June 24, 2006

Claudia Slater Santa Cruz County Planning Department 701 Ocean Street, Room 400 Santa Cruz, CA 95060

Re: Revised Draft East Cliff Drive Bluff Protection and Parkway EIS/EIR

Dear Ms. Slater,

The Revised Draft EIS/EIR for the proposed East Cliff Drive Bluff Protection and Parkway is flawed. Luckily, as the titled states, this is merely the revised draft; please allow me to humbly suggest some revisions for the final paper.

First, the "Environmentally Preferable/Superior Alternative" is not credited as the "Preferred Alternative." In this day and age of our heightened awareness to anthropogenic impact, I find this appalling that we still move in a manner that is not the environmentally preferable/superior alternative in all we do. I mean, after all, it is alleged to be not only preferable, but also superior. The Environmentally Preferable/Superior Alternative would allegedly get the job done. Yet Santa Cruz County Planning Dept. proposes to go above and beyond the call of duty (which would usually be nice, except...) by impacting this overused area in an attempting to gentrify the area by updating/expanding the bike/pedestrian path. I feel the area (and the bike/ped path) is quite quaint as it is. Little much could possibly be done to "improve" on its rustic quality. The EIS/EIR makes little (if any - I saw none) mention of compliance with the Local P37-2 Coastal Plan, especially the provision of "Special Places" within the coastal zone. It has been said whether or not this area is designated as such a place, (whether it is I cannot recall) it surely is a special place. The "Preferred Alternative" would surely change the P37-3 character of the community.

Yet there are flaws even with the Environmentally Preferable/Superior Alternative (and these flaws may be attributed to the other alternatives as well). First, I found no mention of passive erosion. (Please note: passive erosion is different from active erosion.) Figure 6-3 does not convey this process whereby the beach will continue to narrow until it reaches the seawall and is completely gone, and the water depth at the base of the armoring would continue to increase. Beach and shore loss is listed as a "nonsignificant impact" that would result in a "potential estimated loss of ten to 20 feet of ground" in front of the bluff face during winter months. Yet, winter months (and often times during the summer) already provide less than 10-20 feet of ground in front of the cliff face. Any further loss caused by the project is unacceptable.

Responses

P37-1

The environmentally preferable alternative identified in the Revised Draft EIS/EIR is essentially a holdover from when the Army Corps of Engineers was a project co-sponsor and reflects the Corps' procedures for implementing the National Environmental Policy Act (NEPA). As explained in Section 2.10, the environmentally preferable/superior alternative was selected solely on the basis of what project would have the smallest footprint and that would result in the least physical disturbance. While Alternative 3 best meets these criteria, it would not fully achieve the project objectives or realize the public benefits of the proposed Alternative 1. Under Alternative 3, only the Purisima Formation would be armored. This would reduce the project footprint but would provide less protection to the public right-of-way and infrastructure because the terrace deposits would still be subject to erosion. The parkway footprint would also be reduced, but this would be accomplished by eliminating some of the improvements to public access. Consequently, the Planning Department does not advocate implementing Alternative 3. Under CEQA, which allows for consideration of project goals and objectives, the Planning Department believes that a mitigated Alternative 1, as described in the Revised Draft EIS/EIR, represents the environmentally superior alternative. Section 2.10 of the Revised Final EIS/EIR has been revised to reflect this.

P37-2

Section 3.1.2 of the Revised Final EIS/EIR presents a broad discussion of land use policies applicable to the proposed project, including compliance with the County's General Plan and Local Coastal Program (LCP). Additionally, more detailed information about applicable General Plan and LCP policies and objectives is included in Sections 4.1.2 (recreation), 5.1.2 (visual resources), 6.1.2. (geological resources and coastal processes), 7.1.2. (water resources), 8.1.2 (biological resources), 9.1.2 (transportation), and 11.1.2 (cultural and paleontological resources). Proposed Alternative 1 coupled with the recommended mitigation measures would be fully consistent with County's General Plan and LCP.

