

APPENDIX B

Notice of Preparation Comments

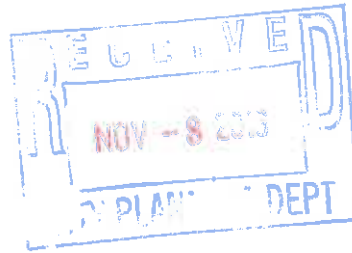
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DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
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October 27, 2016

SCrz-1-17.24
SCH# 2016102018

Ryan Bane
City of Santa Cruz
809 Center Street, Room 206
Santa Cruz, CA 95060

**COMMENTS TO 1930 OCEAN STREET EXTENSION-40 UNIT CONDO DEVELOPMENT
NOTICE OF PREPARATION**

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the above referenced project and offers the following comments.

1. Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel.
2. The environmental document should include an analysis of the multimodal travel demand expected from the proposed project. This analysis should also identify potentially significant adverse impacts from such demands and the subsequent mitigation measures to address them. Early collaboration, such as sharing the analysis and findings with Caltrans prior to official circulation, can lead to better outcomes for all stakeholders.
3. Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.
4. Our future comments to this, and any subsequent EIR for the project, will stress the importance of using the Association of Monterey Bay Area Governments Model for traffic analysis.
5. The traffic study should include information on existing volumes within the study area, including the State transportation system, and should be based on recent traffic volumes less than two years old. Counts older than two years cannot be used as a baseline. Feel free to contact us for assistance in acquiring the most recent data available.

Ryan Bane
October 27, 2016
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6. At any time during the environmental review and approval process, Caltrans retains the statutory right to request a formal scoping meeting to resolve any issues of concern. Such formal scoping meeting requests are allowed per the provisions of the California Public Resources Code Section 21083.9 [a] [1].
7. Any work within the State right-of-way will require an encroachment permit issued from Caltrans. Detailed information such as complete drawings, biological and cultural resource findings, hydraulic calculations, environmental reports, traffic study, etc., may need to be submitted as part of the encroachment permit process.

If you have any questions, or need further clarification on items discussed above, please don't hesitate to call me at (805) 542-4751.

Sincerely,



JOHN J. OLEJNIK
Associate Transportation Planner
District 5 Development Review Coordinator
john.olejnik@dot.ca.gov

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

From: Ryan Bane [<mailto:RBane@cityofsantacruz.com>]

Sent: Thursday, November 10, 2016 5:24 PM

To: Stephanie Strelow

Subject: FW: CAUTION: Verify Sender Before Opening! OSENA response to the EIR scoping

NOP comments

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

From: Ellen Aldridge [<mailto:emailellen@me.com>]

Sent: Monday, November 07, 2016 3:56 PM

To: Ryan Bane

Subject: CAUTION: Verify Sender Before Opening! OSENA response to the EIR scoping

Attached please find the comments of the OSENA to the scoping of the draft EIR for the project proposed for 1930 Ocean Street Ext. I will send the referenced photos under separate email. Please feel free to contact me if you have any questions or need further information.

Ellen Aldridge.
831-331-7599

November 5, 2016

Ryan Bane, Senior Planner
City of Santa Cruz Planning and Community Development Department
809 Center Street, Rm. 206
Santa Cruz, CA 95060

RE: 1930 Ocean Street Extension, APNs 008-004-02, and -01

Scoping Comments for the Environmental Impact Report

Dear Mr. Bane:

The Ocean Street Extension Neighborhood Association (OSENA) thanks you for the opportunity to comment on the Environmental Impact Report (EIR) scope of work for the 1930 Ocean Street Extension (OSE) project. OSENA is a neighborhood association of over 50 residents of Ocean Street Extension. OSENA objects to any amendment to the General Plan designation and/or the rezoning of parcels to increase density on this rural street straddling the City/County border. Such a

decision is inconsistent with the City's General Plan, Municipal Code, and flies in the face of basic land use principles. OSENA will continue to vigorously oppose any re-designations/rezoning of this parcel absent major infrastructure improvements and environmental mitigation efforts and will seek support from all City residents opposing the City Planning Department's proposed move to increase density in City neighborhoods without considering the environmental impact, ensuring adequate infrastructure improvement and maintaining consistency with current land use planning established in the 2030 General Plan.

This project proposes the development of 40 condominium units and requires a General Plan Amendment, Zoning Map Amendment, Tentative Condominium Plan, Design Permit, and Planned Development (PD).

In your Notice of Preparation of an Environmental Impact Report dated October 7, 2016, you indicate that six topics will be addressed in the EIR: air quality and greenhouse gas emissions, geology and soils, hydrology and water quality, traffic, and public utilities. Below we have provided scoping comments first on these topics and then, in the following section, we have provided comments on the additional topics that we believe must be addressed to fully vet the potential significant environmental impacts of this project. Those topics are: aesthetics; agriculture and forest resources; biological resources; and hazards and hazardous materials and cultural significance.

I. Proposed Topics to be Covered in the EIR

A. Air Quality and Greenhouse House Gas Emissions (GHG)

OSENA agrees that a thorough analysis of both short-term (i.e. construction) and long-term air quality and greenhouse gas emissions must be provided. Included in this analysis, must be the adjacency of crematorium emissions, including particulate emissions (e.g., ash) as well as arsenic, hexavalent chromium (VI), polychlorinated dibenzo-p-dioxan and dibenzofuran (PCDD/F) emissions (some of which are potentially bio-accumulating). The North Central Coast Air Basin is in "non-attainment" status because it exceeds air quality standards for ozone and inhaled particulate matter. The City's General Plan notes that the Monterey Bay Unified Air Pollution Control District and local agencies are concerned with reducing the emission of CFCs and greenhouse gasses. The General Plan has a goal to achieve clean air (Goal HZ2), including an objective to meet air quality standards for the region. How will this car-based development comply with these objectives and policies? With tandem parking and the current usage of available parking by

existing usage especially including cemetery memorial services, how will the additional driving due to the constant moving of cars be accounted for?

With respect to emissions from the crematory: While the scope of the EIR indicates that the air contaminant issues related to the operation of the adjacent crematory needs to be evaluated, the crematory's current location adjacent to the proposed residential development has to be considered. There is an existing entitlement to re-locate the crematory to the west side of OSE, which has not yet been exercised. Given this, the conditions that exist at the time the EIR is performed are those that are relevant since the City has no authority to require the crematory to move. Moreover, the issues related to mercury emissions have not been resolved. There is no proof that any changes have been implemented in cremation procedures with the crematory in its present location, nor are there sufficient safeguards in place presently to protect the future residents from all toxic emissions and particulate matter. What compliance monitoring is in place, and how often is evidence of compliance updated? Any EIR must evaluate the environmental and public health impact of all emissions from the crematory retorts. In addition to the cremations, the retorts periodically emit substantial black smoke particulate matter for a period of time (please see photos). Particulate deposition has been noted by nearby residents. The health effect of these needs thorough analysis in the EIR and comment by the MBAPCD.

B. Geology and Soils

(a-i-iv) The initial study fails to note a serious hazard, one that OSENA has pointed out previously, which must be addressed in the EIR. Namely, three known landslides have occurred on the western flank of Graham Hill Road (1999, 2001, and 2016). Given the project's close proximity to Graham Hill Road, the variance included in the project to allow residences to be located within 10 feet of a 30 percent slope, and the fact that the increase in density will put even more people in harm's way, a geology report must be prepared to fully evaluate this potential hazard. General Plan policy HZ6.2 (Discourage development on unstable slopes) and supporting policy HZ6.2.1 (Require engineering geology reports when... excavation and grading have the potential for exposure to slope instability or the potential to create unstable slope or soils conditions) support the requirement to provide a geology report.

Analysis should be given to the project's compliance with Municipal Code 24.14.030 (Slope Regulations) and, in particular, subsection 1.h. which states, "No new lot shall be created which will require the house to be sited within twenty feet of a thirty

percent slope.” Given that a Tentative Condominium Plan (i.e. a subdivision map creating new lots) is included in the project, how can this project comply with this requirement? Notwithstanding this issue, do the eastern most buildings in the subject development meet the minimum ten-foot slope setback required by Code Section 24.14.030(1)(g)?

A neighbor in Tanner Heights indicated at the scoping meeting held on October 26, 2016 that the Graham Hill roadbed in this location contains a substantial amount of fill. If true, this fill is not retained and could exacerbate the landslide/mudflow issue noted above. The EIR and geology report should evaluate the accuracy of this account and address the issue as needed.

The geology report should also evaluate the liquefaction potential of the southern third of the project site as identified in the geotechnical report (per the initial study).

Has the stability of the ephemeral stream/gully located on the northern parcel been evaluated as no review documents were provided to the public on the City’s website. Currently, slope stability appears to be provided by chunks of cement. Will this be remediated and retained with engineered retaining walls, as needed?

