



**SANTA CRUZ COUNTY
GROUP**

Of The Ventana Chapter

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Re: Riverfront Project Draft Environmental Impact Report (DEIR)

June 23, 2020

The Sierra Club has completed its review of the Draft Environmental Impact Report for the Riverfront Project/Front Street and is concerned that the document is lacking in several important respects, as discussed further below. The Sierra Club found significant impacts not properly addressed in this Draft Environmental Impact Report with regard to the following topics: Natural Resources and Conservation; Bicycle and Pedestrian Design; Water Use; Solar Energy; Community Design; and Bird-Safe Design Standards.

The Sierra Club would like to reference Santa Cruz's General Plan's chapter on Land Use (p. 35), which has guiding principles for development and preservation: "Sustainability, environmental quality, land uses, and development are inexorably linked. By providing for the city's continued economic growth and high quality of life without compromising the needs of future generations, sustainable land uses respond to environmental values widely held in the community. At the heart of this Plan is sustainable development."

Further, the Sierra Club notes that the City's "Urban River Plan articulates a community vision a wildlife area as well as a public amenity for recreation, transportation, and open space. It contains recommendations for habitat enhancement, public access and trail improvements." (2008, p. H-1).

The Urban River Plan goals are to a) Improve the scenic and recreational value of the Riverfront; b) Improve public access and pedestrian/bicycle movement to and along the San Lorenzo River; and c) Improve the urban and neighborhood interface with the San Lorenzo River," (2008, p.H-2).

It is with this vision and these goals in mind that we offer the following comments on the DEIR for the Riverfront Project.

NATURAL RESOURCES AND CONSERVATION - URBAN TREES

In the DEIR, the arborist reports that from "17 to 26 of the total 33 trees within and near the project may be removed." Large groups of trees are key to supporting the climate via carbon sequestration and as habitat for birds and other wildlife. One tree can capture from 40 to 60 pounds of carbon each year. We believe that these removals represent significant impacts and that these trees should not be removed.

In the General Plan in the Natural Resources and Conservation chapter speaks about the importance of the Urban Forest (p.120) : "The tree is metaphor for sustainability. The urban forest is more than trees; it is the sum total of all vegetation growing in the urban area, a critical element of a livable urban environment, and a part of the urban ecosystem. Urban forestry manages trees, forests, and natural systems in and around urban areas for the health and well-being of communities."

Protecting these 26 trees and the vegetation would allow our urban to store over 1040 pounds to 2000 pounds (or 1 ton) of carbon each year. We surveyed the area and found old Magnolia, Buckeye and Maple trees, some that had trunks of 6 to 8 feet diameter and over 40 feet high along the river path and at the corner of Soquel and Front Streets.

(Grove along Soquel and Front; more tree photos on last page)



Recommendations:

1. Require that the project protect our urban forest and not cut or damage the trees along perimeter, which includes trees and vegetation on the river path.
2. Require the project to not cut or harm the heritage grove of tall trees on the corner of Front and Soquel.

BICYCLE AND PEDESTRIAN DESIGN / ADA ACCESSIBILITY

We have highlighted below some of the numerous references in City Plans and documents which stress the importance of bicycle and pedestrian orientation of new development, in order to underscore how strongly this view is reflected in City documents.

The “Mobility chapter of General Plan 2030 looks at ways to facilitate transportation alternatives, keep transportation and road systems safe and efficient, and systematically interconnect bicycle and pedestrian ways. The [mobility] proposals below **aim to encourage greater use of alternative transportation modes and reduce automobile travel.**” (p.51)

- M1.1 Reduce automobile dependence by encouraging appropriate neighborhood and activity center development. Cf. ED5.1, LU4.2; and M1.5.1, M2.4.2, 3.1.2, and 4.3.
- M1.1.1 Create walkable, transit-oriented activity centers throughout the city. Cf. ED5.1, LU4.2; and M2.4.2, 3.1.2, and 4.3
- M1.1.2 Connect activity centers with pedestrian and bicycle paths. Cf. M4.3.
- M1.1.3 Implement pedestrian and bicycle improvements that support transit ridership.
- M1.1.4 Amend the Zoning Ordinance to create an activity-center-oriented urban form.