P37-3

As noted above in the response to Comment P36-4, the RDA has worked with the local community over the past six years. In response to local concerns about changes to the character of the community, the RDA made several changes to the parkway design in an effort to help (cont'd)

P37-4

P37-5

- P37-6 What is acceptable? I'll tell ya: managed retreat. I also have concern that a comprehensive managed retreat option was not considered. A Managed Retreat option would consider rebuilding temporary replacements as they are taking by the sea.
- P37-7 Any "improvements" made to this area should include installation of storm drain filters.
- P37-8 Table 8-1 remains void of several kinds of animals I have personally observed and/or recorded. These include but are not limited to: insects in the bluff top vegetation (such as spiders, moths, butterflies, pill bugs, etc.), pigeons (which I have observed in their nests in the cliff face cavities), muscles, clams, anemones, nudibranch, crabs, sea cucumbers, star fish, fish, sharks, and more. Perhaps many of these species were not noted because the July 2001 survey, timed to allow observation of the lower intertidal, did not have a low enough tide. Another reason is because the seafloor was likely covered in sand during July.

P37-9

The section Mitigation 8.1, together with recent employment experience in the coastal environment, gave me a mental picture that is clearer of previous thoughts I had about the proposed construction procedures. First off, the "temporary rock riprap water barrier" will not block water (trust me, don't trust the contractor – they'll promise the world). Additionally, to remove debri resulting from the project (not to mention existing haphazard makeshift "riprap"), I do not see how the proposed work could be done without a backhoe (and maybe even a dozer, loader, and hauling trucks) on the beach itself. A backhoe on the bluff top won't be able to reach the bottom of the bluff, nor vice versa; a crane positioned atop the bluff with a chain to tie around each individual piece would be much too slow. Furthermore, the report mentions timing work to coincide with low tides. However, you will have a maximum of 12 hours of low tide (liberally speaking – count less for intermediate tides) in any 24-hour period, but this schedule rotates with the moon. You know the contractor ain't gonna work round the clock for this project (and I doubt the local residents would allow it).

P37-10
I could think of more flaws in the report if I did not go to a 40-hour per week job; I simply do this because the proposed project site holds a special place in my heart and soul. I hope this affords you some direction for improvements. Thank you for the opportunity to comment. Please address these and my previous suggestions (some of which are not included here, all of which were not addressed in the Revised Draft report) in the final report.

Sincerely,

Nathan Pierce 4140 Ashford Cir. Hollister, CA 95023

Responses

P37-3 (cont'd)

preserve the nature of the neighborhood. One example is use of landscaping and split rails, instead of safety rails, wherever possible. Other examples include minimizing changes to the inland side of East Cliff Drive to help maintain the existing character of the neighborhood and eliminating the raised crosswalk at The Hook because of noise concerns. The Preferred Alternative enhances the public access and does not conflict with the objectives of the coastal program.

P37-4

Passive erosion and associated beach loss are discussed at some length in Section 6.2.1 of the Revised Final EIS/EIR. Figure 6-3 is not intended to depict passive erosion; rather, it generally portrays how bluff erosion would likely proceed under Alternative 3 (armoring of Purisima Formation only).

P37-5

As discussed in Section 6.2.1 of the Revised Final EIS/EIR, the actual loss of beach width due to encroachment of higher sea levels could be less than 10 to 20 feet because the beach is formed by deposition of sand under a dynamic set of conditions that involve the adjacent shoreline geometry, average wave height, sand supply, and other factors. Because the distance between the bluff and the water line can vary considerably (from 150 feet wide to nearly nothing) in a single tidal cycle, this reduction would likely be imperceptible to most users on a year-to-year basis. Additionally, recreational uses of the shoreline in this area are generally confined to walking and access for surfing; the beach is not commonly used for sunbathing or other stationary uses. The project would include removing rubble and riprap that currently litter the back beach, which would increase the useable beach in the near term. For these reasons, anticipated beach loss at the base of the bluff is considered less than significant. It is also important to recognize that, if the cliff is allowed to erode and recede back to private property, public access to this entire stretch of shoreline would be lost.

