



**SANTA CRUZ COUNTY  
GROUP**

**Of The Ventana Chapter**

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May 25, 2020

**City of Santa Cruz Economic Development Department**

Attn: David McCormic, Asset and Development Manager

337 Locust Street

Santa Cruz, CA 95060

**Re: Santa Cruz Wharf Master Plan Draft Environmental Impact Report (DEIR)**

The Sierra Club has completed its review of the Draft Environmental Impact Report for the Santa Cruz Wharf Master Plan and is concerned that the document is lacking in several important respects, as discussed further below. First, the DEIR has made conclusions regarding wildlife impacts unsupported by the work of qualified personnel. Second, while this project will enhance the ability of bicyclists to access the wharf, bicycle parking is woefully inadequate. Third, there are omissions in the discussion and review of lighting and glare. And lastly, we raise concerns about the overall character of the design, in that the historic qualities of the existing wharf are subsumed by the size of the proposed structures. The Sierra Club does acknowledge the important and substantial work that has gone on in the preparation of the DEIR.

**BIO-1c Special Status Species – Coastal Birds**

We take special exception to the assertion that “the project would result in an overall increase in suitable nesting habitat for the pigeon guillemot ... as this overall expansion of suitable habitat would offset any indirect effects from human presence.” No assertion of expansion of suitable habitat can be made without direct support from a qualified biologist. The Biological Resources section of the DEIR, at page 4.2-32, states that the “impact analysis is based on review by Dudek wildlife and marine biologists and supplemented by local biologists, Gary Kittleson and Bryan Mori, regarding nesting birds.” The DEIR does not make clear that the bird biologists were involved in anything other than the bird surveys they performed, which are referred to. If these biologists were involved in the assessments of impacts, and support the numerous assertions referred to in this paragraph, this work should be referred to specifically, and appropriate references should be cited. The analysis section begins with the bald conclusion that “the proposed Master Plan improvements would result in expansion of the Wharf and would not result in removal of habitat.” This conflation of the size of the Wharf with functional habitat is not supported by any full analysis of what factors combine to make a functional habitat. Such factors may certainly include access to nesting sites and privacy of both the nesting sites and the access flight paths. The

phrasing in the DEIR that because the pigeon guillemots currently nest in both western and eastern locations, that this “suggests that pigeon guillemots do not prefer the undisturbed western side of the Wharf over other areas, and the introduction of human disturbance here may not affect their preference for nesting locations” is explicitly conjecture, and not tied to any input by a qualified biologist. The impacts to the overall habitat area appear to be significant, and no statement to the contrary can be made without the input of qualified (with regard to this species) personnel. As discussed further below, it appears that the proposed western walkway is best removed from this proposal.

### **BIO-1c Effects on Wildlife Populations**

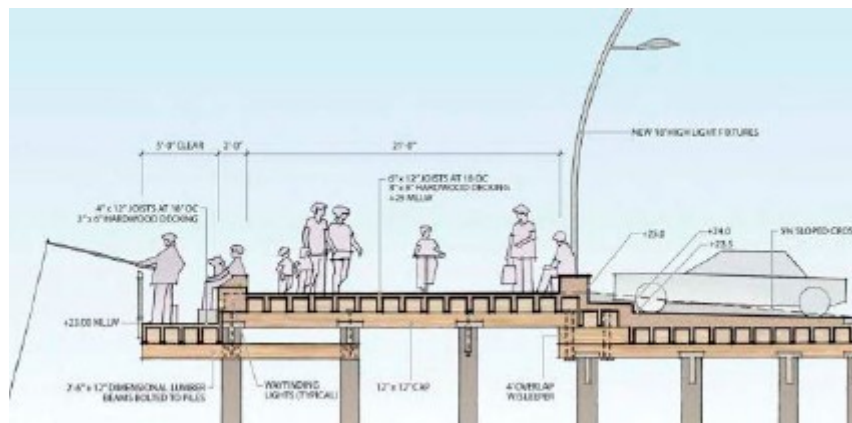
Of concern is the statement that the “Master Plan includes a new boat landing for research and visitor vessels. At this time it is not known when this facility may be developed”. Based upon this temporal ambiguity, the DEIR then appears to brush off any concerns related to increased boat traffic. As it is not known when all aspects of this plan may be developed, the statement referred to above is inappropriate. Should the Wharf, for example, seek to host tenders from cruise ships in the future, impacts from this new boat landing may indeed be significant. We request that a proposed, stated, level of boat traffic be included for this analysis, and that any increase above that level be required to trigger new environmental review. With the proposed use of this boat landing for 200 ton displacement vessels, the DEIR should include analysis of the impacts on wildlife of this use, done by qualified personnel.

