



# SIERRA CLUB

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Dear Mayor Terrazas and City Council,

The Sierra Club has reviewed the Environmental Checklist for Determination of CEQA Exemption (ECDCE) for CP-180079, the Pacific Front Mixed-Use Project and concludes that a CEQA exemption for this project is inappropriate.

This project should not be considered exempt from CEQA analysis, because its environmental impacts were not fully considered under the Program EIR for the Downtown Plan Amendments or under the Santa Cruz City General Plan EIR. An Initial Study must be completed to assess the environmental impacts and risks of this project, followed by a negative declaration or EIR to help inform the public and decisionmakers of how to mitigate or avoid those impacts.

As listed on page 3 of the ECDCE (Nos. 1 to 6), the proposed project requires a number of design and development Variations from the Downtown Plan Amendments approved in November 2017. These Variations need regular environmental review under CEQA, especially given the size, scale and prominence of the project. These departures from the Downtown Plan alone could create significant impacts on Aesthetics, Biotics, Traffic and Transportation, and Hydrology (Flood Hazards), among others. These impacts are of great concern to the public and merit environmental review.

Furthermore, the ECDCE claims that this project is exempt from environmental review because environmental review occurred through the FEIR for the Downtown Plan Amendments. In the Downtown Plan Amendment FEIR, however, the City acknowledges that “the Vulnerability Study...indicates that there **are significant flood risks that will increase** with a rising sea level” and “flood hazards in the downtown area could be **more significant in the future**,” and it confirms that “**the [Downtown Plan Amendment] project is a “program” under CEQA and no specific development is proposed as part of the project**” (emphasis added, Section B4-14, page 4-46).

Environmental risks caused by this specific proposed Project, CP-180079, were not encompassed in the analysis by the Downtown Plan Amendments Program EIR. Instead, the EIR defers analysis to “other studies, plans and actions that the City has and **continues to undertake** to address issues of climate change and sea level rise” (emphasis added). This project does not meet the requirements for an exemption to CEQA.

Using the 73-page exemption checklist rather than the standard Initial Study process for this project abridges the rights of the public to evaluate and comment on environmental impacts of this proposed project, located in the critical downtown area of Santa Cruz. The Sierra Club reiterates that an Initial Study must be completed and circulated publicly to assess the risks of this project.

Thank you very much for your attention,

Gillian

Gillian Greensite, Chair  
Sierra Club, Santa Cruz County Group

12/5/18