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Noah Downing, Planner
City of Santa Cruz
Department of Parks and Recreation
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Dear Noah,

Thank you for the opportunity to read and comment on the Recirculated Draft Initial Study and Mitigated Negative Declaration (RIS/MND) for the City of Santa Cruz Parks Master Plan 2030 (SCPMP2030).

Unfortunately, the recirculated IS/MND does not remedy the previous concerns communicated by the Sierra Club in our response to the initial draft IS/MND. We also have identified additional foreseeable impacts that were neglected in both documents.

Specifically, throughout the document, Environmental impacts of named projects are asserted to be less-than-significant based on:

- 1) the assumption they will be reviewed in future studies. This practice represents illegal segmenting of the whole project under CEQA, and the practice prevents proper environmental review, especially of cumulative impacts; or
- 2) other City plans or procedures will be followed during implementation. Relying on mitigations from other City plans and documents is an inadequate guarantee of mitigation to less-than-significant impact on the environment. Required mitigations must be specified and adopted as conditions of approval for all significant impacts this plan causes.

As a result of these deficits, as well as specific impacts the plan will cause, described below, the document does not support the assertion that all impacts of the plan as written can be reduced to less than significant. **A full Program Environmental Impact Report (EIR) is needed for a**

project of this scope.

The findings of “less-than-significant” impacts noted below are therefore invalid. As part of this process, the public deserves to review appropriate data collection with an analysis of plan alternatives as well as public hearings on the impacts.

The following are some examples of deficiencies in this document which support the need for full environmental review via an EIR:

Project Description

The RIS/MND finds as “less than significant” environmental impacts on clearly foreseeable projects that it defers for study to a future unspecified date. Thus there is no valid measure of their impacts in the document. The RIS/MND repeatedly asserts that specific project site level review MAY be needed, rendering proper environmental assessment uncertain and cumulative impacts of this suite of projects impossible to assess. Deferring for the future the specifics of actions easily foreseeable is inconsistent with CEQA (California Environmental Quality Act) requirements.

For example, a drone course is proposed, with few details. If this activity is to be studied at a later date (not consistent with CEQA requirements), it will be studied in isolation from all the other proposed activities which also give no specifics. Such an approach does not allow for assessing the cumulative impacts on our parks and open space system. Including this and other projects, but deferring analysis, skirts proper environmental review. All proposed new activities need proper environmental review via an EIR that includes all projects named under the Parks Master Plan umbrella.

Other poorly-described projects for which analysis is deferred include new trails, theater dressing room and bathroom facilities, a bridge over a riparian waterway, parking lots, new lighting, and revision of a wetland mitigation. If these projects remain in the plan, they must be described and analyzed at an appropriate level of detail to enable cumulative assessment of their impacts.

Finally, internal inconsistencies in the analysis reveal the ambiguity of the goal of this project. For example, on page 72 the RIS/MND suggests that:

“Recommendations in the Parks Master Plan are consistent with adopted management plans for the City’s open spaces, except the plan indicates that some amendments to existing plans, such as Jessie Street Marsh, Moore Creek Preserve, and Pogonip Open Space, may be necessary to implement some of the recommendations in the Parks Master Plan. Updates to existing plans would need to conform to the General Plan and would undergo a future planning process prior to implementation”

whereas on page 27, the same document asserts that “there are no current proposals to modify the Jessie Street Marsh Management Plan.” The project proposal must be internally consistent to

allow the public and decisionmakers to assess true environmental impacts.

Deferring analysis of anticipated projects is evidence of illegal segmenting. Projects that are truly not being proposed should be eliminated from the plan. Those that remain should be analyzed.

Study / Mitigated Negative Declaration (PMP/RIS/MND)

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?				<input type="checkbox"/>
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?				<input type="checkbox"/>
c) substantially degrade the existing visual character or quality of the site and its surroundings?			<input type="checkbox"/>	
			<input type="checkbox"/>	

Our earlier comment has not been addressed sufficiently:

“Increased night time lighting at De Laveaga Park, Depot Park, Neary Lagoon, Main Beach, San Lorenzo River and the various proposed new parking lots could create significant environmental impacts due to their effects on light-sensitive species and due to their placement in otherwise dark sky locales. These effects are not modeled appropriately.”
(Sierra Club Comment letter on PMP IS/MND)

The effects are not mitigated in the revised document. The revised document added the following explanation of why the impact was considered less than significant: “Goal 1-Policy A, Action 2a calls for installation of computer controlled, energy-efficient lighting in parks and facilities and minimizing light spillover and wildlife impacts.” This language is no substitute for appropriate modeling of light impacts on each of the sensitive species listed in table 3. Such study is needed under the categories of Aesthetics and Biological Resources. The MND ignores the fact that installing nighttime lighting at Depot Park for night- time activity was prohibited as a condition of approval for Depot Park in order to protect the neighborhood.