(b, d) A surveyed slope map should be provided in order to clearly establish the project site’s topography. In particular, a slope map will inform the discussion regarding erosion potential. Santa Margarita sandstone is highly erodible and that erosion potential is amplified when slopes are present. The EIR should evaluate the potential impacts of erosion downstream from this project, including impacts on the existing storm water management system and the impacts to the San Lorenzo River, which supports steelhead and Coho salmon. Site runoff must be evaluated to ensure that it does not cause erosion. A grading and erosion control plan must be evaluated to determine whether or not grading volumes have been minimized and how erosion will be controlled both during construction and throughout the life of the project.

C. Hydrology and Water Quality

(b) The parcel appears to be mapped as Groundwater Recharge. Municipal Code 24.14.090 (Groundwater Recharge Areas) states, “Development within groundwater recharge areas...shall be planned to minimize adverse environmental impacts. Structures and other impervious surfaces in the R-1, R-L and R-M zoning districts

shall not cover more than 55 percent of the project site.” Does the project comply with this Code section intended to protect groundwater recharge areas?

Further, EQ Element Policy 2.3.2 states, “Within undeveloped groundwater recharge areas, new parcel divisions **shall be limited to one unit per 10 acres** and new uses that would pollute the groundwater shall be prohibited” (source Appendix G City of Santa Cruz General Plan / Local Coastal Plan Policies that Relate to City Creeks and Wetlands). There is no analysis in the EIR draft of how this requirement will be satisfied in the current development plan.

(d, e) The project proposes to add a substantial amount of impervious area to a now vacant site. The runoff generated by the project will increase substantially. Crossing Street neighbors have stated and all longtime OSENA members have observed that, even in moderate rainfall during non-saturated conditions, the storm water system becomes overwhelmed and flooding occurs. (See photos) Additionally, back-of-the-envelope calculations, given Bowen & Williams (2010) initial estimates of increases in runoff during 10 and 25-yr storms, the very real possibility that these were underestimates given a potential underestimate of water retention on the proposed site, the lack of error margins provided for these estimates, and the high level of water in the drains both on Ocean St. Extension and on Crossing St. (>70% of capacity) during the first storm in 2016 (i.e., non-saturated conditions), easily show how increased runoff might exceed current drain capacity and cause downstream flooding. To reduce the risk and severity of the project’s runoff causing downstream flooding, careful analysis of the storm water management plan must occur to ensure that the project complies with both local and State standards. Quantitative analysis of, at a minimum, 10-, and 25-year storms, with analysis of the downstream path (both its capacity and condition) and provision of safe overflow must be provided. Given the increased severity of storm events predicted with climate change, it is also necessary to consider 50-100 year storms. The quantitative analysis must account for any “run-on” the site receives, but in particular, run-on from Graham Hill Road. Moreover, the repeated failures of the Graham Hill Road storm water runoff system that have resulted in landslides on the western flank of Graham Hill Road need to be evaluate to determine what impact this flawed system will have on the proposed development, given its proximity to the 30% slope and road. Additionally, the grade of the access driveway to the project on Ocean Street Extension will potentially increase the concentration of runoff into the street creating a driving safety hazard that needs to be analyzed and mitigated.

On-site retention must use actual site conditions to evaluate the infiltration rate and the site’s ability to retain storm water. Given the noted soil variability found in the

borings, additional borings are likely needed to provide an overall understanding of the site's infiltration rate and its ability to retain storm water. The perched groundwater found at three feet must be considered and the wet area that precluded geotechnical field exploration must be evaluated.

(f) Given the steep slopes, erosion potential of the underlying soils of the site, and the proposed construction of 40 new residences, water quality impacts warrant careful consideration. In addition to construction impacts, new residents may improperly dispose of household waste, cleaners and other household products, and animal waste. Disturbance of the subject parcel's soils may mobilize likely contaminants from the crematorium such as mercury, arsenic, hexavalent chromium (VI), and/or polychlorinated dibenzo-p-dioxan and dibenzofuran (PCDD/F). The addition of 96 parking spaces for cars and their attendant oil/gas/antifreeze and other petrochemicals also raises concerns about water quality throughout the life of this project. This issue is particularly significant given the site's proximity to the San Lorenzo River and the fact the City of Santa Cruz Water District's water intake is located where runoff from the project will outlet. Given the significance of the project's location, the development of a Storm Water Pollution Prevention Plan (SWPPP) should be provided for evaluation to ensure compliance with the Water Quality Control Plan for the Central Coast Basin (Central Coast Regional Water Control Board). Given the large size of the project, does the project comply with both the impact to resources as well as flood control regulations?

Has a Phase 2 Environmental Assessment been completed to evaluate whether or not there are in fact contaminants from the crematory operations present in the soil that could become mobilized through project grading or expose construction workers and residents to contamination?

D. Traffic

Traffic is a serious issue for this project. (See Photos) The traffic study must consider/evaluate the following (a-f):

1. The background traffic data used for the project must be updated to include current trip counts and recent development, including the currently under construction 11-unit residential development and memory care facility on Jewell Street. Traffic counts must account for seasonal differences. For example, the previous analysis used traffic counts from a single winter day (March 9, 2007). Warm weather traffic counts are likely to be significantly

- higher given the increase in traffic from tourists/visitors. Additionally, traffic has substantially increased on Graham Hill Road since the adoption of the traffic flow app WAZE and any study needs to take into consideration peak traffic during both commute times and warm weather weekend traffic.
2. The project's impact on the Highway 1 and 17 on-ramps/off-ramps must be evaluated. In particular, the northbound on-ramp to Highway 1 requires careful analysis given that stacking during peak times can result in gridlock at the Highway 17/Ocean Street intersection and creates unsafe conditions for bikers when drivers enter the bike lane to pass cars waiting to turn.
 3. In addition to PM peak analysis, the traffic study must include AM analysis. Entering Graham Hill Road from OSE during peak morning traffic is already difficult and can require long waits for breaks in the Graham Hill traffic. Graham Hill is the major route for San Lorenzo Valley traffic entering Santa Cruz. AM peak usage appears to be more concentrated than PM peak usage.
 4. Intersection function and safety must be evaluated, including:
 - a. Graham Hill (GH) traffic speeds must use actual speeds, not posted speeds.
 - b. The effect the lengthening of the left hand turn pocket on Graham Hill Road both on northbound traffic (is there room for a longer turn pocket?) and how that will affect the geometry of the road alignment for southbound traffic, including impacts to bicycle traffic (drivers regularly enter the shoulder to get around cars waiting to turn left onto OSE). How will bicyclists navigate this tricky left hand turn onto OSE which requires them to cross the northbound GH traffic to reach the relative safety of the turn pocket? What is the risk of being rear-ended for drivers waiting in the left turn pocket?
 - c. Analysis of the breaking distances required for southbound GH drivers entering OSE must be provided as well as analysis of sight distance for those drivers turning right onto OSE. The topography in this location makes it impossible for drivers to see southbound vehicles on OSE. The acute angle of the turn, requires driver to cross into oncoming southbound OSE traffic to complete the turn onto OSE. Will the project's additional trips exacerbate this dangerous situation?

- d. Traffic accident data for the intersection since 2000 should be considered as there is significant accident history there. The cemetery sidewalk at the intersection of OSE and GH has been breached frequently by vehicles unable to navigate the turn and ending up in the cemetery. With the current traffic flow and design, there is a dangerous condition of public property creating substantial danger to pedestrians and cyclists at that curve. The impact of any proposed re-design of the intersection has to take this risk into consideration, including the excessive speed at which vehicles enter the intersection and veer into the bike path. Moreover, if the project design is based in any part on increasing alternative transportation such as walking, cycling or public transit, then the risk to the increased pedestrian traffic/bike traffic must be evaluated and remedied. This includes pedestrian/bike traffic through the narrow OSE exit lane onto GH, adjacent to a utility switch box and onto the sidewalk site of these frequent accidents. Should the public utility switch box be relocated to allow adequate space for the increase in pedestrian and cyclists through the intersection?
 - e. Removal/reduction of islands and the pine tree which afford a certain level of protection to southbound OSE drivers stopped at the stop sign, may increase the seriousness of any future accidents and any increased risk mitigated. Also the removal of a heritage tree needs to be evaluated in light of the City's Heritage Tree ordinance.
 - f. Increased light from the exterior and interior residences and vehicles at the development may impair driver's vision navigating the curved intersection of OSE and GH. The impact of additional light sources needs to be evaluated for traffic safety concerns.
5. This project proposes a 40-unit development on a rural road with no existing street improvements whatsoever. The lack of roadway infrastructure, in light of the proposed development, including the increase in density, needs to be evaluated for increased public safety risks. As such, the EIR should provide analysis of the adequacy of the proposed OSE road section, which includes a sidewalk on the western side, parking, and two 10-foot wide traffic lanes within a 40-foot wide right-of-way. Does this road section comply with the City's road improvement standards for arterial roadways supporting this level of density? Does it comply with General Plan Policies CD4.2.3 and M3.2.9 which require undergrounding utilities when major road

improvements or reconstruction is proposed and policy M3.3.1 (Enhance neighborhood livability through the design of road and transit improvements).