Responses

P37-6

An expanded discussion of planned or managed retreat is included in Section 2.4.1 of the Revised Final EIS/EIR. While planned retreat could have fewer short-term environmental effects than the proposed project, it would ultimately have significant adverse impacts related to the relocation of facilities, provision of emergency services, traffic circulation, and public access to coastal resources. Additionally, a rough estimate of the firsttime cost of planned retreat for this stretch of coastline alone is \$28 to \$46 million. This cost would have to be borne entirely by the local community, and the estimate assumes that all of the property owners would be willing sellers. If not, the County would have to consider asserting eminent domain, which has not historically been used to take private residences. Finally, a planned retreat alternative could not reasonably be implemented for the proposed project area alone but would need to be implemented on a regional basis, in concert with other land management agencies. For these reasons, planned retreat is not a feasible alternative and was therefore eliminated from further evaluation in the Revised Draft EIS/EIR.

P37-7

As described in Section 2.6.8 (Table 2-4) of the Revised Final EIS/EIR, the project would include installing several new drainage filters.

P37-8

You are correct that Table 8-1 presents a list of species observed in July 2001; it is not a comprehensive list of species found in the project area. Additional species that likely occur within or near the project vicinity are discussed in Section 8.1.5.

P37-9

As indicated in the Revised Final EIS/EIR, the RDA and the County Department of Public Works would ensure that the contractor's construction plan includes appropriate best management practices to minimize impacts and reduce siltation of intertidal areas. A DPW inspector would also have a daily presence on-site to ensure that these practices are implemented and to institute alternate or corrective measures, if necessary. Work on the beach would be scheduled to correspond with low tide during normal construction hours. For example, if low tide occurred at 11:00 AM, beach work would be conducted at that time.

Comments Responses

P37-10

Please refer to the October 2003 Final EIS/EIR for responses to your comments on the March 2003 Draft EIS/EIR.

Ms. Claudia Slater Planning Department, County of Santa Cruz 701 Ocean Street, Room 400 Santa Cruz, CA 95060 (831) 454-5175

Dear Ms Slater,

P38-1 I am writing in support of the East Cliff Drive Bluff Protection project as described in the May 2006 EIS/EIR, in particular the preferred alternative, Full Bluff Armoring. I am a frequent visitor to Pleasure Point and I have watched with increasing concern as the road and sidewalk decline in usefulness and appearance. Although armoring the bluffs has some risks, I feel strongly that the consequences of inaction are much worse, and more certain.

Regards,

George Powers 21968 Gillette Drive Los Gatos, CA 95033

cc: Paul Rodrigues, Redevelopment Agency

Responses

P38-1

Thank you for your comment.

SANTA CRUZ COUNTY PLANNING DEPARTMENT AND REDEVELOPMENT AGENCY (as the project sponsor)

REVISED DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT (EIS/EIR) EAST CLIFF DRIVE BLUFF PROTECTION AND PARKWAY PROJECT SANTA CRUZ, COUNTY, CALIFORNIA

Public Comment Card

Please use this comment card to submit your views regarding the project alternatives and potential environmental impacts of the East Cliff Drive Bluff Protection and Parkway Project.

Name: MICHAEL READY Mailing Address: 3635 FLORAL DR Street, state, ZIP: 95062 CA Affiliation (if any): Date: JUN & 'OG

Comments:

· GREAT PROJECT! P39-1 · PLEASE CONSIDER ... P39-2 VISUAL HEIGHT FROM P39-3 HARBOR & NEW LIBRARY BY KSCO (AGGREGATE IN BROWN CONCRETE I THINK) ROLL OFF SURFACE & INSTALL FENCING ON THE EDBE TO REDUCE VISUAL OBSTRUCTION, ESPECIALLY, BY - CONSIDER A RAILING SYSTEM THAT DOESN'T CBSTRUCT THE VIEW AS MUCH AS REDWOOD FENCE UNDERGROUND STREETLIGHT WIRES, IF YOU DON P39-4 DO IT NOW IT WILL NEVER BE DONE

- KEEP LANDSCAPING LOW

County of Santa Cruz Planning Department 701 Ocean Street, Room 400 Santa Cruz, CA 95060 Attn: Claudia Slater (831) 454-5175

To submit comments, please turn in today or mail to:

Comments must be received by 5:00 P.M. June 26, 2006

Responses

P39-1

Thank you for your comment.

P39-2

Specific bench locations have not been identified at this point in the process. However, the RDA intends to provide benches at various locations along the pedestrian walkway where sufficient space is available.