The City General Plan chapter on Land use states: “Future growth and change will be focused in the Downtown and along corridors **where transit, bicycling, and walking can be strengthened as primary modes of travel.**” (p.37)

Goals from the City of Santa Cruz General Plan (p.32) encourage pedestrian-friendly design and increase people moving about by foot downtown include, from “Community Design CD5.2:

- Require new development to include elements that relate to the pedestrian scale.
- Cf. CD4.3.1, M1.3.
- CD5.2.1 Encourage buildings to be oriented towards side-walks, public plazas, walkways, or rivers and to include features such as public benches and natural seating areas.
- CD5.2.2 Encourage the incorporation of public benches and natural seating areas along public walkways and in public plazas and parks. Cf. LU1.1.3, M1.6, M1.6.3, and ED5.4.
- CD5.2.3 Design parking strategies at a district or neighbor-hood-wide level to foster a pedestrian-oriented environment. Cf. LU1.1.3, M1.5, M1.5.3, and ED5.4.
- CD5.2.4 Ensure that new and revised design guidelines encourage the use of pedestrian-scaled fenestration, awnings, entrances, landscaping, and other amenities.”

Further, the Urban River Plan goals are to:

- improve the scenic and recreational value of the Riverfront;
- Improve public access and pedestrian/bicycle movement to and along the San Lorenzo River; (2008, p.H-2)

Also, the City of Santa Cruz General Plan (at page 26), describes the downtown with "The San Lorenzo River—an important defining feature—flows through the center of Santa Cruz" and "pedestrian and bicycle paths along the levees provide views of the river" The Plan also reminds us that "At a community design workshop held in 2006, participants' highest-ranked goal was to create a "River Walk" district in Santa Cruz, with shops and restaurants along the river."

Lastly, from the City General Plan's Community Design section CD1.5.2 (p.28) "Provide incentives for new development adjacent to the San Lorenzo River that includes patios overlooking the river, enhanced connections to the levee trails, and other design features that connect the built environment to the river".

In addition, we note that transportation is the largest contributor to climate change; Senate Bill (SB) 743 (2013), creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the CEQA Guidelines to provide an alternative for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (Public Resources Code Section 21099(b)(1).) Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." Transportation impacts related to air quality, noise and safety must still be analyzed under CEQA where appropriate. SB 743 also amended congestion management law.

Comments:

On page 4.5-14 of the DEIR, in the Standard for the section of Public Connections to the River, the Project "includes two pedestrian passageways that will provide publicly accessible connections at required widths." Bicycle access is not mentioned here and it will be negatively impacted, since the developer plans to eliminate the bike ramp (from the parking lot just south of the end of Cathcart Street to the levee.) The nearest remaining levee connection to the north will be off of Soquel Avenue and to the south will be through the parking lot south of Sherwin-Williams.

The project plan forces cyclists traveling between Cathcart and the levee to dismount, take an elevator or walk their bikes up the steps on a "bike rail" incline. This means that bicycling would be interrupted and pushing a bike up stairs and a hill is not possible for all people and will discourage bike commuting altogether.

The DEIR is not consistent with The *City of Santa Cruz Downtown Plan*, the *Santa Cruz City Active Transportation Plan* and *San Lorenzo Urban River Plan* which all emphasize bicycle access to the River levee. Although the *Downtown Plan* says, "bicycle access shall be provided at the extension of Elm Street, which will serve as the primary bicycle access to the Riverwalk between Soquel Avenue and Laurel Street," no bike ramp at this location is shown in the proposed plans either. A ramp would also be usable by those in wheelchairs or those who have trouble walking up or down stairs.

With increased motor vehicle traffic along Front Street, this plan will have an adverse effect on cycling and pedestrian safety since cars must cross the bike lane to enter or exit the parking garage. Also, in this design, cyclists are prevented from riding in a straight line, which is the safest, most predictable way to ride.

Additionally, the vehicle moving into and out of the on-street parking spaces with the car passengers entering and exiting the vehicles are a danger to bicyclists within the adjacent, narrow, curving bike lane. Furthermore, vehicles often park over the space markings and into the bike lane, especially large ones.

