



**PUBLIC WORKS DEPARTMENT**

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October 31, 2018

Ms. Gillian Greensite, Chair  
Sierra Club, Santa Cruz County Group  
P.O. Box 604  
Santa Cruz, CA 95061

Dear Ms. Gillian Greensite:

Thank you for providing the Sierra Club's comments on the Initial Study/ Mitigated Negative Declaration (IS/MND) for Phase II of the Santa Cruz Rail Trail Segment 7 Project (Project). The comments made on the Project in the letter dated August 13, 2018 were reviewed and the following responses have been prepared to clarify Project details.

**Special-Status Wildlife Species**

Page 1 and 2 of the Sierra Club's letter states that the Project would result in a significant loss of habitat from the removal of trees, vegetation, and soil and that the mitigation identified in the IS/MND is not sufficient to mitigate this impact.

The letter accurately describes that trees and vegetation would be removed and that special-status species use those trees and vegetation for habitat. However, compliance with City ordinances and implementation of mitigation measures identified within the IS/MND would indeed reduce these impacts to a less than significant level. There are additional trees nearby, including within Neary Lagoon that could provide habitat for special-status species and the removal of 47 trees would not substantially deplete the existing number of trees that provide habitat for special-status species, including nesting birds. Furthermore, the planting of trees per the City's Heritage Ordinance would create habitat for special-status species and even though the trees may be planted off-site, special-status species would still be able to use those trees. In addition, the IS/MND goes above and beyond requirements for planting trees. Per Mitigation Measure BIO-6, the City will replace the willow trees that are removed near Neary Lagoon at a 3:1 ratio. In conclusion, the IS/MND adequately addresses the potential impacts to special-status species.

**Lighting**

The letter expresses concern about the effects of new Project lighting. The IS/MND identifies that the impact associated with new lighting would be mitigated through the implementation of Mitigation Measure AES-3. Mitigation Measure AES-3 (see page 3-6) identifies that Project lighting would be designed in a way, such that light is only directed towards objects requiring illumination. Because lighting would be maintained on the Project site, it would not have an effect to the

surrounding environment. Thus the mitigation provided in the IS/MND is sufficient to address the potential lighting impacts.

### **Air Quality**

The letter incorrectly identifies that the Project would result in the activation of the rail line since the Project is called a rail/trail project. The IS/MND identifies that rail service occurs within the limits of the project. On page 1-2 of the IS/MND, the document states that recreational passenger service occurs during the tourist season, from approximately 1,000 feet west of the wye to the Boardwalk, by Roaring Camp Railroads in Felton California. The operator of the railroad tracks is Roaring Camp Railroad. The Project is referred to a rail/trail project because it is located adjacent to an existing rail line. The Project only entails the construction of a bicycle/ pedestrian trail and does not involve the activation of the rail line. As described above, the rail is being operated by Roaring Camp Railroad. The IS/MND identified the potential cumulative impacts based on the 2030 General Plan EIR (see pages 3-67 to 3-68). The IS/MND already sufficiently addresses any potential cumulative impacts, including air quality impacts.

### **Fragmentation**

The letter identifies concern that the IS/MND did not address potential cumulative impacts on habitat, associated with the connectivity to other regional bicycle and pedestrian facilities. As described in Response IV(b) of the IS/MND (see pages 3-24 and 3-25), the Project would impact a small portion of habitat (Central Coastal riparian scrub) that offers little habitat because it is not connected to Neary Lagoon and because it is dominated by invasive weeds. Nonetheless, the Project would offset this impact through the planting of willow trees at a 3:1 ratio, as required by Mitigation Measure BIO-6. Because the Project would offset its potential impacts to low-quality habitat, the Project would not overall decrease the amount of habitat in the area and would not contribute to a cumulative impact.

### **Monarch Habitat**

The letter identifies potential concerns about impacts to monarch butterflies. The letter states that impacts to monarch butterflies were not addressed in the IS/MND. This impact was not addressed in the IS/MND because monarch butterflies are not considered special-status species under CEQA and are thus not required to be analyzed under CEQA but nonetheless, the City as the lead agency is looking for ways to minimize impacts. Per the July 30, 2018 project walkthrough with the Sierra Club, City staff said they would look into redesigning the wall and reducing the trail width to minimize impacts to 6 eucalyptus trees. Working with the design consultant the City believes 5 of the 6 eucalyptus trees can be saved without reducing the minimum trail width and required clearances. The 1 tree removed would be mitigated through plantings at a 3:1 ratio.

## Alternatives

The letter identifies an alternative of using the existing rail-line for maintenance needs. The letter also identifies an alternative of placing the trail within La Barranca Park. CEQA does not require that an IS/MND consider alternatives; thus, the IS/MND sufficiently addresses all CEQA requirements. Nonetheless, a brief summary of the alternatives that were considered for the Project is included here.

As described in the IS/MND, the Project forms a part of the Monterey Bay Sanctuary Scenic Trail (MBSST). The MBSST Master Plan initially proposed the Segment 7 trail on the north side (inland side) of the railroad tracks, directly adjacent to Neary Lagoon.<sup>1</sup> It was decided early on, due to potentially significant impacts to Neary Lagoon, to shift the Segment 7 trail to the south side (ocean side) of the railroad tracks. This alternative alignment on the north side of the railroad tracks would have resulted in greater impacts on Neary Lagoon and biological resources because this alternative would have required more extensive retaining walls, closer to Neary Lagoon. This alternative alignment would have also required permits from the California Public Utilities Commission (CPUC) for two new railroad crossings, which would have likely required removal of four existing crossings and significantly delayed project implementation. Thus, this alternative alignment on the north side of the railroad tracks was not pursued further.

