



**SANTA CRUZ COUNTY  
GROUP**

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Dear Noah,

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

Having carefully reviewed these documents, the Sierra Club wishes to communicate that:

- 1) The SCPMP2030 does not succeed in providing an appropriate cumulative plan for protection and recreational and environmental connectivity of the City's parks and open space, and it conflicts with or undermines existing Master Plans for individual City of Santa Cruz Parks.
- 2) The associated IS/MND document is inadequate for basic environmental review of this proposed Master Plan. **A full Program Environmental Impact Report (EIR) is needed for a project of this scope**, with such clear potential for significant, possibly unmitigable environmental impacts on Biological Resources, Aesthetics, Geology, Hydrology / Water quality, Transportation/Traffic, Greenhouse Gases, Air Quality, Noise, Forest Resources, and cumulative (Mandatory) effects of the suite of proposed actions, among others. As part of this EIR 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 IS/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 IS/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 no 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 with no specifics. Such an approach does not allow for assessing the cumulative impacts on our park and open space system. It skirts proper environmental review. All proposed new activities need proper environmental review via an EIR under the Parks Master Plan umbrella.

### **Some resource areas that could be significantly impacted:**

#### **Lighting: Aesthetics and Biological Resources**

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. The effects are not mitigated in the current document. The MND assurances that such lighting will be shielded by newly planted trees or will be properly directed is vague and insufficient for proper environmental review. 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 MND is silent on the impacts of introducing new lighting in such areas.

#### **Geology and Hydrology**

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 with proper study of 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.

#### **BIOLOGICAL RESOURCES.**

The IS/MND recognizes four sensitive habitat types: freshwater wetland; salt marsh; riparian forest and scrub and coastal prairie. Wildlife habitats support each other’s bio-diverse vitality and require that habitat fragmentation (habitat “islands”) be avoided. It is important to address the adjacent habitats in their entirety with their interconnection to each other. The IS/MND is

segmenting these habitats thus fragmenting the wildlife impact, which is not consistent with the General Plan Natural Resources and Conservation Goals 1 - 5 and the CEQA required guidelines. The failure to address habitat types consistently and correctly throughout the document, poses a potentially significant issue since no proper evaluation is possible.

The Impact Analysis does not effectively account for trail construction, which needs to be assessed in accordance with the General Plan.

The Santa Cruz General Plan 2030 refers to the San Lorenzo River, however in the IS/MDN the reference to the “Santa Cruz Riverwalk” represents a fragmentation of the San Lorenzo River. This prevents adequate assessment as CEQA guidelines require and is a potentially significant issue. This fragmentation approach is a potentially significant issue, especially as riparian and watershed areas have to be addressed in their entirety. On page 50 of the IS/MND the San Lorenzo River is not listed as sensitive habitat, and due to this omission it is impossible to apply CEQA guidelines and is a potentially significant issue. The Southwestern Pond Turtle, sighted by Gary Kittleson in 2017 on the San Lorenzo River, is not listed as a species of the river. These items constitute a potentially significant issue.

The IS/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 achieve measurable changes to species sensitive habitats and constitute a potentially significant issue.

The IS/MND on page 18, Table 2, under ‘Existing City Parks, Open Space Lands and Beaches’ omits # 3: Poet Park and Beach/Flats Community Garden from Figure 2 ‘Existing Park Coverage’ (page 21). The Beach Flats Community Garden is a vital neighborhood, community and environmental asset for the surrounding dense and economically disadvantaged neighborhood. Thus it needs to be addressed separately from both Poet Park and the Beach in order to be properly analyzed in the Initial Study. There have been requests made to circulate both the Parks Master Plan and the IS in Spanish and the Sierra Club supports this request.

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

### **Transportation**

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.

### **Greenhouse gases**

Increasing parking availability at parks and open space will increase the number of cars visiting our parks and open space. 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.

### **Mandatory findings/cumulative impacts**

Since habitats' biodiversity and vitality are supported and sustained by adjacent habitats, the 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".

For the reasons outlined above, the Sierra Club considers that an Environmental Impact Report (EIR) is the only proper venue for assessing the environmental impacts of such a broad, impactful and important document as a Parks Master Plan. We request you put aside this inadequate MND and start the process for a comprehensive EIR.

We look forward to your response.

Sincerely,

Gillian

Gillian Greensite, Chair  
Santa Cruz Group, Sierra Club