



Staff Report to the Zoning Administrator

Application Number: 181146

Applicant: Land Trust of Santa Cruz County
Owner: Peninsula Open Space Trust
APN: 080-011-42 (+ multiple APNs)
Site Address: No Situs (Empire Grade Road)

Agenda Date: June 21, 2019
Agenda Item #: 6
Time: After 9:00 a.m.

Project Description: Proposal to construct a parking lot and trail system for access to open space.

Location: The main tract (8,160 acres) is located north of Highway 1, east of Swanton Road, south of Jamison Creek Road, and west of Empire Grade. Laguna Tract (373 acres) is located north of Smith Grade, east of Pine Flat Road, south of Ice Cream Grade, and west of Empire Grade. Trailhead access to the main tract is proposed on the west side of Empire Grade, approximately 1/4 mile north of Braemoor Drive.

Permits Required: Coastal Development Permit, Master Site Plan, Riparian Exception

Supervisory District: 3rd District (District Supervisor: Ryan Coonerty)

Staff Recommendation:

- Adopt the attached Mitigated Negative Declaration (Exhibit A) per the requirements of the California Environmental Quality Act.
- Approval of Application 181146, based on the attached findings and conditions.

Project Description & Setting

The project includes the approval and implementation of the proposed San Vicente Redwoods public access plan (Attachment 2 to the Initial Study - Exhibit D) and the construction and operation of a parking area and multiple use trail system on the San Vicente Redwoods property. The San Vicente Redwoods is composed of 26 parcels in two separate areas (approximately 8,500 acres in total). The main tract is an 8,160-acre property located between the Ben Lomond Conservation Camp (off of Empire Grade) to the north and the Cotoni-Coast Dairies property (off of Highway 1) to the south. The Laguna tract is a 373-acre property located to the southeast of the main tract and is adjacent to the Bonny Doon Ecological Reserve.

The San Vicente Redwoods public access plan would provide a phased program for public access on the property for recreation, research, and education with a trailhead proposed off of Empire Grade for access to a proposed trail system on the main tract. The San Vicente

Redwoods public access plan was developed by the conservation partners, including the Peninsula Open Space Trust (POST), Sempervirens Fund, Save the Redwoods League, and the Land Trust of Santa Cruz County. A conservation easement has been placed on the property for the combined purposes of natural resource management and opening the property to public access.

The proposed parking area would include roads for access and circulation, parking for vehicles and bicycles, and access features such as gates, restroom building with vault toilets, trailheads, and storage. The conceptual trail alignment would be located on a combination of newly constructed trails and existing timber harvest roads on the main tract and would be located on existing informal trails on the Laguna tract. The proposed trails would be available for hiking, biking, horse riding, and on-leash dog walking (on select trails).

The conceptual trail alignment was prepared through an iterative process including field review by professional trail designers, civil engineers, biologists, and archaeologists, and reviewed by a geotechnical engineer. The proposed trail system was developed in consultation with ecologists and wildlife biologists and would avoid sensitive areas that will be closed to public access. These closed areas were identified based on review of sensitive biotic resources, erosion risk, water resources, and potential hazards.

The proposed San Vicente Redwoods public access plan would be implemented in multiple phases. The first phase would include the construction of the parking area with up to 50 parking spaces and approximately 8.4 miles of trails on the main tract adjacent to the the parking area. An existing 1.5 miles of trails on the Laguna tract (which form a connecting loop to the existing adjacent trails in the Bonny Doon Ecological Reserve) are proposed to be rehabilitated and improved to prevent erosion. The second phase would include approximately 9.3 additional miles of trails on the main tract and up to 40 more parking spaces. The third phase would include approximately 16.5 additional miles of trails on the main tract. Later phases would include approximately 2.3 additional miles of trails near on the main tract for a total of approximately 38 miles of trails. The phase one trails are proposed to be constructed over a one-year period, later phases are proposed to be constructed over an estimated timeline of subsequent three-year periods after the first phase.

Zoning & General Plan Consistency

The subject property includes 26 parcels located in the TP (Timber Production) and SU (Special Use) zone districts. All trails and access improvements would be located on TP zoned parcels. Both the TP and SU zone districts are consistent with the R-M (Mountain Residential) General Plan land use designation. The TP zone district allows facilities for outdoor recreational activities as well as habitat management and timber production/harvesting. The current proposal for outdoor recreational facilities is allowed within the TP zone district with a development permit.

Master Site Plan

The implementation of the public access plan would result in a trail system and access improvements within the San Vicente Redwoods that is constructed in phases. The property would function as a regional open space preserve with trail access that is run by a collaboration of non-profit entities.

Community facilities, including restrooms, parking areas, and trails are allowed within parks and open space preserves, with the extent and phasing of improvements to be established through the approval of a master site plan. The proposed San Vicente Redwoods public access plan details the extent and phasing of the proposed improvements, as well as a detailed set of protocols and standards for long term management of public access and conservation of natural resources while allowing continued timber harvesting of the property.

Coastal Development Permit

The southern portion of the main tract and all of the Laguna tract are located within the coastal zone and a Coastal Development Permit is required for those portions of the project. The proposed trail system and access improvements are in conformance with the County's certified Local Coastal Program, in that the portions of the trail system located within the coastal zone would allow additional recreational opportunities and access to experience the natural environment and would not impact coastal scenic resources due to their location within a heavily wooded area.

Additionally, the project site is not located between the shoreline and the first public road and is not identified as a priority acquisition site in the County's Local Coastal Program. Consequently, the proposed project will not interfere with public access to the beach, ocean, or other nearby body of water.

Scenic Resources & Design Review

The proposed project complies with the requirements of the County Design Review ordinance and scenic resource protection policies in the General Plan. The proposed trailhead parking area is located within the viewshed of Empire Grade, which is a designated scenic roadway. The parking area and associated improvements would be set back from Empire Grade with a tree backdrop and additional plantings to screen views from Empire Grade. All improvements would be constructed of natural materials or be painted with muted natural tones to further reduce the visual impact of the proposed development on surrounding land uses and the natural landscape. The proposed trail system would be located within a wooded area, away from public roads and viewpoints, and would not impact scenic resources as a result.

Biotic Resources

The proposed trail system was designed to avoid sensitive biotic resource areas while allowing public access on a defined trail system within the San Vicente Redwoods property. Additional work has been performed on the property (separate from the proposed public access plan) by the conservation partners to enhance biotic resources (through removing invasive species and restoring the natural environment) since the property was acquired. A biological resource assessment (Attachment 5 to the Initial Study - Exhibit D) has been prepared to evaluate impacts resulting from implementation of the public access plan and the report has been reviewed and accepted by Environmental Planning staff.

Riparian Exception

The locations where the proposed trail system would cross streams (via bridges, puncheons, or armored crossings) or be located within riparian resource areas will require a Riparian Exception approval. Proposed trails would avoid riparian areas to the extent feasible and stream crossing designs and locations have been evaluated and accepted by Environmental Planning staff. Riparian Exception findings have been made for the project and are included in this report (Exhibit B).

Public Outreach/Public Comment

The project applicant conducted public meetings and circulated a survey questionnaire in advance of completing the draft San Vicente Redwoods public access plan. The applicant incorporated the comments and suggestions that were received from the meetings and survey questionnaire into the public access plan where feasible and appropriate. Participants stated their concerns, which were listed and ranked into topic categories by the applicant. Comments and concerns were then addressed through the inclusion of management strategies proposed in the public access plan. Additional informational meetings have since been held by the applicant to update the community on the proposed public access plan.

A summary of comments and responses are included as an appendix to the public access plan (Attachment 2 to the Initial Study - Exhibit D).

Environmental Review

Environmental review has been required for the proposed project per the California Environmental Quality Act (CEQA). The project was reviewed by the County's Environmental Coordinator on December 18, 2018. A preliminary determination to issue a Negative Declaration with Mitigations (Exhibit A) was made on February 12, 2019. The public comment period for the environmental document was extended beyond the standard 30 days, ending on March 29 2019, with comments from 26 respondents received. Comments received varied from expressions of support to more detailed questions regarding the environmental review process. The Environmental Coordinator reviewed the comments and prepared a letter to respond to issues that were related to the environmental review of the project (Exhibit G).

The environmental review process focused on the potential impacts of the project in multiple categories, including biotic and cultural resources. The environmental review process generated mitigation measures that will reduce potential impacts from the proposed development and adequately address these issues.

Conclusion

The proposed trail system and access improvements would allow access to an open space preserve and provide additional recreational opportunities within the region. The creation and maintenance of a natural open space preserve and trail system on the San Vicente Redwoods property is consistent with the following goals of the County Strategic Plan:

- Outdoor Experience (Ensure access to and enhance experience in parks, open spaces,

water areas and outdoor activities)

- Natural Resources (Protect and restore natural resources, including water, air, forests, coastline and agricultural lands)
- Health Equity (Promote a safe and healthy community that nurtures body and mind across all ages and social conditions)

As proposed and conditioned, the project is consistent with all applicable codes and policies of the Zoning Ordinance and General Plan/LCP. Please see Exhibit "B" ("Findings") for a complete listing of findings and evidence related to the above discussion.

Staff Recommendation

- Adopt the attached Mitigated Negative Declaration (Exhibit A) per the requirements of the California Environmental Quality Act.
- **APPROVAL** of Application Number **181146**, based on the attached findings and conditions.

Supplementary reports and information referred to in this report are on file and available for viewing at the Santa Cruz County Planning Department, and are hereby made a part of the administrative record for the proposed project.

The County Code and General Plan, as well as hearing agendas and additional information are available online at: www.sccoplanning.com

Report Prepared By: Randall Adams
Santa Cruz County Planning Department
701 Ocean Street, 4th Floor
Santa Cruz CA 95060
Phone Number: (831) 454-3218
E-mail: randall.adams@santacruzcounty.us

Exhibits

- A. Mitigated Negative Declaration (CEQA determination)
- B. Findings
- C. Conditions
- D. Initial Study (CEQA Document) including the following attached documents:
(Attachment 2): Draft San Vicente Redwoods Public Access Plan
(Attachment 3): Project Plans (Trails and Staging Area Plan)
- E. Project Plans
- F. Parcel Information
- G. Environmental Coordinator response to CEQA review comments
- H. Comments & Correspondence

Mitigated Negative Declaration

(Initial Study and Attachments available online at: www.sccoplanning.com)

Application Number 181146
Zoning Administrator Hearing
6/21/19



COUNTY OF SANTA CRUZ

PLANNING DEPARTMENT

701 OCEAN STREET, 4TH FLOOR, SANTA CRUZ, CA 95060
(831) 454-2580 FAX: (831) 454-2131 TDD: (831) 454-2123

KATHLEEN MOLLOY, PLANNING DIRECTOR

<http://www.sccoplanning.com/>

MITIGATED NEGATIVE DECLARATION

Project: San Vicente Redwoods

APPLICATION #: 181146

APN(S):

Main Tract: 058-011-01, 058-011-10, 058-011-11, 058-022-04, 063-011-01, 063-011-09, 063-031-02, 063-071-01, 080-011-03, 080-011-06, 080-011-09, 080-011-10, 080-011-12, 080-011-14, 080-011-36, 080-011-37, 080-011-38, 080-011-39, 080-011-41, 080-011-42, 080-021-05, 080-021-07, 080-331-01, 080-331-02

Laguna Tract: 062-101-01, 063-101-09

Project Description: The project consists of two main components: 1) the approval and implementation of the proposed San Vicente Redwoods Public Access Plan, and 2) the construction and operation of an approximately 38-mile multiple use trail system over approximately 8,500 acres and a parking area in the San Vicente Redwoods of the Santa Cruz Mountains. The trail system and the parking area (with approximately 90 parking spaces) would be developed in phases. The proposed trails would be available for: hiking, biking, horse riding, dog walking (on-leash only), small group gatherings, as well as nature observation.

Project Location: The project site, comprised of the main tract and Laguna Tract properties, is located in the Santa Cruz Mountains in unincorporated Santa Cruz County. The main tract is located north of Highway 1, east of Swanton Road, south of Jamison Creek Road, and west of Empire Grade. The Laguna Tract is located north of Smith Grade, east of Pine Flat Grade, south of Ice Cream Grade and west of Empire Grade in the Bonny Doon planning area of Santa Cruz County. Santa Cruz County. Santa Cruz County is bounded on the north by San Mateo County, on the south by Monterey and San Benito counties, on the east by Santa Clara County, and on the south and west by the Monterey Bay and the Pacific Ocean. Santa Cruz County is bounded on the north by San Mateo County, on the south by Monterey and San Benito counties, on the east by Santa Clara County, and on the south and west by the Monterey Bay and the Pacific Ocean.

Owner: Peninsula Open Space Trust and Sempervirens Fund

Applicant: Land Trust of Santa Cruz County

Staff Planner: Randall Adams, (831) 454-3218

Email: Randall.Adams@santacruzcounty.us

This project will be considered at a public hearing before the Zoning Administrator. The time, date and location have not been set. When scheduling does occur, these items will be included in all public hearing notices for the project

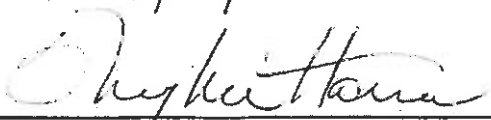
California Environmental Quality Act Negative Declaration Findings:

Find, that this Negative Declaration reflects the decision-making body's independent judgment and analysis, and; that the decision-making body has reviewed and considered the information contained in this Negative Declaration and the comments received during the public review period, and; on the basis of the whole record before the decision-making body (including this Negative Declaration) that there is no substantial evidence that the project will have a significant effect on the environment. The expected

environmental impacts of the project are documented in the attached Initial Study on file with the County of Santa Cruz Clerk of the Board located at 701 Ocean Street, 5th Floor, Santa Cruz, California.

Review Period Ends: March 29, 2019

Date: 5/16/19

A handwritten signature in cursive script, appearing to read "Stephanie Hansen", written over a horizontal line.

STEPHANIE HANSEN, Environmental Coordinator
(831) 454-3112



County of Santa Cruz

PLANNING DEPARTMENT

701 OCEAN STREET, 4TH FLOOR, SANTA CRUZ, CA 95060
(831) 454-2580 FAX: (831) 454-2131 TDD: (831) 454-2123

MITIGATION MONITORING AND REPORTING PROGRAM for Application No. 181146

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Finding of Compliance
Biological Resources				
BIO-1	In addition to implementing construction protocols BR-1.1 through BR-1.15 pursuant to Mitigation Measure BIO-4 below, the following construction protocols are required to ensure the protection of special-status plant species. Construction Protocol BR-2.1. All occurrences of special-status plants within 50 feet of any work areas shall be flagged by a qualified, County-approved biologist prior to construction. Where work will occur within 10 feet of a special-status plant to be preserved, orange construction fencing (or similar) shall be installed at the edge of the work area and no work shall occur beyond the fence. If there are occurrences of special-status plants downslope from the work area, silt fencing shall be installed at the edge of the work area to prevent soil or other materials from being transported downslope where they may impact special-status plants. Construction Protocol BR-2.2. Occurrences of special-status plants shall be avoided by re-routing the trail alignment to the extent feasible and practicable. Where this is not possible, impacts to special-status plants shall be minimized by reducing the trail width and associated vegetation removal to the fullest extent feasible. At a minimum, the full width of the trail (i.e., the full extent of vegetation removal) should avoid the dripline of any special-status shrubs and should avoid special-status herbs by a minimum of 10 feet. If trails are re-routed, they should be re-routed downslope, where feasible, of any special-status plants to avoid causing erosion or sedimentation issues which could be detrimental to special-status plants. If not feasible then re-route the drainage away from the special-status plants. If other considerations such as slope or soil stability make it impossible to avoid special-status plants, a qualified, County-approved biologist shall apply a combination of propagation from local seed and habitat enhancement to repair, rehabilitate, or restore the impacted environment.	Applicant	Compliance monitored by the County Planning Department	During trail construction and site grading operations
BIO-2	In addition to implementing Construction Protocol BR 1.1 through 1.15 pursuant to Mitigation Measure BIO-4 below, the following construction protocols are required to ensure the protection of special-status wildlife species. Construction Protocol BR-3.1. Tree removal and trimming, regardless of size, may take place outside of both the maternity and hibernation period for special-status bats (between September 1st and October 31st) and avoid the breeding bird window per Protocols BR 3.4 and BR 3.5. Tree removal can take place during this period (between September 1st and October 31st) without a breeding bird or bat roost survey. Construction Protocol BR-3.2. If removal of large trees (e.g., the DBH is greater than 12 inches) occurs during the bat roosting season (November 1st through August 31st), these trees shall be inspected by a qualified, County-approved biologist for the presence of bat roosts. If a maternity roost is detected, up to a 200-foot buffer shall be placed around the maternity site until the bats are no longer utilizing the site. Non-maternity roost sites can be removed under the direction of a qualified, County-approved biologist. Any large tree that will be removed shall be left on the ground for 24 hours before being taken offsite or being chipped. This period will allow any day-roosting bats the opportunity to leave before the tree is either removed from the area or is chipped.	Applicant	Compliance monitored by the County Planning Department	During trail construction and site grading operations

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	Construction Protocol BR-3.3. Consultation with the CDFW shall be initiated to determine appropriate conservation measures if active roosting bat sites are disturbed. Construction Protocol BR-3.4. Conduct pre-construction breeding bird surveys if construction, vegetation removal, or ground disturbance activities occur during the breeding season (February 1 to August 31). Pre-construction surveys shall be conducted by a qualified individual within 14 days of the start of these activities to avoid disturbance of active nests, eggs, and/or young. If these activities stop or lapse for a period of 14 days or more during the breeding season, a follow-up breeding bird survey shall be conducted to ensure no new breeding activity has occurred within the anticipated work area. Outside of the breeding season, no pre-construction breeding bird survey would be required for construction, vegetation removal, or ground disturbance activities. Construction Protocol BR-3.5. If nesting birds are identified, an exclusion zone in which no construction activities would be allowed shall be established around any active nests of any avian species protected by the Migratory Bird Treaty Act and California Fish and Game Code until a qualified, County-approved biologist has determined that all young have fledged. Suggested exclusion zone distances differ depending on species, location, and placement of nest, and shall be at the discretion of the biologist based on the species in question, the proximity of the nest to the work area, and the type of work being conducted (e.g., use of hand tools versus gas-operated machinery). Construction Protocol BR-3.6. During construction, all workers shall ensure that food scraps, paper wrappers, food containers, cans, bottles, and other trash from the construction area is deposited in covered or closed trash containers. The trash containers shall not be left open and unattended overnight. Construction Protocol BR-3.7. A pre-construction survey of the parking area shall be conducted by a qualified, County-approved biologist to flag and delineate any woodrat middens within the planned disturbance footprint. During construction of the parking area, a biological monitor shall be onsite to ensure vegetation and ground disturbance with heavy equipment shall not impact those delineated resources. When avoidance of woodrat middens is not possible, the qualified, County-approved biologist shall dismantle the nest in accordance with Construction Protocol BR 3.9. Construction Protocol BR-3.8. During construction and trail installation, a qualified, County-approved biologist or trained designee from the contractor's crew shall identify woodrat middens located along the trail alignment. If the latter, a qualified, County-approved biologist shall provide the training prior to the start of each construction phase. To the extent feasible and practicable, the trail alignment shall avoid woodrat middens by re-routing the trail alignment. Where this is not possible, implementation of Construction Protocol BR-3.9 would be required. Construction Protocol BR-3.9. When construction of the trail alignment or the parking area would result in a direct impact to a woodrat midden, a qualified, County-approved biologist shall dismantle the nest and scatter the nest material a minimum of 10 feet outside of the trail alignment or the footprint of the parking area. If woodrat middens with young are encountered during the dismantling process, the material shall be placed back on the nest and the nest shall remain unmolested for three weeks in order to give the young enough time to mature and leave on their own accord. After three weeks, the nest dismantling process may resume. In the event that a nest must be relocated, the following procedures shall be adhered to: a) Prior to nest disturbance, the biologist shall obtain from CDFW a scientific collection permit for the trapping of the dusky-footed wood rats. b) Nests shall be disturbed or dismantled only during the non-breeding season, between October 1 and December 31. c) At least two weeks prior to construction, the qualified biologist shall survey the project disturbance area to confirm the wood rat nest location and locate any other nests that may have been built in the project			

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	vicinity that may be affected by the proposed development. d) Prior to nest disturbance, wood rates shall be trapped at dusk of the night set for relocation of the nest(s). e) Any existing nest that may be disturbed by construction activities shall be mostly dismantled and the material spread in the vicinity of identified nest relocation site(s). f) In order to avoid the potential health effects associated with handling rodents and their milieu, all workers involved in the handling of the wood rats or the nest materials should wear protective gear to prevent inhalation of contaminant particulates, contact with conjunctiva (eyes), and protection against flea bites; a respirator, eye protection, and skin protection should all be used. g) Dismantling shall be done by hand, allowing any animals not trapped to scape either along existing wood rat trails or toward other available habitat. h) If a litter of young is found or suspected, nest materials shall be replaced, and the nest left along for 2-3 weeks before recheck to verify that young are capable of independent survival before proceeding with nest dismantling. i) Woody debris shall be collected from the area and relocated nests shall be partially constructed in an area determined by the qualified biologist to be both suitable for the wood rats and far enough away from the construction activities that they will not be impacted. j) Rats that were collected at dusk shall be released hours before dawn near the newly constructed nests to allow time for rats to find refuge. k) Once construction is complete, the biologist shall survey the nest area to note whether the new nests are in use, the wood rats have built new nests, or the nest area has been completely abandoned. This information shall be reported in a letter report to the Environmental Planning Section of the Planning Department, and the local CDFW biologist. Construction Protocol BR-3.10. A qualified, County-approved biologist shall conduct a pre-construction survey immediately prior to the start of any ground-disturbing activities for stream crossings and areas within 100 feet of wetted features. If California red-legged frog (CRLF) are found within the work area, all work shall cease within the immediate vicinity (approximately 25 feet around the work area) until the individual(s) have been allowed to leave the work area on their own. If CRLF cannot passively leave the work area, work shall cease and the USFWS shall be contacted by the qualified, County-approved biologist to determine the appropriate course of action. The qualified, County-approved biologist shall then implement the appropriate course of action as determined by the USFWS. Construction Protocol BR-3.11. Because dusk and dawn are often the times when CRLF are most active and likely to disperse, all construction activities shall cease one half hour before sunset and shall not begin prior to one half hour after sunrise. Furthermore, no mechanized work shall occur during significant rain events, defined here as 0.25 inch or greater within a 24-hour period, when CRLF are more likely to disperse and occur within the work area.			
BIO-3.	Educational signage should be placed within the parking lot and at picnic areas informing the public to remove trash and food waste. Signage should provide information on the marbled murrelet and the impact that corvid and avian predators can have on nest sites. This education signage should be in place prior to opening the trails for public access and should be routinely maintained by the Public Access Manager to ensure that signage is not obstructed and is legible at all times.	Applicant	Compliance monitored by the County Planning Department	Prior to opening parking area and trail system for use
BIO-4	Implement the following Biological Resources (BR) construction protocols from the San Vicente Redwoods Public Access Plan: Construction Protocol BR-1.1. The construction work area including the parking area shall be minimized to	Applicant	Compliance monitored by the County Planning	During trail construction and site