There is no mention of IDA (International Dark-Sky Association)-approved lighting, nor Title 24 guidelines and no specifics on shielding. There is no mention of the documented impacts of night LED lighting on wildlife, plant life and humans. The proposed lighting in many cases will intrude on currently non-lighted areas. The RIS/MND is silent on the impacts of introducing new lighting in such areas.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement Methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?				<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				<input type="checkbox"/>

The conclusion of “no impact” with respect to the loss of forest land (d) and “no impact” with respect to conversion of forest land to non-forest use under **AGRICULTURE AND FOREST RESOURCES** (d) and (e) are invalid since analysis ignores the numerous references in the document to new mountain bike trails and connecting spurs in currently forested areas with highly erosive soils at Delaveaga and other parks. That such uses are not being studied in this document despite their inclusion as possible future projects does not validate a conclusion of “no impact.” In fact, increasing trail areas at these

fragile parks will cause significant impacts on the forest resource.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			<input type="checkbox"/>	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			<input type="checkbox"/>	
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			<input type="checkbox"/>	
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		<input type="checkbox"/>		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				<input type="checkbox"/>

The Sierra Club’s assessment is that Biological Resources a) through d) require much more thorough analysis. If this were done, each of these impact areas currently described as “less than significant” would be shown to be “potentially significant.” The sole mitigation proposed for Biological Resources is a pre-construction bird nesting survey followed by minimal construction-related avoidance of direct short-term impacts on nesting birds.

The RIS/MND recognizes the presence of 15 special status species in Table 3, in addition to uncounted resident and migratory birds, bats and dusky-footed woodrat, and five sensitive habitat types: freshwater wetland; salt marsh; riparian forest and scrub and coastal prairie. Any or all of these resources could be impacted by the proposed additional usage of the parks, trail construction and use, lighting, paving, construction and other activities foreseen by the PMP. No mitigations have been proposed for any of the impacts on these species and ecosystems other than nesting birds.

Although we appreciate that the PMP RIS/MDN has added the Western pond turtle to the San Lorenzo River, impacts of increased activity on this and other sensitive species that use the river have not been assessed, despite proposed comprehensive park “renovation” with undefined “upgrades” “removal of pond,” “events/concerts” at San Lorenzo park on the San Lorenzo River (RIS/MND Attachment A, p. A-3). Impacts of any of these activities could be significant for river wildlife.

Furthermore, wildlife habitats support each other’s biodiversity. Habitat fragmentation (habitat “islands”) is a significant impact that must be avoided, per City of Santa Cruz General Plan Natural Resources and Conservation Goals 1 - 5 and the CEQA guidelines. It is important to address the adjacent habitats in their entirety with their interconnection to each other at the program level. By segmenting analysis, the RIS/MND cannot evaluate interactions among habitats, or fragmentation of wildlife impact. The failure to address habitat types consistently and correctly throughout the document, poses a potentially significant issue since no proper evaluation is possible.

The Santa Cruz General Plan 2030 refers to the San Lorenzo River. In the RIS/MND, however, the reference is to the “Santa Cruz Riverwalk” which represents a segmentation of the San Lorenzo River. This segmentation is a potentially significant CEQA issue as riparian and watershed areas have to be addressed in their entirety, not removed from the adjacent riverwalk.


The RIS/MND states that the recommended “improvements” would not adversely affect wildlife movement corridors. However soil removal and replacement, vegetation removal and increased human recreational activities cause measurable changes to species sensitive habitats and constitute a potentially significant issue.