P39-3

The pedestrian walkway would be constructed of the same material as that used near the vacht harbor and the new Live Oak library. The RDA will evaluate whether there are opportunities (i.e., adequate space and sufficient safety) to install railings, as you suggest, to further reduce visual impacts. That technique has been used effectively elsewhere. The current parkway design includes use of landscaping, rather than railings, where sufficient space is available, and split rails, where safety allows. In areas where the pedestrian path would come close to the bluff edge, safety (metal) railings would be required.

P39-4

The current design includes undergrounding the street light wires at Pleasure Point Park.

P39-5

Landscaping would be done to preserve existing views. Some higher growth plants would be used to shield man-made structures, such as the improved restroom at Pleasure Point Park.

THX MICHAEL

P39-5

SANTA CRUZ COUNTY PLANNING DEPARTMENT AND REDEVELOPMENT AGENCY (as the project sponsor)

REVISED DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT (EIS/EIR) EAST CLIFF DRIVE BLUFF PROTECTION AND PARKWAY PROJECT SANTA CRUZ, COUNTY, CALIFORNIA

Public Comment Card

Please use this comment card to submit your views regarding the project alternatives and potential environmental impacts of the East Cliff Drive Bluff Protection and Parkway Project.

Name: Bill Rich Mailing Address: 421 3 4 45 fr.

Street, state, ZIP: Sanda Curi, 95062
Affiliation (if any): 2031 dent d
Date: 4/8/2016

P40-1 The project looks good. Lit's start ASAP.

To submit comments, please turn in today or mail to:

County of Santa Cruz Planning Department 701 Ocean Street, Room 400 Santa Cruz, CA 95060 Attn: Claudia Slater (831) 454-5175

Comments must be received by 5:00 P.M. June 26, 2006

Responses

P40-1

Thank you for your comment.

Kay Schroer 1431 Arbor Avenue Los Altos, CA 94024

May 26, 2006

P41-1

Planning Department, County of Santa Cruz701 Ocean Street, Room 400 Santa Cruz, CA 95060

Attention: Claudia Slater

This letter is to express my support for initiatives to preserve East Cliff Drive both for coastal access for visitors and residents. It is important for the city of Santa Cruz commerce, for residents and visitors convenience to repair and preserve the road as well as bicycle and pedestrian paths. Homeowners too should have the right to preserve their property and it is certainly vital to protect the main sewer line and prevent a major environmental catastrophe. Seawalls, if constructed properly, can diffuse storm wave energy and do not have to be an eyesore.

This issue needs to be addressed with an open mind and a satisfactory compromise arrived at that can be a model for other threatened communities.

Thank you for this opportunity to express my views.

Kay Schroer.

Responses

P41-1

Thank you for your comment

June 20, 2006

Planning Dept. County of Santa Cruz 701 Ocean St. Room 400 Santa Cruz, Ca 95060

Dear Claudia Slater,

The issue of the East Cliff Drive Bluff Protection and Parkway Project is important to us.

P42-1 WE SUPPORT THIS PLAN. This is a lovely spot and should be taken care of properly.

Sincerely,

JW and Barbara Silveira 2425 Shoreview Dr. Santa Cruz, Ca

Responses

P42-1

Thank you for your comment.

SANTA CRUZ COUNTY PLANNING DEPARTMENT AND REDEVELOPMENT AGENCY (as the project sponsor)

REVISED DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT (EIS/EIR) EAST CLIFF DRIVE BLUFF PROTECTION AND PARKWAY PROJECT SANTA CRUZ, COUNTY, CALIFORNIA

Public Comment Card

Please use this comment card to submit your views regarding the project alternatives and potential environmental impacts of the East Cliff Drive Bluff Protection and Parkway Project.

Mailing Address: 25 32 Ave Street, state, ZIP: Affiliation (if any):

Date:

Comments:

New parking spaces is an appallingly bad I dea. Traffic will be obstructed and congested, notice, air, and view pollution will be evented. Parking on the elift and elift ear only increase the burden on the elift and will only attended those unwilling to walk or breydle.

