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Coastal Rail Trail Segments 8 and 9 Draft Environmental Impact Report Comment Letter

The Sierra Club appreciates the opportunity to comment on the Coastal Rail Trail Segments 8 and 9 Draft Environmental Impact Report (DEIR). The Sierra Club strongly supports the Rail Trail and the future of rail and active transportation in Santa Cruz County. The Sierra Club appreciates the level of work involved in having prepared the DEIR, and does believe that the DEIR properly identifies the impacts of the Project and those of the Alternatives. However, the Sierra Club believes that more extensive environmental mitigations are called for, and would add value to the final project.

The Sierra Club supports the Ultimate Trail Configuration (the Project), which appears to offer the greatest level of use and benefit to the community. Given the strong public support for preservation of possible passenger rail transit in Santa Cruz County, as shown by the 2022 Measure D's 73% negative vote, we do not believe that the Optional First Phase: Trail on the Rail Line (Interim Trail) options of either Alternative 1 (Trail Only) or Alternative 3 (No Project) present a correct path forward. We therefore support the Proposed Project (Ultimate Trail Configuration), but request expanded mitigations to compensate for the very substantial losses in mature trees, tree canopy, and urban wildlife habitat. Alternative 1, which requires permanent removal of the existing railroad ties and tracks, appears to subvert the clear intention of Santa Cruz County voters in voting down Measure D, and while its inclusion in the DEIR provides useful information, it should not be considered as a selectable project option. We note that this alternative also fails to meet the stated Project Objective #6 ("Minimize trail impacts to sensitive habitat areas and special-status plant and animal species [Master Plan objective 1.4, Policy 1.4.1, 5–15]).

While Alternative 3 would preserve the current species count and existing ecology of these segments, this alternative also fails to fulfill the city, county and RTC's mandate to move forward with the process of returning the rail corridor to full functionality. Therefore we do not concur with either Alternatives 1 or 3. Alternative 2 of the Optional First Phase (Interim Trail with Rail Preservation), which applies only to Segment 9, would require less ground disturbance, and reduces the potential for dispersal of hazardous materials contained in the rail bed and ballast gravel, requiring fewer mitigation measures.

Segments 8 and 9 contain a significant population of hundreds of mature trees, including coastal live oaks and non-native eucalyptus, which will require removal during construction of either Alternative 1 or Alternative 2 (Interim Trail with Rail Preservation), as well as the Ultimate Trail Configuration. Any project involving construction of a trail will incur the loss of natural resources; mitigation along these segments is critical to maintaining a core of urban greenery, contributing to temperature cooling, preserving moisture, and offering shaded spaces. These trees provide valuable habitat, shelter, and food sources for urban wildlife, in an area of heavy and increasing development. The DEIR notes that the project may have adverse effects on monarch butterfly overwintering sites, as a “significant and unavoidable” impact (BIO-2). Segments 8 and 9 also contain invasive and non-native species beyond eucalyptus, including jubata grass, which sows itself freely and spreads rapidly. Due to the acknowledged significant impacts to this regional butterfly habitat, the project should be required to contribute to mitigations both onsite and offsite.

Impact LUP-1: Dividing a Community. There are several important pedestrian crossings of the tracks, including one at El Dorado Avenue that provides access from the inland neighborhoods to Twin Lakes State Park. At page 2-8, the DEIR discusses the two crossings near El Dorado Avenue, and states that they shall both remain accessible as part of the Project. We strongly support retention of these important crossings, and that they are maintained during all stages of the Project. We recognize that rail crossings are regulated at the Federal level, but as fencing along the rail corridor will also substantially impede residents moving through the area, including current informal crossings, we request that staff consider possible mitigations based upon community use.

Impact BIO-1: Significant and Unavoidable Impacts to Monarch Habitat. The DEIR states that there are significant impacts to the Monarch Butterfly habitat that would be reduced to less than significant with mitigations. We believe that the removal of such a large swath of trees will introduce wind and other impacts such that the proposed mitigations on site will be insufficient to achieve less than significant status. A further mitigation could be the provision of badly needed replacement trees at nearby park sites such as Moran Lake, which has suffered decades of tree losses and removals, impairing its important function as the third largest Monarch Butterfly overwintering population site in Santa Cruz County. This is the closest identified large Monarch Butterfly habitat, it is predominantly on public property, and does have an adopted Management Plan which would guide replacement plantings there to enhance the Moran Habitat.

Impact BIO-6: Impacts to Bats: The mitigation measures are inadequate to insure that potential bat mitigation is successful. The bat mitigation shall be revised to include a bat house installation and habitat restoration program that will be monitored and managed until it achieves a bat occupancy at least equal to the adverse population impact of the rail construction to the maximum extent feasible.

Impact BIO-9 (and others): Timing of Mitigations – Tree Replacement. Although the timeline for the demolition of the Interim Trail, rebuild of the Rail Line, and construction of the Ultimate Trail Configuration is very lengthy and may not begin until 2053 (ES-2), the optional Interim trail may be fully constructed by 2027, offering the community a potential 25 year functional lifespan. This extended timeline allows time for early mitigating plantings of trees and vegetation to reach maturity, and any such plantings should comprise native species as far as is feasible. As replacement plantings may take a decade before they provide significant mitigating value, the plantings should be advanced, where feasible, to the beginning of the project. It is recommended that directly adjacent

publicly owned lands be utilized for some of the replacement plantings. The loss of up to 404 fully mature trees is of serious environmental concern and should trigger a replacement rate above the Santa Cruz County standard ratio of 3 to 1. Sierra Club asks that the replacement ratio be 5 to 1 to provide a safety margin for sapling death, with appropriate monitoring and thinning if required. Removal of such a large number of trees will alter the canopy percentage for areas outside the riparian corridor so significantly that it should trigger mandated tree replacements on other available public properties. As the county also owns adjacent property by the Simpkins Swim Center, it may be advisable for mitigating plantings to be placed there, as we recognize that trail construction may make replanting in any capacity along the rail corridor infeasible. The Rail Trail's location along multiple parcels of city and county owned land offers the possibility of using those parcels for more extensive mitigation plantings.

Impact BIO-11: Wildlife Movement. We support the DEIR's recommendation that fencing along the trail be accessible for wildlife to move through, as animal migration and movement will be impeded by the fencing installed along the trailside. The rail corridor currently provides passage for urban wildlife to move more safely through this heavily trafficked area of the city, and the blocking of such pathways is a detriment which should be considered and addressed, to avoid undue harm to area wildlife. This was previously done in the construction of the Westside's Segment 7, in which wire cable fencing was installed with a gap at the bottom, allowing small animals to cross easily. Split rail fencing would also be a good alternative.

The Sierra Club appreciates this opportunity to comment on this important environmental review document. We appreciate that our recommendations will be carefully considered.

Yours Sincerely,



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