



**SANTA CRUZ COUNTY
GROUP**

Of The Ventana Chapter

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September 10, 2018

**To: California Coastal Commissioners
From: Sierra Club
Re: San Lorenzo River Trestle Bridge
Walkway**

Agenda Item 13 b)

**Thursday 9/13/18
Coastal Permit
Application # 3-18-077**

The Sierra Club has only just had a chance to review the Santa Cruz City's response to our June 6th submitted comments on the Mitigated Negative Declaration for the San Lorenzo River Trestle Bridge Walkway Phase III Project. The city's response to the MND comments was apparently attached to their design permit application. We were not alerted to any public meeting on this issue nor was a response provided to the Sierra Club nor attached to your agenda packet. We therefore appreciate this opportunity to share our concerns and hope they will be addressed in your deliberations.

While some of our concerns have been addressed by the city, some significant ones are left unaddressed or are inadequately addressed. Specifically:

1. On page 7 b. the city dismisses the impacts to birds of construction noise as less than significant as measured by residents (sic) 35 feet away. This conclusion ignores the fact that the San Lorenzo River is in the Pacific Migratory Flyway. Wintering migratory waterfowl arrive as early as September and stay until March. Species such as the Bufflehead, Common Goldeneye, Eared and Horned Grebes all heavily utilize the Estuary Reach. The noise impact on these particular migratory species is not addressed, consequently the construction noise level impact warrants further detail. According to birding expert Steve Gerow and the City funded *LOWER SAN LORENZO 2015 FALL MIGRATION BIRD SURVEY* over 100 bird species regularly utilize the lower San Lorenzo River <http://foslrw.weebly.com/documents.html>
[Microsoft Word - STEVE'S LIST SLR .docx - steves-list-slr.pdf](#)

2. On page 9 c. the Mitigation Measure BIO-1 addresses only nesting and breeding birds. It does not address the impact of habitat loss due to potential damage to and removal of any of the long established eucalyptus on the east bank of the San Lorenzo River, the only tall trees available. These tall trees are used by many species such as the Osprey pictured, for sustained hunting and feeding perches. The city writes that *“they (the trees) will only be removed as necessary if it was determined that project implementation would result in damage to the roots and the overall decline in the health of the trees, creating a potential safety issue.”*



Given the soil removal and construction at the proposed landing on the east bank, such damage is likely. Given that probability, such impact should be mapped, estimated and factored into the environmental review so its significance can be evaluated before, not after approval of the Coastal Permit.

3. On page 13 c. The city minimizes the shade on the river from the trees in its photo. In the photo below (from the Sierra Club/jane mio) you can see the more accurate shade value (for fish) of the trees compared to the second photo (City, MND).





4. Page 11 b. The city does not adequately address lighting impacts. Despite the lights associated with the Boardwalk and trestle entrances, new lights on the proposed walkway need specific evaluation. The city uses Arana Gulch lighting as a positive model. It was precisely the Arana Gulch lights that the Sierra Club noted as a problem in its MND comments, due to their reflection off the bridge, despite the fact that the lights are small and subtle. Painting the bridge deck a rose color is not adequate mitigation. A lighting expert such as locally based Lisa Heschong should have been consulted before proposing a new light source into a significant habitat area.

The Sierra Club thanks you for carefully evaluating these observations and comments. We hope that you will postpone the granting of a Coastal Permit until these coastal environmental issues have been satisfactorily addressed.

Sincerely,

Gillian

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