No provision for bikes has been made for bicyclists despite the City's General Plan having numerous policies supporting the provision and enhancement of bicycle usage and infrastructure (e.g. General Plan Policies M1.4.1 Assure that...street design will support pedestrian and bike improvements... and M2.3.1 Design for and accommodate multiple transportation modes; M2.3.3 Incorporate pedestrian, bicycle...in the design of...road projects; M4.2.3 Facilitate bicycling connections to all travel modes; and M4.3.1 Promote development of bike lanes on arterial and collector streets....).

Will 10-foot traffic lanes accommodate two-way traffic (and bicyclists) when farm vehicles, propane trucks, overflow parking from memorial services, and casket delivery trucks are present? With the SC Memorial Park, a public facility that has frequent large crowds and commercial deliveries, there should be analysis of road safety and improvements during the peak usages of both parcels fronting OSE.

Has the new road section accounted for the location of a PGE gas main which is located in the vicinity? Can grading and construction of the road improvements be done without affecting this now dated and fragile main? Has P.G.& E. provided comments on this project relative to the feasibility of construction near the gas main?

6. Parking demand: The parking that is proposed to be formalized on the western side of OSE is already in heavy use by Santa Cruz Memorial during large services, bikers and runners who stage their activities there, utility and construction workers who stop there for lunch, and others. In addition, OSENA is concerned about the tandem parking exception's effect on this on-street parking area. Tandem parking is impractical for day-to-day use which will likely result in residents parking on OSE, potentially resulting in parking issues and the overcrowding of narrow roadways around the development, including Crossing St. As OSE slopes down after passing the project the roadway narrows and these existing conditions creates an impaired line of sight for vehicles and a danger currently exists for the lack of road width for passing cars or bikes/pedestrians. How will the project parking and roadway improvements create or mitigate these existing issues?

7. Current trips include those generated by the approximately 49 residences on OSE and an unknown number of Paradise Park residents. The trips generated by the project will add substantially to the overall trip total. Consider whether or not the traffic report accurately calculates the project trip generation relative to the project floor plans, absence of alternative transportation, and likely demographics of future residents of the project? Does the trip generation account for the frequent closures of Highway 9 resulting in the only exit from the 400 residences in the Paradise Park neighborhood to be through OSE?
8. Emergency Access and Emergency Evacuation for the project specifically, and the OSE neighborhood and Paradise Park generally, must be evaluated. These issues are important in the event of earthquakes, fires, or floods, etc., all real dangers in this area. Does the project's proposed driveway conform to the fire department's slope requirements? If not, how will fire protection be provided? Given the site's slopes, its adjacency to a heavily wooded area, its location in a wildland fire hazard area, and the fact that the development itself would become fuel for a wildfire, adequate fire suppression and firefighting equipment access is essential.

OSE is a dead end street and is the only ingress/egress available to residents and could effectively become a choke point during emergency access and/or evacuation. There is no secondary access. When Highway 9 is blocked by construction, slides, or fallen trees, the residences of over 400 homes in the Paradise Park neighborhood must use OSE. Graham Hill Road is an arterial roadway providing emergency access to and from the San Lorenzo Valley. How will additional traffic generated by the project and the redesign of the intersection affect safe egress/ingress?

In the event of a catastrophe such as a wildfire in this high risk area, can OSE accommodate both emergency responders heading north on OSE in response to the emergency and residents of both OSE and Paradise Park fleeing south? How would the project improvements and traffic exacerbate this situation? Will the project comply with M3.2.3 (Ensure that street widths are adequate to safely serve emergency vehicles and freight trucks) and HZ1.2.5 (Continue to ensure that new development design and circulation allow for adequate emergency access)? It is our understanding that the covered bridge in Paradise Park cannot accommodate hook and ladder fire trucks. If this access choke point is blocked will this project lead to additional hazards to those on OSE and Paradise Park residents on the east side of the San Lorenzo? Has the

County Office of Emergency Services reviewed this project for consistency with the 2015-2020 County Hazard Mitigation Plan? CalFire protects County residents on OSE; was the project routed for their comments?

9. How does the project comply with the General Plan, which calls for trip reductions, since it is not located along a city transit or commercial corridor and there is no apparent way in which the project has attempted to reduce vehicle trips? (LU4.1 Encourage a transition to higher densities along the city's transit and commercial corridors; and M31.1 Seek ways to reduce vehicle trip demand and reduce the number of peak hour vehicle trips.) Did not the City determine that higher density was to occur on major transit arteries with established roadway infrastructure and transit improvements as proposed by the Corridor Plan, which does not include this parcel? What is the effect of proposing to allow infill density of this parcel outside the public process and design of the Corridor Planning Process?

E. Public Utilities

1. Water Supply. OSENA agrees that the project water demand should be evaluated relative to the recently updated water plans, demand projections, and water supply considerations. Conformance with General Plan Goal LU1.2 is required and the cumulative effects of recent and reasonably foreseeable development should be evaluated, particularly since the General Plan amendment and rezoning of the parcel were not contemplated at the time of the General Plan and water plans' adoption.

2. Sewage Lines and Treatment Capacity. Can the existing sewage lines in the neighborhood (near city limits), and capacity at the local treatment facility handle the additional load from the proposed development?

3. Gas line dangers. Over the past few years, significant work has been undertaken by PG & E on the gas line main that runs down Graham Hill Road, and also the gas line that services OSE. Since this project cuts into the slope adjacent to GH Road its impact on GH road gas pipeline stability and proximity risks need to be evaluated. Additionally the impact on the construction on OSE gas line safety needs to be considered.

F. Land Use

(b) The project proposes to amend this 2.74 acre parcel's General Plan designation from Low Density Residential (L) to Low Medium Density Residential (LM) and rezone the parcel from single-family residential, with about 11 possible new lots, to multiple-residence – low density which would allow the proposed 40-unit

development. This is almost a quadrupling in density at the urban edge where densities and intensity of use typically decrease as development approaches the City/County boundary. Ocean Street Extension is informal in character and charm, with no sidewalks or other formalized road improvements serving this, essentially, rural area. The proposed development is at odds with the existing pattern and character of development, and this topic warrants careful consideration in the EIR.

Related to this is the fact that Graham Hill Road provides a natural physical divide between multi-family and single-family zoning (the east side of OSE at GH is zoned single-family up to and including the subject property). This project effectively leapfrogs multi-family zoning over the R-1-10 single-family zone district. This conflicts with the existing pattern of development, puts development pressure on the agricultural lands located further north within the County's jurisdiction, and appears to be "spot zoning."

The City's General Plan has multiple policies supporting the goal of "Complete Neighborhoods" (e.g. policy LU4.2 Encourage land use changes that reduce the need for autos....). The intent of these policies is to protect the environment by reducing overall vehicle trips through developing residential uses where a variety of uses are present. Unlike along transit corridors within the City, the parcel is located at the City/County boundary where there are no schools, parks, grocery stores, libraries, medical offices or other shopping opportunities. The project appears to be a car-based development since there are no nearby bus stops and the proposed OSE road section has not accounted for bicycle traffic. Given this, the project should be evaluated for conformance with the General Plan policies written in support of the "Complete Neighborhoods" vision. What efforts has the applicant made to reduce the number of trips generated by the development (M31.1 Seek ways to reduce vehicle trip demand and reduce the number of peak hour vehicle trips.)?

The existing General Plan 2030, which was recently adopted, is an integrated document in which existing and anticipated development is considered relative to the various General Plan elements. When General Plan re-designations occur outside of the adoption of the General Plan, no comprehensive analysis or plan is made to account for infrastructure shortfalls or other consequences of the unanticipated development. Currently, analysis of the project's impacts extends only to nearby intersections with no regional evaluation of, for example, traffic impacts. Given this, what is the cumulative effect of amendments such as the one proposed for the subject parcel?

Does the proposed project comply with the zone district site standards, including height, floor area ratio, lot coverage, stories, open space, and parking? Have all of the areas that are likely to be used as bedrooms, but not labeled as such, been accounted for in the calculation of parking, trip generation and demand on public utilities?

As noted previously, the proposed slope exception appears to be in conflict with Municipal Code 24.14.030(1)(h) which prohibits new lots (such as those being created by this land division) from being located within twenty feet of a thirty percent slope. Even if this project removed the land division component (i.e. became an all-rental project), the project does not appear to comply with the exceptions standards where a minimum ten-foot slope setback is required (Section 24.14.030(1)(g)). How will the project demonstrate compliance with these Code sections?