### **AES-4 Lighting and Glare**

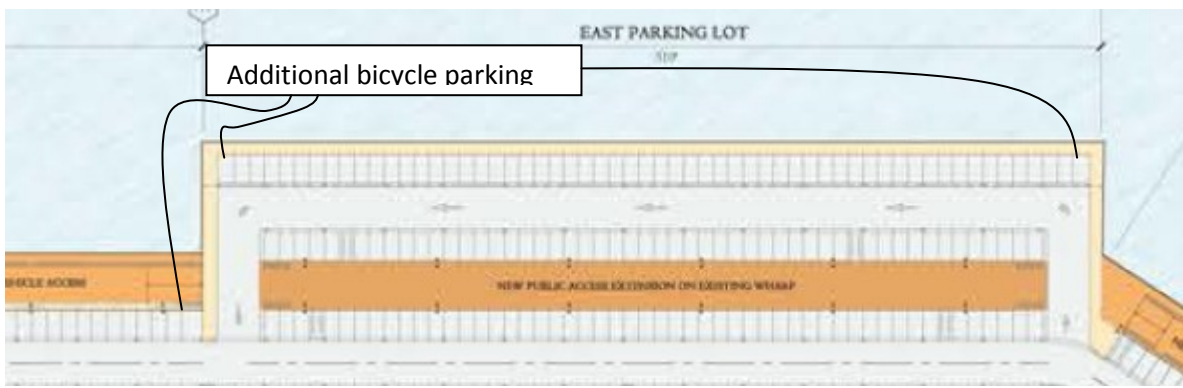
Although we appreciate the centering of the walkway lights away from the edge of the Wharf, we are concerned about an overall increase in light due to the construction of new buildings. In order not to have impact, the overall light emitted by aspects of the design, including that emitted by the new buildings, should not increase the total light emission from the Wharf. We also note that simply not increasing the light emission may not be a high enough standard, with instead a reduction in overall light being the goal.

### **TRAF-1 Conflict with a Program - Bicycle**

The Sierra Club appreciates and applauds the proposed design for its large bicycle and pedestrian walkway, as seen here:



This can give the impression that the Plan takes bicycle transportation seriously. Access is only a portion of visiting the Wharf by bicycle. The design fails to provide adequate bicycle parking. City of Santa Cruz Ordinance No. 2017-02 requires that public or commercial recreation uses have a number of parking spaces of at least 35% of the auto parking spaces. The design calls for 64 bicycle parking spaces yet 495 auto parking spaces – 12.9% Although mention is made of providing more spaces in the future, how and where these spaces will be is of concern. Namely, whereas all of the auto parking spaces are designed in and indicated, the future bicycle spaces are not, and then evidently must be taken from areas already identified for pedestrian and bicycle use. A Plan without the full amount of required spaces is in conflict with the City requirements; but even if it were not the proposed 64 spaces indicates that bicycle parking is an afterthought in this Plan. We strongly recommend that all corner areas currently designated for auto parking be instead allocated for bicycle parking, so that proper accommodation of bicycles may be achieved:



### **AES-2 and AES-3 - Scenic Resources and Visual Character**

In general, we are concerned that the scale of the proposed improvements risks losing the aesthetic flavor of the Wharf. In particular, one aspect of the scenic character of the Wharf is the experience of those on the Wharf, and the proposed 48 foot tall buildings would overwhelm those on the Wharf itself. Further, we believe that the EIR understates the visual impacts. The use of the Dream Inn as a reference does not accurately contrast the Wharf with its surroundings. The height and massing of the new proposed buildings are more than half the height of the iconic Giant Dipper roller coaster. Also, the views of the Wharf from the shore, namely from Cowell’s Beach and from the adjacent West Cliff Drive, include views of the pilings. The western walkway impacts this aspect significantly. We recommend, again, that the western walkway be eliminated from this proposal.

### **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.

Michael Guth,  
Conservation Committee Chair  
Sierra Club, Santa Cruz County Group

Micah Posner,  
Executive Committee Chair