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	the fullest extent feasible and trails shall be limited to the minimum width necessary to support the proposed use (i.e., hiking, cycling, and horse riding) as detailed in Table 3 (Trail Dimensions by Use Type). Construction Protocol BR-1.2. Prior to the start of construction, all construction personnel shall be educated on the sensitivity of the biological communities and species at the site by a qualified, County-approved biologist. Environmental awareness training shall include measures to avoid or reduce impacts to the community, reporting and follow-up actions if sensitive biological communities are impacted, and the worker's responsibility under the applicable environmental regulation(s). A designated staff member from the contractor's crew shall provide follow-up training to any employees who begin work after the initial pre-construction training. Construction Protocol BR-1.3. Trails should be routed around sensitive vegetation to the fullest extent feasible. At a minimum, the full width of the trail (i.e., the full extent of vegetation removal and ground disturbance during construction) should avoid the dripline of sensitive vegetation, with greater separation between the trail and sensitive vegetation being preferred. If trails are re-routed, they should be re-routed downslope of any sensitive vegetation to avoid causing erosion or sedimentation issues which could be detrimental to sensitive vegetation. Construction Protocol BR-1.4. Tree and shrub removal in sensitive biological communities shall be minimized to the fullest extent feasible. Where necessary, obtaining a tree removal permit may be required per Santa Cruz County Code Chapter 16.34, Significant Trees Protection. Tree removal should be conducted by a licensed arborist or registered professional forester using industry-standard BMPs to prevent the spread of invasive weeds or plant pathogens and avoid damage to vegetation to be retained. Construction Protocol BR-1.5. Trail construction shall incorporate the best available technology and industry-standard BMPs to minimize the potential for detrimental impacts such as erosion or sedimentation and to minimize the need for future maintenance. Construction Protocol BR-1.6. Any restoration or landscape plantings (e.g., plantings around the proposed parking/parking area) shall use native species appropriate for plant communities found at the site. To the extent feasible, plant material shall be salvaged from trail construction activities at the site. If not possible, plant material shall be propagated by a reputable nursery with protocols in place for minimizing the potential spread of plant diseases (sudden oak death or other <i>Phytophthora</i>-related diseases). Any propagated plant material shall be sourced from as close to the site as possible, ideally from within the site itself to avoid genetic variation. Construction Protocol BR-1.7. Stream crossings should ideally be designed and constructed to freespans the channel and be anchored above the top of bank. Crossings of regulated streams that avoid work below the ordinary high-water mark do not require a permit from the United States Army Corps of Engineers (USACE). When required, notify the CDFW and the Central Coast Regional Water Quality Control Board (RWQCB) of the crossing, even if located above the top of bank. If the CDFW and/or RWQCB issue authorizations for such work, the measures included in any such authorizations shall be incorporated into the design. Construction Protocol BR-1.8. Where wetlands or streams cannot be avoided, appropriate approvals from the USACE (for impacts to regulated wetlands or areas below the ordinary high water mark of regulated streams) and/or the RWQCB and the CDFW (for impacts to regulated wetlands, riparian vegetation, or areas below the top of bank of regulated streams) shall be secured prior to initiating work in these areas. The measures included in any such authorizations shall be incorporated into the design. Construction Protocol BR-1.9. Trails constructed near wetlands or streams shall be designed to minimize changes to pre-project hydrology. Avoid erosion or sedimentation by installing BMPs (e.g., silt fencing, wattles, sterile straw, hydromulch, geotextile fabrics, sediment traps, drainage swales, or sand bag dikes) around wetlands and streams. All materials shall be certified weed-free and must be constructed of natural materials. No plastic monofilament netting may be used. The exact location and configuration of BMPs shall		Department	grading operations

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	be determined by the contractor based on specific site conditions and the type of work being conducted. BMPs shall remain in place until all disturbed ground has been stabilized either through compaction or re-vegetation. Construction Protocol BR-1.10. Equipment used for building new trails should generally have tread width of 48 inches or less and mass less than 10,000 pounds. Construction Protocol BR-1.11. To avoid the introduction and prevent the spread of invasive weeds or plant pathogens, prior to arriving on the site, all construction equipment and vehicles shall be inspected to ensure they are clean. Construction Protocol BR-1.12. Any equipment or vehicles that have been used in areas with known sudden oak death or other <i>Phytophthora</i>-related plant diseases shall be sterilized before being used and inspected by a qualified, County-approved biologist prior to entering the job site. Construction Protocol BR-1.13. All disturbed ground shall be stabilized concurrent with or immediately following construction. Stabilization methods may include: compacting the soil (for trail surfaces only), covering disturbed soils with duff and leaf litter as well as branches removed for construction of trails, revegetation using appropriate native plant species, or use of other standard erosion control measures such as weed-free straw or hydromulch. If disturbed areas are to be revegetated, only native plants appropriate for the habitat shall be used per Construction Protocol BR-1.6. If other erosion control materials are to be used, they shall be certified weed-free and as otherwise specified in Construction Protocol BR-1.9. Construction Protocol BR-1.14. The importation of soils for construction of the parking area or other parts of the site shall be minimized to the fullest extent feasible. To the extent feasible, soils shall be salvaged from onsite before being imported from offsite. If it is necessary to import soils, they shall be certified weed-free and from a qualified, County-approved source with protocols in place for minimizing the potential spread of plant diseases (e.g., sudden oak death or other <i>Phytophthora</i>-related diseases). Construction Protocol BR-1.15. Equipment and vehicle fueling and maintenance parking areas shall be at least 100 feet from any wetland or stream. A spill containment kit shall be provided at the work site and located within 50 feet of the fueling or maintenance area. All spills shall be cleaned immediately (i.e., within 5 minutes of the spill) and all resulting materials shall be disposed of properly. All construction vehicles shall be inspected daily for leaks of oil, hydraulic fluid, or other potentially hazardous materials by a qualified construction crew member and drip pans shall be placed under parked vehicles during prolonged periods of disuse (e.g., during evenings and weekends).			
BIO-5	To minimize the introduction of invasive plants or plant pathogens that could threaten sensitive vegetation, parking and parking areas should include signage or other materials aimed at instructing the general public on the potential threats associated with invasive plants, plant pathogens, and other pests of concern. These materials should include basic prevention methods that the general public can implement such as inspecting shoes and pet fur for weed seeds or avoiding the movement of plant material or soil from one area to another. This education signage should be in place prior to opening the trails for public access and should be maintained annually by the Public Access Manager to ensure that signage is not obstructed and is legible at all times.	Applicant	Initial compliance monitored by the County Planning Department; Annual compliance monitored by the Public Access Manager	Prior to opening parking area and trail system for use
BIO-6	To minimize impacts to sensitive vegetation from use of the trail network, the trail maintenance system should be implemented as described in Chapter 6 of the San Vicente Redwoods Public Access Plan. The trail maintenance system includes an annual monitoring program aimed at identifying maintenance issues (e.g., erosion) and other problems (e.g., nuisance trash areas or other impacts from trail users). The trail maintenance system should include specific methods for routinely documenting and implementing the	Applicant	Compliance monitored by the Public Access Manager	Annual monitoring after parking area and trail system is open for use

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	necessary maintenance by the Public Access Manager.			
BIO-7	All picnic locations shall be located outside of old-growth stands.	Applicant	Compliance monitored by the County Planning Department	At submittal for construction and grading permits
Cultural Resources				
CUL-1	The following text shall be clearly identified on all grading plans and construction drawings: <i>Pursuant to sections 16.40.040 (Site Discovered During Excavation or Development) of the Santa Cruz County Code, if archaeological resources are uncovered during construction, the responsible persons shall immediately cease and desist from all further site excavation and comply with the notification procedures given in County Code Chapter 16.40.040.</i>	Applicant	Compliance monitored by the County Planning Department	At submittal for construction and grading permits
CUL-2	Implement the following CR construction protocols from the San Vicente Redwoods Public Access Plan: Construction Protocol CR-1.1. Prior to the start of construction, all construction personnel shall be educated on the identification and treatment of prehistoric and/or historic artifacts that may be discovered by a qualified, County-approved archaeologist who meets the Secretary of Interior standards or a registered, County-approved forester who has successfully completed the CAL FIRE archeology program. Construction Protocol CR-1.2. If ground disturbing activity takes place and possible artifacts are discovered, then all construction activities within a 50-foot radius of the find shall be halted immediately and a qualified, County-approved archaeologist who meets the Secretary of Interior standards (including CAL FIRE archaeologists) shall be consulted to determine whether the resource requires further study. (Note, it is CAL FIRE policy that registered professional "foresters" do not perform significance evaluations of cultural resources). Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire affected stones. Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps). Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of the CEQA criteria by a qualified archaeologist. If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analyses; prepare a comprehensive report complete with methods, results, and recommendations; and provide for the permanent curation of the recovered resources. The report shall be submitted to the County of Santa Cruz, Northwest Information Center, and State Historic Preservation Office, if required. Construction Protocol CR-1.3. When trail building in the vicinity of sites P-44-000069, P-44-000070, P-44-000071, P-44-000123, and P-44-000596 as identified in the <i>Cultural Resources Study</i> dated October 2017 and on file with the County, a County-approved, qualified archaeologist who meets the Secretary of the Interior standards or a County-approved, registered forester who has successfully completed the CAL FIRE archaeology program shall be present during the initial ground-disturbing phase of construction. Selected portions of trail routes may be in close proximity to sites P-44-000069, P-44-000070, P-44-000071, P-44-000123, and P-44-000596, and monitoring at locations shown on Figure 3 and Figure 4 of the <i>Cultural Resources Study</i> is required. If archaeological specimens are discovered, a qualified archaeologist who meets	Applicant	Compliance monitored by the County Planning Department	During trail construction and site grading operations

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	the Secretary of the Interior standards should evaluate their significance. Construction Protocol CR-1.4. For sites P-44-000596 and Camp ZZZ, a signage program at all entrances shall be developed by the applicant prior to final inspection at the entrances to the property. Signs shall include a brief description of the history of San Vicente Railroad, including various camps throughout the area, a discussion of the historic value of the sites, and the citation of the regulatory codes that protect artifacts. The signage shall also include the requirement to stay on trails. Construction Protocol CR-1.5. If a trail is planned at site P-44-000596, the trail shall be constructed within the old railroad grade wherever possible because no trace of the railroad line, other than the grade is evident. If the trail is planned to be built outside the railroad grade where past land uses have disturbed the ground surface, construction of the trail is acceptable with the provision that any surface artifacts are avoided and ground disturbance is kept to a minimum. Portions of known railroad grade segments are depicted in Figures 5a and 5b of the <i>Cultural Resources Study</i>. Construction Protocol CR-1.6. If a trail is planned at the Camp ZZZ site to follow the alignment of the existing gravel road, it is acceptable for the trail to follow within the road route because there is no trace of historic-period specimens evident within this alignment.			
CUL-3	The following text shall be clearly identified on all grading plans and construction drawings: <i>Pursuant to sections 16.40.040 (Site Discovered During Excavation or Development) of the Santa Cruz County Code, if at any time during site preparation, excavation, or other ground disturbance associated with this project, human remains are discovered, the responsible person shall immediately cease and desist from all further site excavation and notify the sheriff-coroner and the Planning Director. If the coroner determines that the remains are not of recent origin, a full archeological report shall be prepared and representative of the local Native California Indian group shall be contacted. Disturbance shall not resume until the significance of the archeological resource is determined and appropriate mitigations to preserve the resource on the site are established.</i>	Applicant	Compliance monitored by the County Planning Department	At submittal for construction and grading permits
CUL-4	Implement the following Cultural Resources (CR) construction protocol from the San Vicente Redwoods Public Access Plan: Construction Protocol CR-1.7. The following actions are promulgated in Public Resources Code 5097.98 and Health and Human Safety Code 7050.5, and pertain to the discovery of human remains. If human remains are encountered, excavation or disturbance of the location must be halted in the vicinity of the find, and the county coroner contacted. If the coroner determines the remains are Native American, the coroner shall contact the Native American Heritage Commission. The Native American Heritage Commission will identify the person or persons believed to be "most likely descended" from the deceased Native American. The most likely descendant would then make recommendations regarding the treatment of the remains with appropriate dignity.	Applicant	Compliance monitored by the County Planning Department	During trail construction and site grading operations

Development Permit Findings

1. That the proposed location of the project and the conditions under which it would be operated or maintained will not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood or the general public, and will not result in inefficient or wasteful use of energy, and will not be materially injurious to properties or improvements in the vicinity.

This finding can be made, in that the project is located in an area which allows open space recreational uses and natural resource management. Construction will comply with prevailing building technology, the California Building Code, and the County Building ordinance to ensure the optimum in safety and the conservation of energy and resources.

2. That the proposed location of the project and the conditions under which it would be operated or maintained will be consistent with all pertinent County ordinances and the purpose of the zone district in which the site is located.

This finding can be made, in that in that the proposed trail system would be located on properties zoned TP (Timber Production), a designation which allows open space recreational uses. The proposed location of the trail system and access improvements and the conditions under which it would be operated or maintained will be consistent with all pertinent County ordinances and the purpose of the TP (Timber Production) zone district as open space recreational uses and natural resource management are allowed uses within the TP zone district.

The proposed trail system and access facilities are consistent with County Code sections 13.10.372(B) (Timber Production - Allowed Uses) and 13.10.351 et. seq. (Parks, Recreation & Open Space - Allowed Uses), in that facilities for outdoor recreational activities are allowed within TP zone districts when also consistent with requirements for the PR zone district (13.10.351 et. seq). Recreational trails and open space are both principal permitted uses within the PR zone district, and the proposed trail system will not interfere with continued timber harvesting on the subject property.

The proposed use of the property for timber harvesting, outdoor recreational activities, and natural resource management is consistent with the requirements of County Code section 13.10.355(A)(1) (Master Site Plans) in that the proposed public access plan describes all phases of proposed trail and access improvements in tandem with continued timber harvesting and natural resource management on the subject property.

3. That the proposed use is consistent with all elements of the County General Plan and with any specific plan which has been adopted for the area.

This finding can be made, in that the TP (Timber Production) and SU (Special Use) zone districts are consistent with the R-M (Mountain Residential) land use designation of the properties in the County General Plan.

The proposed trail system and access improvements are consistent with the requirements of General Plan policy 5.12.3 (Conditional Uses within Timber Production Zones) in that facilities for outdoor recreational activities are allowed within timber production zones when consistent

with organized camp regulations and not in conflict with the management of timber resources on the subject properties. In this case, organized camp provisions do not apply as the proposed trail system is a principal permitted use for non-commercial recreation and is not limited by the density requirements that apply to overnight camps.

The project will be consistent with the requirements of General Plan policy 5.10.11 (Development Visible from Rural Scenic Roads) in that the trail systems will not involve structures and will be located away from scenic roadways (Empire Grade and Martin Road) and the proposed parking area will be adequately set back from Empire Grade road with a tree back drop and vegetation to further screen the proposed parking area from view.

A specific plan has not been adopted for this portion of the County.

4. That the proposed use will not overload utilities, and will not generate more than the acceptable level of traffic on the streets in the vicinity.

This finding can be made, in that the proposed trail system and access improvements will not rely on utility connections, other than those necessary for the trailhead improvements and bathroom facilities. A traffic analysis was completed that indicates that the project will not adversely impact existing roads or intersections in the surrounding area.

5. That the proposed project will complement and harmonize with the existing and proposed land uses in the vicinity and will be compatible with the physical design aspects, land use intensities, and dwelling unit densities of the neighborhood.

This finding can be made, in that the proposed trail system and access improvements will occur within an existing forested timber production area. The parking area will be set back from Empire Grade and the proposed use will be compatible with the land use intensity and residential densities in the surrounding neighborhood.

6. The proposed development project is consistent with the Design Standards and Guidelines (sections 13.11.070 through 13.11.076), and any other applicable requirements of this chapter.

This finding can be made, in that the proposed trail system and access improvements will not involve structures and will be located away from roadways, muted natural colors will be utilized for all structures and fencing in the parking area, and the proposed parking area will be adequately set back from Empire Grade road with a tree back drop and vegetation to further reduce the visual impact of the proposed development on surrounding land uses and the natural landscape.

Coastal Development Permit Findings

1. That the project is a use allowed in one of the basic zone districts that are listed in LCP Section 13.10.170(D) as consistent with the LCP Land Use Plan designation of the site.

This finding can be made, in that the proposed trail system would be located on properties zoned TP (Timber Production), a designation which allows open space recreational uses. The proposed trail system and access improvements are an allowed use within the TP zone district, and the zoning is consistent with the R-M (Mountain Residential) General Plan designation.

2. That the project does not conflict with any existing easement or development restrictions such as public access, utility, or open space easements.

This finding can be made, in that the proposed trail system would not be in conflict with any easements on the project site.

3. That the project is consistent with the design criteria and special use standards and conditions of this chapter pursuant to SCCC 13.20.130 and 13.20.140 et seq.

This finding can be made, in that the project will be a trail system through a wooded area, muted natural colors will be utilized for all structures and fencing in the parking area, and the proposed parking area will be adequately set back from Empire Grade road with a tree back drop and vegetation to further reduce the visual impact of the proposed development on surrounding land uses and the natural landscape.

4. That the project conforms with the public access, recreation, and visitor-serving policies, standards and maps of the LCP Land Use Plan, including Chapter 2: Section 2.5 and Chapter 7.

This finding can be made, in that the project site is not identified as a priority acquisition site in the County Local Coastal Program and allows public recreational access on the property via the proposed trail system. Additionally, the project site is not located between the shoreline and the first public road. Consequently, the proposed project will not interfere with public access to the beach, ocean, or other nearby body of water.

5. That the project conforms to all other applicable standards of the certified LCP.

This finding can be made, in that outdoor recreational facilities are allowed uses in the TP (Timber Production) zone district, and the zoning is consistent with the R-M General Plan and Local Coastal Program land use designation.

6. If the project is located between the nearest through public road and the sea or the shoreline of any body of water located within the Coastal Zone, that the project conforms to the public access and public recreation policies of Chapter 3 of the Coastal Act.

This finding can be made, in that the project site is not located between the shoreline and the first public road. Consequently, the proposed trail system and access improvements will not interfere with public access to the beach, ocean, or any nearby body of water. Further, the project site is not identified as a priority acquisition site in the County Local Coastal Program.

Riparian Exception Findings

1. That there are special circumstances or conditions affecting the property.

This finding can be made, in that the subject property includes parcels in two separate areas (main and Laguna tracts) totaling approximately 8,500 acres of land area. This large area is crossed by numerous small streams that flow through the parcels from the higher elevations near Empire Grade towards the ocean to the south and west. The existing roads serving timber harvest operations and private inholdings cross streams at multiple locations. The special circumstances or conditions affecting the subject property are the large size of the parcels involved and the presence of multiple streams on the properties with an existing road network that crosses these streams to provide access.

2. That the exception is necessary for the proper design and function of some permitted or existing activity on the property.

This finding can be made, in that the existing timber harvest activity, the access to private inholdings, and the proposed trail system will require allowing trails and roads to cross streams at some locations. It would not be possible to continue timber harvests, to provide access to private inholdings, or to open the property to public recreational access without having roads or trails that cross streams at some locations.

3. That the granting of the exception will not be detrimental to the public welfare or injurious to other property downstream or in the area in which the project is located.

This finding can be made, in that the project will allow the use of portions of the property for public recreational access and will not impact existing stream channel capacity or water quality as the project will utilize appropriate Best Management Practices (BMPs) to prevent erosion and sedimentation from occurring and negatively impacting downstream properties.

4. That the granting of the exception, in the coastal zone, will not reduce or adversely impact the riparian corridor, and there is no feasible less environmentally damaging alternative.

This finding can be made, in that the proposed trail system is designed to avoid riparian areas to the maximum extent feasible except where necessary to cross streams. The BMPs utilized in the design of the proposed bridges, puncheons, and armored crossings will ensure that there will not be adverse impacts to the riparian corridor or properties downstream. Given the large number of streams and existing roads and trails that pass through the property, there are no alternatives that do not involve stream crossings to provide access throughout the site.

5. That the granting of the exception is in accordance with the purpose of this chapter, and with the objectives of the General Plan and elements thereof, and the Local Coastal Program land use plan.

The purpose of the riparian and wetland protection ordinance is to eliminate or minimize development activities in riparian areas in order to protect wildlife habitat, water quality, open space and to allow for conveyance and storage of floodwaters. Through the riparian exception

Application #: 181146
APN: 080-011-42 + multiple APNs
Owner: Peninsula Open Space Trust

process, encroachment into riparian areas (for stream crossings or other purposes) can be authorized to allow permitted land uses on subject properties. Additionally, General Plan/Local Coastal Program policy 5.2.7 (Compatible Uses within Riparian Corridors) allows parks and non-motorized recreational trails within riparian corridors and buffer areas. The proposed trail system and access improvements have been designed and located in a manner that will minimize impacts to riparian resources, protect wildlife habitat, provide access to open space, while preserving water quality and existing stream channel capacity.

Conditions of Approval

Exhibit E: Project plans, prepared by Fall Creek Engineering, dated 8/18.

- I. This permit authorizes the phased construction of a trail system and access improvements as indicated on the approved Exhibit "E" for this Master Site Plan approval and the San Vicente Redwoods Public Access Plan. This approval does not confer legal status on any existing structure(s) or existing use(s) on the subject property that are not specifically authorized by this permit. Prior to exercising any rights granted by this permit including, without limitation, any construction or site disturbance, the applicant/owner shall:
 - A. Sign, date, and return to the Planning Department one copy of the approval to indicate acceptance and agreement with the conditions thereof.
 - B. Obtain a Building Permit from the Santa Cruz County Building Official.
 1. Any outstanding balance due to the Planning Department must be paid prior to making a Building Permit or Grading Permit application. Applications for Building Permits or Grading Permits will not be accepted or processed while there is an outstanding balance due.
 - C. Obtain a Grading Permit from the Santa Cruz County Building Official.
 1. Any outstanding balance due to the Planning Department must be paid prior to making a Building Permit or Grading Permit application. Applications for Building Permits or Grading Permits will not be accepted or processed while there is an outstanding balance due.
 - D. Obtain an Encroachment Permit from the Department of Public Works for all off-site work performed in the County road right-of-way.
- II. Prior to issuance of a Building Permit the applicant/owner shall:
 - A. Submit final architectural plans for review and approval by the Planning Department. The final plans shall be in substantial compliance with the plans marked Exhibit "E" on file with the Planning Department. Any changes from the approved Exhibit "E" for this development permit on the plans submitted for the Building Permit must be clearly called out and labeled by standard architectural methods to indicate such changes. Any changes that are not properly called out and labeled will not be authorized by any Building Permit that is issued for the proposed development. The final plans shall include the following additional information:
 1. A copy of the text of these conditions of approval incorporated into the full size sheets of the architectural plan set.
 2. One elevation shall indicate materials and colors as they were approved by this Discretionary Application. Colors and materials for structures and

fencing shall be muted natural tones.