II. Additional topics that should be evaluated in the EIR

A. Aesthetics

(c) Graham Hill Road is a natural divide between the higher density development along Ocean and Jewell Streets and the lower density development along Ocean Street Extension and Crossing Street. Currently, the OSE's zoning on the north side of GH is R-1-10 on the east side with the Santa Cruz Memorial property zoned Public Facility. The Santa Cruz Memorial property, a historic resource, has a rural/open feel because most of the property's 17.5 acres is devoted to graves. Continuing north, OSE dips down through a wooded area and, at Crossing Street, enters the County jurisdiction where the zoning changes to Residential Agriculture with a one-acre minimum on the east side of OSE and Commercial Agriculture on the west side. This reflects OSE's long history as the Italians Gardens agricultural area. Leap-frogging multi-family zoning over the existing single-family zoning to create an island of multi-family zoning would be grossly out of character with the area. Up-zoning the area to allow 40 units where about 11 units would have been possible, degrades the visual character as well as the quality of the site and its surroundings by introducing an incompatible development at the City/County boundary where, typically, the density and intensity of development decreases. This topic warrants careful consideration in the EIR.

Because of the parcel's slope, the proposed development will loom over OSE and Santa Cruz Memorial—the location of solemn memorial services and a designated historic property. This facility is used for long-term public grieving and the paying

of respect, such as when two SCPD officers laid in state for over a week in 2013. With the residential structures abutting this facility with little setback and building heights greater than 30 feet, the development will substantially interfere with the adjacent public use.

The mass and bulk of the project will only be amplified where there is no similar development in the vicinity. Because the project steps up the hill, the development will likely visually read as too massive and bulky for the site and context and block the scenic view of the town and Pogonip from Graham Hill Road. The proposed architecture appears to have no relationship to surrounding historically significant architecture of the Memorial Park. To fully evaluate the impact of the development, photo-simulations should be provided from OSE at road grade and from Graham Hill, and the consistency of an increased density/ zoning change on the adjacent use as a Memorial Park should be evaluated.

One of the benefits of a Planned Development project is that clustering allows greater flexibility and creativity in the site plan. The project's site plan does not appear to have taken advantage of this flexibility as the main design principle seems to be maximization of units while minimizing open or recreational space. Will this project be compatible with the cemetery/memorial use across the street? How does this project comply with General Plan policy CD1.4.1 (Use planned development and other clustering techniques to protect resources and views and allow for siting that is sensitive to adjacent uses)?

(d) The proposed 40-unit development is anticipated to introduce a new source of substantial light which will adversely affect nighttime views in the area. Currently, this area has dark nighttime skies because of its location at the urban/rural edge. The City's General Plan recognizes light "spillage" as an issue in its Hazards, Safety, and Noise element and even has a goal (GOAL HZ5) for minimal light pollution. Supporting policy HZ5.1 states, "Reduce light pollution." Policy HZ5.1.3 further amplifies this goal with, "Consider appropriateness of lighting when reviewing proposed development..."(96). Quantitative analysis should be provided to evaluate the existing light conditions as compared to calculated light conditions.

B. Agricultural & Forest Resources

(e) The proposed increase in density at the City/County boundary would put pressure on the agricultural lands further north both on existing operations and in relationship to eventual pressure to convert those lands to housing. Farm trucks will be required to navigate the southern end of OSE with the formalized road

improvements that leave little room for larger vehicles. Conflicts between project residents and farm-related traffic are likely. Although the County currently has strong policies protecting commercial agriculture, pressure from a creeping urban edge will inevitably increase with increasing densities. How is the proposed multi-family rezoning and increase in density resulting from the re-designation compatible with the existing agriculture uses nearby to the north? Additional analysis should be done to evaluate the potential impacts of the increased density at the urban edge. Have efforts been made to work with the County to ensure that lands within the City's Planning Area are developed with appropriate uses as is required by General Plan policies LU1.2.2 and LU2.3.5?

C. Biological Resources

(a, f) We are concerned that the one to two surveys conducted in only one season for species of concern are not adequate to establish presence/absence of such species. For example, the initial study indicates that surveys of the subject parcel were not done during flowering season. If that is case, how can the biologist be confident that no protected flowering species are present? The presence of patchily-distributed, nocturnal and/or highly-mobile wildlife may also not be captured by one or two day-time surveys.

Additionally, there are species of concern that were not addressed by the Biotic Review (2007) or subsequent update (2016). These include the White-Rayed Pentachaeta (*Pentachaeta bellidiflora*; California-endangered), a flower that may occur on this or adjacent properties. There was no mention of any reptiles in the Biotic Review. A garter snake that was possibly a San Francisco Garter Snake (*Thamnophis sirtalis tetrataenia*; federally-endangered – identifiable by turquoise markings) was recently observed on the perimeter of the property (early October 2016). The project is also located within 900 feet of mapped Sandhills habitat which can support endemic and federally-endangered species such as the Zayante Band-Winged Grasshopper (*Trimerotropis infantilis*) and the Mount Hermon June Beetle (*Polyphylla barbata*). Lots of grasshopper activity in the vicinity of the property has been heard in the recent months. Surveys targeting detection of species in question should be undertaken, using appropriate methodologies and during appropriate time-of-day and season, as required by foraging, reproductive and any migration habits of these species.

More generally, the Biotic Report did not thoroughly evaluate risks from the potential development to wildlife in the area. Increased paved area and car traffic would increase the risk of mortality for reptiles such as Western Fence Lizards,

Alligator Lizards, and garter snakes, and other ground-dwelling animals including California Quail. The potential exists for light emanating from the project to affect both diurnal and nocturnal wild animals in the vicinity. Diurnal species often need dark conditions for nighttime cover to ensure their survival, and the foraging, mating, and other behaviors of nocturnal species could be negatively affected. For example, what would be the effect on the Great Horned Owls and other owls and various bat species that have been observed on this property and adjacent and nearby properties? What would be the effect on the mating habits of the June Beetle or Zayante band-winged grasshopper in what is currently a dark, rural environment? We saw no note that a Habitat Conservation Program (HCP) was developed for the City's water treatment plant on Graham Hill Road to protect the June Beetle and associated species.

Risk mitigation efforts should be considered and incorporated into the project, such as habitat set-asides, protective fencing, reduced speed limits, restricted traffic, and restricted construction timelines to ensure breeding, nesting and migration habits of these native species are studied and protected.

D. Hazards & Hazardous Materials

(g, h) According to the County Office of Emergency Services, Santa Cruz County ranks 9th among 413 western state counties for percentage of homes along the WUI and 14th in California for fire risk (Local Hazard Mitigation Plan 2015-2020). The project is located adjacent to a heavily wooded area and roughly across the river from the Pogonip, one of five areas targeted within the City as likely to have a wildland fire. With high winds, a wildland fire could easily cross the river and Highway 9. Is it prudent to increase densities in this high hazard area, exposing future residents to the risk and also providing additional risk for future fires in the form of development itself? Has adequate analysis been given to the wildfire hazard risk associated with this parcel's location within the high hazard area? Will the project comply with the Local Hazard Mitigation Plan 2015-2020 which calls for appropriate road and secondary access improvement and creation program (C-8)? Has the project transportation engineer provided a wildfire or dam failure response analysis in a scenario where all of Paradise Park residents must exit the area using OSE? Careful consideration must be given to water supply required for this project, ingress/egress, and compliance with WUI policies. Secondary access on public roads for the development should be required to mitigate the impact on the already congested traffic chokepoint.

E. Cultural Resources

This parcel is located in the historical Italian Gardens neighborhood of the City of Santa Cruz, which has been consistently farmed since the City's founding. Prior to that, this area was a gateway to the historical Powder Mill and adjoining community. Earlier than that, it is possible that this parcel was occupied by Native Americans of the Ohlone tribe. As such there needs to be further analysis of the potential for archeological significance of the site, which may be adversely impacted by any significant grading and construction.

III. General Matters

A. Notice Concerns:

In addition to these scoping comments, OSENA questions whether there was adequate notice of this proposed EIR. According to one neighborhood resident, there was a standard (8.5" x 11") sheet of paper posted for one day at the site on October 14, 2016, which disappeared in the rainstorm of that weekend. If City code requires public notice longer than one day, notice should be provided. Similarly, all residents within 300 feet of the project did not receive notice of the development. Additionally, the supporting documentation was not made available on the City's website until a few days prior to the end of comment period and not all referred documents, such as a Gully Erosion Repair letter, and possibly others were posted at all. . This in no way is transparent government and should require extension of the comment period and Notice reposting.

B. Supporting Documentation

OSENA hereby incorporates by this reference all documents and reports that were submitted to the City Planning Department on behalf of OSENA during the initial processing of the proposed development of this parcel in 2010, and also all documents related to the emissions and operation of the crematory in the permit application proceeding to the Santa Cruz Memorial Park crematory relocation. If the City requires re-submission of these documents that are already in your files, please inform OSENA.