This project will be walking distance to Downtown shopping and the Transit Center, a perfect place for residents to not have a car. It is possible to reward tenants that do not have a car or use a parking space by lowering their rent or giving them free bus passes. National Sierra Club Transportation policy calls for

- eliminating parking subsidies and minimum requirements to encourage shifts to biking, walking, scooting, carpooling and transit;
- to greatly reduce or eliminate parking in areas served well by public transit.

This agrees with the General Plan, as seen below:

- M 1.5 Reduce the need for parking and promote parking efficiency. Cf. CD5.2.3, ED5.4 and PR1.6.3.
- M1.5.1 Increase land use efficiency and the walkability of activity centers. Cf. LU4.2, M1.1, M3.1.2, M4.3. (p.54)

Recommendations:

1. As in the General Plan, require that "New development adjacent to the San Lorenzo River should include enhanced connections to the levee trails, and other design features that connect the built environment to the river, with " bike paths "and patios overlooking the river."
2. Create the "River Walk District" that citizens ranked the highest priority, increasing walkability and emphasizing nature and walkability along the river.
3. Require a path that cyclists and those in wheel chairs can continually ride; on the ample 60-foot passageway, to accommodate a bike path.
4. Require that all on-street parking on Front Street be removed so the bike lane is safe, free of the danger of obstacles, i.e. car doors and pedestrians.
5. Require that the Front Street bike lane be wider and straight (not meandering).
6. Require incentives to reduce cars and car parking for the tenants
7. Require the developer to design safe, attractive, tree-lined ADA accessible, pedestrian walkways , with local public art and native trees and vegetation leading from the project into the transit center and into downtown.

WATER USE; WATER-NEUTRAL GROWTH

The City of Santa Cruz's water management plan states that "Santa Cruz has long faced challenges with the reliability of its water supply and with droughts." Development with its additional water demand increases our risk of drought and not having enough water for all residents. The Climate Crisis is also increasing extremely dry weather so the City must act responsibly. Water-neutral policies will allow reasonable growth to continue without eroding our water security. The City Water Department report, "Adequacy of Municipal Water Supplies to Support Future Development" , (2004) stated:

"Continuing to provide water to new customers upon request, (as is the current practice), may do harm to existing customers by making the potential water shortage situation worse than it would otherwise be."

Recommendation:

- Implement water offsets for this development.

SOLAR ENERGY

As part of our state's ongoing battle against climate change, the California Building Standards Commission and the California Energy Commission approved a 2020 mandate requiring all newly-built homes to be equipped with a solar power system. With our current climate emergency, we urge you to require this project to follow these solar guidelines, even though the plan may be exempt. The California solar mandate is part of an initiative by the California Energy Commission to have at least 50% of the state's energy produced from clean energy sources by 2030. Now the state has set the goal of drawing 100 percent of its electricity from renewable energy sources in order to sharply reduce greenhouse gas emissions. With this in mind, we urge you to also require solar to heat water which is the most energy, cost and climate-effective way to heat water, not using natural gas at all.

According to Drew Bohan, executive director of the California Energy Commission, "With extreme weather events becoming more frequent, there is even greater need for buildings that are efficient," Bohan said, "[these solar building standards] will continue to keep costs down, better withstand the impacts of climate change, and reduce greenhouse gas emissions."

Recommendation:

1. Follow the General plan Natural Resources and Conservation chapter (p.125) regarding energy use and new construction:

- NRC7.4.2 Require that new construction and major remodeling projects in City facilities use high-efficiency or zero-waste [energy, garbage creation and water] fixtures.
- NRC7.1.4 Require new development to provide for passive and natural heating and cooling opportunities, including beneficial site orientation and dedication of solar easements.

BIRD-SAFE DESIGN STANDARDS

The City recently adopted Bird-safe building design standards that “apply to any portions of buildings or structures that are located adjacent to or within 300 feet of and could reflect areas with a General Plan land use designation of CR, PR, NA, or AG, any open waterway mapped in the City-wide Creeks and Wetlands Management Plan, or any area deemed by the Zoning Administrator to need consideration for bird-safe design due to proximity to natural features” [such as this tall project on San Lorenzo River bird sanctuary].