3. Grading, drainage, and erosion control plans.
 4. Details showing compliance with fire department requirements. If the proposed structure(s) are located within the State Responsibility Area (SRA) the requirements of the Wildland-Urban Interface code (WUI), California Building Code Chapter 7A, shall apply.
- B. Meet all requirements of and pay drainage fees to the County Department of Public Works, Stormwater Management. Drainage fees will be assessed on the net increase in impervious area.
 - C. Obtain an Environmental Health Clearance for this project from the County Department of Environmental Health Services.
 - D. Meet all requirements of the Environmental Planning section of the Planning Department.
 - E. Meet all requirements and pay any applicable plan check fee of CalFire (County Fire Department).
 - F. Provide required off-street parking as indicated in the approved Exhibit "E" for this permit. Parking improvements may be phased as indicated in the approved Exhibit "E" and the San Vicente Redwoods Public Access Plan. Parking must be clearly designated on the plot plan.
- III. Prior to any site disturbance or physical construction on the subject property the following condition(s) shall be met:
- A. Pre-Construction Meeting: In order to ensure that the mitigation measures are communicated to the various parties responsible for constructing the project, prior to any disturbance on the property the applicant shall convene a pre-construction meeting on the site. The following parties shall attend: the applicant, grading contractor supervisor, the project biologist, the project archeologist, and Santa Cruz County Environmental Planning staff.
- IV. All construction shall be performed according to the approved plans for the Building Permit. Prior to final building inspection, the applicant/owner must meet the following conditions:
- A. All required mitigation measures shall be implemented during construction, as specified in the Mitigation Monitoring and Reporting Program attached to these conditions.
 - B. All site improvements shown on the final approved Building and Grading Permit plans shall be installed.

1. Phased construction is allowed as indicated on the approved Exhibit "E" for this permit and the San Vicente Redwoods Public Access Plan.
- C. The applicant and project contractor shall comply with the following measures during all construction work:
1. Limit all trailhead parking area and driveway construction to the time between 8:00 am and 5:00 pm weekdays unless a temporary exception to this time restriction is approved in advance by County Planning to address an emergency situation.
 - a. Trail construction work groups arranged by non-profit organizations may construct trails between the hours of 8:00 am and 8:00 pm, including weekdays and weekends.
 2. Each day it does not rain, wet all exposed soil frequently enough to prevent significant amounts of dust from leaving the site.
 3. The applicant shall designate a disturbance coordinator and a 24-hour contact number shall be conspicuously posted on the job site. The disturbance coordinator shall record the name, phone number, and nature of all complaints received regarding the construction site. The disturbance coordinator shall investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or inquiry.
- D. All inspections required by the building and grading permits shall be completed to the satisfaction of the County Building Official and Environmental Planning staff.
- E. Pursuant to Sections 16.40.040 and 16.42.080 of the County Code, if at any time during site preparation, excavation, or other ground disturbance associated with this development, any artifact or other evidence of an historic archaeological resource or a Native American cultural site is discovered, the responsible persons shall immediately cease and desist from all further site excavation and notify the Sheriff-Coroner if the discovery contains human remains, or the Planning Director if the discovery contains no human remains. The procedures established in Sections 16.40.040 and 16.42.080, shall be observed.
- V. Operational Conditions
- A. Master Site Plan
1. This approval for a Master Site Plan authorizes phased construction of a trail system and access improvements as indicated on the approved Exhibit "E" for this permit and the San Vicente Redwoods Public Access Plan.
 2. Trails and access improvements may be constructed in phases consistent with the San Vicente Redwoods Public Access Plan and the approved Exhibit "E" for this permit.

the COUNTY, its officers, employees, and agents, from and against any claim (including attorneys' fees), against the COUNTY, its officers, employees, and agents to attack, set aside, void, or annul this development approval of the COUNTY or any subsequent amendment of this development approval which is requested by the Development Approval Holder.

- A. COUNTY shall promptly notify the Development Approval Holder of any claim, action, or proceeding against which the COUNTY seeks to be defended, indemnified, or held harmless. COUNTY shall cooperate fully in such defense. If COUNTY fails to notify the Development Approval Holder within sixty (60) days of any such claim, action, or proceeding, or fails to cooperate fully in the defense thereof, the Development Approval Holder shall not thereafter be responsible to defend, indemnify, or hold harmless the COUNTY if such failure to notify or cooperate was significantly prejudicial to the Development Approval Holder.
- B. Nothing contained herein shall prohibit the COUNTY from participating in the defense of any claim, action, or proceeding if both of the following occur:
 - 1. COUNTY bears its own attorney's fees and costs; and
 - 2. COUNTY defends the action in good faith.
- C. Settlement. The Development Approval Holder shall not be required to pay or perform any settlement unless such Development Approval Holder has approved the settlement. When representing the County, the Development Approval Holder shall not enter into any stipulation or settlement modifying or affecting the interpretation or validity of any of the terms or conditions of the development approval without the prior written consent of the County.
- D. Successors Bound. "Development Approval Holder" shall include the applicant and the successor(s) in interest, transferee(s), and assign(s) of the applicant.

VII. Mitigation Monitoring Program

The mitigation measures listed under this heading have been incorporated in the conditions of approval for this project in order to mitigate or avoid significant effects on the environment. As required by Section 21081.6 of the California Public Resources Code, a monitoring and reporting program for the above mitigation is hereby adopted as a condition of approval for this project. This program is specifically described following each mitigation measure listed below. The purpose of this monitoring is to ensure compliance with the environmental mitigations during project implementation and operation. Failure to comply with the conditions of approval, including the terms of the adopted monitoring program, may result in permit revocation pursuant to section 18.10.462 of the Santa Cruz County Code.

VIII. Mitigation measures

Application #: 181146
APN: 080-011-42 + multiple APNs
Owner: Peninsula Open Space Trust

See attached pages.

Minor variations to this permit which do not affect the overall concept or density may be approved by the Planning Director at the request of the applicant or staff in accordance with Chapter 18.10 of the County Code.

Please note: This permit expires three years from the effective date listed below unless a building/grading permit is obtained for the first phase of the project consisting of one of the primary structures or improvements described in the development permit (does not include demolition, temporary power pole or other site preparation permits, or accessory structures unless these are the primary subject of the development permit). Failure to exercise the building permit and to complete all of the construction under the building permit, resulting in the expiration of the building permit, will void the development permit, unless there are special circumstances as determined by the Planning Director.

Approval Date: _____

Effective Date: _____

Expiration Date: _____

Appeals: Any property owner, or other person aggrieved, or any other person whose interests are adversely affected by any act or determination of the Zoning Administrator, may appeal the act or determination to the Planning Commission in accordance with chapter 18.10 of the Santa Cruz County Code.



County of Santa Cruz

PLANNING DEPARTMENT

701 OCEAN STREET, 4TH FLOOR, SANTA CRUZ, CA 95060
(831) 454-2580 FAX: (831) 454-2131 TDD: (831) 454-2123

MITIGATION MONITORING AND REPORTING PROGRAM for Application No. 181146

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
Biological Resources				
BIO-1	In addition to implementing construction protocols BR-1.1 through BR-1.15 pursuant to Mitigation Measure BIO-4 below, the following construction protocols are required to ensure the protection of special-status plant species. Construction Protocol BR-2.1. All occurrences of special-status plants within 50 feet of any work areas shall be flagged by a qualified, County-approved biologist prior to construction. Where work will occur within 10 feet of a special-status plant to be preserved, orange construction fencing (or similar) shall be installed at the edge of the work area and no work shall occur beyond the fence. If there are occurrences of special-status plants downslope from the work area, silt fencing shall be installed at the edge of the work area to prevent soil or other materials from being transported downslope where they may impact special-status plants. Construction Protocol BR-2.2. Occurrences of special-status plants shall be avoided by re-routing the trail alignment to the extent feasible and practicable. Where this is not possible, impacts to special-status plants shall be minimized by reducing the trail width and associated vegetation removal to the fullest extent feasible. At a minimum, the full width of the trail (i.e., the full extent of vegetation removal) should avoid the dripline of any special-status shrubs and should avoid special-status herbs by a minimum of 10 feet. If trails are re-routed, they should be re-routed downslope, where feasible, of any special-status plants to avoid causing erosion or sedimentation issues which could be detrimental to special-status plants. If not feasible then re-route the drainage away from the special-status plants. If other considerations such as slope or soil stability make it impossible to avoid special-status plants, a qualified, County-approved biologist shall apply a combination of propagation from local seed and habitat enhancement to repair, rehabilitate, or restore the impacted environment.	Applicant	Compliance monitored by the County Planning Department	During trail construction and site grading operations
BIO-2	In addition to implementing Construction Protocol BR 1.1 through 1.15 pursuant to Mitigation Measure BIO-4 below, the following construction protocols are required to ensure the protection of special-status wildlife species. Construction Protocol BR-3.1. Tree removal and trimming, regardless of size, may take place outside of both the maternity and hibernation period for special-status bats (between September 1st and October 31st) and avoid the breeding bird window per Protocols BR 3.4 and BR 3.5. Tree removal can take place during this period (between September 1st and October 31st) without a breeding bird or bat roost survey. Construction Protocol BR-3.2. If removal of large trees (e.g., the DBH is greater than 12 inches) occurs during the bat roosting season (November 1st through August 31st), these trees shall be inspected by a qualified, County-approved biologist for the presence of bat roosts. If a maternity roost is detected, up to a 200-foot buffer shall be placed around the maternity site until the bats are no longer utilizing the site. Non-maternity roost sites can be removed under the direction of a qualified, County-approved biologist. Any large tree that will be removed shall be left on the ground for 24 hours before being taken offsite or being chipped. This period will allow any day-roosting bats the opportunity to leave before the tree is either removed from the area or is chipped.	Applicant	Compliance monitored by the County Planning Department	During trail construction and site grading operations

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	Construction Protocol BR-3.3. Consultation with the CDFW shall be initiated to determine appropriate conservation measures if active roosting bat sites are disturbed. Construction Protocol BR-3.4. Conduct pre-construction breeding bird surveys if construction, vegetation removal, or ground disturbance activities occur during the breeding season (February 1 to August 31). Pre-construction surveys shall be conducted by a qualified individual within 14 days of the start of these activities to avoid disturbance of active nests, eggs, and/or young. If these activities stop or lapse for a period of 14 days or more during the breeding season, a follow-up breeding bird survey shall be conducted to ensure no new breeding activity has occurred within the anticipated work area. Outside of the breeding season, no pre-construction breeding bird survey would be required for construction, vegetation removal, or ground disturbance activities. Construction Protocol BR-3.5. If nesting birds are identified, an exclusion zone in which no construction activities would be allowed shall be established around any active nests of any avian species protected by the Migratory Bird Treaty Act and California Fish and Game Code until a qualified, County-approved biologist has determined that all young have fledged. Suggested exclusion zone distances differ depending on species, location, and placement of nest, and shall be at the discretion of the biologist based on the species in question, the proximity of the nest to the work area, and the type of work being conducted (e.g., use of hand tools versus gas-operated machinery). Construction Protocol BR-3.6. During construction, all workers shall ensure that food scraps, paper wrappers, food containers, cans, bottles, and other trash from the construction area is deposited in covered or closed trash containers. The trash containers shall not be left open and unattended overnight. Construction Protocol BR-3.7. A pre-construction survey of the parking area shall be conducted by a qualified, County-approved biologist to flag and delineate any woodrat middens within the planned disturbance footprint. During construction of the parking area, a biological monitor shall be onsite to ensure vegetation and ground disturbance with heavy equipment shall not impact those delineated resources. When avoidance of woodrat middens is not possible, the qualified, County-approved biologist shall dismantle the nest in accordance with Construction Protocol BR 3.9. Construction Protocol BR-3.8. During construction and trail installation, a qualified, County-approved biologist or trained designee from the contractor's crew shall identify woodrat middens located along the trail alignment. If the latter, a qualified, County-approved biologist shall provide the training prior to the start of each construction phase. To the extent feasible and practicable, the trail alignment shall avoid woodrat middens by re-routing the trail alignment. Where this is not possible, implementation of Construction Protocol BR-3.9 would be required. Construction Protocol BR-3.9. When construction of the trail alignment or the parking area would result in a direct impact to a woodrat midden, a qualified, County-approved biologist shall dismantle the nest and scatter the nest material a minimum of 10 feet outside of the trail alignment or the footprint of the parking area. If woodrat middens with young are encountered during the dismantling process, the material shall be placed back on the nest and the nest shall remain unmolested for three weeks in order to give the young enough time to mature and leave on their own accord. After three weeks, the nest dismantling process may resume. In the event that a nest must be relocated, the following procedures shall be adhered to: a) Prior to nest disturbance, the biologist shall obtain from CDFW a scientific collection permit for the trapping of the dusky-footed wood rats. b) Nests shall be disturbed or dismantled only during the non-breeding season, between October 1 and December 31. c) At least two weeks prior to construction, the qualified biologist shall survey the project disturbance area to confirm the wood rat nest location and locate any other nests that may have been built in the project			

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	vicinity that may be affected by the proposed development. d) Prior to nest disturbance, wood rates shall be trapped at dusk of the night set for relocation of the nest(s). e) Any existing nest that may be disturbed by construction activities shall be mostly dismantled and the material spread in the vicinity of identified nest relocation site(s). f) In order to avoid the potential health effects associated with handling rodents and their milieu, all workers involved in the handling of the wood rats or the nest materials should wear protective gear to prevent inhalation of contaminant particulates, contact with conjunctiva (eyes), and protection against flea bites; a respirator, eye protection, and skin protection should all be used. g) Dismantling shall be done by hand, allowing any animals not trapped to scape either along existing wood rat trails or toward other available habitat. h) If a litter of young is found or suspected, nest materials shall be replaced, and the nest left along for 2-3 weeks before recheck to verify that young are capable of independent survival before proceeding with nest dismantling. i) Woody debris shall be collected from the area and relocated nests shall be partially constructed in an area determined by the qualified biologist to be both suitable for the wood rats and far enough away from the construction activities that they will not be impacted. j) Rats that were collected at dusk shall be released hours before dawn near the newly constructed nests to allow time for rats to find refuge. k) Once construction is complete, the biologist shall survey the nest area to note whether the new nests are in use, the wood rats have built new nests, or the nest area has been completely abandoned. This information shall be reported in a letter report to the Environmental Planning Section of the Planning Department, and the local CDFW biologist. Construction Protocol BR-3.10. A qualified, County-approved biologist shall conduct a pre-construction survey immediately prior to the start of any ground-disturbing activities for stream crossings and areas within 100 feet of wetted features. If California red-legged frog (CRLF) are found within the work area, all work shall cease within the immediate vicinity (approximately 25 feet around the work area) until the individual(s) have been allowed to leave the work area on their own. If CRLF cannot passively leave the work area, work shall cease and the USFWS shall be contacted by the qualified, County-approved biologist to determine the appropriate course of action. The qualified, County-approved biologist shall then implement the appropriate course of action as determined by the USFWS. Construction Protocol BR-3.11. Because dusk and dawn are often the times when CRLF are most active and likely to disperse, all construction activities shall cease one half hour before sunset and shall not begin prior to one half hour after sunrise. Furthermore, no mechanized work shall occur during significant rain events, defined here as 0.25 inch or greater within a 24-hour period, when CRLF are more likely to disperse and occur within the work area.			
BIO-3	Educational signage should be placed within the parking lot and at picnic areas informing the public to remove trash and food waste. Signage should provide information on the marbled murrelet and the impact that corvid and avian predators can have on nest sites. This education signage should be in place prior to opening the trails for public access and should be routinely maintained by the Public Access Manager to ensure that signage is not obstructed and is legible at all times.	Applicant	Compliance monitored by the County Planning Department	Prior to opening parking area and trail system for use
BIO-4	Implement the following Biological Resources (BR) construction protocols from the San Vicente Redwoods Public Access Plan: Construction Protocol BR-1.1. The construction work area including the parking area shall be minimized to	Applicant	Compliance monitored by the County Planning	During trail construction and site

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	the fullest extent feasible and trails shall be limited to the minimum width necessary to support the proposed use (i.e., hiking, cycling, and horse riding) as detailed in Table 3 (Trail Dimensions by Use Type). Construction Protocol BR-1.2. Prior to the start of construction, all construction personnel shall be educated on the sensitivity of the biological communities and species at the site by a qualified, County-approved biologist. Environmental awareness training shall include measures to avoid or reduce impacts to the community, reporting and follow-up actions if sensitive biological communities are impacted, and the worker's responsibility under the applicable environmental regulation(s). A designated staff member from the contractor's crew shall provide follow-up training to any employees who begin work after the initial pre-construction training. Construction Protocol BR-1.3. Trails should be routed around sensitive vegetation to the fullest extent feasible. At a minimum, the full width of the trail (i.e., the full extent of vegetation removal and ground disturbance during construction) should avoid the dripline of sensitive vegetation, with greater separation between the trail and sensitive vegetation being preferred. If trails are re-routed, they should be re-routed downslope of any sensitive vegetation to avoid causing erosion or sedimentation issues which could be detrimental to sensitive vegetation. Construction Protocol BR-1.4. Tree and shrub removal in sensitive biological communities shall be minimized to the fullest extent feasible. Where necessary, obtaining a tree removal permit may be required per Santa Cruz County Code Chapter 16.34, Significant Trees Protection. Tree removal should be conducted by a licensed arborist or registered professional forester using industry-standard BMPs to prevent the spread of invasive weeds or plant pathogens and avoid damage to vegetation to be retained. Construction Protocol BR-1.5. Trail construction shall incorporate the best available technology and industry-standard BMPs to minimize the potential for detrimental impacts such as erosion or sedimentation and to minimize the need for future maintenance. Construction Protocol BR-1.6. Any restoration or landscape plantings (e.g., plantings around the proposed parking/parking area) shall use native species appropriate for plant communities found at the site. To the extent feasible, plant material shall be salvaged from trail construction activities at the site. If not possible, plant material shall be propagated by a reputable nursery with protocols in place for minimizing the potential spread of plant diseases (sudden oak death or other <i>Phytophthora</i>-related diseases). Any propagated plant material shall be sourced from as close to the site as possible, ideally from within the site itself to avoid genetic variation. Construction Protocol BR-1.7. Stream crossings should ideally be designed and constructed to freespan the channel and be anchored above the top of bank. Crossings of regulated streams that avoid work below the ordinary high-water mark do not require a permit from the United States Army Corps of Engineers (USACE). When required, notify the CDFW and the Central Coast Regional Water Quality Control Board (RWQCB) of the crossing, even if located above the top of bank. If the CDFW and/or RWQCB issue authorizations for such work, the measures included in any such authorizations shall be incorporated into the design. Construction Protocol BR-1.8. Where wetlands or streams cannot be avoided, appropriate approvals from the USACE (for impacts to regulated wetlands or areas below the ordinary high water mark of regulated streams) and/or the RWQCB and the CDFW (for impacts to regulated wetlands, riparian vegetation, or areas below the top of bank of regulated streams) shall be secured prior to initiating work in these areas. The measures included in any such authorizations shall be incorporated into the design. Construction Protocol BR-1.9. Trails constructed near wetlands or streams shall be designed to minimize changes to pre-project hydrology. Avoid erosion or sedimentation by installing BMPs (e.g., silt fencing, wattles, sterile straw, hydromulch, geotextile fabrics, sediment traps, drainage swales, or sand bag dikes) around wetlands and streams. All materials shall be certified weed-free and must be constructed of natural materials. No plastic monofilament netting may be used. The exact location and configuration of BMPs shall		Department	grading operations

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	be determined by the contractor based on specific site conditions and the type of work being conducted. BMPs shall remain in place until all disturbed ground has been stabilized either through compaction or re-vegetation. Construction Protocol BR-1.10. Equipment used for building new trails should generally have tread width of 48 inches or less and mass less than 10,000 pounds. Construction Protocol BR-1.11. To avoid the introduction and prevent the spread of invasive weeds or plant pathogens, prior to arriving on the site, all construction equipment and vehicles shall be inspected to ensure they are clean. Construction Protocol BR-1.12. Any equipment or vehicles that have been used in areas with known sudden oak death or other <i>Phytophthora</i>-related plant diseases shall be sterilized before being used and inspected by a qualified, County-approved biologist prior to entering the job site. Construction Protocol BR-1.13. All disturbed ground shall be stabilized concurrent with or immediately following construction. Stabilization methods may include: compacting the soil (for trail surfaces only), covering disturbed soils with duff and leaf litter as well as branches removed for construction of trails, revegetation using appropriate native plant species, or use of other standard erosion control measures such as weed-free straw or hydromulch. If disturbed areas are to be revegetated, only native plants appropriate for the habitat shall be used per Construction Protocol BR-1.6. If other erosion control materials are to be used, they shall be certified weed-free and as otherwise specified in Construction Protocol BR-1.9. Construction Protocol BR-1.14. The importation of soils for construction of the parking area or other parts of the site shall be minimized to the fullest extent feasible. To the extent feasible, soils shall be salvaged from onsite before being imported from offsite. If it is necessary to import soils, they shall be certified weed-free and from a qualified, County-approved source with protocols in place for minimizing the potential spread of plant diseases (e.g., sudden oak death or other <i>Phytophthora</i>-related diseases). Construction Protocol BR-1.15. Equipment and vehicle fueling and maintenance parking areas shall be at least 100 feet from any wetland or stream. A spill containment kit shall be provided at the work site and located within 50 feet of the fueling or maintenance area. All spills shall be cleaned immediately (i.e., within 5 minutes of the spill) and all resulting materials shall be disposed of properly. All construction vehicles shall be inspected daily for leaks of oil, hydraulic fluid, or other potentially hazardous materials by a qualified construction crew member and drip pans shall be placed under parked vehicles during prolonged periods of disuse (e.g., during evenings and weekends).			
BIO-5	To minimize the introduction of invasive plants or plant pathogens that could threaten sensitive vegetation, parking and parking areas should include signage or other materials aimed at instructing the general public on the potential threats associated with invasive plants, plant pathogens, and other pests of concern. These materials should include basic prevention methods that the general public can implement such as inspecting shoes and pet fur for weed seeds or avoiding the movement of plant material or soil from one area to another. This education signage should be in place prior to opening the trails for public access and should be maintained annually by the Public Access Manager to ensure that signage is not obstructed and is legible at all times.	Applicant	Initial compliance monitored by the County Planning Department; Annual compliance monitored by the Public Access Manager	Prior to opening parking area and trail system for use
BIO-6	To minimize impacts to sensitive vegetation from use of the trail network, the trail maintenance system should be implemented as described in Chapter 6 of the San Vicente Redwoods Public Access Plan. The trail maintenance system includes an annual monitoring program aimed at identifying maintenance issues (e.g., erosion) and other problems (e.g., nuisance trash areas or other impacts from trail users). The trail maintenance system should include specific methods for routinely documenting and implementing the	Applicant	Compliance monitored by the Public Access Manager	Annual monitoring after parking area and trail system is open for use