IV. Conclusion

Clearly, a substantial amount of additional analysis and professional opinion and study is required to fully vet the potential environmental impacts of this project. OSENA thanks you for this opportunity to comment on the scope of the EIR and looks forward to reviewing the Draft EIR and providing additional comments as

needed. OSENA requests notification of all project developments, including the issuance of the Draft EIR, Final EIR and any public hearings.

Respectfully Submitted,

Ocean Street Extension Neighborhood Association,
Representing over 50 residents of the Ocean Street Extension and side streets

November 4, 2016

Ryan Bane, Senior Planner
City of Santa Cruz Planning and Community Development Department
809 Center Street, Rm. 206
Santa Cruz, CA 95060

Re: 1930 Ocean Street Extension, APNs 008-004-01 and -02

Scoping Comments for the Environmental Impact Report

Dear Mr. Bane,

Thanks for organizing the community meeting to present pre EIR project status. Unfortunately, proceeding with this project at the 2016 general election time period does not allow for adequate public attention to this project.

The project at 1930 Ocean St. Extension proposes the development of 40 condominium units. Such density is contrary to the vision Santa Cruz City Council had in its 2030 General Plan and will disrupt the identity and vitality of our neighborhood. The dense parts of the city suppose to be at the centers of the city and along public transportation routes. This project is an urban sprawl which will stretch the distances people need to travel by private cars to get their needs met. We request that the EIR investigate this discrepancy.

Apart from this contradictory inherent issue with the proposed project which needs to be evaluated, we request that solutions for pedestrians, bicyclist and public transportation are investigated and proposed in the EIR.

We request that no rezoning of this parcel is allowed since this contradicts General Plan and City vision.

Please include us in any future process to change this project status as it seems to affect our lives significantly.

We submit this as comment on the scope of the EIR.

Respectfully,
Yosi and Ayelet Almog
45 Quail Crossing
Santa Cruz, CA 95060

From: David Chesluk [<mailto:davidchesluk@yahoo.com>]
Sent: Thursday, November 03, 2016 11:39 AM
To: Ryan Bane
Cc: Ellen Aldridge; Ellen Aldridge
Subject: 1930 Ocean St Extension

My concerns about the proposed development on this parcel are all about traffic. I have lived on Ocean St Extension for 41 years and I believe the left hand jog onto the extension at the foot of Graham Hill Rd is the most dangerous moment of my day. Traffic speeds downhill into a curve while anyone waiting to turn left is facing uphill and must cross this stream of traffic. That downhill curve is so treacherous that every year or two a vehicle crashes into the cemetery at the bottom.

When Highway 9 is blocked due to washouts, mudslides or down trees our narrow, winding country road is the only way out of Paradise Park toward Santa Cruz.

Parking is very limited on the extension with long stretches of no shoulder and cars often park illegally, partially blocking a lane. And parking at the head of the street is a real tangle when there is a funeral with overflow parking by the cemetery.

There is no sidewalk and no safe, easy access to walk to town at the head of the street. The bus stop that used to connect us to the Metro system is now closed.

Obviously, there is no alternative to this traffic pattern because we are a 1.7 mile stretch of narrow country road with no other way in or out.

I believe that 40 new units would turn a difficult traffic situation into a nightmare- dangerous for everyone involved.

David Chesluk 2234 Ocean St Extension

Lauren Crux LMFT, #8199

740 Front Street, Ste. 378

Santa Cruz, CA 95060

831 425-8700

Ryan Bane, Senior Planner
City of Santa Cruz Planning and
Community Development Dept.
809 Center St. Room 206
Santa Cruz, CA 95060

Re: 1930 Ocean St. Ext.
APN 008-004-02 NS PN 008-004-01
Proposed 40 Unit Residential Development

12/2/16

DEC 5 2016

Dear Mr. Bane:

I own a home on Ocean St. Extension and I own a business in the city of Santa Cruz.

I am strongly opposed to the proposed to the 40 unit residential development. I have emailed you about this earlier but never had a response so am writing you.

This area was originally zoned for 10 units. The city unwisely and without a big picture in mind changed the zoning to 40 units, which is not permitted by the General Plan and the Zoning Map.

I am opposed to any amendment of either the Plan or the Map which would allow such a development in this one of the last rural single family residential neighborhoods in the area. 10 units OK. 40 not OK.

There is already a serious problem with traffic on a curve that is already unsafe. During peak commuter hours I have had to sit and wait 5, 10 minutes or more to exit our street or to return home to my street. The developers hired a traffic study that was not taken during peak hours and was of course favorable to the developers. 40 units means 80 more cars added to a road that is already inadequate---especially given that it is an important evacuation route for Paradise Park and for the rest of us on the street.

Lauren Crux LMFT, #8199

740 Front Street, Ste. 378
Santa Cruz, CA 95060

831 425-8700

There has not been adequate environmental studies that address issues such as:

Drainage

Slopes

Pollution and environmental safety

Protected Species

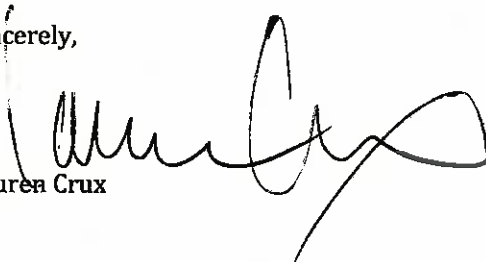
Water safety

and so forth. I refer you to the extensive document that OSENA (Ocean Street Extension Neighborhood Association) has submitted re: all of this.

Additionally, the developers arrogant approach that "we have the city council in our pocket," and neglect to consult with the neighborhood and subsequent hostility to our neighborhood concerns seems untoward to say the least. Also, the city's initial dismissal of all of our concerns also seems untoward. I hope you will correct this situation.

Yes, we need more housing in Santa Cruz. But to just stuff it in areas that will greatly degrade the environment, traffic, safety and that will result in numerous other costly "fixes" is short-sighted. We need a larger understanding of what the entire community, city and county wants to look like, feel like. Not just take an opportunistic approach that in the short run seems like a fix but in the long run ruins a city and its environment.

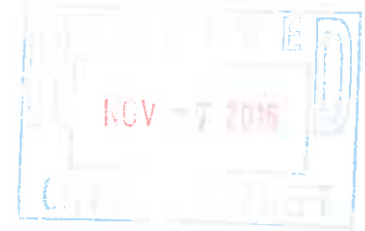
Sincerely,

A handwritten signature in black ink, appearing to read 'Lauren Crux', with a large, stylized flourish at the end.

Lauren Crux

DEC 5 2016

NICK J. DROBAC
Attorney at Law
218 Majors Street
Santa Cruz, CA 95060
Telephone: (831) 427-3333



November 5, 2016

Ryan Bane, Senior Planner
City of Santa Cruz Planning and
Community Development Department
809 Center Street, Room 206
Santa Cruz, CA 95060

Re: 1930 Ocean Street Extension
APN 008-004-02 and APN 008-004-01
Proposed 40 Unit Residential Development

Dear Mr. Bane:

I own a single family residence on Tanner Heights Drive directly above the proposed development.

I oppose this development.

The development is not permitted by the General Plan and the Zoning Map.

I oppose any amendment of either the Plan or the Map that would allow the overwhelming mass and density of a 40 unit residential development to be inserted into this rural single family residential neighborhood.

Any Environmental Impact Report for this proposal should address the many issues presented, among them:

Drainage

Changes in volume, direction and ultimate disposition of surface waters altered by covering a large area of percolating surface with buildings, walks and driveways.

Slopes

Effects of proposed altering of degrees of slopes bordering the proposed construction sites and how stability thereof would be affected.

Trees, Shrubs and Grasses

Effects of removal of habitat on animals, birds and insects living in the area.

Ryan Bane
November 5, 2016
Page Two

Increase in Vehicular Traffic

Hundreds of additional vehicular trips in and out of this development would result, e.g., residents coming and going, service vehicles, mail deliveries, waste collection vehicles, etc.

Exhaust, Noise and Light Pollution

These would increase exponentially, degrading the environment for everyone on or near the site.

Effect of Increased Traffic on Funeral Home Processions

Traffic jams would result when funeral processions try to get through the increase in vehicles resulting from this development.

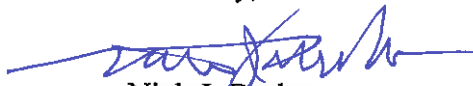
Line of Sight on Graham Hill Road

Vehicles going north or south on Graham Hill road confront a substandard line of sight as a result of a curve in the road bordering this proposed development causing a traffic hazard.

Native American Sites

This proposal requires a study to determine if any living sites or burial sites are within the proposed development area.