The project appears to address aspects of this concern, with the DEIR stating that “The architectural features that require glazing treatment are 90 percent of all glazing within 40 feet above grade. Staff will work with developers to decide on best design measures. Glazing treatment shall follow the 2” x 4” rule: spaces of untreated glazing must have a maximum height of two inches and a maximum width of four inches. Birds cannot see untreated glazing and may attempt to fly through “openings” greater than these dimensions. 2” x 2” spacing is highly encouraged. Pattern elements should be at least 1/8” thick. Glazing treatment shall include at least one of the following: Bird safe glass approved for use by the American Bird Conservancy; Fritted windows; Patterned windows; UV pattern film (not appropriate for all locations); Window nets; Window screens ;Any American Bird Conservancy approved product: <https://abcbirds.org/get-involved/bird-smart-glass/>;Other design measures that have been identified by qualified professionals as providing adequate bird protections”

However, due to the absolute importance of using bird-safe designs, we request that this issue be more clearly and specifically addressed to assure compliance to bird safe design, structurally and with regard to lighting.

Recommendation: Require the project to include all elements of bird safe design, given its sensitive location. Require stands of trees, which are bird habitat and should not to be removed.

COMMUNITY DESIGN

An 81 foot large structure will dominate and overwhelm the river, rather than "emphasize the distinguishing natural features that strengthen Santa Cruz's visual image" and downtown. This size and scale will not "ensure that the scale of this new development preserve important public scenic views.", instead it will obstruct the view on the river. An oversized 81 foot tall building will not be part of the General Plan's goals to "develop complimentary scale" that "ensure development is compatible with the character of the area". Neither will it "reflect the character of the downtown district" which maintains heights of 50 feet or less.

In the DEIR Land Use 4.5-12: (page 31) According to "the Downtown Plan, building heights shall not exceed 50 in the Front Street/Riverfront Corridor." However, it states " the applicant is requesting approval of 11 feet in height beyond the 70 foot height allowance ([to] 81 feet maximum)." We recommend against approving this request.

We see the City Plan's guidance differently, and base our concern on the following City Plans: The City's "Urban River Plan articulates a community vision, a wildlife area as well as a public amenity for recreation, transportation, and open space. It contains recommendations for habitat enhancement, public access and trail improvements." In the General Plan, the Community Design chapter speaks to retaining the City's character and preserving the community and tourist values of our unique, smaller town appearance. Here are the relevant community design goals:

- CD1.5 Ensure that new development adjacent to the San Lorenzo River relates to the river in its design.
- CD1.5.1 Enhance the prominence of the San Lorenzo River as a natural feature that provides structure, orientation, and recreational enjoyment by including it in surrounding area and management plans.
- CD1.1.4 Identify and emphasize distinguishing natural features that strengthen Santa Cruz's visual image (i.e., open space, San Lorenzo River).
- CD1.2 Ensure that the scale, bulk, and setbacks of new development preserve important public scenic views and vistas.
- CD1.2.1 Develop complimentary siting, scale, landscaping, and other design guidelines to protect important public views and ensure that development is compatible with the character of the area.
- CD1.2.2 Develop minimum standards and guidelines for residential, commercial, and industrial development that reflect the character and needs of the districts.

In the DEIR 4.5-27, figure 4.5-1, the photos of the development on the river demonstrate how this very tall structure towers over the gentle hills of the river valley and does not blend with the surrounding downtown buildings. With the surrounding height of the downtown's buildings at 50 feet, this building will leap 31 feet over all other buildings. Breaking out the building skyline in the 81 feet of height conflicts with the language in the General Plan regarding Community Design of buildings, it will be the

tallest building on the river and in this downtown area, this design does not "relate to the river" nor "enhance the prominence of the river".

Recommendations: Require the project to lower the height of the building to 50 feet, which matches with the surrounding area and preserves the special downtown character.

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 at the contact email provided above.



Keresha Durham,
Conservation Committee Member



Michael Guth,
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(large tree on river levee)