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	necessary maintenance by the Public Access Manager.			
BIO-7	All picnic locations shall be located outside of old-growth stands.	Applicant	Compliance monitored by the County Planning Department	At submittal for construction and grading permits
Cultural Resources				
CUL-1	The following text shall be clearly identified on all grading plans and construction drawings: <i>Pursuant to sections 16.40.040 (Site Discovered During Excavation or Development) of the Santa Cruz County Code, if archaeological resources are uncovered during construction, the responsible persons shall immediately cease and desist from all further site excavation and comply with the notification procedures given in County Code Chapter 16.40.040.</i>	Applicant	Compliance monitored by the County Planning Department	At submittal for construction and grading permits
CUL-2	Implement the following CR construction protocols from the San Vicente Redwoods Public Access Plan: Construction Protocol CR-1.1. Prior to the start of construction, all construction personnel shall be educated on the identification and treatment of prehistoric and/or historic artifacts that may be discovered by a qualified, County-approved archaeologist who meets the Secretary of Interior standards or a registered, County-approved forester who has successfully completed the CAL FIRE archeology program. Construction Protocol CR-1.2. If ground disturbing activity takes place and possible artifacts are discovered, then all construction activities within a 50-foot radius of the find shall be halted immediately and a qualified, County-approved archaeologist who meets the Secretary of Interior standards (including CAL FIRE archaeologists) shall be consulted to determine whether the resource requires further study. (Note, it is CAL FIRE policy that registered professional "foresters" do not perform significance evaluations of cultural resources). Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire affected stones. Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps). Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of the CEQA criteria by a qualified archaeologist. If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analyses; prepare a comprehensive report complete with methods, results, and recommendations; and provide for the permanent curation of the recovered resources. The report shall be submitted to the County of Santa Cruz, Northwest Information Center, and State Historic Preservation Office, if required. Construction Protocol CR-1.3. When trail building in the vicinity of sites P-44-000069, P-44-000070, P-44-000071, P-44-000123, and P-44-000596 as identified in the <i>Cultural Resources Study</i> dated October 2017 and on file with the County, a County-approved, qualified archaeologist who meets the Secretary of the Interior standards or a County-approved, registered forester who has successfully completed the CAL FIRE archaeology program shall be present during the initial ground-disturbing phase of construction. Selected portions of trail routes may be in close proximity to sites P-44-000069, P-44-000070, P-44-000071, P-44-000123, and P-44-000596, and monitoring at locations shown on Figure 3 and Figure 4 of the <i>Cultural Resources Study</i> is required. If archaeological specimens are discovered, a qualified archaeologist who meets	Applicant	Compliance monitored by the County Planning Department	During trail construction and site grading operations

No.	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
	the Secretary of the Interior standards should evaluate their significance. Construction Protocol CR-1.4. For sites P-44-000596 and Camp ZZZ, a signage program at all entrances shall be developed by the applicant prior to final inspection at the entrances to the property. Signs shall include a brief description of the history of San Vicente Railroad, including various camps throughout the area, a discussion of the historic value of the sites, and the citation of the regulatory codes that protect artifacts. The signage shall also include the requirement to stay on trails. Construction Protocol CR-1.5. If a trail is planned at site P-44-000596, the trail shall be constructed within the old railroad grade wherever possible because no trace of the railroad line, other than the grade is evident. If the trail is planned to be built outside the railroad grade where past land uses have disturbed the ground surface, construction of the trail is acceptable with the provision that any surface artifacts are avoided and ground disturbance is kept to a minimum. Portions of known railroad grade segments are depicted in Figures 5a and 5b of the <i>Cultural Resources Study</i>. Construction Protocol CR-1.6. If a trail is planned at the Camp ZZZ site to follow the alignment of the existing gravel road, it is acceptable for the trail to follow within the road route because there is no trace of historic-period specimens evident within this alignment.			
CUL-3	The following text shall be clearly identified on all grading plans and construction drawings: <i>Pursuant to sections 16.40.040 (Site Discovered During Excavation or Development) of the Santa Cruz County Code, if at any time during site preparation, excavation, or other ground disturbance associated with this project, human remains are discovered, the responsible person shall immediately cease and desist from all further site excavation and notify the sheriff-coroner and the Planning Director. If the coroner determines that the remains are not of recent origin, a full archeological report shall be prepared and representative of the local Native California Indian group shall be contacted. Disturbance shall not resume until the significance of the archeological resource is determined and appropriate mitigations to preserve the resource on the site are established.</i>	Applicant	Compliance monitored by the County Planning Department	At submittal for construction and grading permits
CUL-4	Implement the following Cultural Resources (CR) construction protocol from the San Vicente Redwoods Public Access Plan: Construction Protocol CR-1.7. The following actions are promulgated in Public Resources Code 5097.98 and Health and Human Safety Code 7050.5, and pertain to the discovery of human remains. If human remains are encountered, excavation or disturbance of the location must be halted in the vicinity of the find, and the county coroner contacted. If the coroner determines the remains are Native American, the coroner shall contact the Native American Heritage Commission. The Native American Heritage Commission will identify the person or persons believed to be "most likely descended" from the deceased Native American. The most likely descendant would then make recommendations regarding the treatment of the remains with appropriate dignity.	Applicant	Compliance monitored by the County Planning Department	During trail construction and site grading operations

Initial Study

(Initial Study and Attachments available online at: www.sccoplanning.com)

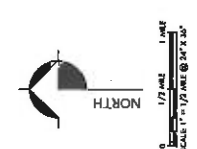
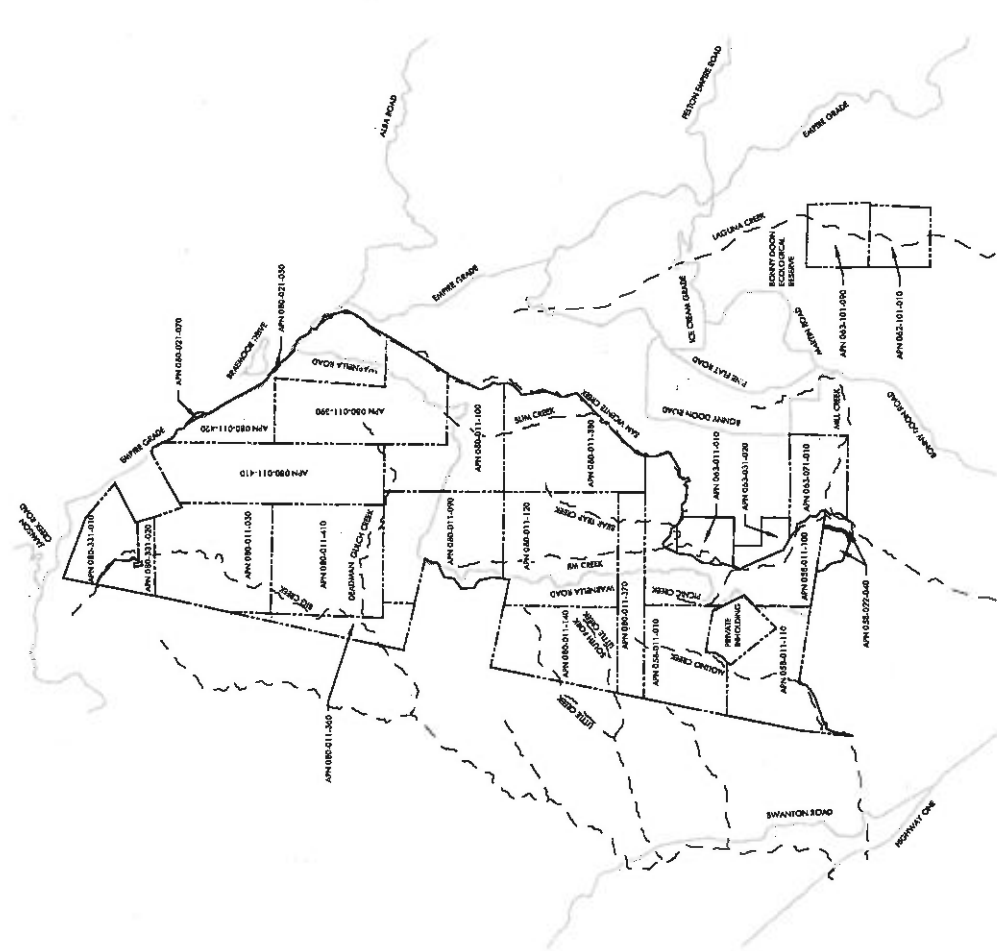
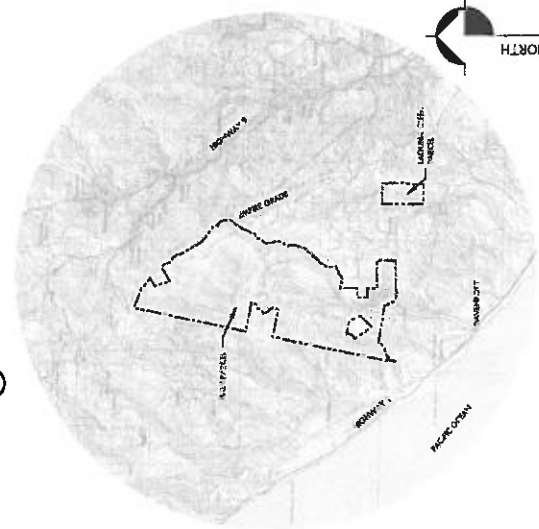
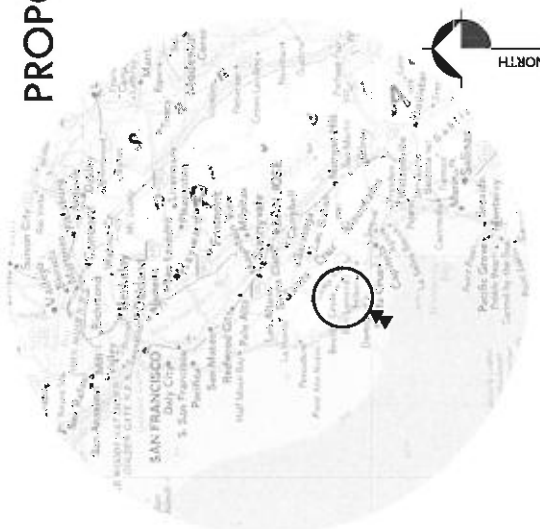
Application Number 181146 Zoning Administrator Hearing 6/21/19

Project Plans

(Included as Attachment 3 to Initial Study - Exhibit D)

**Application Number 181146
Zoning Administrator Hearing
6/21/19**

SAN VICENTE REDWOODS SANTA CRUZ COUNTY, CALIFORNIA PROPOSED TRAIL NETWORK AND STAGING AREA CONDENSED PERMITTING SET



LEGEND
PROPERTY LINE
EXISTING ROAD
PROPOSED ROAD - MAJOR
PROPOSED ROAD - MINOR

COVER SHEET	LAND TRUST OF SANTA CRUZ COUNTY SANTA CRUZ, CALIFORNIA, 95060 ATTY. BRIAN L. LLOYD 617 WATER STREET	SAN VICENTE REDWOODS PROPOSED TRAIL NETWORK AND STAGING AREA SANTA CRUZ COUNTY, CALIFORNIA OWNER: LAND TRUST OF SANTA CRUZ COUNTY	PROJECT TITLE SANTA CRUZ COUNTY, CALIFORNIA OWNER: LAND TRUST OF SANTA CRUZ COUNTY	DATE: 10/17/2018 DRAWN BY: JAC CHECKED BY: JAC DATE: 10/17/2018 LOI NO: 2131471032 SCALE: AS SHOWN SHEET: C0.0	1 OF 17
--------------------	--	--	---	---	----------------

SHEET LIST INDEX		TITLE	SHEET
NUMBER	NAME		
1	COVER SHEET		C00
2	SYMBOLS, ABBREVIATIONS, FORMS AND NOTES		C01
3	COMPLETE PLAN		C10
4	SECTION 1		C11
5	SECTION 2		C12
6	SECTION 3		C13
7	SECTION 4		C14
8	SECTION 5		C15
9	SECTION 6		C16
10	SECTION 7		C17
11	SECTION 8		C18
12	SECTION 9		C19
13	SECTION 10		C20
14	SECTION 11		C21
15	SECTION 12		C22
16	SECTION 13		C23
17	SECTION 14		C24
18	SECTION 15		C25
19	SECTION 16		C26
20	SECTION 17		C27
21	SECTION 18		C28
22	SECTION 19		C29
23	SECTION 20		C30
24	SECTION 21		C31
25	SECTION 22		C32
26	SECTION 23		C33
27	SECTION 24		C34
28	SECTION 25		C35
29	SECTION 26		C36
30	SECTION 27		C37
31	SECTION 28		C38
32	SECTION 29		C39
33	SECTION 30		C40
34	SECTION 31		C41
35	SECTION 32		C42
36	SECTION 33		C43
37	SECTION 34		C44
38	SECTION 35		C45
39	SECTION 36		C46
40	SECTION 37		C47
41	SECTION 38		C48
42	SECTION 39		C49
43	SECTION 40		C50
44	SECTION 41		C51
45	SECTION 42		C52
46	SECTION 43		C53
47	SECTION 44		C54
48	SECTION 45		C55
49	SECTION 46		C56
50	SECTION 47		C57
51	SECTION 48		C58
52	SECTION 49		C59
53	SECTION 50		C60
54	SECTION 51		C61
55	SECTION 52		C62
56	SECTION 53		C63
57	SECTION 54		C64
58	SECTION 55		C65
59	SECTION 56		C66
60	SECTION 57		C67
61	SECTION 58		C68
62	SECTION 59		C69
63	SECTION 60		C70
64	SECTION 61		C71
65	SECTION 62		C72
66	SECTION 63		C73
67	SECTION 64		C74
68	SECTION 65		C75
69	SECTION 66		C76
70	SECTION 67		C77
71	SECTION 68		C78
72	SECTION 69		C79
73	SECTION 70		C80
74	SECTION 71		C81
75	SECTION 72		C82
76	SECTION 73		C83
77	SECTION 74		C84
78	SECTION 75		C85
79	SECTION 76		C86
80	SECTION 77		C87
81	SECTION 78		C88
82	SECTION 79		C89
83	SECTION 80		C90
84	SECTION 81		C91
85	SECTION 82		C92
86	SECTION 83		C93
87	SECTION 84		C94
88	SECTION 85		C95
89	SECTION 86		C96
90	SECTION 87		C97
91	SECTION 88		C98
92	SECTION 89		C99
93	SECTION 90		C100
94	SECTION 91		C101
95	SECTION 92		C102
96	SECTION 93		C103
97	SECTION 94		C104
98	SECTION 95		C105
99	SECTION 96		C106
100	SECTION 97		C107
101	SECTION 98		C108
102	SECTION 99		C109
103	SECTION 100		C110
104	SECTION 101		C111
105	SECTION 102		C112
106			

AC	AGE	CHITRENE
CDW		CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
CAF		COMBUSTION METAL PIPE
CV		CLIMIC VALVE
.....		DIAMETER
HO		HOISTING
EL		ELEVATION
FE		FEEL
FT		FEEL CENTER BROWDERING
FOOT		FOOT
LCF		LOUQUA CREEK TAIL
LF		LEAFY FOOT
NCAR		NATIONAL CENTER FOR AIRBORNE LASER MAPPING

MAX	MAX SALIN
MIN	AD-EN-BA
NP	NAAP POINT
NO	NORTH TIDE IS

NOT TO SCALE
ON CENTER
OUTDOOR RECREATION ACCESS ROUTE

SCC	SANTA CRUZ COUNTY
SP	SQUARE FEET
STA	STATION
TRF	TO BE REMOVED

TYP	TYPICAL
URACOR	US ARMY CORPS OF ENGINEERS

LINE TYPES

PROPERTY LINE

STREAMS - MAJOR

STREAMS - MINOR

EXISTING ROAD

0 100 200 300 400 500 600 700 800 900 1000 1100 1200 1300 1400 1500 1600 1700 1800 1900 2000 2100 2200 2300 2400 2500 2600 2700 2800 2900 3000 3100 3200 3300 3400 3500 3600 3700 3800 3900 4000 4100 4200 4300 4400 4500 4600 4700 4800 4900 5000 5100 5200 5300 5400 5500 5600 5700 5800 5900 6000 6100 6200 6300 6400 6500 6600 6700 6800 6900 7000 7100 7200 7300 7400 7500 7600 7700 7800 7900 8000 8100 8200 8300 8400 8500 8600 8700 8800 8900 9000 9100 9200 9300 9400 9500 9600 9700 9800 9900 10000

SYMBOLS AND MATERIALS LEGEND

 EXITING GATE

WOODRAT NEST
WILDERNESS TRAIL
ANDERSON MANZANITA



PROPOSED TRAIL CORRIDOR

PROPOSED CROSSING

DETAIL CALL OUT

BRONZEN TITANIUM



PROJECT DATA

	(C)(A) ID# DISTRESSANCE
--	-------------------------

TRAILS	17.0
CROSSINGS	0.2
TEMPORARY CONSTRUCTION STAGING AREAS	0.1
CONSTRUCTION ACCESS	9.3

100

[illegible]

TECHNICAL REFERENCES

HYDROLOGY AND METEOROLOGICAL ANALYSIS FOR SAN VICENTE, EDWARDS, PREPARED BY FALL CREEK ENGINEERING, INC., DATED APRIL 31, 2017.

PACIFIC CRUISE ENGINEERING INC., DATED JANUARY 11, 2018.
SAN VICENTE REDWOODS PUBLIC ACCESS PLAN, PREPARED BY PLACEWORKS, DATED MARCH 20, 2018.
BIOLOGICAL RESOURCES ASSESSMENT, SAN VICENTE REDWOODS PUBLIC ACCESS PLAN, PREPARED BY WRA ENVIRONMENTAL CONSULTANTS, DATED APRIL 10, 2018.

REPEATED BY TON CRENSHAW & ASSOCIATES, DATED NOVEMBER 7, 2016.

GRADING VOLUMES - TABLE

12046 CY	12,380 CY	349 CY REL
----------	-----------	------------

GRADING VOLUMES - STAGING AREA		
CUT	FILL	NET
2,791 CY	2,862 CY	74 CY REL

GRADING VOLUMES - TOTAL		
CUT	FILL	NET
14,421 CY	15,284 CY	425 CY FILL

THESE GRADING VOLUMES ARE PRELIMINARY.
NO COMPACTED FACTOR HAS BEEN APPLIED TO THE FILL VOLUMES.
NO EXPANSION FACTOR HAS BEEN APPLIED TO THE CUT VOLUMES.
ALL CONTRACTED SLOPES SHALL NOT EXCEED 2:1 UNLESS STATED OTHERWISE.

ALL GRADING SHALL CONFORM TO SANTA CRUZ COUNTY REQUIREMENTS AND THE CALIFORNIA BUILDING CODE.

GRADING VOLUMES FOR TIER 1 WERE DETERMINED ASSUMING THE FOLLOWING GRADING VOLUMES WERE DETERMINED FOR TIER 2:

UNIT GRADING VOLUMES			
TRAIL TYPE	CUT (CY/ST)	FILL (CY/ST)	
ROAD TO TRAIL CONVERSION	0	0	
INITIAL TRAIL ON GRADE	0.07	0.07	

	0.09	0.03
FULL BENCH		
BUTTERFLY TAIL	0	0.2

1.3. GRAVELS - AREA OF IMPROVEMENT PLUS 1 FOOT LENGTH AND WIDTH BY 2 FOOT DEPTH. GRAVELS DO NOT ACCOUNT FOR ROCK AND OTHER MATERIALS USED IN CONSTRUCTION THAT WILL OFFSET THE VOLUME OF CUT AND FILL.

THE UNIVERSITY OF CHICAGO

[illegible]

BRASS SHALL HAVE A MAXIMUM GROSS SLOPE OF 0.7% FOR SURFACES CONSTRUCTED OF CONCRETE, ASPHALT, OR POWERS
OF CONC. SLOPE OF 3% FOR SURFACES CONSTRUCTED FROM OTHER MATERIALS.
SURFACE LEVEL AREAS SHALL BE PROVIDED AT THE TOP AND BOTTOM OF AN EQUAL SECTION LONG ANY TIME THE ELEVATION
IS ACCORDING TO THE TABLE ABOVE. SETTING INTERVALS SHALL BE A MINIMUM OF 60' LONG AND 8" WIDE. THE
OF A BRACKET AREA SHALL IN 2% IN ANY DIRECTION FOR SURFACES CONSTRUCTED OF CONCRETE, ASPHALT, OR POWERS
SECTION FOR SURFACE CONSTRUCTION OF OTHER MATERIAL.

ALL SHALL BE CONFINED IN THE DIRECTION OF NATURAL DRAINAGE TO THE EXISTING FLOODLINE. INCLUDING A ALLOWANCE AT THE LOCATION OF THE TRAIL, BARRIERS AND APPROVED BY THE CIVIL ENGINEER. GRADE REVERSALS SHALL BE INSTALLED AT THE LOCATION OF NATURAL DRAINAGE. GRADE REVERSALS SHALL BE INSTALLED AT AN INTERVAL OF EVERY 150 FEET. FREQUENCY OF GRADE CHANGE AS THE TRAIL GRADE INCREASES.

REMARK: FINAL TRAIL ALIGNMENTS SHALL MAINTAIN SEPARATION FROM WATERCOURSES. FOR CLASS I AND CLASS II TRAILS SHALL MAINTAIN THE FOLLOWING SEPARATION:

GROUP	GROUP 1	GROUP 2
75-FT SEPARATION	75-FT SEPARATION	50-FT SEPARATION
30 - 50% 75-FT SEPARATION	100-FT SEPARATION	75-FT SEPARATION
>50% 150-FT SEPARATION	150-FT SEPARATION	100-FT SEPARATION

WAITING SIGNAGE WILL BE INCLUDED WITH THE LAYOUT OF THE PROPOSED TRAILS.

THE FOLLOWING AVOIDANCE MEASURES SHALL BE FOLLOWED BY THE FINAL TRAIL ALIGNMENTS:

AS DESCRIBED FOR ANDERSON'S MANGROVE, TRAILS SHALL BE RE-ROUTED WITHIN THE APPROVED TRAIL CORRIDOR ON A BASIS TO AVOID OCCURRENCES OF RARE PLANTS.

AVOID OCCURRENCES OF RARE PLANTS, OTHER THAN ANDERSON'S MANGROVE, BY A MINIMUM OF 10 FEET.

NOT POSSIBLE TO PROVIDE A MINIMUM 10-FOOT BUFFER AROUND OCCURRENCES OF RARE PLANTS, OTHER THAN ANDERSON'S MANGROVE, IMPACTS SHALL BE QUANTIFIED AND MITIGATION SHALL BE IMPLEMENTED ACCORDING TO THE REGULATORY FRAMEWORK FOR THE PROJECT.

[illegible]

NOT RECOMMEND POSSIBLE TO AVOID WOODRUM MTS. TRAILERS SHALL BE DISMANTLED BY A QUALIFIED BROADCAST ENGINEER. THE FOLLOWING INFORMATION IS FOR THE RECORD.

UNIT, TAIL CONSTRUCTION, GRADING, DRAINAGE, AND EROSION CONTROL SHALL FOLLOW THE REQUIREMENTS OF CITY DESIGN CRITERIA, DATED FEBRUARY 2017.

ROUTING ROAD IDENTIFICATION NUMBERS REFER TO THE ROAD IDS IN THE CEMEX ROAD ASSESSMENT COMPILED BY ASSOCIATES IN 2003 - 2009.

