



**SANTA CRUZ COUNTY
GROUP**

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Cory Caletti, Senior Transportation Planner
Santa Cruz County Regional Transportation Commission
1523 Pacific Avenue, Santa Cruz, CA 95060
submitted by email to: NCRTDraftEIR@scrtc.org

Subject: North Coast Rail Trail Draft Environmental Impact Report (DEIR)
SCH#2017092034

Dear Ms. Caletti:

While the Sierra Club in general supports the rail trail project we note serious shortcomings in the DEIR for the North Coast segment as a component of the planned Monterey Bay Sanctuary Scenic Trail.

The DEIR as written contains valuable information regarding the environmental impacts of the proposed project, but it lacks critical information to assess and mitigate impacts of the project and alternatives. In particular, the Sierra Club requests that you address the following concerns (headings reflect resource areas under Appendix G of the CEQA guidelines as well as Sierra Club conservation and transportation policies):

Federal Nexus

1. How will the requirement of the federal funding for this project, by increasing access to federal lands, be implemented?
2. Why have the project proponents avoided a NEPA review process, given the federal funding for the project?
3. How have project proponents consulted with BLM in planning for this project?
 - a. What conclusions were reached during these consultations?
 - b. In what ways were these discussions exempt from the Federal land use planning process?

Biological Resources

1. California Red-Legged Frog (CRLF)
 - a. Please specify what fraction the acreage of CRLF habitat that will be lost represents of the total remaining CRLF habitat.
 - b. To be considered less than significant, mitigation must replace lost CRLF habitat at a 3:1 ratio. The proposed mitigations do not reduce the impact to less-than-significant.
2. How will the project proponents analyze the effects of the alternatives on the species and communities included in the Santa Cruz County General Plan list of locally unique sensitive species and communities, which must be addressed under CEQA?
3. Tree removal: Please provide an accurate and complete accounting of trees to be removed for each alternative.
4. How do you calculate that mitigations, including BIO-4, reduce the impact to less than significant? Please quantify the threshold you use.
5. Table ES-1 in the Appendix covers mitigations from the Monterey Bay Sanctuary Scenic Trail Master Plan. We request a mitigation that addresses restoration adjacent to the proposed path in order to increase and improve lost habitat.
6. The DEIR states that bi-annual "Routine Maintenance" will occur. Please specify which habitat-friendly methods of maintenance will be used in Mitigation Measure BIO-9(b).
7. In the Project description, in addition to estimates of acreage that will be disturbed, please specify how much of the adjacent ground cover and growth will be affected.
8. The Project description references wire fence between trail and railway or trail and farmland or where safety is a concern, and split-wire fencing is mentioned in BIO-9(b) as a possible choice.
9. Please assess the relative impact of each of these fencing types on wildlife movement.

Hydrology and Water Quality

1. HYD-3. The Project would alter drainage patterns in the Project corridor, which may impact water quality. The DEIR fails to mention how stream crossings will be managed regarding drainage and any project construction that might affect stream crossings.
2. Please describe how each stream crossing in section 3.9 will be managed by the Project and its alternatives.
3. Although Mitigation Measure BIO-9(b) addresses wetlands, restored wetland habitats cannot be equated to mature wetlands.
 - a. Please specify what quantity of wetland loss would be significant to the protection of the CRLF.
 - b. Please specify how CRLF affected by wetland loss will be protected.
 - c. Please specify where wetland habitat restoration will take place.
 - d. How much reduction of movement to the CRLF be considered significant.
 - e. Impacts to "special aquatic sites" such as all habitat areas of the CRLF are not acceptable because the Clean Water Act requires the Regional Board to protect to the highest degree possible.