Sincerely,



Nick J. Drobac

From: Joseph Fisher [<mailto:jrfisher02@gmail.com>]

Sent: Monday, November 07, 2016 6:03 AM

To: Ryan Bane

Cc: Heidi Fisher

Subject: 1930 Ocean Street Extension, APNs 008-004-02, and -01 Scoping Comments for the Environmental Impact Report

Ryan Bane, Senior Planner
City of Santa Cruz Planning and Community Development Department
809 Center Street, Rm. 206
Santa Cruz, CA 95060

RE: 1930 Ocean Street Extension, APNs 008-004-02, and -01 Scoping Comments for the Environmental Impact Report

Dear Mr. Bane:

Thank you for the opportunity to comment on the Environmental Impact Report scope of work for the 1930 Ocean Street Extension project.

We are very concerned with the proposed rezoning for this project. The parcel is zoned for about 11 possible new single-family lots and what is being proposed is a 40-unit multiple-residence development. This is almost a quadrupling in density at the urban edge where densities and intensity of use typically decrease as development approaches the City/County boundary. Ocean Street Extension is more rural than this and is an inspiring and beautiful area for the whole community. The shape and slope of this lot will require many compromises to fit 40 units and will result in an uninspiring piece of architecture. There is real opportunity to do something special and "green" at this location, like primarily facing new residences south and making these structures passive solar and almost eliminating heating costs (like many of the newer houses on Ocean St Ext). To fit the 40 units, they will be mostly facing west and do the exact opposite (increase heating costs and add cooling costs to boot) as well as overlook a cemetery (again, a negative impact for the new residents on the parcel and everyone visiting the cemetery).

Along with all the other quality comments from the Ocean Street Extension Neighborhood Association (OSENNA) that we strongly support, we hope the rezoning and thus the opportunity to do something meaningful and special in such a special location in Santa Cruz is considered strongly.

We submit this as comment on the scope of the EIR.

Respectfully,
Joseph and Heidi Fisher
33 Quail Crossing (corner of Quail Crossing and Ocean St Ext)
Santa Cruz, CA 95060

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Department of Literature
Santa Cruz, California 95064
December 2016

From: Carla Freccero
2108 Ocean St ext
Santa Cruz, CA 95060

To: Ryan Bane, Senior Planner
City of Santa Cruz Planning & Community Development Dept.
809 Center St, room 206
Santa Cruz, CA 95060

RE: Proposed 40-Unit Residential Development
1930 Ocean St extension
APN 008-004-02 & APN 008-004-01

Dear Sir:

As a 16-year resident of Ocean Street extension, I write to register my opposition to the proposed development. The development is not permitted by the General Plan and the zoning map, and, for a number of important reasons mentioned below, I object to an amendment of the plan or map that would allow for a variance to insert 40 residential units into what is essentially a rural, single-family dwelling residential neighborhood.

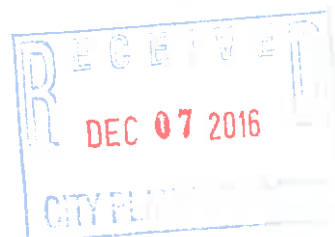
Any environmental impact report for this proposal should address the following critical issues:

- a) Traffic Increase (this has an impact not only on Graham Hill Road and the entrance to Highway 1—which is currently over-congested on a regular basis—but also on the general neighborhood around the units), and the effect of such an increase on funerals and funeral home processions (as of now, the shoulders on what is essentially a one-lane road are completely occupied by cars when there's a funeral, with people walking all along and across the street where the residential units are being proposed);
- b) Graham Hill Road line of sight (the hazardous downhill/uphill curve adjacent to the proposed development has limited line of sight) and dangerous road (there have been a serious number of traffic accidents on the downhill curve of Graham Hill Road);
- c) Fire and emergency access (there is only one entrance and exit that can sustain fire trucks in and out of Ocean St extension, and the proposed development would put at risk all residences between Graham Hill and Paradise Park, given the insufficiency of the weight-bearing capacity of the wooden bridge in Paradise Park);
- d) Drainage (the road currently experiences flooding during rainstorms as it is at the base of a significant hill; the report would need to address the changes in volume, direction and disposition of surface waters altered by covering a large area of percolating surface with buildings, walks and driveways);
- e) Slopes (the effect of altering the degrees of the slopes bordering the proposed construction sites especially with regard to stability);
- f) Habitat (effects of habitat removal on flora and fauna in the area);
- g) Exhaust, noise and light pollution, which would increase significantly and degrade the surrounding environment;
- h) Native American sites (the proposal requires a study to determine whether there are burial or living sites within the proposed development area).

Thank you for your attention to these important matters as you deliberate on the matter of the proposed development.

Sincerely,

Carla Freccero



From: mike g [mailto:mike_n_cindy@hotmail.com]
Sent: Monday, November 07, 2016 9:04 AM
To: Ryan Bane
Subject: 1930 Ocean Street Extension, APNs 008-004-01 and -02

November 7, 2016

Ryan Bane, Senior Planner
City of Santa Cruz Planning and Community Development Department
809 Center Street, Rm. 206
Santa Cruz, CA 95060

Re: 1930 Ocean Street Extension, APNs 008-004-01 and -02

Dear Mr Bane,

I ask that you please leave the current zoning for 1930 Ocean Street Extension unchanged. In my opinion the proposed 40 unit development is too dense considering its rural neighborhood setting miles from downtown.

Sincerely,

Mike Grall
52 Quail Crossing
Santana Cruz, CA 95060

November 7, 2016

Brant Herrett
306 Tanner Heights Drive
Santa Cruz, CA 95060

Ryan Bane, Senior Planner
City of Santa Cruz Planning and Community Development Department
809 Center Street, Rm. 206
Santa Cruz, CA 95060

RE: 1930 Ocean Street Extension, APNs 008-004-02, and -01

Scoping Comments for the Environmental Impact Report:

Traffic Issues related to this project

There is a tendency in these matters to treat things in isolation. In this case the Ocean Street Extension/Graham Hill Road intersection. The truth is, this intersection is part of a complex system that includes the Highway 17/Ocean Street intersection, the Highway 1 on and off ramps to Graham Hill, and the Highway 1/River St interchange.

Traffic on Graham Hill has increased dramatically since 2010 as more people have moved up into the San Lorenzo Valley and then commute into Santa Cruz for work.

During the morning commute, traffic can back up well past Corday Lane on Graham Hill. This also occurs at times at approximately 1 pm during weekdays as people are trying to get back to the Harvey West area after lunch. The backup occurs due to the traffic lights at highway 1 and River Street.

During summer season, this same backup occurs up Graham Hill Road on the weekend as people come down Graham Hill to bypass the backup on Highway 17 from Ocean Street.

The situation is bad now. Trying to turn left (northbound) on to Graham Hill from Ocean Street Extension can take a very long time, due to bumper to bumper traffic during peak traffic times or due to the high traffic speeds during non-peak periods. Trying to go south on Graham Hill from OSE can also be a challenge due to the speeding that occurs on Graham Hill. The addition of a substantial number of cars trying to enter and exit OSE will create another choke point on Graham Hill.

The proposed solution to increase the length of the left turn lane from Graham Hill northbound to OSE and the proposed project is a band aid at best. As stated above, due to congestion or traffic speed, cars will have a difficult time making the left turn and traffic could backup considerably towards the Highway 1 interchange as people are waiting to turn left at the intersection. At the very least this solution needs serious reevaluation.

Due to the current traffic congestion, the ability of emergency vehicles to get to the Jewel St/Ocean Street Extension/Tanner Heights areas can be challenging. Given the critical fire

danger in these areas, the ability of emergency responders to get to the scene is crucial. Additional vehicles and structures will make this even more important.

Therefore, there needs to be an updated, comprehensive traffic study of the complete system during morning, mid-day and afternoon commute hours as well as holiday weekends as outlined above to accurately assess the impact of additional cars accessing Graham Hill road. Ideally such a study would include high tourist season, if practical.

Regards,
Brant Herrett
Tanner Heights Drive

From: julie thayer [<mailto:julie.thayer.mascarenhas@gmail.com>]
Sent: Monday, November 21, 2016 1:54 PM
To: Ryan Bane
Subject: Fwd: letter re: 1930 ocean st. ext.

Hi Ryan,

I sent a letter several weeks ago regarding 1930 Ocean St. Ext. to this email that I got from the receptionist when I called the SC planning dept. number, but I never received any confirmation of receipt. I spoke to my neighbor Michael Nussbaum, who said he did receive confirmation from you. Could you please confirm that you received my letter?

Thank you,

Julie Mascarenhas

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

From: julie thayer <julie.thayer.mascarenhas@gmail.com>
Date: Mon, Nov 7, 2016 at 2:20 PM
Subject: letter re: 1930 ocean st. ext.
To: rbane@cityofsantacruz.com

Hi Ryan,

Please find attached our letter regarding the notification of EIR for this proposed development. Please feel free to contact us with any quesitons.