THE PROJECT CIVIL ENGINEER HAS THE AUTHORITY TO MAKE REVISIONS TO THE TRAIL DESIGN AS NECESSARY DURING

LAND TRUST OF SANTA CRUZ COUNTY
ATTN: BRYAN LARGAY
617 WATER STREET
SANTA CRUZ, CALIFORNIA, 95060

1521 SANBRIGHT AVE.
SANTA CRUZ, CA 95062
TEL. (408) 426-4044

DRAWN BY: _____
 CHECKED BY: _____
 DATE: _____
 JOB NO: 215147
 SCALE: AS SHOWN
 SHEET: _____
 CO. 1
 2 OF 2

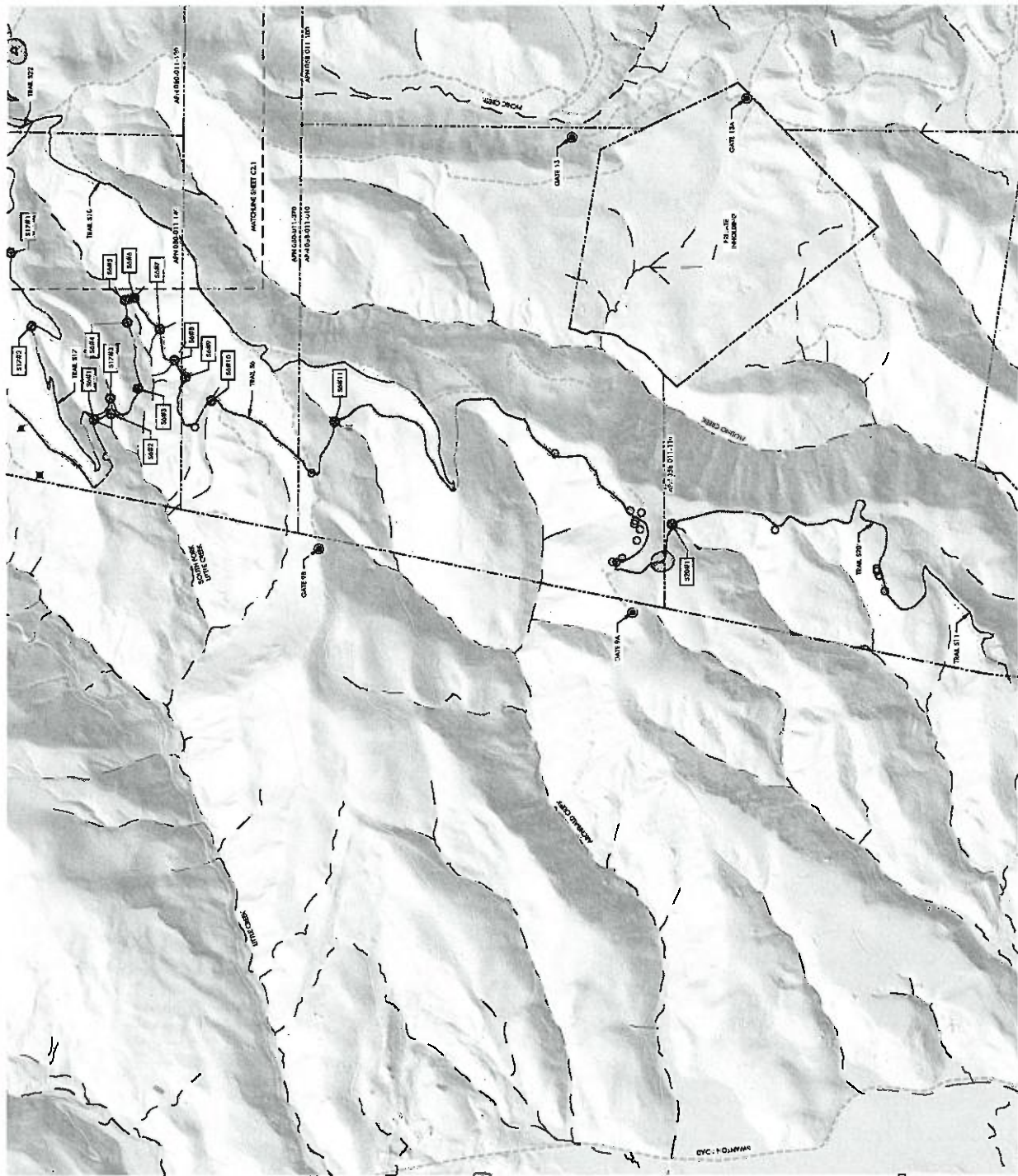


1525 SOMERSET AVE.
SANTA CLAY, CA 95062
TEL. (916) 436-2634

FALL CREEK ENGINEERING, INC.
 **Consulting Engineers**
C/O Fall Creek Engineering, Inc., 11141 Highway 200, Reno, NV 89502

SAN VICENTE REDWOODS
PROPOSED TRAIL NETWORK AND STAGING AREA
CEMEX PROPERTY, EMPIRE GRADE
SANTA CRUZ COUNTY, CALIFORNIA

LAND TRUST OF SANTA CRUZ COUNTY
ATTN: BRYAN LARGAY
617 WATER STREET
SANTA CRUZ, CALIFORNIA 95060



TRAIL NAME	LENGTH (FT)	TRAIL WIDTH	INTENDED USE	PHASES
56	9,269	24'	HRS, MLE, HORSE	PHASE 2
810	7,281	24'	HRS, HORSE	PHASE 2
811	1,829	24'	HRS, MLE, HORSE	PHASE 3
817	9,713	24'	HRS, MLE	PHASE 3
820	9,620	24'	HRS, MLE, HORSE	PHASE 3
832	168	24'	HRS, MLE, HORSE	PHASE 3

NOTES:

1. TRAIL CONSTRUCTION SHALL FOLLOW STANDARD NOTES ON SHEET C.O.I.
2. HILLSHADE BACKGROUND IMAGE EXTRACTED FROM LIBRARY COLLECTIONS ACQUIRED FROM SANTA CLUZ COUNTY.

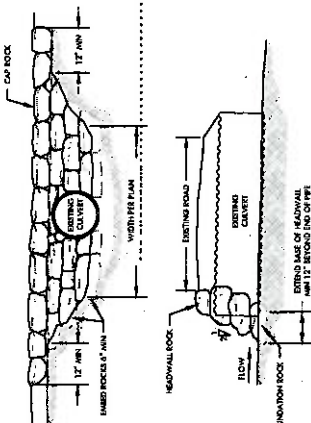
UNFPA

- | | |
|--|---|
| | PROPERTY LINE |
| | STREAM - MAJOR |
| | STREAM - MINOR |
| | SIDING ROAD |
| | GATE |
| | SPRING |
| | WOODEN POST |
| | VULPESS TREE |
| | ANDERSON'S MAN-SANTA |
| | WILDING WITH 100-POST MARKER |
| | PROPOSED TRAIL ALIGNMENT |
| | PROPOSED CROSSING BOX ON TOP OF TREE SHIRTS & C&A |



NORTH
0 500' 1000'
SCALE 1" = 500' @ 24"x36"

C2.6

[illegible]

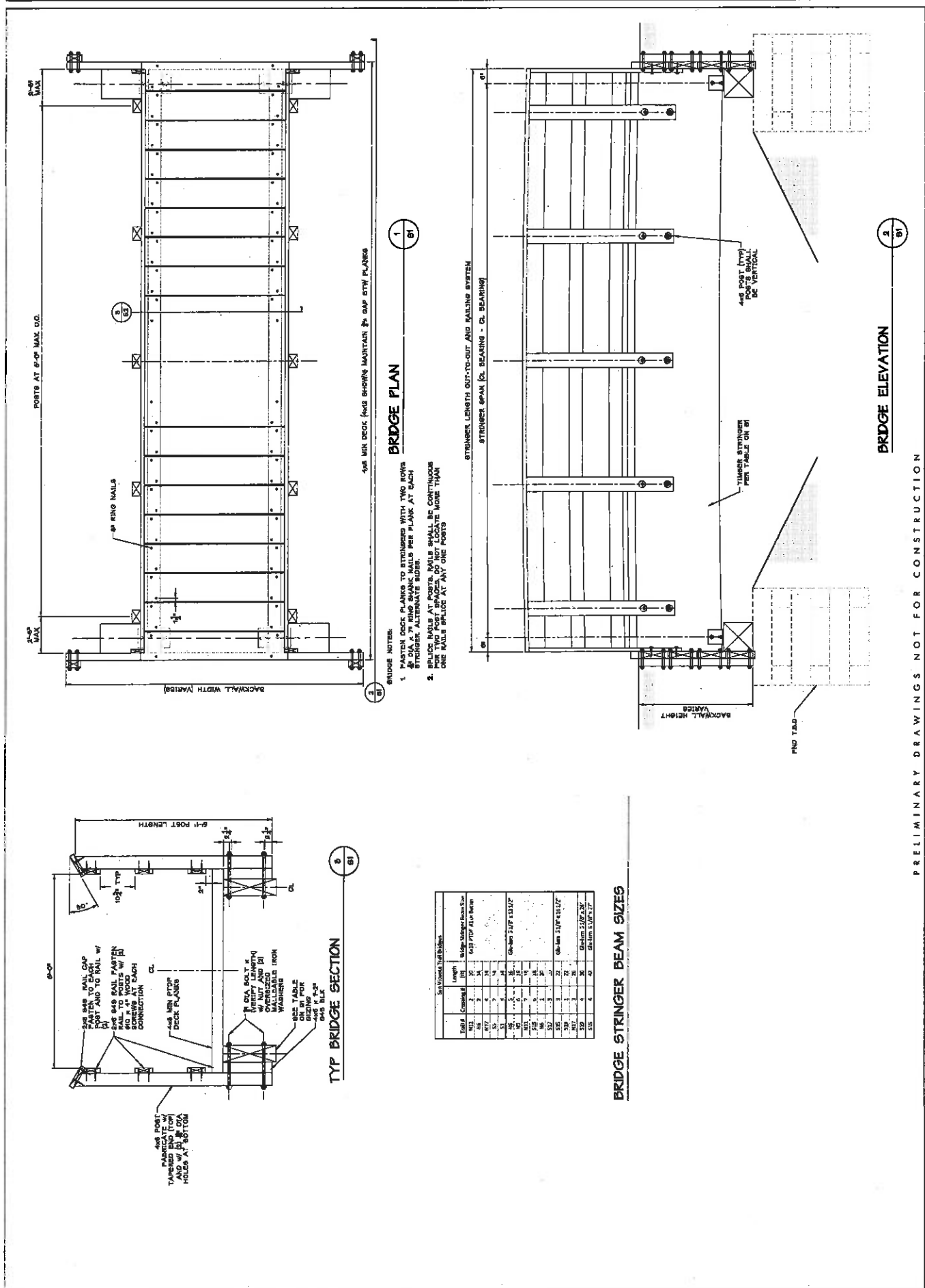
2 TYPICAL CULVERT IMPROVEMENT
SCALE AS DIMENSIONED

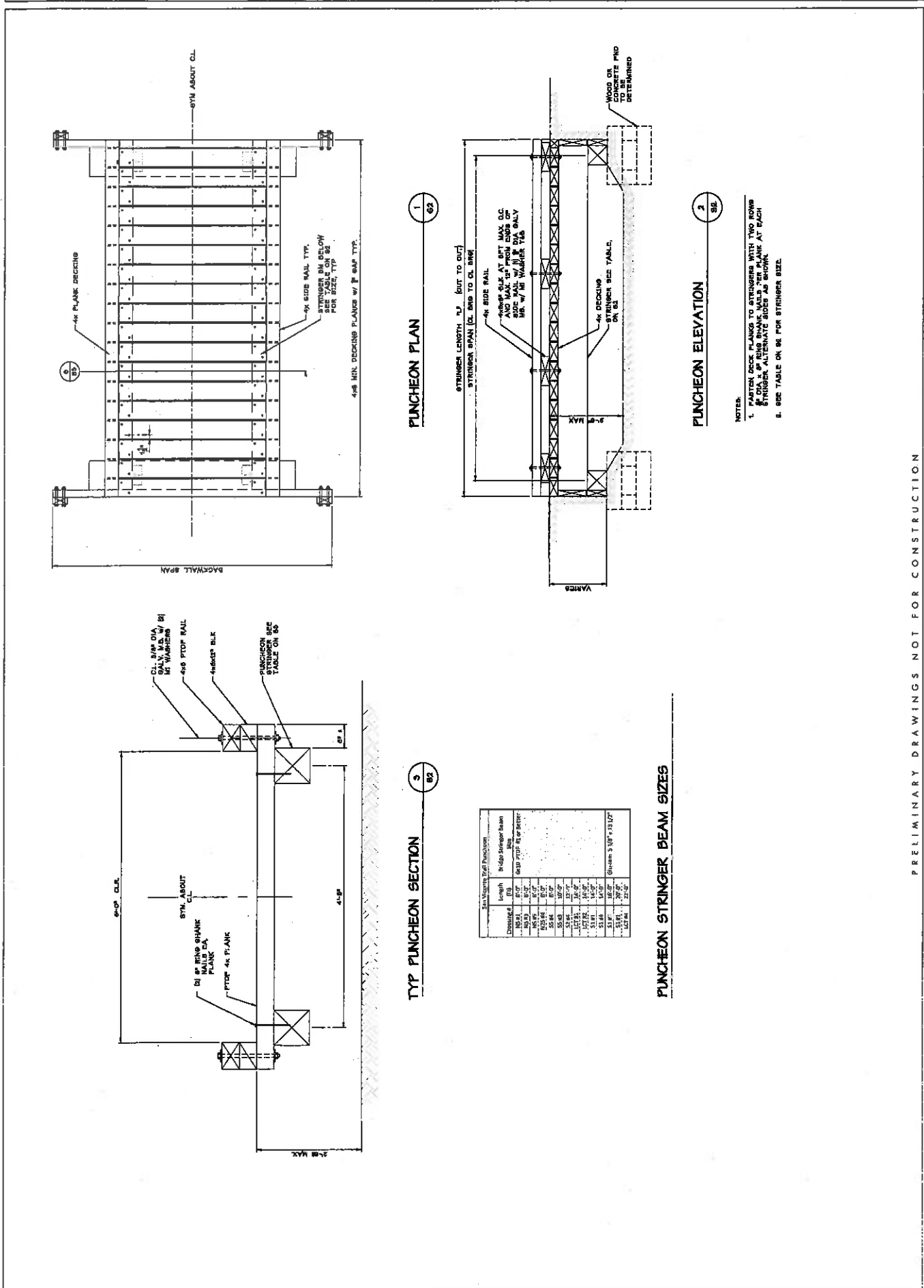
CHASSIS NUMBER	PWID	CLASS	CHASSIS TYPE	CHASSIS LENGTH	CHASSIS WIDTH	CHASSIS HEIGHT	CHASSIS WEIGHT	CHASSIS COLOR	CHASSIS FINISH	CHASSIS MARKING	CHASSIS DESCRIPTION	CHASSIS REMARKS
51 63	988	I	SW	100	100	100	100	100	100	100	100	100
54 81	913	6/M	SW	100	100	100	100	100	100	100	100	100
54 82	92		SW	100	100	100	100	100	100	100	100	100
54 83	93		SW	100	100	100	100	100	100	100	100	100
54 84	94	6/M	SW	100	100	100	100	100	100	100	100	100
54 85	95		SW	100	100	100	100	100	100	100	100	100
54 86	96	6/M	SW	100	100	100	100	100	100	100	100	100
54 87	97	6/M	SW	100	100	100	100	100	100	100	100	100
54 88	98	6/M	SW	100	100	100	100	100	100	100	100	100
54 89	99	6/M	SW	100	100	100	100	100	100	100	100	100
54 90	100	6/M	SW	100	100	100	100	100	100	100	100	100
54 91	101	6/M	SW	100	100	100	100	100	100	100	100	100
54 92	102	6/M	SW	100	100	100	100	100	100	100	100	100
54 93	103	6/M	SW	100	100	100	100	100	100	100	100	100
54 94	104	6/M	SW	100	100	100	100	100	100	100	100	100
54 95	105	6/M	SW	100	100	100	100	100	100	100	100	100
54 96	106	6/M	SW	100	100	100	100	100	100	100	100	100
54 97	107	6/M	SW	100	100	100	100	100	100	100	100	100
54 98	108	6/M	SW	100	100	100	100	100	100	100	100	100
54 99	109	6/M	SW	100	100	100	100	100	100	100	100	100
55 00	110	6/M	SW	100	100	100	100	100	100	100	100	100
55 01	111	6/M	SW	100	100	100	100	100	100	100	100	100
55 02	112	6/M	SW	100	100	100	100	100	100	100	100	100
55 03	113	6/M	SW	100	100	100	100	100	100	100	100	100
55 04	114	6/M	SW	100	100	100	100	100	100	100	100	100
55 05	115	6/M	SW	100	100	100	100	100	100	100	100	100
55 06	116	6/M	SW	100	100	100	100	100	100	100	100	100
55 07	117	6/M	SW	100	100	100	100	100	100	100	100	100
55 08	118	6/M	SW	100	100	100	100	100	100	100	100	100
55 09	119	6/M	SW	100	100	100	100	100	100	100	100	100
55 10	120	6/M	SW	100	100	100	100	100	100	100	100	100
55 11	121	6/M	SW	100	100	100	100	100	100	100	100	100
55 12	122	6/M	SW	100	100	100	100	100	100	100	100	100
55 13	123	6/M	SW	100	100	100	100	100	100	100	100	100
55 14	124	6/M	SW	100	100	100	100	100	100	100	100	100
55 15	125	6/M	SW	100	100	100	100	100	100	100	100	100
55 16	126	6/M										

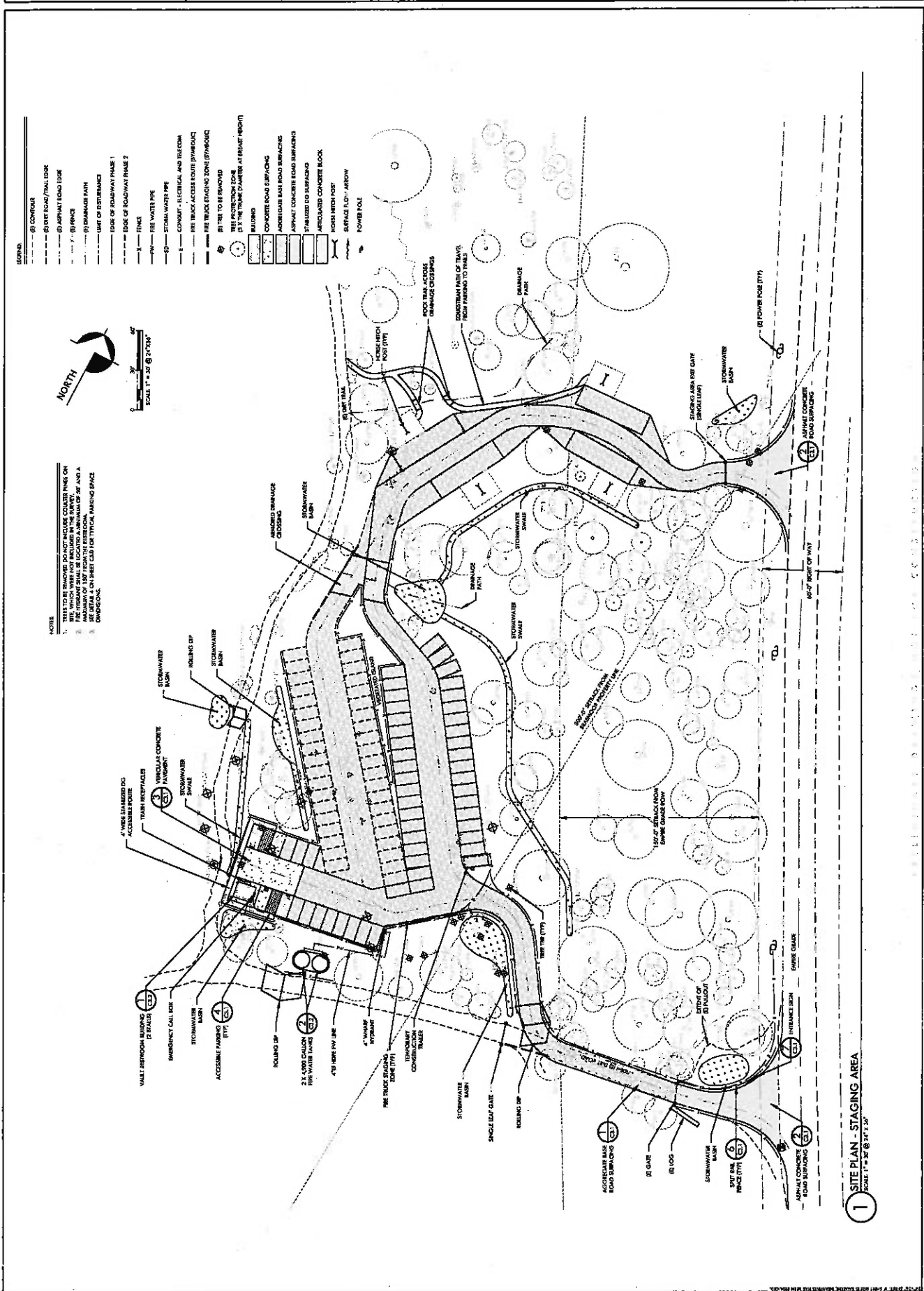
[illegible]

REMOVE CHUTE AND INSTALL ROCK ENERGY DISSIPATER

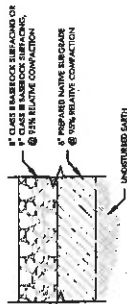
2 TYPICAL CULVERT IMPROVEMENT
SCALE AS DIMENSIONED





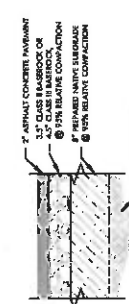


NOTE
1. FOLLOW RECOMMENDATIONS IN COTTONWOOD UNDERGROUND PORT.



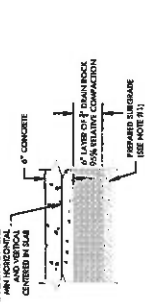
1 TYPICAL AGGREGATE BASE PAVEMENT SECTION
SCALE AS DIMENSIONED

NOTE
1. FOLLOW RECOMMENDATIONS IN COTTONWOOD UNDERGROUND PORT.