A Final Environmental Impact Report (EIR) for the MBSST was certified on November 7, 2013 by the Santa Cruz County Regional Transportation Commission (RTC). Section 6.0 of this EIR includes analysis of a No Project Alternative, an On-Road Alignment Alternative, and a Reduced Project Alternative.<sup>2</sup> The No Project Alternative assumes that the MBSST would not be constructed and the Reduced Project Alternative includes the alignment proposed for Segment 7 (Phase II); thus, these alternatives do not provide an alternative alignment for this Project [Segment 7 (Phase II)]. However, the On-Road Alignment Alternative does provide an alternative alignment for this Project [Segment 7 (Phase II)]. Under the On-Road Alignment Alternative, the proposed alignment would be relocated to on-road sidewalks, bicycle lanes, including bicycle lanes on roadways and separated bicycle paths along the shoreline through Santa Cruz. RTC prepared a CEQA Findings document, which identified that specific economic, legal, social, technological, or other considerations make this alternative infeasible.<sup>3</sup> The CEQA Findings identifies that this alternative would not provide safe separation from vehicles or between trail users; would be in conflict with the project objective of developing a continuous trail alignment that maximizes opportunities for a multi-use bicycle and pedestrian trail separate from roadway vehicle traffic; would result in more roadway crossings, which could increase vehicle-related conflicts; and would not fully meet the remaining project objectives, including developing public trail access along the Monterey Bay National Marine

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<sup>1</sup> Santa Cruz County Regional Transportation Commission. *Monterey Bay Sanctuary Scenic Trail Network Master Plan*. Adopted November 7, 2013. Available: <https://sccrtc.org/projects/multi-modal/monterey-bay-sanctuary-scenic-trail/mbsst-master-plan/>. Page 4-42.

<sup>2</sup> Santa Cruz County Regional Transportation Commission. *Monterey Bay Sanctuary Scenic Trail Network Master Plan Final Environmental Impact Report*. Certified November 7, 2013. Available: <https://sccrtc.org/projects/multi-modal/monterey-bay-sanctuary-scenic-trail/final-environmental-impact-report-on-the-monterey-bay-santucary-scenic-trail-mbsst/>.

<sup>3</sup> Santa Cruz County Regional Transportation Commission. *Monterey Bay Sanctuary Scenic Trail Network Master Plan EIR - CEQA Findings*. Available: <https://sccrtc.org/wp-content/uploads/2013/05/Final-MBSST-Findings.pdf>. Page 62.

Sanctuary and promoting awareness of the trail.<sup>4</sup> Although this alternative was considered, it was found to be infeasible and was not pursued further.

The City also considered an alternative route for the Project trail through La BARRANCA Park. A large concrete ramp structure would have been required to create an accessible trail between the park and the railroad bed where there is approximately thirty-five (35) feet of elevation difference. Construction cost of the large ramp structure was anticipated to be significant. This alternative alignment through La BARRANCA Park would result in direct impacts on the park and its current users, many of whom are elderly, and would change the existing park, including the introduction of different uses (bicycling) to the park that have not been planned. Following a presentation and discussion at the Parks and Recreation Commission public meeting on May 2, 2016, the City chose not to pursue this alternative route further as the Commission and public were not supportive of the alternative.

The City also considered potential alternative alignments on existing roadways, including (1) an alternative alignment on Bay Street from the intersection of Bay Street/California Street to the intersection of Bay Street/West Cliff Drive and (2) an alternative alignment on California Street and Laurel Street from the intersection of California Street/Bay Street to the intersection of Laurel Street/Pacific Avenue. These alternative alignments were not pursued further because they would not meet the objective of maximizing safety of trail users; these roadways have high bicycle and pedestrian collisions. The Transportation Injury Mapping System (TIMS) database collects collision data. Review of this database revealed that over 50 collisions, including 1 fatality have been reported in the alternative alignment. Furthermore, this alignment would have slopes that exceed 8.33 percent running slopes, which would result in the alignments not being compliant with the Americans with Disabilities Act (ADA). For these reasons, the Project is proposed next to the railroads tracks and not on roadways. Thus, these alternatives were not pursued further.

Furthermore, during the design phase of the Project, the City considered a 16-foot wide trail at the request from City emergency services, members of the public, and trail support groups including Ecology Action and Bike Santa Cruz County. However, the City abandoned that design concept after considering the additional tree removals and impacts on La BARRANCA Park. The trail was ultimately reduced from 16-feet to 12-feet, in order to minimize costs and environmental impacts.

A trail only project was not considered since the approved funding for the Project is predicated on implementing a segment of the MBSST Network Master Plan. In addition, this rail line is actively used by Roaring Camp Railroad, which currently has track rights to 1,000 feet west of the wye and this area is used to turn the train.

Although the IS/MND does not identify alternatives in the document, several alternatives have been considered for the Project, including (1) an alternative alignment on the north side of railroad tracks; (2) an alternative alignment on roads, sidewalks, and bike lanes; (3) an alternative alignment on Bay Street from the intersection of Bay Street/California Street to the intersection of Bay Street/West Cliff Drive; (4) an alternative alignment on California Street and Laurel Street from the intersection of California Street/Bay Street to the intersection of Laurel Street/Pacific Avenue; (5) an alternative route through La BARRANCA Park; and (6) a 16-foot wide trail. These alternatives were

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<sup>4</sup> Ibid.

not pursued any further because they were found to result in greater environmental impacts, because they did not meet the project objectives, or because they were considered infeasible. The proposed Project, however, would meet the MBSST project objectives, including maximizing safety for the users of the park. Furthermore, the proposed Project is consistent with the policies in the City's documents, including the General Plan, Climate Action Plan, and Neary Lagoon Management Plan. For these reasons, the City is pursuing the proposed Project.

Sincerely,



Nathan Nguyen  
Associate Engineer