sailing Association

Mr. Thompson stated that if improvements were to occur at the North Coast Beaches such improvements should be completed without denying access to board sailors. Mr. Thompson said that board sailors required adequate parking, a rigging area, and a safe launch area.

Response to Comments

Comment acknowledged. The comment addresses the merits (not the environmental effects) of the proposed General Plan insofar as recreational use by board sailors is concerned; thus, no response is necessary in the EIR. Inclusion of this comment in the EIR, however, will makes the speaker's views available to public officials to take into account when they make decisions of the General Plan and the content of that plan.

Celia Scott-Von der Muhll, Sierra Club

Ms. Scott-Von der Muhll raised concerns regarding the adequacy of the mitigation measures, the visual impact analysis, the policy analysis, and the alternatives analysis. Each of Ms. Scott-Von der Muhll's concerns were further explained in the subsequent letter to Mr. Pete Parkinson, dated June 1, 1989.

Response to Comments

See responses to comments of letter dated June 1, 1989 from Celia Scott-Von der Muhll, Sierra Club to Pete Parkinson, Environmental Coordinator, County of Santa Cruz, no additional response necessary.