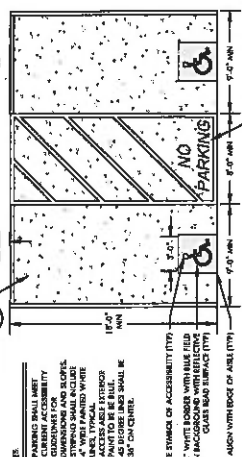
2 TYPICAL ASPHALT CONCRETE PAVEMENT SECTION
SCALE AS DIMENSIONED

NOTE
1. PREPARE SUBGRADE BY REMOVING ALL EXISTING PAVEMENT AND SMOTHERING SUBGRADE WITH 6\"/>

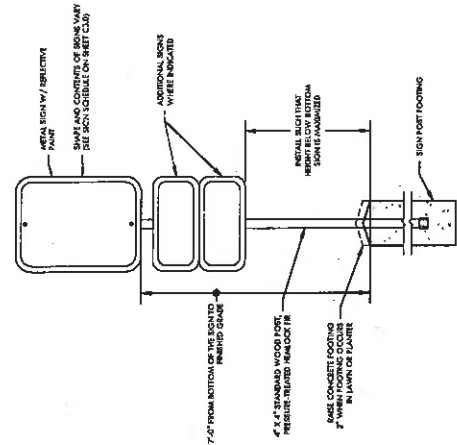


3 TYPICAL VEHICULAR CONCRETE PAVEMENT SECTION
SCALE AS DIMENSIONED

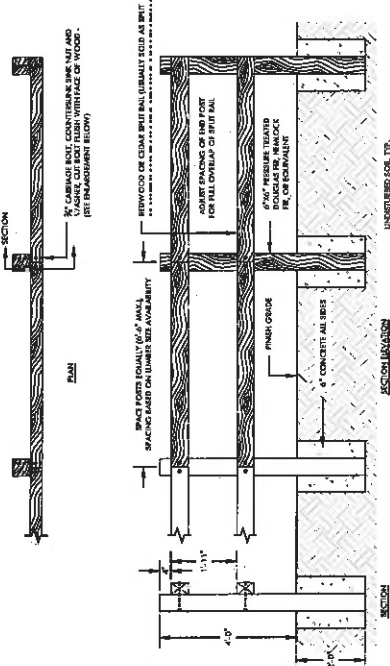
NOTE
1. PARKING SHALL MEET CURRENT ACCESSIBILITY REQUIREMENTS AND SLOPES.
2. STRENGTH SHALL INCLUDE UNIFORM, TYPICAL, AND MINIMUM STRENGTH.
3. ALL SURFACES SHALL BE FINISHED TO BE 1/4\"/>



4 TYPICAL ACCESSIBLE PARKING
SEE CALIFORNIA PARKING CODE 11A.30

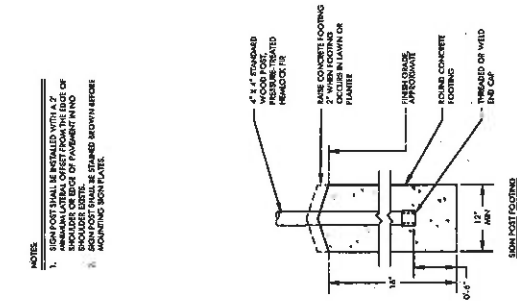


5 TYPICAL SIGN DETAILS
SCALE AS DIMENSIONED

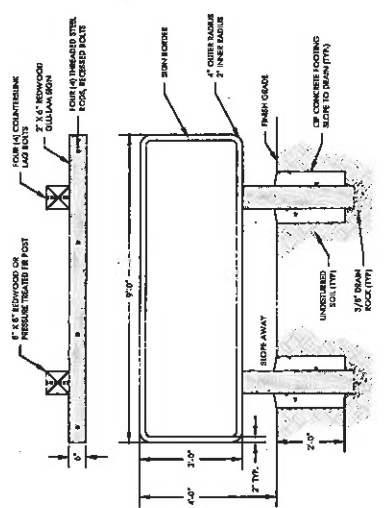


NOTE
1. UNLESS AVAILABLE FROM COTTONWOOD UNDERGROUND PORT, PREPARE SUBGRADE BY REMOVING ALL EXISTING PAVEMENT AND SMOTHERING SUBGRADE WITH 6\"/>

6 TYPICAL SPLIT RAIL FENCE DETAIL
SCALE AS DIMENSIONED



7 TYPICAL ENTRANCE SIGN DETAILS
SCALE AS DIMENSIONED



NOTE
1. SIGN STRUCTURE SHALL BE 18\"/>

8 TYPICAL VEHICULAR CONCRETE PAVEMENT SECTION
SCALE AS DIMENSIONED

STAGING AREA DETAILS
BRITISH

LAND TRUST OF SANTA CRUZ COUNTY
617 WATER STREET
SANTA CRUZ, CALIFORNIA 95060

SAN VICENTE REDWOODS
PROPOSED TRAIL NETWORK AND STAGING AREA
SANTA CRUZ COUNTY, CALIFORNIA

PAUL COTTE ENGINEERING, INC.
COTTE ENGINEERING
2100 CAMPBELL AVENUE
SAN JOSE, CALIFORNIA 95128
TEL: 408/261-0000



DRAWN BY: SLS
CHECKED BY: SLS
DATE: AUGUST 2018
PROJECT NO.: 218120252
SHEET NO.: 18 OF 20

C3.1
14 OF 17

STAGING AREA DETAILS
CONTINUED

LAND TRUST OF SANTA CRUZ COUNTY
SANTA CRUZ, CALIFORNIA, 95060
ATTN: BRIAN LARGAY
617 WATER STREET

SAN VICENTE REDWOODS
PROPOSED TRAIL NETWORK AND STAGING AREA
SANTA CRUZ COUNTY, CALIFORNIA

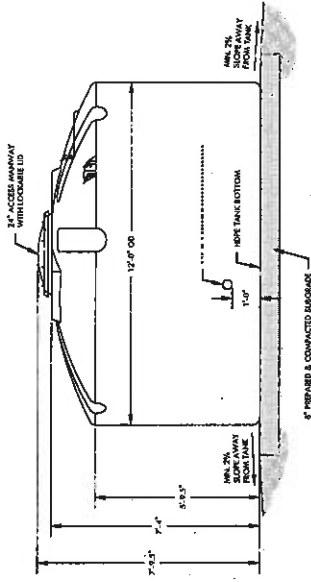
PAUL CARR ENGINEERING, INC.
Civil Engineering
1000 AVENUE 100
SANTA CRUZ, CALIFORNIA 95060
TEL: 831.284.8888



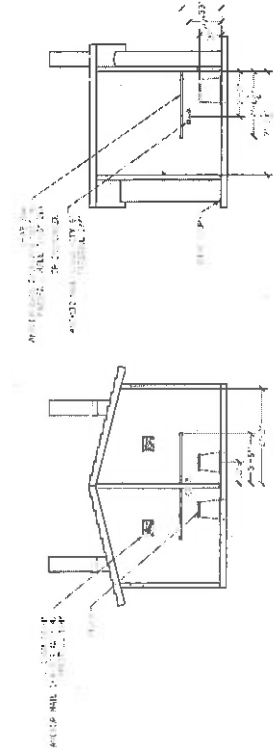
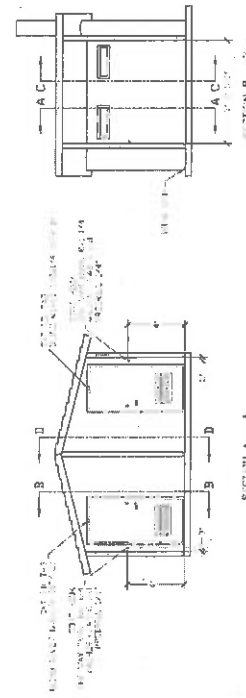
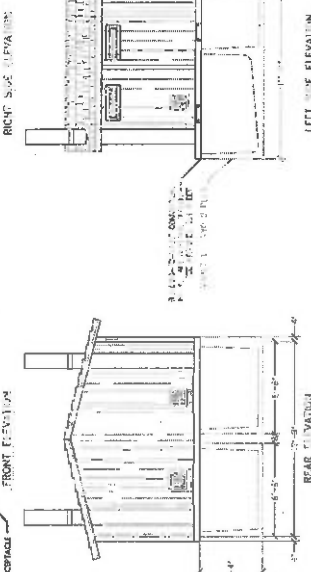
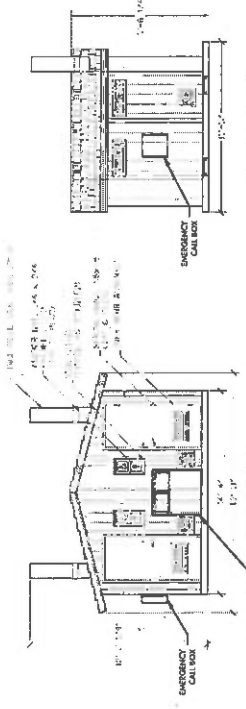
DESIGNED BY: P.C.
CHECKED BY: P.C.
DATE: AUGUST 2013
PROJECT: 213-171433
SHEET: 25 STAGING
SCALE: AS SHOWN

C3.2
15.08.17

- NOTES:
1. TANKS SHALL BE SET BACK FROM A WATER COURSE BY A MINIMUM OF 10 FEET.
 2. TANKS SHALL BE SET BACK FROM A WATER COURSE BY A MINIMUM OF 10 FEET.
 3. TANKS SHALL BE HYDRAULICALLY CONNECTED.



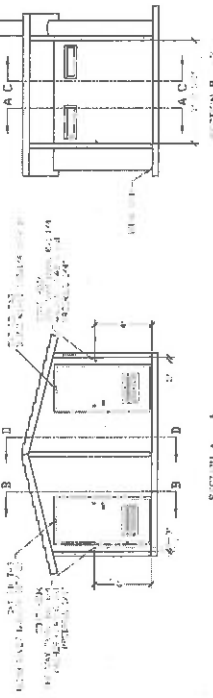
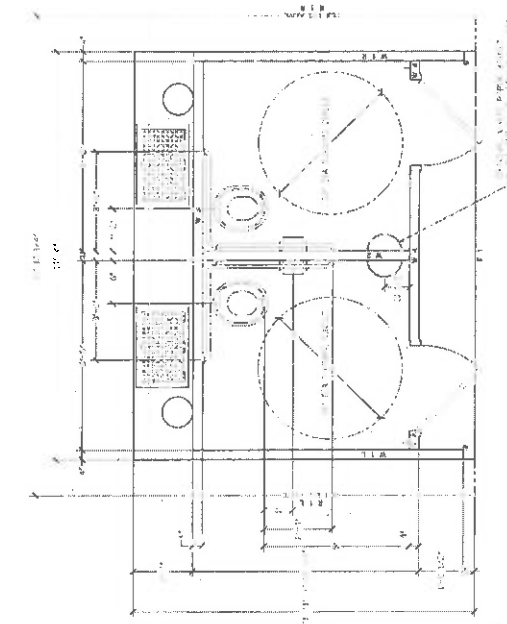
2 4,900 GALLON HDPE WATER TANK
SCALE: AS SHOWN



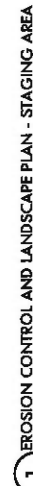
SECTION C - C

1 VAULT RESTROOM
CUT TO SHOW SPICAL DOME VAULT RESTROOM

- NOTES:
1. VAULT RESTROOM SHALL BE INSTALLED PER THE FOLLOWING DETAILS.
 2. VENTS ON VAULT RESTROOM SHALL BE LOCATED IN THE DOWNWIND DIRECTION.



SECTION D - D



5 TYPICAL COMPOST BLANKET
SCALE AS DIMENSIONED

Application #: 181146
APN: 080-011-42 + multiple APNs
Owner: Peninsula Open Space Trust

Parcel Information

Services Information

Urban/Rural Services Line: ☐ Inside ☒ Outside
Water Supply: Private
Sewage Disposal: Septic
Fire District: CalFire (County Fire Department)
Drainage District: None

Parcel Information

Parcel Size: Main tract: 8,159 acres on twenty-four contiguous parcels
Laguna Tract: 373 acres on two contiguous parcels
Existing Land Use - Parcel: Timber production
Existing Land Use - Surrounding: Rural residential, timber production
Project Access: Empire Grade
Planning Area: Bonny Doon
Land Use Designation: R-M (Mountain Residential)
Zone District: TP (Timber Production) & SU (Special Use)
Coastal Zone: ☒ Inside ☐ Outside
Appealable to Calif. Coastal Comm. ☒ Yes ☐ No

Assessor's Parcel Numbers (APNs)

Main tract:	058-011-01	063-031-02	080-011-12	080-011-41
	058-011-10	063-071-01	080-011-14	080-011-42
	058-011-11	080-011-03	080-011-36	080-021-05
	058-022-04	080-011-06	080-011-37	080-021-07
	063-011-01	080-011-09	080-011-38	080-331-01
	063-011-09	080-011-10	080-011-39	080-331-02
Laguna Tract:	062-101-01	063-101-09		

Technical Reviews: Archaeological Report Review, Biotic Report Review, Soils Report Review, Preliminary Grading Review

Environmental Information

An Initial Study has been prepared (Exhibit D) that addresses the environmental review associated with this application.

**Environmental Coordinator response
to CEQA review comments**

**Application Number 181146
Zoning Administrator Hearing
6/21/19**



COUNTY OF SANTA CRUZ

PLANNING DEPARTMENT

701 OCEAN STREET - 4TH FLOOR, SANTA CRUZ, CA 95060
(831) 454-2580 FAX: (831) 454-2131

April 5, 2019

**Subject: Application # 181146 - San Vicente Redwoods
Response to IS/MND Comments**

This letter has been prepared as a summary of comments received on the Initial Study and draft Mitigated Negative Declaration for a proposed trail system on the San Vicente Redwoods property that were received during the public comment period (February 12 through March 29, 2019).

In receiving comments regarding an Initial Study and draft Mitigated Negative Declaration, the California Environmental Quality Act (CEQA) requires that all comments be forwarded on to the decision-making body for consideration, and no formal response to those comments is required from the lead agency. When comments are provided from review agencies or other concerned parties, the Environmental Coordinator evaluates those comments and makes a determination as to whether any of the issues raised rise to the level of requiring modification to the initial study or mitigation monitoring and reporting plan. Often there are changes to clarify the analysis or correct inconsistencies which do not require recirculation of the document. In some cases, issues are raised that result in the project being withdrawn until further analysis can be done. In this case there were some modifications to the document to clarify some of the issues raised but no changes that would require recirculation.

Comments were received from 26 different respondents. Many of the comments received were expressions of support or opposition to the project, with suggestions about trail use in some cases. Comments of support or opposition are relevant to the review and consideration of the project, but comments that do not raise specific or substantive issues related to the environmental review for this project are not addressed in this letter.

This letter is a response to the comments that raised specific or substantive issues related to the environment review documents that were circulated for review and comment per the requirements of CEQA.

Grey Hayes

Grey Hayes has provided a series of questions regarding the process and analysis of environmental review that appear to be intended to improve the quality and content of the environmental document. Since the questions do not clearly identify deficiencies or directly challenge the results of the Initial Study, individual responses to each of these questions will not be provided by staff. However, all the questions/comments have been taken into consideration in the review of the Initial Study and draft Mitigated Negative Declaration.

One comment asked how heavily the "adaptive management strategies" (outlined in the draft Public Access Plan) were relied upon in order to arrive at determinations of significance of impacts. The project (a trail system and parking area) was reviewed for significance of impacts and the determination of impacts was not reliant on the adaptive management proposed by the applicant. The impacts of a recreational trail system on a limited portion of the property, which had previously been used solely for timber production was considered to be less than significant in most cases. Where additional technical information was provided that could further protect sensitive resources, mitigations were added to further ensure that impacts would be less than significant. None of the mitigations are reliant on an adaptive management approach past the construction and implementation phase, other than BIO-5 and BIO-6, which require annual compliance regarding educational signage and trail maintenance on the property. Adaptive Management allows for flexibility and adjustment depending on the specific circumstances encountered, which should improve long-run management outcomes.

Another comment asked how cumulatively considerable impacts were addressed in the Initial Study, and if other known projects in the vicinity were taken into consideration. The analysis performed by project consultants and staff did take into consideration other known projects in the vicinity (including a trail connection to the Cotoni Coast Dairies property, the rail trail, and increased visitation in the Davenport area and coastal areas overall). The projected visitor counts and traffic analysis provided by the consultant include an increased level of visitation based on the future buildout of recreational facilities in the area. However, each of those separate projects may have their own localized impacts and the majority of trail use on the main tract of the San Vicente Redwoods property will be limited to visitors who access the property through the trailhead off of Empire Grade, so that is where an evaluation of potential impacts was focused. The Initial Study has been revised to explain how cumulatively considerable impacts have been assessed.

Sierra Club

The Sierra Club has expressed their opinion that the impacts of the project are not less than significant and that an Environmental Impact Report (EIR) should be prepared instead. This is based on their concerns regarding impacts to wildlife on the property and a request for project alternatives that would result in less impact to the sensitive ecosystem.

The applicant has designed the trail system to avoid woodrat nests to the maximum extent feasible. Where avoidance is not possible, the dismantling of woodrat nests is standard accepted practice per the California Department of Fish and Wildlife (CDFW). It is anticipated that there will be impacts to woodrat nests, however, given that staff identified 1,815 nests within 25 feet of the trail alignment, and estimate approximately 74,000 nests on the San Vicente property, impacts to at most 144 nests would not be considered significant.

Dog use on trails would be limited on-leash activity only on the upper portions of the property, which is the area closest to existing residential development and Empire Grade. While some dog owners will continue to violate leash laws, CEQA does not require mitigation for illegal behaviors.

Although mountain lions are charismatic macrofauna, they are not a specifically protected species under CEQA. The trail system was designed to avoid known mountain lion denning and breeding areas, as determined by biological assessment of the property in order to minimize interactions.

It is important to note that the baseline environment in which the recreational trail system is proposed is a property that has been used periodically for logging for over 100 years, with no protections for wildlife habitat, other than the limited standards imposed by the State of California for timber harvests. Although some logging would continue to occur on the property, the conservation partners have performed extensive studies to determine which portions of the property should be off limits to logging entirely in order to protect sensitive resources. Additionally, the property includes various inholdings and roadways that are used by residents of the area and limited timber harvesting would continue to occur. Vehicles used for timber harvest and property access would continue to pass through the property whether or not the proposed recreational trail system is constructed.

Monterey Bay Air Resources District

The Monterey Bay Air Resources District (MBARD) has stated appreciation for the inclusion of Construction Protocol AQ 1.1. Although this protocol was referenced as a mitigation measure by MBARD, it is not a required mitigation since it is a construction protocol that is included as part of the project proposal. Additionally, the air district has recommended using cleaner than required construction equipment if feasible, and this recommendation has been passed on to the applicant.

Additional permits will be required by the air district, and this requirement has been noted in the revised Initial Study.

Bonny Doon Fire

Bonny Doon Fire has requested that an emergency egress from Warren Drive be re-opened into the San Vicente Redwoods property. As this route is not part of the public access plan, it is not part of the project. This request has been noted and provided to the applicant, who can choose to open or close the access route at their discretion.

Valerie Haley

Valerie Haley has expressed concerns related to the Laguna tract portion of the proposed project that is adjacent to the Bonny Doon Ecological Reserve and the Santa Cruz Sandhills. Specific comments request that the Laguna tract improvements not be included in phase 1 and that maps and internet graphics not include trails on the Laguna tract due to sensitivity of the area and the presence of rare and endangered species. Additionally, the comments mention that a memorandum of understanding (MOU) between the conservation partners and CDFW may be required in order to implement trail improvements on the Laguna Tract.

The trails on the Laguna tract are existing, and the project proposes to repair and improve the trail system to prevent erosion and impacts to the natural environment. The applicant has been provided the comments and can decide to perform trail improvements in a separate phase of construction. If an MOU is required prior to making trail improvements, the applicant will be required to enter into one with the CDFW. Advertising of the trail system is not a requirement of the proposed project, and the applicant can decide to exclude the Laguna tract from trail maps for public access.

Brenda Barcelo

Brenda Barcelo has provided comments related to tree removals for parking improvements. The proposed parking lot and trail system is sited and designed to avoid and preserve as many trees as possible and will not result in the removal of all the trees around the parking area. The property is densely wooded and in a landscape of approximately 8,500 acres with an active logging operation (which will continue on the property), the removal of trees for parking improvements would be less than significant. Replacement plantings of trees on the property may occur in conjunction with ongoing logging and revegetation operations where adequate spacing and proper forest management practices allow.

Land Trust of Santa Cruz County

The Land Trust of Santa Cruz County is the project applicant. The Land Trust has submitted comments requesting clarification of mitigation BIO-2 for timing of tree removals related to special status bat and bird species. County staff have reviewed the request and recommends revising the language of the Construction Protocols 3.1 and 3.2 within the BIO-2 mitigation as follows:

Construction Protocol BR-3.1. Tree removal and trimming, regardless of size, ~~shall~~ **may** take place outside of both the maternity and hibernation period for special-status bats (between September **1st** and October **31st**) and avoid the breeding bird window per Protocols BR 3.4 and BR 3.5. Tree removal can take place during this period (**between September 1st and October 31st**) without a breeding bird or bat roost survey.

Construction Protocol BR-3.2. If removal of large trees (e.g., the DBH is greater than 12 inches) occurs during the bat roosting season (November **1st** through August **31st**), these trees shall be inspected by a qualified, County-approved biologist for the presence of bat roosts. If a maternity roost is detected, up to a 200-foot buffer shall be placed around the maternity site until the bats are no longer utilizing the site. Non-maternity roost sites can be removed under the direction of a qualified, County-approved biologist. Any large tree that will be removed shall be left on the ground for 24 hours before being taken offsite or being chipped. This period will allow any day-roosting bats the opportunity to leave before the tree is either removed from the area or is chipped.

Mark Lipson

After expressing support for the public access proposal, comments include a concern regarding cumulative impacts and identify Cotoni-Coast Dairies, the rail trail, and the Cemex property as projects that could have cumulative impacts in the project vicinity.

As noted above in the response to the comments received from Grey Hayes, the analysis performed by project consultants and staff did take into consideration other known projects in the vicinity (including a trail connection to the Cotoni-Coast Dairies property, the rail trail, and increased visitation in the Davenport area and coastal areas overall). Any proposal for the Cemex site would be considered as speculative at this time so it has not been specifically included in any visitation or traffic estimates. The projected visitor estimates and traffic analysis provided by the consultant include an increased level of visitation based on the future buildout of recreational facilities in the area. However, each of those separate projects may have their own localized impacts and the majority of trail use on the main tract of the San Vicente Redwoods property will be limited to visitors who access the property through the trailhead off of Empire Grade, so that is where an evaluation of potential impacts was focused. As noted above, the Initial Study has been revised to

explain how cumulatively considerable impacts have been assessed.

Jacob Pollock

Jacob Pollock has submitted comments related to coulter pines, mountain lions, adaptive management, biological monitoring, and impacts from trail use on erosion and wildlife.

The proposed parking lot site was selected by the applicant due to the location in a portion of the property where coulter pines were planted previously. It is unclear if these trees were planted for revegetation or forest plantation purposes, but they are not a commonly occurring natural tree species on the property or in the project vicinity (although they are native to California, which was misstated in the public access plan as non-native trees).

As noted above in response to comments from the Sierra Club regarding impacts to mountain lions, the trail system was designed to avoid known mountain lion denning and breeding areas, as determined by biological assessment of the property, in addition to closing the trails at night.

As noted above in response to comments from the Sierra Club regarding a determination of potential impacts from public access, the baseline environment in which the recreational trail system is proposed is a property that was used specifically for logging, with no protections for wildlife habitat other than the limited standards imposed by the State of California for timber harvests. Although some logging would continue to occur on the property, the conservation partners have performed extensive studies to determine which portions of the property should be off limits to logging entirely in order to protect sensitive resources. Additionally, the property includes various inholdings and roadways that are used by residents of the area and limited timber harvesting would continue to occur. Vehicles used for timber harvest and property access would continue to pass through the property whether or not the proposed recreational trail system is constructed.

As noted above in response to comments from Grey Hayes regarding adaptive management strategies, the project (a trail system and parking area) was reviewed for significance of impacts and the determination of impacts was not reliant on the adaptive management proposed by the applicant. The impacts of a recreational trail system on a limited portion of the property, which had previously been solely for timber production was considered to be less than significant in most cases. Where additional technical information was provided that could further protect sensitive resources, mitigations were added to further ensure that impacts would be less than significant. None of the mitigations are reliant on an adaptive management approach past the construction and implementation phase, other than BIO-5 and BIO-6, which requires annual compliance regarding educational signage and trail maintenance on the property.