To submit comments, please turn in today or mail to:

County of Santa Cruz Planning Department 701 Ocean Street, Room 400 Santa Cruz, CA 95060 Attn: Claudia Slater (831) 454-5175

Comments must be received by 5:00 P.M. June 26, 2006

Responses

P43-1

See response to Comment P1-1 for RDA's rationale for proposing the amount and configuration of parking. This parking arrangement complies with County road design criteria and should not obstruct traffic. Significant air and noise pollution are not anticipated in connection with the additional parking, and the new spaces would be located well away from the bluff face and therefore should not accelerate erosion. These parking spaces would be particularly beneficial to visitors with small children, the elderly, and the disabled.

SANTA CRUZ COUNTY PLANNING DEPARTMENT AND REDEVELOPMENT AGENCY (as the project sponsor)

REVISED DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT (EIS/EIR) EAST CLIFF DRIVE BLUFF PROTECTION AND PARKWAY PROJECT SANTA CRUZ, COUNTY, CALIFORNIA

Public Comment Card

Please use this comment card to submit your views regarding the project alternatives and potential environmental impacts of the East Cliff Drive Bluff Protection and Parkway Project.

Mailing Address: PO BOX 1287 Aptos, CA 9500 Street, state, ZIP: 3262 Fern Flat Fd. Aptos, CA

Affiliation (if any):

Date:

Consider all the rate that live in the rife

1966. There probably needs to be some kirdle

1944-1 of extermination project before the rock if

1944-1 (creat; otherwise they might make to the

1960-1965 structures.

To submit comments, please turn in today or mail to:

County of Santa Cruz Planning Department 701 Ocean Street, Room 400 Santa Cruz, CA 95060 Attn: Claudia Slater (831) 454-5175

Comments must be received by 5:00 P.M. June 26, 2006

Responses

P44-1

Mitigation 8.1 has been expanded to require that the project biologist be present when beach rubble and riprap are removed to determine whether the work is creating a problem by displacing rats. If the biologist determines that a problem exists, a rat removal program would be implemented before any more rubble and riprap are removed.

Susan C. Snyder 2-3645 E. Cliff Drive Santa Cruz, CA 95062 Home: (831) 475-2694 Work: (831) 427-2727

June 2, 2006

Claudia Slater County of Santa Cruz 701 Ocean Street, Rm 400 Santa Cruz, CA 95060

East Cliff Drive Bluff Protection and Parkway Project

Ms. Slater:

I will be out of state on June 8 and will not be able to attend the public open house regarding this project. In lieu, I am submitting this comment regarding the project to you to incorporate into the public commentary for review.

First, I am very much in favor of the preferred option of this project going forward. This short strip of coastal access is a valuable public asset, and it is used daily by the complete spectrum of residents and visitors in our area. Surfers do not own this precious view and access strip, and in fact everyone from drive-by viewers to dolphin gazers enjoy the area every day.

Comment on Report. I note the preferred project calls for a walkway and bikeway, which is great. My concern, however, is that the walkway portion is designated to be crushed granite. My personal interview with persons living next to public "improvements" that incorporate crushed granite walkways reveals that this is not a desirable material for finishing a walkway. P45-2 They report that the crushed granite creates a noticeable increase in dust and dirt filtering into their homes. They also report that is it high maintenance in that the surface gets scuffed and dips and holes develop quickly and require repair. I understand that crushed granite is considered by some to be "earth friendly" and it is permeable, but I believe a more sturdy and non-air polluting surface should be used. Perhaps a partitioned concrete walk would allow permeability and still provide a surface strong enough to support heavy foot traffic use without creating unnecessary airborne dust transfer.

> Thank you for your attention to this request and for your work concerning this project. Yours truly,

> > Susie Snyder

Responses

P45-1

Thank you for your comment.

P45-2

The pedestrian walkway would be constructed of resin-stabilized decomposed granite, like the walkway installed along Portola Drive by the new Live Oak library. This material is quite hard and does not create dust or a maintenance problem.

William G. Swinton 2-3515 E. Cliff Dr. Santa Cruz, CA 95062

June 21, 2006

County of Santa Cruz Planning Department 701 Ocean St., Room 400 Santa Cruz, CA 95060

ATTN: Claudia Slater, 831 454-5175

Re: E. Cliff Dr. Bluff Protection and Parkway Project EIR

To Whom It May Concern:

P46-1

I have reviewed the plans and the latest EIR for the above referenced project. I agree with its overall conclusion that Alternative 1 (Full Bluff Armoring) is the most appropriate solution, with a net positive environmental impact. I urge all concerned to move this project forward.

