



SANTA CRUZ COUNTY GROUP

Of The Ventana Chapter

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March 15, 2017

To:

Ron Powers, Principal Planner
City of Santa Cruz Planning and Community Development
809 Center Street, Rm. 206
Santa Cruz, CA 95060

Subject: Comments on EIR for Downtown Recovery Plan

Dear Ron Powers,

The Sierra Club appreciates the opportunity to respond to the Notice of Preparation of an Environmental Impact Report for the Downtown Recovery Plan (DRP), General Plan and Coastal Plan Amendments.

Issues of environmental concern that will have a potentially significant impact are listed in the Initial Study/Environmental checklist and we anticipate responding to those depending on the findings in the draft EIR. The specific issues listed below are those we feel need careful, in-depth review via the EIR or are those we see as not included in the Initial Study.

- The amendment to eliminate 9 of the 11 policies in the 2003 San Lorenzo Urban River Plan (SLURP) needs its own section and full explanation for such action with alternatives. These 9 policies are certified under the Local Coastal Plan. SLURP was intended to protect, restore and enhance this important riparian natural resource. It has never been fully implemented nor replaced with a Plan to reflect the environmental goals and recommendations in the 2030 General Plan.
- Any analysis of the impacts on wildlife species can be determined only by a thorough, current baseline study of the San Lorenzo River (SLR) riparian fish, wildlife and fauna by qualified biologists specializing in such species. We request that such study be undertaken.
- The EIR should include study of the Urban Heat Island effect on riparian habitat from this scale of urban development as well as the impacts on birds and other wildlife generated from the additional lighting, glass windows and people.

- The Aesthetics section appears to be limited in its inclusion of the various view-sheds that will be impacted by building heights up to 85 feet along the SLR. For example, the view from the eastern side of the river is not but should be included. The EIR should include renditions that are realistic, not distorted via aerial views or placing people in the foreground, which minimizes the background scale of the proposed structures.

We look forward to seeing the above issues addressed in the draft EIR.

Sincerely,

Greg McPheeters
Chair, Santa Cruz Group, Sierra Club