



**SANTA CRUZ COUNTY  
GROUP**

**Of The Ventana Chapter**

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City of Santa Cruz Planning Commission  
809 Center Street  
Santa Cruz, California 95060

October 30, 2023

**Re: Santa Cruz Wharf Master Plan Recirculated Environmental Impact Report (EIR)**

Dear Planning Commissioners,

As you consider the Wharf Master Plan and its EIR, the Sierra Club joins the Santa Cruz Bird Club and the Historic Preservation Commission in urging the City of Santa Cruz Planning Commission to vote in favor of EIR Alternative #2. This alternative removes the lowered westside walkway from the Wharf Master Plan, with no reduction in project objectives according to the 2023 EIR. The reasons the City gives for including the lowered walkway were determined by the recent Court Ruling to be achievable with alternatives that avoid the negative impacts on both migratory birds and the Wharf's historic integrity.

Both the Sierra Club and the Santa Cruz Bird Club submitted comments to the EIR that detail the impact of this lowered walkway on the ability of migratory Pigeon Guillemots to access their nesting sites underneath the Wharf, to which they return every spring from the far north. The lowered walkway would bring people, noise, and activity in the range of their nesting sites, which have historically been undisturbed.

The Historic Preservation Commission at its meeting on October 18<sup>th</sup> voted against the adoption of the Wharf Master Plan and its EIR. They voted to recommend to the City Council that the lowered westside walkway be removed. This is Alternative #2. Their reasons were to preserve the historic pilings on the west side from the visual, aesthetic and character-altering impact of such a populated structure, horizontally bisecting the pilings for a third of the Wharf's length. It behooves the Planning Commission to heed the recommendation from the Historic Preservation Commission, whose mandate is clear regarding this historic Santa Cruz icon.

The Sierra Club notes that in both the 2020 EIR and the recirculated 2023 EIR, Alternative #2 was determined to be the environmentally superior alternative and was quoted as "meets all project objectives" in both the 2020 and the 2023 final EIR. The Court Order stated that the City

failed to provide compelling evidence why the decision was made to **not** adopt the environmentally superior alternative that met all project objectives.

The Sierra Club submitted comments for the 2020 EIR as well as for the 2023 recirculated EIR. The City did not respond to our submitted comments for the 2023 EIR, other than to reference the rescinded 2020 EIR. Our understanding from the Court Order is that the Wharf Master Plan and its EIR were to be rescinded, which they were, and that the public could submit comments on any aspect of the recirculated 2023 EIR and expect responses. The Court Order did not add any restrictions or limits on the range of public comment and required response.

For the above reasons, we urge you to follow the Historic Preservation Commission's unanimous vote against approval of the 2023 Wharf Master Plan and the 2023 EIR as presented, and vote for adoption of Alternative #2.

A handwritten signature in black ink that reads "Michael Guth". The signature is written in a cursive style with a prominent initial "M".

Michael Guth, Executive Committee Chair  
Santa Cruz Group of the Ventana Chapter of the Sierra Club