



SANTA CRUZ COUNTY GROUP

Of The Ventana Chapter

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Jim Burr
Transportation Planner
City of Santa Cruz Public Works
809 Center Street, Rm. 201
Santa Cruz, Ca. 95060

Subject: San Lorenzo River Parkway Phase III MND

Dear Mr. Burr,

The Sierra Club submits the following comments on the Mitigated Negative Declaration for the San Lorenzo River Parkway.

We assess that the Initial Study/Mitigated Negative Declaration (IS/MND) for the San Lorenzo River Parkway Phase III is incomplete in its findings, makes assumptions not based on fact and presents unclear statements. Overall, this prevents a valid evaluation of the Project's impact on the environment, creating the potential for both immediate and cumulative impacts negatively affecting the riparian corridor habitats.

Topics that are not addressed in the MND:

- a) The project area is in the riparian corridor, an important habitat for migratory winter/summer bird species. It is located in the Pacific Flyway and a destination for winter migratory waterfowl. Riparian corridors require specific evaluation due to their status. This is absent from the MND findings.
 - b) The noise level of the Project location is above water. Sound is intensified by water surface and carries further than on land. This effect on the riparian corridor requires details.
 - c) The damaged rail track is covered with plywood and has wide gaps. The effect of the Project equipment weight on the track warrants further details.
 - d) The current path vibrates when used by cyclists, pedestrians and train. The MND omits information about potential vibration/swing of a 10' path during heavy storms or increased foot/bike/train traffic. Additional details are needed.
- *These missing MND topics require assessment for Mitigation Measures.*

We find inadequacies/inconsistencies with the following:

Construction/Design of 10' multiple-use path:

1. pg 8 Project Overview states that, 'total area of disturbance for the project would be approximately 250-square feet (sf) on the ground to modify the east connection,' to accommodate 'a 10-foot-wide concrete multi-use path (also called trail)'

pg 7 'To connect to the existing ramp at the east end, the project would infringe on the unpaved area adjacent to two eucalyptus trees (**Figures 2 and 5**).'

pg 51 The MND states that 'There is a chance that construction activities could damage the root system of the southernmost eucalyptus tree and result in its death or removal of the tree(s).

pg 73 MND states 'The project would not include grading, new impervious surface or any other changes that would alter the topography or drainage patterns in the project area etc)

- *The discrepancy between pg 8 & pg 73 ground disturbance statements needs clarification.*
- *Any area disturbance needs to evade possible erosion outcome.*
- *Any root damage to the Eucalyptus Grove trees, causing their removal, warrants to be addressed as possible cumulative effect on the environment due to Habitat loss. This issue is further addressed under # 6 Biological Resources.*
- *Our Proposed Mitigation: That the east path connects to the ramp without affecting the root systems of Eucalyptus Grove trees since there is enough room to accommodate such a construction.*

2. We address a missing finding:

On pg 8 under Project Construction the MND statement is 'to remove the existing wooden walkway, and either modify or replace the existing cantilever structure that supports the walkway.'

- *Should the existing cantilever structure be replaced/modified then the required construction details have to be listed in the MND and assessed for effects on the environment.*

3. We note this lack of clarity:

pg 7 'with a 10-foot-wide concrete multi-use path (also called trail)'

pg 9 'The proposed materials for the 300-foot-long replacement path are steel and concrete for longevity and low maintenance. Alternative materials that may be considered for the replacement path include fiber reinforced polymer (FRP) composite decking, steel plates, '

- *These 2 statements are confusing since Project Overview states the path material and then mentions other options without detailing their characteristics. Consequently a proper environmental impact assessment is not possible.*

4. We note 2 contradictions:

pg 8 MND states 'A level landing pad would be provided at the transition supported with a drilled pier set back from the bluff edge.'

pg 78 12 b) MND states 'Although a bulldozer is not anticipated to be required for construction, it is included below to present a worst-case conservative estimate for

construction equipment. Jackhammers may be used during modification of the east landing.'

- *These 2 statements are confusing since one mentions that drilling activity will take place while the other statement doesn't list a drill.*
- *The potential effect on the environment/erosion due to drill activity is absent and needs to be included.*

5. We address these 6 discrepancies:

pg 39 New Source of Substantial Light or Glare – Less Than Significant.

pg 39 the MND states 'The replacement path would be concrete and could be a lighter color than the existing walkway, which could slightly but not substantially increase glare within the project area.'