Thanks,

Julie & Leonardo Mascarenhas

Julie & Leonardo Mascarenhas
100 Crossing Street
Santa Cruz, CA 95060

November 4, 2016

Ryan Bane
Senior Planner
City of Santa Cruz Planning and Community Development Department
809 Center Street, Rm. 206
Santa Cruz, CA 95060

RE: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT, RE: 1930 Ocean Street Extension, dated October 7, 2016, as found online at:
<http://www.cityofsantacruz.com/home/showdocument?id=56719>

To Whom It May Concern:

As residents of the city of Santa Cruz and property owners downhill from 1930 Ocean St. Extension, we are very concerned about a number of issues related to the potential development of that location. Some of these issues appear in the EIR checklist, but have been given highly questionable categorizations of “no impact” or “less than significant impact”; we strongly disagree and feel that these would have potentially significant negative impact and need to be investigated thoroughly. Other concerns of ours were not listed at all in the checklist nor any related documents we could find, yet are extremely important and also need to be addressed.

There were severe lapses in notification regarding this proposed project – neither we nor our neighbors received any notification over the summer or this fall, by mail or otherwise. I just happened to discover a tiny 8.5” by 11” thin sheet of paper quite by accident nailed to a post during a rainy Saturday morning, that had washed down the street by the time I ended my morning walk. A proposed development of this nature that requests changes in zoning, is of such a large scale (40 units), and that would impact not only our property but the whole neighborhood, surely requires more notification than this.

Of utmost concern is increased stormwater and other contaminant runoff and sediment suspension, and related flooding and sediment deposition and contamination risk to our property. This includes new potential pollution from vehicles such as oil/gas/antifreeze and/or improper household waste disposal of cleaners, animal waste, etc. in the proposed development, as well as existing mercury, arsenic, hexavalent chromium (VI), polychlorinated dibenzo-p-dioxin and dibenzofuran (PCDD/F) and/or other chemicals from soil disturbance at the potential building site, related to neighboring crematorium emissions for decades. I would imagine this would also be a concern of the city more generally, given the location of the city’s drinking water intake at the end of Crossing St?

The existing drainage systems are taxed almost to capacity under the existing conditions, as I observed during the FIRST storm of the season, when the ground was unsaturated. Subsequent storms during the winter season and increased runoff due to ground saturation, not to mention any additional runoff due to potential development of the named site, would likely overwhelm the drainage system, particularly on Crossing St. There have also been a number of landslides/slumping/erosion below Graham Hill Rd. in various locations, and we do not want further risk of that due to potential development right below Graham Hill road on a parcel which is entirely on a slope.

We are also very concerned about increased traffic, air pollution, and reduced safety. This is particularly disconcerting as my 7-year old daughter and I are daily bike commuters. I am obviously concerned for my own safety but especially for that of my child. Many of my neighbors also commute by bike, or walk with dogs or children in this area – with no existing sidewalks so these activities take place in the street. Particular issues of concern include:

- increased emergency evacuation bottlenecks out of the Ocean St. Extension and Paradise Park neighborhoods
- increased danger to pedestrians and bicyclists on the narrow road and at the intersection of Graham Hill Rd/Ocean St. with Ocean St. Extension and also on the crosswalk across Ocean St. with Jewell St. – *accidents have already occurred at these locations with existing traffic levels*
- increased risk of accidents at the intersection of Graham Hill Rd/Ocean St. (at the curve where the road changes names) with Ocean St. Extension – *accidents are also common in this location*
- increased traffic at the already dysfunctional intersection of Hwy 1/Hwy 17/Ocean St. and increased risk of accidents among cars but also with cyclists and pedestrians – *there is often gridlock in this location on warm/sunny days, increasing impatience, road rage and impulsive behaviors, and we have experienced irritated or angry drivers not paying attention to cyclists and pedestrians, narrowly avoiding several accidents ourselves*
- impractical day-to-day use of tandem parking in the proposed development, potentially resulting in parking issues and overcrowding of Ocean St. Extension and also Crossing St. *The roads here are already narrow and require vehicular slowing to pass. There are also crowds of parked cars during events at the Santa Cruz Memorial Cemetery. Any increase in street parking would increase dangers significantly.*

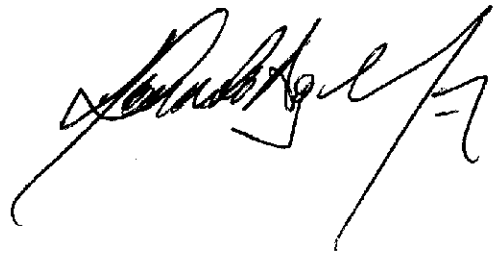
Other concerns include significant negative impacts to natural and scenic views, and increased noise and night-lighting levels in this quiet, dark area with a rural feel. For example, how could a development of this magnitude, 40 units, fit on the approximately 2 acre site without destroying the current bucolic feel and native huge oaks, and then towering over the road and neighboring parcels? There is currently no night-lighting or noise on that site, so lighting for and noise from 40 units would not only create pollution in the immediate vicinity, but create a halo of light visible from and noise audible from further away. There are both businesses and residences that would be affected (including the cemetery and nearby residents of Ocean St. Extension and Crossing St.). Wildlife would also be negatively affected, not only raptors, owls, other birds including ground-dwelling birds, bats, other large and small mammals, reptiles, amphibians and invertebrates, but to our knowledge, there are also several endangered or vulnerable animal and plant species in the vicinity and potentially on the proposed development site.

Sustainable development within the city is not consistent with increased housing density near the city limits. This is especially problematic in relation to reliability on cars rather than alternative forms of transportation, near existing traffic bottlenecks (as mentioned above). High-density garbage generation, as would be expected from 40 new units, is likely to attract rats and wild animals, resulting in nuisance problems and even potential dangers (coyotes, bobcats, mountain lions, etc.) since it would be located in a currently low-density area near agriculture, wooded areas and a state park. I also question existing infrastructure of sewage lines and other utility services here on the outskirts of town to reasonably accommodate development of this scale.

We request that we receive written notice in the future regarding any happenings or updates related to this proposed project.

Sincerely,


Julie & Leonardo Mascarenhas





Michael Nussbaum / Jill Damashek

200 Crossing Street • City of Santa Cruz, CA, 95060 • Phone: 617 5156606
mbn@alum.mit.edu , jill.damashek@gmail.com

Date: 4 November, 2016

Ryan Bane

Senior Planner

City of Santa Cruz Planning and Community Development Department
809 Center Street, Rm. 206
Santa Cruz, CA 95060

To Whom it may Concern:

This is in response to the publication:

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT, RE: 1930 Ocean Street Extension,
dated October 7, 2016

It also includes a number of comments on the publication:

INITIAL STUDY / ENVIRONMENTAL CHECKLIST, Application No: CP10-0033, dated October 3, 2016

As residents of the City of Santa Cruz and property owners in close proximity to the proposed development at 1930 Ocean Street Extension, we wish to register grave misgivings about the prospect of the City granting a land use designation change from L to LM, and allowing the site to be re-zoned from R-1-10 to RL.

We were quite surprised at hearing about this renewed development effort quite by accident – we would have thought that, as property owners of record, and given that the City has been communicating with us for purposes of collecting taxes, and about the well drilling project (which is in our front yard), we would have been promptly notified about the prospect of a development of this magnitude. We received absolutely no notification.

In reading over the initial study, our overall impression is that it largely ignores the existence of the neighborhood of Ocean Street Extension, and the effects of the proposed development on the integrity of this neighborhood. There are numerous instances in the study in which the new development is compared to existing development occurring along Ocean Street to the south, but little to no mention of the jarring discontinuity it would represent and problems it would cause to the present neighborhood of Ocean Street Extension to the north.

Further, as daily bicycle commuters, we are very concerned that the already unsafe intersection between Ocean Street Extension and Graham Hill Road would be rendered even more dangerous by the proposed changes to the intersection and increase in traffic associated with a development of this magnitude.

We are also concerned about the potential impact on the night sky and general lighting environment. A development of this magnitude would certainly involve outdoor lighting significantly in excess of the norm which presently exists on Ocean Street Extension.

Finally, we are worried that the additional water running off of 1930 Ocean Street Extension, if developed, will over-whelm the drainage facilities in place on Crossing Street and not only cause property damage but also transport toxic residues left by the crematorium into our yard. Our understanding is that the water study presently contemplated for the EIR will not consider the effects of additional runoff on adjacent properties, and we want this looked at as part of the EIR.



