



**SANTA CRUZ COUNTY GROUP**  
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Dear Ms. Molloy,

Thank you for the opportunity to read and comment on the Draft Initial Study and Mitigated Negative Declaration (IS/MND) for the San Vicente Redwoods Project.

Unfortunately, the IS/MND does not effectively mitigate all impacts of this substantive project to less than significant. The Sierra Club requests that an EIR be prepared to fully assess and mitigate outstanding impacts to less-than-significant and examine project alternatives that would cause less damage to the very sensitive ecosystem in which it is located.

Below are just a few of the outstanding impacts of this project:

1. Educational signage is used as a mitigation measure, but such measures are typically highly ineffective. To make sure there's no trash, for example, the project would need many animal-proof trash receptacles, and you will need an employee to walk the trails every day and pick up trash.
2. Given the number of sensitive species, dogs absolutely should not be allowed on these trails.
3. There's no discussion of the impacts on wildlife of the long-term use of trails by people. Significant impacts include reducing the abundance of nesting birds and woodrats near trails and reducing the foraging area available to some species (see, for example, attached study of the effects of trail use on western pond turtle. Studies of this caliber must be provided for all sensitive species in this project area).
4. The project should locate woodrat houses and avoid impacts to them. No evidence is provided to support the assertion that dismantling the houses, which can be used for decades, is a viable mitigation measure.
5. The Initial Study inadequately mitigates the impact of dogs on medium and large mammals, which the UCSC Puma Project confirms is a significant impact. Locating the dog walking areas

adjacent to Empire Grade and requiring leashes have shown to be ineffective in deterring illegal usage in all other open space lands in the county. More documentation and effective mitigations should be considered if you are going to allow activities that have serious environmental consequences.

An Environmental Impact Report is the appropriate level of review for such a substantial project in a sensitive ecosystem. The environmental impacts documented here require an EIR.

Thank you for considering these comments.

Sincerely,

Gillian

Gillian Greensite, Chair  
Sierra Club, Santa Cruz County Group