- *The MND needs to address how the glare and lights will affect the flyway of local/migratory birds, night flying birds, the resting/feeding/shelter area of raptures, falcons and the Cormorant roost. This issue is further addressed under #6 in Biological Resources. Note the comment regarding Arana Gulch bridge lights: the bridge lights at Arana Gulch, although small and at foot level, create significant light pollution into the surrounding habitat due to reflection off the bridge surface.*

pg 39 also states, 'This would be similar to any glare from vehicles and equipment currently stored and parked in the staging area. The additional glare would be temporary, limited to daytime hours, and similar to cars and trucks that are currently associated with the existing land uses that border the project area.'

- *The MND makes a comparison that lacks scientific data since the one area is above water while the other is on land. Water reflects light and glare differently and impacts birds accordingly.*
- *The MND finding needs to expand on the glare and night bridge lights interaction and its effect on the riparian corridor wildlife and birds.*

pg 39 d) 'Although the project would introduce a new source of light on the trestle path, it would be very low level, substantially dimmer than the lights on the ramps leading to the bridge, and thus would not create substantial additional light or glare that would adversely affect day or nighttime views in the area'

- *Since the ramp lights are not up-to-date to the latest wildlife friendly light standards any comparison to them is ill advised. Nighttime views are not the only consideration. Effects of lights on wildlife should be considered in an environmental document.*
- *The new light source findings need to be based on the most current scientific data for the best wildlife/bird friendly lighting, IDA approved, that eliminate any impact on the riparian corridor habitats. Even so, with a lighter color trestle path, light pollution can be a problem with even the dimmest of lights. For comparison, the bridge lights at Arana Gulch cause significant light pollution into the surrounding habitat due to reflection off the bridge surface.*

pg 54 'Further, wildlife in the area are likely acclimated to the nighttime lighting in the area, including the all-night lighting on both the east and west access ramps to the SLR

Trestle Bridge, as well as lights and activities from the adjacent Santa Cruz Boardwalk. ‘
MND

- *There is no scientific data available for the effects of the all night- lights at the ramp and Boardwalk on the riparian corridor wildlife. This MND finding is invalid, because it is based on an assumption not a study.*

6. We find 9 inconsistencies:

Biological Resources

The MND lists on pg 46, pg 46 & pg 48 15 a total of bird species in 6 areas.

- *The bird MND species list is incomplete and segments the bird population in the Project Area.*
- *The MND bird species list is low according to various sources documenting the 120 bird species for the San Lorenzo River:*

‘The EcoSystem West (EW) reports their survey findings for the ‘Project Area on 14 and 26 March 2018 and evaluated the Project Area, characterized all habitat types, and assessed the availability of suitable habitat for sensitive plants and wildlife species.’

quote pg 3

- *The 2 surveys for the MND must record the recorded presence of:
the Peregrine Falcon
the Osprey
the Bald Eagle,
the Cooper Hawk,
the Red-shouldered and Red-tailed Hawk*

All of whom rest, hunt and eat in the Eucalyptus Grove, which is are vital for their survival.

- *The 2 surveys for the MND are not addressing that a wide range of local/migratory bird species using the entire Eucalyptus Grove for food and shelter such as Bushtits, Townsend’s Warbler, Wilson Warbler...*
- *The MND surveys must emphasize that the removal of any trees from the eucalyptus grove will create habitat loss for the raptors, falcon, cormorants and multiple local/migratory bird species.*
- *The MND does not adequately acknowledge that the Eucalyptus Grove is an active Cormorant roost, where at times over 60 Cormorants are present.*

pg 47 *‘The grove supports a semi- open tree canopy over the developed, landscaped, and ruderal areas east of the SLR Trestle Bridge.’*

- *The MND fails to acknowledge that this tree canopy gives shade and protection for fish in the bank channel.*
- *The MND does not include that the areas below the grove are vital feeding grounds for the Spotted Sandpiper, Green Heron, Snowy Egret, Great Blue Heron and Yellowleg.*

7. We notice this omission:

On pg 47 MND lists native plants.

- *Mugwort, Gumplant and Purple Needle Grass are omitted.*

8. We note cumulative impact concerns:

pg 50 The MND Impact Analysis states that 'Once the replacement path is constructed and in use, there would be no ongoing project features that would impact sensitive species or habitats within or adjacent to the project area.'

- *The MND is not disclosing that the culvert installation project at the river mouth is scheduled for the summer of 2019, which will further impact the migratory and local bird population.*
- *In view of the above listed concerns the project has environmental impacts some of which are individually limited but are potentially cumulatively significant.*

The Sierra Club would appreciate a response to our concerns and looks forward to seeing these omissions and inaccuracies corrected in the final MND.

Sincerely,

Gillian

*Gillian Greensite, Chair
Sierra Club, Santa Cruz County Group
Ventana Chapter*