



**SANTA CRUZ COUNTY GROUP**  
**Of The Ventana Chapter**  
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December 4<sup>th</sup>, 2018

To: City Planning Commissioners  
City Planning Director  
Nathan Nguyen

From: The Sierra Club

Re: CEQA INITIAL STUDY/MITIGATED NEGATIVE DECLARATION  
SANTA CRUZ RAIL TRAIL SEGMENT 7 PROJECT (PHASE II)

Dear Mr. Ngyuen and City Planning Commissioners:

Thank you for your response to the Sierra Club's comments on the Initial Study/Mitigated Negative Declaration for Phase 2 of the Santa Cruz Rail Trail Segment 7 Project. The Sierra Club fully supports the goal of improving and enhancing bicycle and pedestrian facilities along the rail corridor, providing amenities that reduce gasoline-powered vehicle miles, and substantially reducing the carbon footprint of our transportation system. This project is particularly important, because it is a highly visible segment of the much larger rail/trail project, which we hope will be successful and responsive to community and environmental needs along its entire length.

Your response to our initial letter, unfortunately, fails to assure us that the environmental impacts of the project have been sufficiently analyzed and mitigated to a less-than-significant degree.

One example: Your letter acknowledges that the impact of this project on monarch butterflies "*was not addressed in the IS/MND,*" claiming that "*monarch butterflies are not considered special-status species under CEQA and are thus not required to be analyzed under CEQA.*" This assertion is incorrect. It is contradicted by the city's 2030 General Plan Policy NRC 2.4.1, the City's adopted Monarch Butterfly Management Plan, and the City's Sensitive Habitat map, all attached. Impacts on Monarch butterflies from development are very much required to be analyzed under CEQA in the City of Santa Cruz. The project site is furthermore located in and near identified sensitive habitat for monarchs. For this and other environmental review shortcomings, such as assuming that special status species can simply move to other parts of Neary Lagoon and that saplings planted as mitigation for the removal of tall, mature trees will suffice for nesting birds, our position that an EIR is required to assess environmental impacts of proposed alignments for this Segment has not changed.

As you note, an EIR would allow for the assessment of alternatives. The Sierra Club wants this important project to be successful for our community, while also protecting the environment. Decision makers need full information in order to make an informed choice among the alternatives. The Sierra Club requests that the city perform the required environmental review of alternatives to maximize the interests of both trail users and wildlife inhabitants.

Sincerely,

Gillian

Gillian Greensite, Chair,

Sierra Club, Santa Cruz County Group