Multiple studies have been completed regarding the effect of trail use (by various user types, including hikers, dog walkers, bikes, trail runners, horseback riders), which indicate that the presence of people (and animals) within habitat areas can disturb wildlife. A recent report presented by the Mountain Bikers of Santa Cruz includes references to several such reports regarding impacts associated with trail use in natural areas. Regardless of studies on the potential impacts of trails and trail users on wildlife, the review and assessment of impacts for this project was not reliant on the property being considered as a pristine natural wildlife habitat where a trail system is proposed. The primary assessment of impacts for this project was considered from the baseline condition of the property as an active timber production property with existing roads and private property inholdings.

Changing the existing timber production use (where periodically tractors, heavy equipment, chainsaws, and vehicles are present) to include a recreational use (with hikers, bikers, and horses) on a limited portion of the property was considered to be less than significant.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Johnston", with a stylized, cursive script.

Matt Johnston
Environmental Coordinator

Comments & Correspondence

**Application Number 181146
Zoning Administrator Hearing
6/21/19**

Randall Adams

From: jfbergs <jfbergs@sbcglobal.net>
Sent: Wednesday, February 27, 2019 1:12 PM
To: Randall Adams
Subject: San Vicente Redwoods CEQA

The San Vicente Redwoods multiuse trail system will be a wonderful addition to our Santa Cruz outdoor experience. The more people are exposed to the beautiful Santa Cruz environment, the more they will work to protect it. I encourage you to work with the Santa Cruz Landtrust to shepherd this project along.

Joel Steinberg, MD
Santa Cruz, California

Sent via the Samsung Galaxy S8+, an AT&T 5G Evolution smartphone

Randall Adams

From: Donna Karolchik <donnak@soe.ucsc.edu>
Sent: Monday, March 4, 2019 8:22 PM
To: Calah Pasley
Cc: Randall Adams
Subject: Re: TRAILS UPDATE: San Vicente Redwoods

I cringed when I opened up your webpage re: Trails Impact on Nature: "Less than Significant". It shows a picture of a big pack of mountain bikers assaulting yet another backcountry trail. I'm dismayed that the Land Trust is catering to the local mountain bike lobby when planning trails at San Vicente Redwoods, but is restricting dogwalking access to such a small percentage of the trail network. Unfortunately, the mountain bikers in Santa Cruz are supported by a very lucrative industry that is willing to sink big dollars into making sure that every trail in Santa Cruz County is accessible, whereas us dogwalkers don't have that kind of big bucks lobby backing us...we just want to have nice places to walk our dogs. I have heard the excuse that the Land Trust is worried about the impact on the mountain lions, but in my experience, the impact of mountain bikes on the environment far exceeds that of dogwalkers.

I wish I could be more excited about your plans for San Vicente Redwoods. Instead, they continue to sadden me.

-Donna

On 3/1/19 10:23 AM, Calah Pasley wrote:

Dear Donna,

The County of Santa Cruz has released its initial CEQA (California Environmental Quality Act) study of our plans to build 38 miles of trails through San Vicente Redwoods.

The report finds that the trails will have "less than significant" impact on nature — and that is exactly what we and our partners hoped to achieve in designing these trails.

You can read the report [here](#), along with our Access Plan, FAQ, and other materials. Learn more in [this Story of the Week post](#).

Also this week, the Land Trust was granted re-accreditation through the Land Trust Accreditation Commission. It is basically the good conservation seal of

approval. [You can read more in the press release here.](#)

All the best,



Calah Pasley
Development and Communications Director
Land Trust of Santa Cruz County



Copyright © 2019, Land Trust of Santa Cruz County. All rights reserved.

Our mailing address is:

617 Water Sreet, Santa Cruz, California 95060

[unsubscribe from this list](#) [update subscription preferences](#)

info@landtrustsantacruz.org

This email was sent to dkarolchik@gmail.com

[why did I get this?](#) [unsubscribe from this list](#) [update subscription preferences](#)

Land Trust of Santa Cruz County · 617 Water St · Santa Cruz, CA 95060-4148 · USA

Randall Adams

From: James Feichtl <kkidguy@gmail.com>
Sent: Friday, March 8, 2019 4:01 PM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

I fully support public access, but believe some of the trail system should be designated for hiking only (no horses, bikes, or dogs).

Thank you

Jim Feichtl

2036 Lyon Ave, Belmont, CA 94002

Randall Adams

From: Bob Schildgen <bob.schildgen@gmail.com>
Sent: Friday, March 8, 2019 4:13 PM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

Please preserve the San Vicente Redwoods!

Randall Adams

From: Jayne Cerny <jaynecerny@gmail.com>
Sent: Friday, March 8, 2019 5:11 PM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

Please preserve the beauty of the San Vicente Redwoods and create this preserve for the public to appreciate them.

Jayne Cerny

Randall Adams

From: Marcel Moran <moranm@berkeley.edu>
Sent: Friday, March 8, 2019 5:33 PM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

To Whom it May Concern,

My name is Marcel Moran, I am a Bay Area resident, and avid hiker in the Santa Cruz Mountains. I am writing to endorse the plan submitted by the Land Trust of Santa Cruz County for 38 miles of trails in the San Vicente Redwoods. This new park will be a wonderful addition to the redwood forests of the county, and I cannot wait to visit them as a hiker!

Sincerely,

--
Marcel Moran
PhD Student
Department of City & Regional Planning
University of California, Berkeley

moranm@berkeley.edu

Randall Adams

From: kristinwomack <kristinwomack@yahoo.com>
Sent: Friday, March 8, 2019 8:28 PM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

I strongly support the plan for 38 miles of trails put forward by the Trust for Public Land of Santa Cruz County in the San Vicente Redwoods Preserve!

Sincerely, Kristin Womack

Sent from my Samsung Galaxy smartphone.

Randall Adams

From: Randall Kirschman <rkkemail@gmail.com>
Sent: Friday, March 8, 2019 8:57 PM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

I am in favor of whatever promotes natural environments in this age of endless traffic and smartphone obsession.

(another) Randall

Randall Adams

From: Anil Gangolli <1800getanil@gmail.com>
Sent: Saturday, March 9, 2019 7:39 AM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

Dear Mr. Adams:

I am writing to register my support for the plan, submitted by the Land Trust of Santa Cruz County, for approximately 38 miles of trails through San Vicente Redwoods. These trails will provide access for residents of Santa Cruz and neighboring counties to this beautiful preserve while taking the proper caution and care to mitigate impacts to it. Providing access is important because it allows the population to develop an appreciation for the land and to understand the value of public and donor investment to preserve it.

Anil Gangolli
Palo Alto, California
Life Member of The Sierra Club,
Member/donor of Sempervirens Fund and POST

Randall Adams

From: Richard Rammer <richramm@gmail.com>
Sent: Saturday, March 9, 2019 9:54 AM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

I reviewed the trails plan submitted for the San Vicente Redwoods. I like the overall layout and the fact that the trails should reduce incursions into other areas. I hope it gets approval as I plan to help build the trails whenever time permits me to volunteer. I strongly favor preservation of our remaining Redwood habitat along our beautiful Northern California coast.

Richard Rammer

Randall Adams

From: Virginia Leslie <mvleslie@att.net>
Sent: Saturday, March 9, 2019 1:01 PM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

One of Santa Cruz County's biggest assets is its access to nature. Many people visit for a chance to spend time in the redwoods or at the coast. Letting the Land Trust of Santa Cruz County save a stretch of the San Vicente Redwoods and make it accessible to the public would add to the natural riches of the county.

Sincerely,
M. Virginia Leslie

Randall Adams

From: Ben Martin <benmartin12@stanfordalumni.org>
Sent: Saturday, March 9, 2019 3:47 PM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

Dear Mr. Adams,

I support the proposal prepared by the Land trust of Santa Cruz County, in conjunction with the Sempervirens Fund, to construct 38 miles of trails through the San Vicente redwoods.

Sincerely,

Dr. Ben R. Martin
Mountain View

Randall Adams

From: john engell <johnf.engell@gmail.com>
Sent: Sunday, March 10, 2019 1:23 PM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

Dear Mr. Adams,

As a long-time member of Sepervirens Fund, I strongly support the trail plan for the San Vicente Redwoods preserve.

Sincerely, John Engell

Randall Adams

From: Henry Millstein <elijahudelacruz@icloud.com>
Sent: Friday, March 8, 2019 5:08 PM
To: Randall Adams
Subject: San Vicente Redwoods Public Comments

Dear Mr. Adams,

As a person who frequently hikes in Santa Cruz County, I wish to express my support for the plan for trails in San Vicente Redwoods by the Land Trust of Santa Clara County. I believe that public access to this area is essential to maintaining support for it as public open space. I hope that you will support this project going forward.

Yours,
Henry Millstein
1604 Collingwood Ave.
San Jose, CA 95125

Randall Adams

From: Grey Hayes <coastalprairie@aol.com>
Sent: Tuesday, March 12, 2019 10:03 PM
To: Randall Adams
Subject: San Vicente Redwoods Plan and Initial Study Comments
Attachments: GHayes_Comments_SVRPlan_InStudy.docx

Hello Randall,

Attached, please find my comments regarding the San Vicente Redwoods Public Access Plan and accompanying Initial Study/Mitigated Negative Dec.

I submit these comments as a private citizen, an ecologist, and as one who has extensive familiarity with the biological and social communities in the region surrounding the proposed project.

I am also a neighbor and a sometimes collaborator with the project proponents. In these regards, I have the highest esteem for the integrity and neighborliness of the individuals involved. I hope that the comments are received with this in mind - that I have long worked to improve the science, planning, analysis, and public participation in natural areas management, a subject that I teach at the University and have researched as a professional scientist.

I hope that the County and the Project Proponents make some efforts to improve what has been proposed in response to my comments.

Please email me back a receipt so that I know you have received this before deadline.

Many thanks,

Grey

Grey Hayes, PhD

Ecologist
coastalprairie@aol.com
greyhayes.net
@drgreyhayes

Coastal Act Questions

- What portion of the proposed project is in the State-designated Coastal Zone?
- What portion of proposed recreational trail use would take place in Environmentally Sensitive Habitat Areas (ESHA), which are protected by Coastal Commission policy?
 - How has the project proponent consulted with the Coastal Commission about ESHA concerns?
- What aspects of recreational trail use are permissible in ESHA?
 - To what degree must trails be redesigned to transform them from recreational to interpretive trails to meet the requirements of trail development through ESHA?

Mitigation Measures and Public Reporting Questions

The approval process relies on a CEQA process of Mitigated Negative Declaration, requiring mitigation measures to be enacted and ongoing monitoring and maintenance to reduce certain impacts to below certain thresholds.

- What are the specific baseline *versus* thresholds of significance for the all of the potential impacts that require mitigation to bring the proposed project impacts to a level of “less than significant?”
- To what degree does the Initial Study rely on the “Construction Protocols” (Plan, p. 7-25) included in the Access Plan in order to determine that a CEQA Mitigated Negative Declaration is sufficient for environmental review and approval? Which Protocols are omitted from the Plan in the Initial Study, and why?
- To what degree does the Initial Study rely on the “Trail Maintenance Guidelines” (Plan, p. 7-38) included in the Access Plan in order to determine that a CEQA Mitigated Negative Declaration is sufficient for environmental review and approval? Which Guidelines are omitted from the Plan in the Initial Study, and why?
- To what degree does the Initial Study rely on the “*adaptive management strategies*” (Initial Study, p. 58) included in the Access Plan in order to determine that a CEQA Mitigated Negative Declaration is sufficient for environmental review and approval? Which specific strategies from the Plan are omitted as specific mitigations in the Initial Study, and why?
- How will the public be informed about the implementation and monitoring of all of the mitigation measures that made it possible to rely on a Mitigated Negative Declaration process/approval, including success of the adaptive management strategies, construction protocols and trail maintenance guidelines?
 - Will the Lead Agency require regular reporting?
 - If so, in the absence of quantitative thresholds to monitor, how will the project proponent know what must be included in those reports?
 - Why has the public not been informed about these reporting requirements during this public review process?

Enforcement Questions

The Plan and Initial Study seem to rely on policies and regulations with some education and signage to reduce the impacts of the extensive new recreational uses of this property. And yet, there is no clear dedication to enforcement mentioned.

- What evidence does the Lead Agency cite to support that non-enforcement-based approaches work to deter uninvited recreational uses such as with this project?
- To what extent are the Project Proponents dedicated to legal enforcement of the recreational use policies associated with the Plan?
 - What specific County, State, or Federal laws/regulations/codes would the Project Proponents use to enforce use restrictions on the property?
 - To what extent are law enforcement personnel dedicated to assuring prosecution of those laws?
 - To what extent is the District Attorney's office dedicated to assuring prosecution of those laws?
- What evidence does the Lead Agency or Project Proponents cite for the ratio of trail users who abide by restrictions versus those who do not in natural areas in the region?
 - What level of effort do the Project Proponents believe will be necessary to control use to designated trails?
 - How will the public access the statistics related to enforcement activities on the property?

Conservation Easement-Project Purpose Questions

The document informs the public of seemingly contradictory directions of the conservation easement: *"...allowing for public access is a requirement of the Conservation Easement that protects the property." (Plan, p. 1-3; Initial Study p. 12) versus "The Conservation Easement gives the SRL the right to allow public access. (p. 1-5)"*

Questions:

- In what ways has legal counsel determined that it is a requirement that the owners provide public access on the property?
- How does the cited easement language giving the property owner the 'right to allow public access' correlate with the *requirement* for public access?
- How important was it to the Lead Agency review that the conservation easement may *require* versus *allow* public access?
- What communications from the Easement holders including their legal counsel(s) indicate the degree to which public access must be allowed?

"The Public Access Plan includes a Recreational Access Plan and a Research and Education Access Plan, though the focus of the Public Access Plan is recreational access and regional trail connections. While all research and educational activities are not necessarily open to the public, they are included as part of the Public Access Plan because of the education potential and because research and education will be supported by the same trails and access features required for recreational access. Research access will be managed by the owners, while educational and special use will be managed by the Land Trust."

The Initial Study says *"The purpose of the proposed San Vicente Redwoods Public Access Plan is to identify the short-and long-term vision and tools to initiate and maintain public access for at least 10 years."* (Initial Study p. 12)

- How was the level of public access determined?
- Why was the level of public access not included in the CEQA project purpose statement?
- How does the project proponent distinguish between public access and private access uses of the property?
- How does the project proponent foresee the ratio of public access versus private access uses of the property over the course of the 10-year project timeframe?
- To what extent have public entities or private funding agencies mandated public access as part of their funding obligations?
 - If so, to what extent have these funding obligations informed the project purpose?

Public Outreach and Engagement Questions

Extensive activities are outlined in the Plan and Initial Study including the types of attendees, but not the issues raised. Of the many activities, the document states that only the input from the community meetings was used to revise the Plan.

- Why did the Plan authors spend so much time and money on public outreach and engagement?
- In what ways did feedback from the community meetings affect the content and direction of the Plan?
- Why wasn't input from the other extensive public outreach and engagement activities used to revise the Plan?
- How did the Plan authors apply social science tools to analyze and summarize the public input into the planning process?

Trail Planning Questions

"RECREATION 4.1 Designate a Skyline-to-Sea Trail corridor through San Vicente Redwoods, extending from Empire Grade to the Cotoni-Coast Dairies property." (Plan, p 3-4)

Questions

- How was it determined that regional trail connections are a priority for the property?
 - What percentage of recreational needs will be met by this priority?
 - How was this determined?
 - What socio-economic demographic is most likely to be served by such a priority?
 - How was this determined?
- How was it determined that a Skyline-to-Sea Trail corridor should be a priority for the property?
 - What percentage of recreational needs will be met by this priority?
 - How was this determined?
 - What socio-economic demographic is most likely to be served by such a priority?
 - How was this determined?

"Trail planning for the Laguna tract has been conducted in coordination with CDFW..." (Initial Study, p. 28)

Questions:

- Has the CDFW approved through trail use by the project proponents?
- What level of environmental review has CDFW undertaken in order to allow the current trail access, which would be less than the additional proposed access?
- How does CDFW have the authority to permit uses for the next 10 years on an Ecological Reserve without an approved management plan?
- Has the Coastal Commission previously communicated to CDFW about visitor use at the Ecological Reserve in the absence of an approved management plan?
- Would the target group for the Laguna Parcel trail - recreational trail users – be impacting Environmentally Sensitive Habitat Areas at the Bonny Doon Ecological Reserve?
- How is the trail system at the Ecological Reserve, and, by extension into the Laguna Parcel, an interpretive trail versus a recreational trail?

Alternatives Analysis Questions

Allowed Uses;

"Hiking, Bike Riding, Horseback Riding, and Dog Walking: These uses result in similar effects in regard to trail erosion, in that trail design and maintenance have a greater effect on erosion than the type of use." (Initial Study, p. 16)

- How has the Lead Agency determined that these trail uses have comparable effects on trail erosion potential?
 - What scientific evidence supports such a claim?

"These four uses also have been found to have similar impacts on wildlife."

- How has the Lead Agency determined that these trail uses have comparable effects on wildlife disturbance potential?
 - What scientific evidence supports such a claim?
 - How can the public understand the proposed project impacts when there is also a contradictory statement quoted in the Study from the Santa Cruz Puma Group *"dog walking is understood to deter use of the area by medium and large mammals for sensitive life stage activities such as breeding and denning."*

Education Questions

"EDUCATION 2.1 Encourage research projects that will inform management of public access, such as studies that monitor environmental impacts of visitors on the reserves." (Plan, p. 3-5)

- Why do the project proponents limit the research to that which informs management of public access?

Biological Impacts Questions

"D. BIOLOGICAL RESOURCES; Would the project: 4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or migratory wildlife corridors, or impede the use of native wildlife nursery sites?" (Initial Study, p. 59)

The Plan (p.) notes that dog walking would have a substantive adverse effect on cougar nursery sites. The Initial Study appears to rely on Plan components as mitigations without listing them as such, including:

- *"property will be closed at night providing wildlife an opportunity to move through public access areas"*
- *the adaptive management strategies of the proposed San Vicente Redwoods Public Access Plan*

"Construction Protocol BR-1.8. Where wetlands or streams cannot be avoided, appropriate approvals from the USACE (for impacts to regulated wetlands or areas below the ordinary high water mark of regulated streams) and/or the RWQCB and the CDFW (for impacts to regulated wetlands, riparian vegetation, or areas below the top of bank of regulated streams) shall be secured prior to initiating work in these areas. The measures included in any such authorizations shall be incorporated into the design." (Initial Study, p. 56)

- Are wetlands considered ESHA by the Coastal Commission?
- What kind of consultation and permitting is possible or will be required to develop recreational trails in wetlands according to Coastal Commission policy?
- How many linear feet and acres of trail or other access infrastructure, including the proposed parking lot, will pass through Coastal Commission ("1 parameter") ESHA wetland?

Public Services Questions

O. PUBLIC SERVICES

"Would the project: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services?" (Initial Study, p. 88).

"Policy Access 2.3. Work with partners to ensure adequate provision of emergency services."

- What data does the Lead Agency rely on to establish no potential significant impacts under this section?

- How has the Lead Agency been informed of the baseline requirements of local agencies in police or fire agency responses to emergencies associated with recreational trail use?
- Does the Lead Agency rely on the policies listed in this section as mitigations?
- What is the baseline government facility capacity in the service area?
 - How has the Lead Agency determined that the additional recreational use will not require additional government facilities?

Recreation Impacts Questions

P. Recreation

“Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?”
(Initial Study, p. 89)

The Initial Study fails to mention of the Bonny Doon Ecological Reserve and the Cotoni Coast Dairies properties in this analysis.

- What is the baseline state of trail use including physical deterioration of trails at the Bonny Doon Ecological Reserve?
- How has the Lead Agency determined that additional use of the Bonny Doon Ecological Reserve would not substantively deteriorate the trails on this sensitive and highly erosive area?
 - What are the specific thresholds of significance applied in this case?
- How have the project proponents assured that their negotiations and plans are not ‘pre-dispositional’ to federal decision making processes for the Cotoni Coast Dairies property?
- How do the project proponents envision allowing adjacent natural areas managers to control the level of use on their lands with the trails at the Laguna tract and Skyline-to-Sea?
 - How will the project proponents cooperatively manage for the recreational, social, and biological carrying capacities of these adjacent lands?
 - How might the project proponents attempt to influence future managers who might consider closing the through trails on their lands, therefore affecting the use of the proposed project?
- What would be the baseline state of adjacent trail use without the Skyline-to-Sea proposed plan component on the Cotoni Coast Dairies property?
- How has the Lead Agency determined that additional use of the Skyline-to-Sea proposed plan component on the Cotoni Coast Dairies property would not substantively deteriorate the trails on that area?
 - What are the specific thresholds of significance applied in this case?

Other Questions

U. MANDATORY FINDINGS OF SIGNIFICANCE

"2. Does the project have impacts that are individually limited, but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?" (Initial Study, p. 102).

The Initial Study fails to list any connection of increased recreational use with other current and emerging future projects with which some of the project proponents are involved, such as Cotoni Coast Dairies, Cement Plant Reuse, the Rail Trail, Wilder Ranch, County Beaches, etc. In order to effectively establish cumulative impacts analysis, one must first establish a baseline and then analyze expected increases during the timeframe of the project.

Questions:

- Why does the traffic impact analysis only examine effects of Empire Grade, when significant increased use is anticipated by the 'Skyline-to-Sea' aspect of the proposal, hence affecting Highway 1 traffic?
 - What are the cumulative impacts of the proposed project which will coincide with increased Highway 1 traffic
- State Parks has calculated use of its North Coast parks, why were these data not presented to the public to establish a recreational use baseline?
- What is the current recreational use (# users) baseline for Wilder Ranch State Park?
- What is the current recreational use (# users) baseline for County beaches in the vicinity of the proposed project alternatives?
- What is the current recreational use (# users) baseline for Davenport Beach, where users share a parking lot that will also serve the Skyline-to-Sea proposed trail?
- What is the current recreational use baseline (# users) for bicyclists using the Highway 1 corridor adjacent to the proposed project alternatives, including major bicycling events?
- What % increase is projected over what is currently experienced in the vicinity of the proposed project alternatives?
- What are thresholds of significance for cumulative effects for additional recreational users presented by this project, including on:
 - Parking in areas in the vicinity of the Skyline-to-Sea trailhead on Swanton Road
- What are the cumulative effects of this proposed project on wildlife, especially migratory and nursery behaviors, when taken into consideration with:
 - Forestry activities on the property
 - Stewardship activities on the property
 - Non-public use of the property



SANTA CRUZ COUNTY GROUP
Of The Ventana Chapter

P.O. Box 604, Santa Cruz, CA 95061

<https://www.sierraclub.org/ventana/santa-cruz>

e-mail: sierraclubsantacruz@gmail.com

March 14th, 2019

Randall Adams, Project Planner
701 Ocean Street, 4th Floor
Santa Cruz, California 95060
Randall.Adams@santacruzcounty.us

Dear Ms. Molloy,

Thank you for the opportunity to read and comment on the Draft Initial Study and Mitigated Negative Declaration (IS/MND) for the San Vicente Redwoods Project.

