



**SANTA CRUZ COUNTY
GROUP**

Of The Ventana Chapter

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May 10, 2020

Santa Cruz County Planning Department

Attn: Stephanie Hansen, AICP

701 Ocean Street, 4th Floor

Santa Cruz, CA 95060

Re: Medical Office Building Project; APN 029-021-47; Notice of Preparation of a DEIR

The Sierra Club has completed its review of the Notice of Preparation (NoP) of a Draft Environmental Impact Report, dated March 24, 2020, and is concerned that the document is lacking in several important respects. First, the NoP does not discuss nor identify for study the runoff from this project as waterflow across the Live Oak plain, which implicates jurisdictional wetlands concerns. Second, this project raises significant concerns regarding transportation impacts, which we highlight in more detail below. The Sierra Club acknowledges that this submission is dated after the revised due date of May 1, 2020, but notes that the Governor's Office of Planning and Research has released numerous guidelines related to impacts of COVID-19 since this NoP's issuance, which certainly appear to give (if not encourage) local jurisdictions discretion to extend their deadlines. The Sierra Club asks the County of Santa Cruz to exercise their discretion in this case.

Runoff/Drainage/Jurisdictional Wetlands Impacts

Prior environmental study of this project area determined that water flowing across this property had, and still does, flow through its historic pathway and this pathway includes jurisdictional wetlands under the Clean Water Act section 404. Any proposal to re-route the historic flow across this property instead into a drainage pipe along the Soquel Frontage Road is impermissible. As County law requires that there not be a change to pre-development runoff patterns, re-routing all runoff away from its historic flow southeast represents an impermissible change to pre-development runoff. Further, starving the wetlands southeast of this property is also not permissible. In the April 2008 EcoSystems West Wetlands Study undertaken for this area, wetlands were found and mapped. Further, an accompanying drainage study linked the wetlands southeast to Rodeo Creek Gulch. Combining these two studies (undertaken for the R-Combining District rezoning for the Nigh Lumber property) led to clear evidence that section 404 wetlands were involved.

In addition, all runoff from this site should be treated as required by the County's Runoff and Pollution Control Runoff Ordinance 7.79, including the use of on-site filtration such as by the use of bio-swales and other means.

The impacts to the watercourse on the Live Oak plain by the proposed diversion of historic waterflows are a significant impact that must be included in the DEIR. The proposed changes with this project present not merely cumulative impacts, but direct and significant impacts. The DEIR must address this concern.

Transportation Impacts

With regard to transportation, the Sierra Club believes that, absent significant mitigations, the scope and location of this proposed development will substantially increase vehicle miles traveled, both in the immediate area and, potentially, in the County as a whole. The proposed location of this facility makes it difficult to imagine employees or patients walking or taking transit to this facility. The site is a fifteen minute walk from the nearest, infrequent, bus line on Capitola Rd. The proposal includes 730 parking spaces, which indicates the large number of auto trips expected to be generated by this facility.

The Sierra Club policy on land-use states that "an essential strategy for reducing urban related carbon emissions is supporting dense, mixed-use communities and land uses that prioritize walking, biking or transit to meet daily transportation needs." In the case of the proposed Kaiser Development, this would mean relocating the facility to the North side of the freeway, where it would part of a more dense urban environment with access to frequent transit service. This would put the development in line with the County's own General Plan which states, "Encourage concentrated commercial centers, mixed residential and commercial uses, and overall land use patterns which reduce urban sprawl and encourage the reduction of vehicle miles traveled per person."

In addition, years of community planning were involved with the heavily funded Sustainable Santa Cruz County Plan (SSCCP), which included significant public process and was accepted by the Santa Cruz County Board of Supervisors on October 28, 2014. A project such as this was envisioned, and is properly located in the Medical District, which is across the freeway (SSCCP Figures 7-2, 7-3, 7-4). In contrast, the SSCCP reviewed this location as part of its Soquel Avenue District, and does not plan for this use in this District. Both of the aforementioned Districts have Circulation Improvement plans that will be upset by this project. We request that the EIR evaluate other locations to the north side of the freeway.

If the project continues to be scoped at the proposed location on the south side of Highway One, substantial mitigations spanning a fairly wide area would need to be constructed so as to allow and encourage access to the facility by ways other than the private automobile. We suggest that the following mitigations be considered.

- Completion of the proposed pedestrian bridge over the freeway at Chanticleer. The new bridge should include rental bicycles and scooters on both sides of the bridge. Kaiser staff should be available to help the disabled and elderly get across.
- A new bus line on 17th Ave that connects Portola Ave., Brommer St., Capitola Rd., and Soquel Ave. (We discourage consideration of detours in the route of the bus lines along Capitola Rd. Detours from linear bus routes typically undermine travel time and ridership)

- Protected bike lanes and complete sidewalks with wheelchair ‘bumps’ on Soquel Ave between the facility and the planned bicycle and pedestrian bridge at Chanticleer Ave. We note that once the bridge is completed, it will still be a .6 mile walk from Kaiser to transit on Soquel Dr.

The Sierra Club suggests that caution is exercised regarding ‘mitigations’ that include widening streets to automobiles. While these kinds of projects could conceivably increase level of service to certain areas, they could also encourage increased vehicle miles traveled in the area, a potential that would need to be thoroughly studied as part of an EIR. The unintended consequences of these kinds of ‘improvements’ is one reason why the new standard for EIRs is for vehicle miles traveled, not for levels of service at intersections.

We further note that local residents understand that there is already a lunch time rush hour in the vicinity of the Soquel-Highway 1 interchange that appears to be workers from the hospital and other medical facilities using automobiles to drive to have lunch. We also note that any traffic studies not taken prior to the shelter-in-place guidelines were implemented would not be valid representations of traffic patterns unless taken after the current crisis is over.

Lastly, we want to suggest any mitigations required of the project are completed BEFORE the facility opens, and are conditions of the use of the facility. This very much includes the pedestrian bridge at Chanticleer

Summary

We trust our suggestions for improving the review of this project will be carefully considered. Thank you for the opportunity to submit our comments and suggestions. Should you have any questions or wish to discuss these matters in more detail, please contact the undersigned.

A handwritten signature in black ink, appearing to read "Micah Posner". The signature is fluid and cursive, with the first name "Micah" written in a larger, more prominent script than the last name "Posner".

Micah Posner, Executive Committee Chair

Sierra Club, Santa Cruz Group