Sincerely,

Michael Nussbaum

Jill Damashek

Below, please find our notes from our reading of the INITIAL STUDY / ENVIRONMENTAL CHECKLIST, Application No: CP10-0033, dated October 3, 2016

1. P7, section 1.c. “Substantially degrade the existing visual character or quality of the site and its surroundings?” is given a rating of “Less than Significant Impact”
 - a. On p18 the decision criteria are framed as follows: “Substantially degrade the existing visual character or quality of the site and surroundings, *i.e., be incompatible with the scale or visual character of the surrounding area;*”
 - b. In the context of Graham Hill Road to the south, this might be true. However, in the context of Ocean Street Extension on the site and to the north this argument does not hold water – it certainly is incompatible with the scale or visual character of Ocean Street Extension.
 - c. Comments on the argument as laid out on pp20-22 “(c) Effects on Visual Character of Surrounding Area”:
 - i. Paragraph 2: “There are no residential structures adjacent to the project site or in the immediate vicinity of the project site.
 1. I would claim that the residents of Crossing Street are in the immediate vicinity of the project site.
 - ii. The ensuing argument in the section “Impact Analysis” largely ignores the effect of this development on Ocean Street Extension and the associated neighborhood. While it may be an extension of the development on Graham Hill Road to the south, it certainly is not an extension of the character of Ocean Street Extension to the north, and this fact has to be acknowledged.
 1. While it may not substantially impact the visual character from Graham Hill Road, it will undeniably impact that from Ocean Street Extension.
 2. This is written from the perspective of an individual driving along Graham Hill Road. When one considers the perspective of an individual walking or riding a bicycle along Ocean Street Extension, a very different picture emerges.
 - d. For these reasons I believe this should be re-graded to the category of “Potentially Significant Issues”
2. P7, section 1.d. “Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?” is given a rating of “Less than Significant Impact”
 - a. On p22 the justification states “The project would not result in introduction of a major new source of light or glare, although there will be exterior building lighting typically associated with residential development. The project does not contain any design elements or features that would result in introduction of a substantial new source glare that would adversely affect day or nighttime views in the area. “
 - i. Given that there is little or no lighting there now, any lighting will be a big change which would adversely affect the night-time views in that area – the ‘exterior building lighting typically associated with residential development’ is more than adequate to do this.
 - ii. Question – are there plans to put up any street-lighting on Ocean Street Extension in support of this? I believe that this will certainly adversely affect our night-time views along the street.



3. P13, section 13.a. “Population and Housing” – “Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)’ is given a rating of “Less than Significant Impact”
 - a. On p43 the justification is in terms of the entire population of Santa Cruz. If we look at the definition of ‘area’ as the neighborhood of Ocean Street Extension, a very different conclusion would be reached.
 - b. For this reason I believe this should be re-graded to the category of “Potentially Significant Issues”
4. P14, section 16.c) “Transportation/Traffic” – “Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?” is given a rating of “No Impact”
 - a. As a bicycle commuter, I am very concerned with the intersection between Ocean Street Extension and Graham Hill Road, and believe that if anything is done with this intersection, bicycle safety must be one of the considerations. It is dangerous as it is, and increasing traffic and further necking down the traffic coming down Graham Hill Road has the potential to make an already dangerous situation completely un-tenable.
 - b. Whether or not this project would impact the traffic on Graham Hill Road (and it probably would) it will certainly impact the traffic on Ocean Street Extension.
 - c. For these reasons I believe this should be re-graded to the category of “Potentially Significant Issues”
5. P14, section 17.c) “Utilities and Service Systems” - Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? is given a rating of “No Impact”
 - a. The justification for this on p46 references section 9.e. under hydrology. That suggests that further work needs to be done under the EIR, so I do not understand how this could have been given a rating of ‘No Impact’.
 - b. A number of us live directly downhill of the proposed project on Crossing Street. The effects of runoff from the project flowing down the storm drains on Ocean Street Extension and into the drains on Crossing Street should be considered here.

Lori Segovia
1959 Ocean Street Extension
Santa Cruz, CA 95060

November 6, 2016

Ryan Bane
Senior Planner
City of Santa Cruz Planning and Community Development Department
809 Center Street, Room 206
Santa Cruz, CA 95060

RE: Notice of preparation of an Environmental Impact Report for 1930 Ocean Street Extension

To Whom It May Concern:

I am a long-time resident of Santa Cruz and member of this community and have lived over 10 years at my current address. I am writing because I am very concerned about many issues regarding the potential development of 1930 Ocean St. Extension. Storm water runoff, parking problems, traffic and associated safety issues, and increased noise levels and crime are all serious concerns associated with the proposal to develop this property into 40 units.

Very high levels of storm water runoff currently come off that property and down from Graham Hill Road. Existing drains and culverts are often insufficient for this runoff. Runoff also flows down Ocean Street Extension and pours down straight into my yard. I have lived here long enough to have been through several floods. Neighbors and I have gotten out in raingear and boots to sandbag along our yards and driveways so houses don't flood. Any new development on that property would increase runoff and increase flooding.

Ocean Street Extension is a narrow, almost one-lane road in places, and drivers have to slow when oncoming traffic approaches. Adding cars from 40 units to this neighborhood traffic from development of the property at 1930 would be unsafe. There are people who walk their dogs along the street, kids who bike to school and other cyclists who commute to work or go up to Henry Cowell along our street. Parking is already a problem at certain times, particularly in the summer or during cemetery gatherings, and this poses problems at my house, which is the first one downhill from the cemetery and from 1930 Ocean Street Extension, since my available parking is on the street in front of my house. The proposed tandem parking in the development is not realistic and would result in many more cars parked along the street. In the event of an emergency, Ocean Street Extension is the only way in for emergency crews and the only way out for all of us in this neighborhood! It is also the only way out for many Paradise Park residents, especially if something happens to the bridge upstream. How can our safety be compromised to allow for development on property that is not even zoned for such density?

And what about increased traffic at the unsafe intersection of Ocean Street Extension and Graham Hill Road, or gridlock at the Hwy 1 junction? Any housing development at 1930 Ocean St. Ext. would make these problems much worse and compromise safety of the existing residents.

I live in this neighborhood to enjoy the peace and quiet at the edge of town in this wooded area. I am concerned about noise and light pollution that would come from development at 1930. And what about increases in crime? The potential development proposes way too many units, and current zoning laws that are in place should not be ignored to allow such development on a small, rural site. What about utility issues such as the gas line that runs along Ocean Street Extension – how would the development impact that? I live in the last line of houses at the city limits, and this is not an appropriate location for such a dense development.

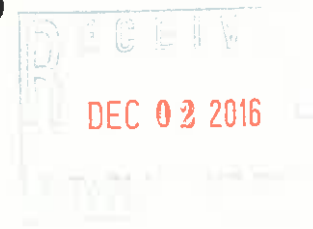
I am requesting written notice regarding any future steps in the planning and permit process regarding the development at 1930 Ocean Street Extension.

Sincerely,

Lori Segovia

831-331-8446

CANON J. WESTERN
MARRIAGE AND FAMILY THERAPIST
147 River Street South, Suite 204
Santa Cruz, CA 95060
831-454-9155



December 1, 2016

Ryan Bane, Senior Planner
City of Santa Cruz Planning and
Community Development Department
809 Center Street, Room 206
Santa Cruz, CA 95060

RE: 1930 Ocean Street Extension
APN 008-004-02 and APN 008-004-01
Proposed 40 Unit Residential Development

Dear Mr. Bane:

I live in a single family residence on Ocean Street Extension up the street from the proposed development and I am a business owner in the City of Santa Cruz.

I oppose this development which is not permitted by the General Plan and the Zoning Map.

I oppose any amendment of either the Plan or the Map that would allow the overwhelming mass and density of a 40 unit residential development to be inserted into this rural single family neighborhood.

Any Environmental Impact Report for this proposal should address the many issues presented, among them:

Drainage

Changes in volume, direction and ultimate disposition of surface waters altered by covering a large area of percolating surface with buildings, walks and driveways.

Slopes

Effects of proposed altering of degrees of slopes bordering the proposed construction sites and how stability thereof would be affected.

Trees, Shrubs and Grasses

Effects of removal of habitat on animals, birds and insects living in the area.

Ryan Bane
December 1, 2016
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Increase in Vehicular Traffic

Traffic at the intersection of Ocean Street Extension and Graham Hill Road is already backed up during peak commute times, and even more so during summer months when the traffic entering Ocean Street becomes extremely congested. Adding an additional 80 to 100 vehicles would greatly exacerbate the existing problem. This would also impact the safety of pedestrians and cyclists on an already dangerous stretch of road.

Effect of Increased Traffic on Emergency Evacuation

Ocean Extension is the emergency evacuation route for Paradise Park at the end of our street, and again, adding 80 to 100 vehicles would severely compromise this exit.

Line of Sight on Graham Hill Road

Vehicles going north or south on Graham Hill road confront a substantial line of sight as a result of a curve in the road bordering this proposed development causing a traffic hazard. There are already multiple accidents at this curve every year. More traffic at this intersection increases the existing hazard.

Sincerely,

A handwritten signature in black ink that reads "Canon J. Western". The signature is written in a cursive, flowing style.

Canon J. Western