

# *One more reason for the CA Coastal Commission to deny approval of Broadway- Brommer*

October 3, 2010

Even if the Coastal Commission is prepared to approve the City's Broadway-Brommer (B-B) transportation project to be built through the greenbelt and on and over Arana Creek, the **bank cutting and sedimentation** problems at the Arana Creek tidal reach must be solved first. If B-B is built, then the culverts under Port District property cannot be enlarged or raised to achieve either 1) restoration of the tidal reach and its associated endangered fisheries or 2) diminished sedimentation into the upper harbor.

As recently as this summer, there has been discussion between the City and the Port District about a possible CalEMA grant, funded by FEMA Pre-Disaster Mitigation (PDM) to, among other things, replace the culverts draining Arana Creek into the north harbor. The following summary of information is from the July 27, 2010 minutes of the Port Commission Regular Public Session (pages 6, 24 & 25):

The Port District committed \$10,000 to Kestrel Consulting, which prepared a Notice of Intent (NOI). The City agreed to sign the NOI and contribute \$2,000 toward the development of the grant application. Kestrel submitted the NOI to CalEMA on July 29, 2010. CalEMA approved the NOI the following day. The project is estimated to cost \$4 million.

While this is good news, there are some constraints to the current grant application process, which has an October 14, 2010 deadline. In addition to the short time frame, those constraints include 1) recommendations for

further study of the initial project design to insure "that the project does not exacerbate the problem" and 2) the estimated \$25,000 - \$30,000 cost to complete the full application. However, apparently the initial NOI that has already been submitted can be used in 2011 with few revisions.

The importance of the sediment problems associated with the AG tidal reach degradation cannot be over stated. The City's AG Master Plan tells it like it is. On page 12 of the AG Master Plan, we read:

"As part of the development of the Upper Harbor in the early 70s, the culverts were installed. The culverts are approximately 2 feet below the grade of the original stream elevation. **This man-made lowering of the base level of Arana Gulch Creek has led to channel incision and bank collapse in this tidal reach.** During some storm events, the culverts also result in ponding of storm runoff within Arana Gulch which can increase erosion. *The Arana Gulch Watershed Enhancement Plan* identifies this tidal reach channel bank failure as a medium priority project.

In addition, the development of the Harbor and culverts has also affected habitat values for fisheries and other aquatic species within Arana Gulch."

Keep in mind that it is the City's 2002 Arana Gulch Watershed Enhancement Plan, **not** the AG Master Plan, that has been the basis of work between the City, the Port District and the Arana Gulch Watershed Alliance to develop and implement projects to reduce sedimentation into the north harbor. In fact, 11 of 13 identified projects are not even located in the Arana Gulch greenbelt property that is the subject of the AG Master Plan (AGMP). With regard to the tidal reach problems, identified in the MP, we also read the limitations of the MP (and therefore B-B) for solving them (p. 36):

"The detailed hydrologic **analysis and actual repair is beyond the scope of this Master Plan;** however, this Plan includes goals to move forward with additional analysis and eventual restoration."

Building Broadway-Brommer before the harbor culvert/Arana Creek tidal reach restoration project is resolved and/or finalized is worse than

...restoration project is reserved and of money is more than putting the cart before the horse. It means spending the funds and energy required to build one project that will have to be demolished to build another. It means construction intrusion into the riparian zone twice. It makes no sense.

The County of Santa Cruz should reconsider its support of the Broadway-Brommer project portion of the AG Master Plan. The County could encourage the City to withdraw its current application to the Coastal Commission and to re-submit a revised application for its Master Plan without the specific Broadway-Brommer transportation project. Then the City and the County and the Port District can focus on restoration of its shared waterway, Arana Creek. If the City and/or the County is/are liable for degradation of habitat of endangered species (i.e., tidewater goby and steelhead trout), the restoration of the tidal reach be a shared priority. With the possibility of PDM/CalEMA grant funds available, this seems like an opportunity not to be missed. At the same time, the County and the City can propose a shared RDA project for Brommer Steet Extension from 7th Avenue down into the harbor that addresses real public safety for pedestrians and bicyclists, enhanced access to the AG greenbelt along the existing decomposed granite trail of the north harbor, as well as ending the current sediment pollution from the Brommer Street Ext. drainage that now directly flows into Arana Creek.