Land Use and Planning

1. What impacts will the alternatives have on the quality of visitor experience for people visiting the beaches along the trail corridor?
2. Table 2-1 Summary of Trail Crossings includes six informal pedestrian trails that will be closed as part of the project. How will these trails be closed? Will there be cuts in the fence for these closed trails, as stated in the DEIR on page 2-19, "At all crossings, there would be a break in the fencing that extends between the trail and the railroad tracks."? Will there be access nearby for the areas these trails reach? Please include a description of the impact of closing these trails, including alternate access for pedestrians and the need to offset damage that might result if people create their own access to areas these trails used to service.
3. Coastal Access: The Appendix A site plan sheets show some proposed closures of existing popular pedestrian crossings of the rail corridor. This needs further evaluation to avoid eliminating practical access to historically established and well-loved beach access trails. Possibly the most striking beach access trail to be closed off at its rail corridor crossing is shown on the lower half of Sheet 4. This is the main 'easy' access trail to Laguna Creek Beach (the trail being mostly, a narrow, gravelly ranch road/trail). Users of this beach access trail, park in the parking lot along Hwy 1 at the intersection with Laguna Rd. (at the north end of the old Laguna Rd. loop, a very old version of Hwy. 1 that dips down into the tiny hamlet of Laguna). From the parking lot, beach trail users walk across Hwy 1 and follow the trail that begins directly across from the north end of the parking lot, down to the wild beach. This is a fairly easy, accessible way to get to Laguna Creek Beach, relatively free of the challenges with poison oak and mud that can be present on the other trail route. The plan sheet shows this as "Existing informal pedestrian RR crossing to be closed."

Transportation/Circulation

1. Appendix K, "Transportation Impact Analysis" (TIA) report by Kimley Horn consultants, does not adequately explain what evidence or data it used to arrive at key travel estimates. These estimates include the 80% - 20% split between in-county and out-of-county trail users and the proportional split between trail users potentially beginning their trip by bicycle (or foot) in Santa Cruz without driving on Highway 1 at all, and those trail users who will be driving on Highway 1 to get to a trail access starting point.
 - a. What is the basis for estimating that in the future fully 60% of local residents would drive cars to access the southern portion of the trail?
 - b. Did the analysis consider the future availability of a connecting, completed rail trail through the City of Santa Cruz plus the existing bike and pedestrian trail out to Wilder Ranch State Park?
 - c. With future policy changes, such as increasing carbon pricing on fossil fuels, will more trail users choose to be recreationally "car-free"?
2. The State of California is moving strongly toward transportation and climate policies that encourage a shift away from over-reliance on automobiles and promoting reductions in vehicle miles travelled. Active transportation and passenger rail are receiving new attention for state funding.
 - a. Please explain how this shifting future is factored in to the TIA.
 - b. The project plan of operation could consider adding some ongoing public outreach in MBSST informational materials (including online and in onsite signage) promoting why, how, and where to begin bicycling or walking from the MBSST sections within the City of Santa Cruz, thereby avoiding North Coast

Highway 1 car travel. This promotional outreach aspect could be included as a required mitigation to reduce traffic impact on Highway 1.

3. Are the Caltrans peak hour traffic volume estimates for future Highway 1 vehicle travel “conventional” regarding growth in vehicle miles, or do they take current and future policy shifts into account?
4. The TIA does not sufficiently examine the possible benefits for reduced vehicle travel and parking lot demand based on car-free recreation and continuing state and local transportation policy shifts and related achievements on climate action.
 - a. What impacts will the alternatives have on the quality of visitor experience for people visiting the beaches along the trail corridor?

Cumulative Impact Analysis

1. What will the cumulative effects of this project be given the following approved and planned projects that would intersect with the proposed project:
 - a. State Parks' approved plan for parking lots at 4 Mile Beach, between the highway and the rail tracks
 - b. State Parks' approved, planned campground on the Scaroni property
 - c. BLM's plans (currently underway) for public entrances to Cotoni Coast Dairies
 - d. County's plans for expanded public access to County beaches near the trail
 - e. Plans (currently underway) for greatly expanded tourist facilities at the decommissioned Davenport cement plant
 - f. Land conservation partners' (currently underway) plans for a ridge-to-sea trail through BLM and the San Vicente Redwoods property

Conclusion

This section of the proposed rail trail affects sensitive environmental species and habitats. The DEIR is inadequate in its assessment of the project's impacts in the areas detailed above. The Sierra Club requests that these inadequacies be fully addressed in the final EIR so that alternatives can be properly considered and mitigations accurately evaluated.

Sincerely,

Gillian

Gillian Greensite, Chair
Sierra Club, Santa Cruz County Group