The RIS/MND is ambiguous in stating that “some improvements are proposed to be further explored” which does not address measurable, predictable, accumulative, potential impacts of such unknown improvements, especially as some of the areas listed include riparian corridors, areas and wetlands.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?			<input type="checkbox"/>	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			<input type="checkbox"/>	
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			<input type="checkbox"/>	
d) Disturb any human remains, including those interred outside of formal cemeteries?			<input type="checkbox"/>	

Discussion of cultural resources (a) is inadequate. For example, effects of “locating a play area or other recreational use” (PMP p. 4.2) at the “historic zoo area” at Delaveaga Park is omitted from the discussion of significant historical resources. Mitigations must be required to ensure that this site is appropriately assessed and protected. The RIS/MND entirely neglects to discuss this site. Proposed actions in the PMP could cause a substantial adverse change in the significance of this historical resource.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
6. GEOLOGY AND SOILS. Would the project:				
1. ↗ Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: • • Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (V.1a, V.1b-DEIR)				<input type="checkbox"/>
ii. Strong seismic ground shaking?			<input type="checkbox"/>	
iii. Seismic-related ground failure, including liquefaction?			<input type="checkbox"/>	
iv. Landslides?			<input type="checkbox"/>	
b) Result in substantial soil erosion or the loss of topsoil?		<input type="checkbox"/>		

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			<input type="checkbox"/>	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			<input type="checkbox"/>	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				<input type="checkbox"/>

Mitigation 2 for the impacts of future trail construction on steeper slopes and areas of high erosion potential is limited and inadequate. There is no analysis or data included of current conditions, current trail impacts nor detailed projections of future trail impacts. Not even the locations of future trails are included on which to base an assessment. “Sustainable design features” are not described adequately by this document (RIS/MND p.75). No qualified geologists are identified as participating in the proposed trail design, instead “volunteers” are to conduct trail erosion prevention. No specific erosion measures or goals are provided. These measures are inadequate to convincingly prevent substantial erosion, as can be seen in current conditions at these parks.

Soils at some parks, most critically at Delaveaga Wilderness, Pogonip Open Space, cliffs adjacent to Jessie Street Marsh and Oceanview park, and elsewhere, are classified as very erosive. Detailed maps of soil erosion potential are easily available for this region, and must be added to the analysis to support assertions whether impacts of specific projects are less-than-significant.

By deferring to the future such projects as new downhill bike trails and trail expansion onto ad hoc (i.e. illegal) trails, issues such as soil erosion and silt intrusion into the San Lorenzo river are side-stepped. A single entry that trail design takes care of such problems is insufficient. If new and expanded bike trails are proposed in the PMP, the impacts of such should be studied in this document, not deferred and then entered as “less than significant.” An EIR that assesses ALL the new activities you propose is not only proper CEQA procedure but also gives the decision-makers and the public the information it needs to make informed decisions.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either				

directly or indirectly, that may have a significant impact on the environment?			<input type="checkbox"/>	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				<input type="checkbox"/>

Increasing parking availability at parks and open space will increase the number of cars visiting our parks and open space. If new downhill trails are built, Santa Cruz will become a destination for the entire region and beyond. That potential impact should be studied and evaluated. The increase in Highway traffic and in-town driving on the weekends without a change in public transit would cause an increase in GHGs, creating a significant impact on greenhouse gas production.

Furthermore, converting forested land to trails, as well as converting open space and vegetated land to paved and built hardscape will release sequestered carbon into the atmosphere and significantly increase atmospheric greenhouse gases. These effects have not been analyzed or mitigated to less-than-significant.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ miles of an existing or proposed school?				<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or				<input type="checkbox"/>


working in the project area?				
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			<input type="checkbox"/>	

Insufficient data has been presented to support the assertion that “impacts resulting from a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands” would be “less-than-significant.” The RIS/MND acknowledged that the risk conditions are extremely high for residences in and around the parks and open spaces in Santa Cruz. Proposed increased access and will generate increased barbecue use, electric lines, and other sources of ignition such as cigarettes. These risks have not been quantified, and could be significant. The document cites “a number of wildfire mitigation measures” (RIS/MND p. 81), rather than elaborating on required mitigations for the plan’s increased fire risks.

Furthermore, the January 2019 state CEQA checklist adopts guidelines for evaluating fire risk, below, that reveal new significant impacts under subsections b) and c) below for several fire-prone open space projects described in the draft Parks Master Plan.

XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |


ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Signifi- cant Impact	No Impact
9. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?				<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local ground water table level (for example, the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?			<input type="checkbox"/>	
f) Otherwise substantially degrade water quality?		<input type="checkbox"/>		
g) Place housing within a 100-year flood-hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				<input type="checkbox"/>
h) Place within a 100-year flood-hazard area structures which would impede or redirect flood flows? (V.1b-Figure 4.7-1 in DEIR)				<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving				<input type="checkbox"/>

flooding, including flooding as a result of the failure of a levee or dam?				
j) Inundation by seiche, tsunami, or mudflow?			<input type="checkbox"/>	

The Sierra Club’s assessment is that c) and e) require analysis based on projected new uses of open space. Only f) is acknowledged as potentially significant. Existing drainage will be impacted by new trails and run-off water generated. The listed mitigation for f) such as “limit trail use” has no documentation as being a workable or effective solution.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
10. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				<input type="checkbox"/>
c) Conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan?				<input type="checkbox"/>

There are conflicts in the RIS/MND with existing park Master Plans. These should be documented, analyzed and mitigated, if possible.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
12. NOISE: Would the project:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?			<input type="checkbox"/>	
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?				<input type="checkbox"/>
c) Substantial permanent increase in ambient				

noise levels in the project vicinity above levels existing without the project?			<input type="checkbox"/>	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			<input type="checkbox"/>	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				<input type="checkbox"/>

Entry c) needs further analysis. Proposals for new bike trails, drone course and off-leash dog areas have significant noise components.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
16. TRANSPORTATION/TRAFFIC. Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			<input type="checkbox"/>	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				<input type="checkbox"/>
d) Substantially increase hazards due to a design				

feature (for example, sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?				<input type="checkbox"/>
e) Result in inadequate emergency access?				<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				<input type="checkbox"/>

Some aspects of the Plan could cause potentially significant traffic impacts. No traffic study has been provided, while informal neighbor reports suggest that Shakespeare Santa Cruz has already created noticeable impacts on the De Laveaga park neighborhood. Additional out of town visitors (mountain biking, birding) could create significant impacts.

The document asserts that the project would not change the level of service of a State Highway roadway segment from acceptable operation (LOS A, B, or C) to deficient operation (LOS D, E, or F). If any new update or addition is made to our “parks and facilities to attract users and foster community involvement and interaction” to the level that they want, (i.e. add new trails, create more space for sports like mountain biking, etc.) then an increase in Highway 9 and 17 traffic can be expected. The traffic there could possibly become a deficient operation level. No traffic analysis is provided.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources):	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
17. Tribal Cultural Resources. Would the project:				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				<input type="checkbox"/>
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the				<input type="checkbox"/>

lead agency shall consider the significance of the resource to a California Native American tribe				
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There needs to be an acknowledgment that if any archaeological resources or remains are discovered, that there will be mitigations in place. A conclusion of “no impact” is inadequate. Native American remains are found throughout Pogonip and Delaveaga parks, as well as others, and others may be encountered as part of digging trails, building, or other activities. Mitigations must be specified.

Mandatory Findings of Significance

Since biodiversity is supported and sustained by networks of adjacent habitats, an environmental review has to address the predictable, cumulative impacts of “future implementation of recommended improvements’ to gain necessary, adequate mitigation measures. Lack of habitat interconnections review based on Policy A/Action 1a only will result in a fragmented management approach, damaging the Special-Status Species and Sensitive Habitat Areas by creating habitat fragmentation (habitat “islands”) and thus have “potentially significant issues”.

Environmental effects of introducing active recreation in the form of increased mountain bike trails, off-leash dog parks and drone courses, although not studied for this document despite being included, have the potential to significantly adversely affect the ability of seniors to access the city’s open space lands. Such a trend has already occurred in the high active use impacted lands of Wilder Ranch and Nisene Marks.

In conclusion, The Sierra Club’s position is that:

1. An Environmental Impact Report is the appropriate level of review for such a wide-ranging, city-wide project that makes changes to several existing park Master Plans. The omission of substantial areas of environmental impact documented here require an EIR.
2. Deferring examination of the environmental impacts of stated proposed activities to a future date, while making conclusions about such activities as being mitigated to less than significant in this RIS/MND, not only invalidates the document but is not allowed under CEQA.

Thank you for considering these comments.

Sincerely,

Erica

Erica Stanojevic, Chair
 Conservation Committee
 Santa Cruz Group, Sierra Club