However, there are 2 features of the Parkway Project plans, the environmental impact of which are not correctly addressed in the EIR. These are:

P46-2

- The addition of 11 additional parking spaces and the relocation of the existin 5 parking spots on the south side of E Cliff Dr, and
- The construction of the large, new restroom facility at Pleasure Point Park.

Both of these features were not correctly addressed in the EIR. Here are the particulars.

P46-4

Section 5.2, Visual Resources, does not address the significant visual impact of these new parking spots on the views of the ocean from the road and of the general streetscape. The visual impact of existing 5 parking spots is low as they are tucked up against the trees near the O'Neill home. The new parking spots at Pleasure Point Park and the addition of the large restroom building will severely and permanently, negatively impact the Visual Resource. The eleven new spots between 36th and 37th on the ocean side will, as they will always be occupied with vehicles, including large RVs, severely and permanently, negatively impact the ocean views for all vistas from 35th to Larch Lane. In summary, the EIR Section 5.2 is flawed in this aspect.

P46-5

Section 9.2, Transportation, does not address the impact of the parking spot addition / relocation, on pedestrian, bicycle, and vehicular safety. The addition of these spaces will result in significantly increased traffic across the pedestrian and bike path areas, as net 11 new spots will result in many more backups to leave and pull ins to enter. This will significantly increase risk to all users of the street. Finally, the increased number of spots will result in increased cruising in circles waiting for a spot to open up, as we see in Capitola Village for example. The EIR does not address this issue in an adequate manner. The permanent impacts of any additional parking on the ocean side of East Cliff on Transportation are negative.

In summary, the EIR is well done and through, however, the above oversights and potential errors with respect to "improvements" on the south, ocean side of E. Cliff, the parking and the new structure, are problematic. I see no possible mitigation of these severe and permanent impacts, except the removal of these proposed changes from the plans.

Sincerely

William G. Swinton

Responses

P46-1

Thank you for your comment.

P46-2

See response to Comment P1-1 for the RDA's rationale for proposing the amount and configuration of parking.

P46-3

See response to Comment P9-1 regarding the improved restroom.

P46-4

As previously mentioned, the proposed parking adjacent to Pleasure Point Park would essentially reclaim an area used for parallel parking in the past, and the parking between 36th and 37th avenues would include replacing six existing spaces and adding seven more. The total amount of parking along the seaward side of East Cliff Drive would be approximately 300 to 400 feet in length. This would affect roadway views along about 15 percent of the 2,800 lineal feet of proposed parkway. Views from the roadway along the remaining 85 percent of the parkway would be unchanged. In addition, the visual effect of the proposed restroom would be reduced through land-scaping, as recommended in Mitigation 5.2. For these reasons, impacts on visual resources are considered to be less than significant

P46-5

The proposed additional parking is not expected to increase traffic along East Cliff Drive or to create a safety hazard for pedestrians and bicyclists for several reasons. First, as noted in Section 9.2.1 of the Revised Final EIS/EIR, the additional parking spaces are not expected to generate new trips to the project area; rather, they are expected to reduce the number of motorists circulating through neighborhood side streets searching for limited parking spots. Second, creating a pedestrian walkway and bicycle path on the seaward side of the roadway should actually improve safety by providing separate facilities for vehicles, pedestrians, and bicyclists. Additionally, implementing Mitigation 9.3 would require installing signs at the intersection of 32nd Avenue/Pleasure Point Drive/East Cliff Drive, similar to the signs at The Hook, which state "Bikes Must Cross." These signs would be installed facing westbound to help ensure that bicyclists obey the stop sign at Pleasure Point Drive and cross back over to the north side of the roadway to the existing bike lanes before continuing westward.

Tune 20, 6006 To : Planning Dept. City of Souta ling Ca. 95000 Hom: Isobel M. Walker PAT-1

Please Cocument that We beartily approve

Please Cocument that We beartily approve

Of the Revised draft & 15/EIR for the

Parkway project.

Parkway project.

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Responses

P47-1 Thank you for your comment.