Unfortunately, the IS/MND does not effectively mitigate all impacts of this substantive project to less than significant. The Sierra Club requests that an EIR be prepared to fully assess and mitigate outstanding impacts to less-than-significant and examine project alternatives that would cause less damage to the very sensitive ecosystem in which it is located.

Below are just a few of the outstanding impacts of this project:

1. Educational signage is used as a mitigation measure, but such measures are typically highly ineffective. To make sure there's no trash, for example, the project would need many animal-proof trash receptacles, and you will need an employee to walk the trails every day and pick up trash.
2. Given the number of sensitive species, dogs absolutely should not be allowed on these trails.
3. There's no discussion of the impacts on wildlife of the long-term use of trails by people. Significant impacts include reducing the abundance of nesting birds and woodrats near trails and reducing the foraging area available to some species (see, for example, attached study of the effects of trail use on western pond turtle. Studies of this caliber must be provided for all sensitive species in this project area).
4. The project should locate woodrat houses and avoid impacts to them. No evidence is provided to support the assertion that dismantling the houses, which can be used for decades, is a viable mitigation measure.
5. The Initial Study inadequately mitigates the impact of dogs on medium and large mammals, which the UCSC Puma Project confirms is a significant impact. Locating the dog walking areas

adjacent to Empire Grade and requiring leashes have shown to be ineffective in deterring illegal usage in all other open space lands in the county. More documentation and effective mitigations should be considered if you are going to allow activities that have serious environmental consequences.

An Environmental Impact Report is the appropriate level of review for such a substantial project in a sensitive ecosystem. The environmental impacts documented here require an EIR.

Thank you for considering these comments.

Sincerely,

Gillian

Gillian Greensite, Chair
Sierra Club, Santa Cruz County Group

NOTES AND FIELD REPORTS

Chelonian Conservation and Biology, 2015, 14(2): 182–184
© 2015 Chelonian Research Foundation

Basking Western Pond Turtle Response to Recreational Trail Use in Urban California

PAUL E. NYHOF* AND LYNNE TRULIO

San José State University, Department of Environmental Studies,
One Washington Square, San José, California 95192 USA
[paulnyhof@gmail.com; lynne.trulio@sjsu.edu]

*Corresponding author

ABSTRACT. – The presence of human activity near freshwater turtle habitat can have a negative impact on a range of turtle behaviors. We assessed whether human use of a recreational trail had an effect on basking behavior of western pond turtles (*Actinemys marmorata*) by observing individuals basking while we monitored recreational disturbances. Based on our results, we suggest limiting the number or times of operation of motor vehicle traffic adjacent to western pond turtle habitat to restrict impacts on basking behavior.

Recreational opportunities in the San Francisco Bay area, California, are widespread and diverse including activities such as hiking, biking, fishing, and boating. These activities may have significant negative effects on populations of western pond turtles (*Actinemys marmorata*). Moore and Seigel (2006) found that fishing, boating, and jet ski activity caused yellow-blotched map turtles (*Graptemys flavimaculata*) to abandon nesting and basking activity, often for the duration of the day. Similarly, Selman et al. (2013) found that frequent human disturbance can decrease turtle basking duration.

Behavioral disruption of basking can lead to a variety of harmful consequences for freshwater turtles. Basking is an essential behavior for freshwater turtle species because it allows individuals to elevate their body temperatures, thus increasing metabolism, ensuring proper digestion, and allowing turtles to operate more effectively in feeding, reproduction, growth, and predator avoidance (Schwarzkopf and Brooks 1985; Bodie 2001; Edwards and Blouin-Demers 2007). *Actinemys marmorata* is the only remaining native freshwater turtle in California and is listed as a California Species of Special Concern (California Department of Fish and Wildlife 2015). As the human population grows within the state, human activity encroaches upon western pond turtle habitat. A remnant *A. marmorata* population exists in a greatly altered water channel near Moffett Naval Air Station in northern California. The canal occurs alongside a recently opened section of the San Francisco Bay Trail, which exposes turtles to high rates of human activity through recreational

trail use. *Actinemys marmorata* is a wary species while basking (Bury et al. 2012). Wariness may increase the disturbance potential for basking individuals and may lead to a decreased ability to thermoregulate. Recent research suggests that *A. marmorata* is less likely to bask in areas of high human disturbance than a common nonnative competitor, the red-eared slider (*Trachemys scripta elegans*), which could limit quality basking sites (Selman et al. 2013). Other research suggests that recreational human activities can decrease basking durations of other turtle species (Moore and Seigel 2006; Selman et al. 2013). The goal of our research was to assess whether human recreational trail use had an effect on western pond turtle basking behavior along a 3.2-km section of the San Francisco Bay Trail.

Moffett Federal Airfield is located at the south end of the San Francisco Bay in Mountain View in Santa Clara County, California (lat 37°25'N, long 122°02'W). Here, turtles occur in channels adjacent to active trails located atop levees (Fig. 1). These channels are bordered on each side by steep slopes with a uniform width of 12 m and an average depth of 2.5 m. The basking substrate consists of muddy banks, tule (*Schoenoplectus acutus*) clumps, and occasional large woody debris. Water temperatures during the study ranged from 18°C to 21°C with a mean of 19.3°C (SD ± 1.03). The section of the Bay Trail we examined was first opened to recreational traffic in September of 2010, 9 mo before we collected data. The start of the observations coincided with the first basking season during which this population of turtles was exposed to recreational human activity in 2011. Vehicular traffic on the levee consisted primarily of infrequent trips by heavy-duty pickup trucks transporting equipment and materials for routine maintenance along the levee system. After trail opening, the level of vehicular traffic is likely to have been similar to pretrail opening, while recreational human activity has almost certainly increased as more people discover this area. Trail users were typically between 3 and 30 m from turtles along the trail.

From June through August 2011, we collected observational data on turtle response rates to various types of recreational activity and recorded basking durations. We observed turtles at 3 locations known to be well-used basking sites based on previous studies (C. Alderete, pers. comm., March 2011). We were concealed behind surrounding vegetation and natural barriers while observing both human activity and turtle behavior using binoculars and spotting scopes (Moore and Seigel 2006). Our distance to basking turtles was approximately 20–30 m. Data on human activity included type of recreational activity (categorized as walker, runner, bicyclist, or motor vehicle), number of people, and general noise level. Observations of turtle behavior included number of turtles, basking duration, initial and submergence behaviors, location, and whether submergence appeared to be associated with human activity or not.

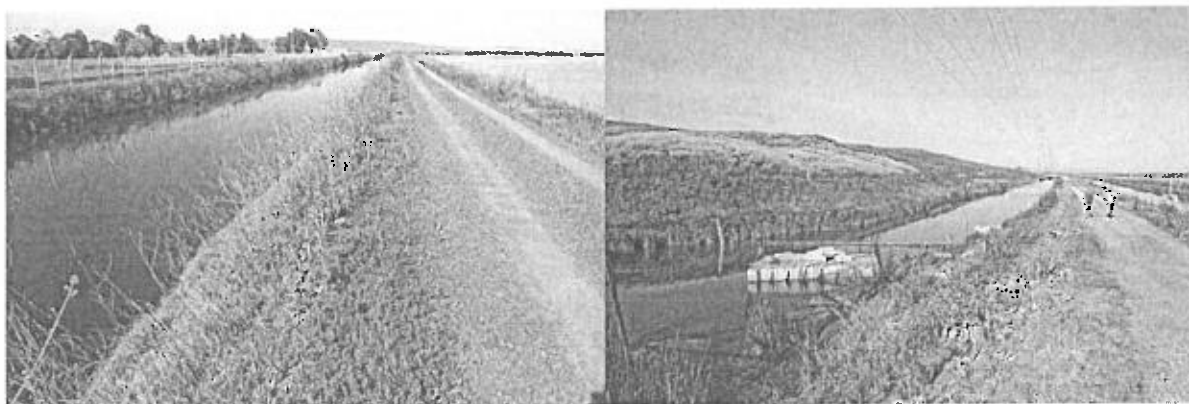


Figure 1. Western pond turtle (*Actinemys marmorata*) habitat at the study site along the San Francisco Bay Trail in Mountain View, California (photographs by P. Nyhof).

We analyzed the data using SYSTAT[®] 13. The total rate of recreational activity along the Bay Trail and rates for each category of recreational activity were calculated by dividing the number of human activity events by the total observation time. Pearson chi-square (χ^2) tests were used to compare the disturbance rates for each category of recreational activity. The mean basking duration (in minutes) of disturbed turtles was compared with the mean basking duration when no recreationists were present. Because the data did not meet assumptions for parametric tests, we used the Mann-Whitney U-test to compare means.

We observed for a total of 68.5 hrs, with 1238 total human activity events recorded, 346 of which involved basking turtles. We observed 52 individuals basking during June ($n = 7$), July ($n = 24$), and August ($n = 21$). Basking was rarely interrupted by human activity, as only 25 of 346 (7%) possible events ended with turtles abandoning their basking site. However, the rate at which turtles abandoned basking differed by type of human activity ($\chi^2 = 52.88$, $df = 3$, $p < 0.0001$, $n = 346$). Turtles abandoned their basking sites at rates of 2%, 5%, and 6% in response to runners, walkers, and bicyclists, respectively (Table 1). However, turtles abandoned basking sites 45% of the time when a motor vehicle passed by on the trail.

The average turtle basking duration of 22 individuals that submerged naturally was 42.8 ± 5.0 SD/min. We recorded 30 individuals that submerged in apparent response to trail use, with an average basking duration

of 16.5 ± 2.8 SD/min for each event. Natural basking duration was significantly longer than disturbed basking times ($U = 542.5$, $df = 1$, $p < 0.0001$, $n = 52$), with natural basking being 2.5 times longer than disturbed basking. The 22 natural submergence events were representative of the 30 disturbed submergence events in that they took place in similar temperatures, times of day, and locations.

Most human activity along the trail was pedestrian traffic (bicyclists, runners, and walkers). Vehicular traffic was largely due to heavy-duty pickup trucks traveling along the levee system, which merges with the Bay Trail in several areas. The overall rate of human activity recorded in this study (18 events/hr) was much lower than observed in other recreational studies involving San Francisco Bay Area Trails, one of which reported 68 human recreational events per hour while observing shorebirds (Trulio and Sokale 2008). Our study site was in a newly opened section of the Bay Trail and, as it becomes more widely recognized, human activity levels could increase.

Overall rates of disturbance were low, which suggests that current human traffic along the trail may only have a limited impact on turtle basking behavior. However, analysis of disturbance types showed western pond turtles were much more likely to respond to motor vehicles than to any other type of disturbance. Motorized vehicles may be especially disruptive to turtles. For example, Moore and Seigel (2006) observed that *G. flavimaculata* frequently abandoned basking behavior due to recreational boat traffic, and Selman et al. (2013) found that boat traffic negatively impacts basking duration for the same species. Intense response to loud and fast-moving vehicles is well documented in bird species, especially when vehicles are approaching animals (Rodgers and Schwikert 2002, 2003; McGowan and Simons 2006). We observed turtles only during the summer months and thus lack data for other seasons. Also, human recreational activity may change throughout the seasons and is likely to increase over time as this section of trail becomes more widely known. The vehicular traffic, on the other hand, remains

Table 1. Type, number, and frequency of human activity events that caused turtles to abandon basking at the Moffett Federal Airfield, California, from June through August 2011.

Type	Individuals disturbed	Total no. of individual	Disturbance frequency (%)
Runner	2	99	2
Walker	4	84	5
Bicyclist	9	141	6
Vehicle	10	22	45
Total	25	326	7

rather steady throughout the year (Santa Clara Valley Water District, *pers. comm.*, April 2011).

Our observations indicate that basking periods interrupted by human disturbance are significantly shorter than undisturbed basking periods. Disturbances of this nature reduce time for thermoregulation and loss of heat energy, which could have profound effects on a turtle's ability to survive and reproduce (Crawford et al. 1983; Edwards and Blouin-Demers 2007). There are some benefits that could be gleaned from habitat alteration, as Lambert et al. (2013) concluded that basking sites shielded from human activity may lead to higher-quality basking potential, especially for native freshwater turtles. Thus, we recommend 1) limiting vehicular traffic near important *A. marmorata* basking habitat whenever possible, 2) encouraging drivers of required service vehicles to avoid driving near basking habitat during peak basking times, and 3) investigating installation of high vegetation and other ways to conceal turtles from trail use, especially by vehicles.

Acknowledgments. — We thank Moffett Federal Airfield and the Santa Clara Valley Water District for allowing us access to the study site. This study was conducted under a permit from the California Department of Fish and Wildlife (no. SC-11825) and the US Fish and Wildlife Service (no. 81640-2011-033). We also thank C. Alderete (Integrated Science Solutions, Inc.) for his information on turtles at Moffett Federal Airfield and for providing field support. This study was conducted with the approval of the Institutional Animal Care and Use Committee and with a grant from the David J. Powers Scholarship in the Department of Environmental Studies, both at San José State University.

LITERATURE CITED

- BODIE, J.R. 2001. Stream and riparian management for freshwater turtles. *Journal of Environmental Management* 62:443–455.
- BURY, R.B., WELSH, H.H., GERMANO, D.J., AND ASHTON, D.T. 2012. Western Pond Turtle: Biology, Sampling Techniques, Inventory and Monitoring, Conservation, and Management. Northwest Fauna 7. Olympia, WA: Society for Northwestern Vertebrate Zoology.
- CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE. 2015. Amphibian and reptile species of special concern. Western pond turtle (*Actinemys marmorata*). www.dfg.ca.gov/wildlife/nongame/ssc/amphibian-reptile.html (15 February 2015).
- CRAWFORD, K.M., SPOTILA, J.R., AND STANDORA, E.A. 1983. Operative environmental temperatures and basking behavior of the turtle *Pseudemys scripta*. *Ecology* 64:989–999.
- EDWARDS, A.L. AND BLOUIN-DEMERS, G. 2007. Thermoregulation as a function of thermal quality in a northern population of painted turtles, *Chrysemys picta*. *Canadian Journal of Zoology* 85:526–535.
- LAMBERT, M.R., NIELSEN, S.N., WRIGHT, A.N., THOMSON, R.C., AND SHAFFER, H.B. 2013. Habitat features determine the basking distribution of introduced red-eared sliders and native western pond turtles. *Chelonian Conservation and Biology* 12:192–199.
- McGOWAN, C.P. AND SIMONS, T.R. 2006. Effects of human recreation on the incubation behavior of American oystercatchers. *Wilson Journal of Ornithology* 118:485–493.
- MOORE, J.C. AND SEIGEL, R.A. 2006. No place to nest or bask: effects of human disturbance on the nesting and basking habits of yellow-blotched map turtles (*Graptemys flavimaculata*). *Biological Conservation* 130:386–393.
- RODGERS, J.A., JR. AND SCHWIKERT, S.T. 2002. Buffer zone distances to protect foraging and loafing waterbirds from disturbance by personal watercraft and outboard-powered boats. *Conservation Biology* 16:216–224.
- RODGERS, J.A., JR. AND SCHWIKERT, S.T. 2003. Buffer zone distances to protect foraging and loafing waterbirds from disturbance by airboats in Florida. *Waterbirds* 26:437–443.
- SCHWARZKOPF, L. AND BROOKS, R.J. 1985. Application of operative environmental temperatures to analysis of basking behavior in *Chrysemys picta*. *Herpetologica* 41:206–212.
- SELMAN, W., QUALLS, C., AND OWEN, J.C. 2013. Effects of human disturbance on the behavior and physiology of an imperiled freshwater turtle. *Journal of Wildlife Management* 77: 877–885.
- TRULLIO, L.A. AND SOKALE, J. 2008. Foraging shorebird response to trail use around San Francisco Bay. *Journal of Wildlife Management* 72:1776–1780.

Received: 18 December 2014

Revised and Accepted: 4 April 2015

Handling Editor: Peter V. Lindeman

Chelonian Conservation and Biology, 2015, 14(2): 184–192
© 2015 Chelonian Research Foundation

Conservation Research Needs of Easter Island (Rapa Nui) Marine Turtles

ROCÍO ÁLVAREZ-VARAS^{1,2,*},
ROBERT PETITPAS^{3,4}, PAULINA STOWHAS^{2,5}, AND
MARCELO FUENTES-HURTADO¹

¹Department of Ecosystems and the Environment, Pontificia Universidad Católica de Chile, Av. Vicuña Mackenna 4860, Santiago 6904411 Chile [reatvarez@uc.cl; mvfuentes@uc.cl];

²Querepara Tortugas Marinas Chile NGO, Las Flores Oriente 2725, Santiago 7910000 Chile;

³Interdisciplinary Center for Intercultural and Indigenous Studies-ICIS, Pontificia Universidad Católica de Chile, Av. Vicuña Mackenna 4860, Santiago 6904411 Chile [rpetitp@uc.cl];

⁴Fauna Australis Wildlife Laboratory, Pontificia Universidad Católica de Chile, Av. Vicuña Mackenna 4860, Santiago 6904411 Chile;

⁵Nelson Institute for Environmental Studies, University of Wisconsin-Madison, 550N Park, Box 47, Madison, Wisconsin 53706 USA [stowhas@wisc.edu]

*Corresponding author

ABSTRACT. — Easter Island has experienced a marked increase in tourism during the past few decades; this has intensified the use of natural resources, which has in turn posed new threats to marine wildlife. To gather

Reproduced with permission of the copyright owner. Further reproduction prohibited without permission.

March 14, 2019

Randall Adams
Land Trust of Santa Cruz County for Peninsula Open Space Trust
617 Water Street
Santa Cruz, CA 95060

Email: Randall.Adams@santacruzcounty.us

Re: Comments on Notice of Intent to Adopt a Mitigated Negative Declaration - San Vicente Redwoods

Dear Mr. Adams:

Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the above-referenced document. The Air District has the following comments:

Air Quality

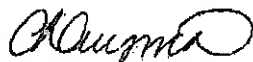
- **MM AQ-1.1:** The Air District appreciates the inclusion of the construction dust mitigation and control measures during construction/earth-moving operations.
- **Construction Equipment:** The Air District recommends using cleaner than required construction equipment that conforms to ARB's Tier 3 or Tier 4 emission standards. With respect to diesel operated on-road and off-road construction vehicles, we further recommend that whenever feasible, construction equipment use alternative fuels such as compressed natural gas (CNG), propane, electricity or biodiesel. This would have the added benefit of reducing diesel exhaust emissions.

Permits Required

- **Portable Construction Equipment:** – If portable construction equipment, such as dredges and air compressors, are to be used during this project, please contact the Air District at (831) 647-9411 for permitting information.
- **A.3 Tree Removal:** The proposed site preparation would result in the removal of 15 existing native and 40 non-native trees. During the tree removal process, if the trees are disposed of via wood chipping, please make sure to contact the Air District's Engineering Division at (831) 647-9411 to discuss if a Portable Registration is necessary for the wood chipper being utilized for this project.

If you have any questions, please contact me at (831) 718-8027 or cduymich@mbard.org.

Best Regards,



Christine Duymich
Air Quality Planner II

Cc: David Frisbey

Randall Adams

From: Susan Mason <s.mason@d-mason.net>
Sent: Friday, March 15, 2019 2:04 PM
To: Randall Adams
Subject: San Vicente Project Comment

It is important to re-open the escape access from the Warren Drive loop out to the reserve. This was open for years and only recently has been allowed to overgrow. Last year, when there was a structure fire on Warren Drive, a piece of equipment responding to the fire tried to access through that route. It is important both as escape for residents and as access to medical and fire emergencies in the hiking tract.

Thank you for your attention to my comment.

Susan Mason, Captain, Bonny Doon Fire and Rescue

Native Vegetation Network

March 16, 2019

Mr. Matt Johnston and Ms. Jessica Degrassi
County of Santa Cruz Planning Department
701 Ocean Street
Santa Cruz CA, 95060

RE: Comments to the San Vicente Redwoods Public Access Plan CEQA Review

Dear Matt and Jessica:

Thank you for the opportunity to make comments on the **San Vicente Redwoods Public Access Plan**. I attended the recent RBDA meeting and presentation of the Plan by Bryan Largay on March 13, 2019. He said that the comment period has been extended until March 29th, 2019.

As you may know, I am an advocate for the Bonny Doon Ecological Reserve and the conservation of the Santa Cruz Sandhills. I served as the docents and volunteers coordinator at the Ecological Reserve from 1994 to 2017. I appreciate the efforts of the Land Trust and its consultants. There are many positive aspects of the San Vicente Redwoods Access Plan; however, I have concerns about potential impacts to sensitive resources along the Ecological Reserve trails, since these trails will be used to access the Laguna Tract in the land locked parcel to the east of the Reserve.

According to Bryan Largay, the consultants for the San Vicente Redwoods Trail Access Plan estimate that 90,000 people per year will use the trail system at full build out of Phase 1 and Phase 2. Phase 1 will serve as a testing ground to monitor the level of public use, traffic, impacts to biological resources from bikes, horses and hikers, the success of rangers and law enforcement, trash, erosion, and trail conditions. If the results of monitoring show low impacts, and that the minimization measures in the Public Access Plan are working, more trails will be built as part of Phase 2.

Over the last 25 years at the Ecological Reserve, we have had an average of about 20 to 25 people using the trails at the Reserve per day, except on days when there are guided nature walks and field trips sponsored by CNPS, high schools or college classes. The CNPS walks and most field trips have been limited to 20 people in order to minimize impacts to the Santa Cruz Sandhills habitat.

The following comments pertain to the proposed phasing of the Public Access Plan, and how the trails are publicized.

Comments

1. Omit Ecological Reserve and Laguna Tract from Phase 1. I strongly recommend that the currently proposed access routes through the Bonny Ecological Reserve to the proposed Laguna Tract trails be eliminated from the Phase 1 testing phase. The highly sensitive Zayante Sandhills habitat and the associated rare and endangered plants in the Ecological Reserve are the most sensitive areas included in the entire Access Plan, and should not be part of the Phase 1 testing phase. Once opened, several years of monitoring are needed in the proposed trail system located to the west of Crest Ranch to determine law enforcement needs, the level of use, number of visitors and impacts due to the 90,000 people (hikers, bike riders, and horse riders) estimated to use the trail system.

Once the level of public use and the extent of human impacts are better known in the trails west of Crest Ranch, more accurate mitigation and minimization measures may be developed for the sensitive habitats in the Ecological Reserve.

It does not seem logical to have the most sensitive habitat developed in Phase 1 of the Trails Plan (testing phase). According to Terris Kasteen with the Dept. of Fish and Wildlife, a Memorandum of Understanding regarding access through the Ecological Reserve still needs to be prepared with Conditions of Approval.

2. Publicity, Trail Maps and Internet Graphics. Full Build Out Maps of both Phase 1 and Phase 2 should not be publicized until Phase 1 is deemed successful. For the first 1 to 2 years after opening the trail system, only the developed trails in Phase 1 should be illustrated on websites, kiosks and map handouts. This will help keep people out of areas that may not have trails developed yet or access is dangerous. It will also help keep visitor use lower in the trails that are not opened or managed yet. There needs to be more discussion about advertising the location Ecological Reserve portion of the trail system. We need to keep public use low in the Reserve.

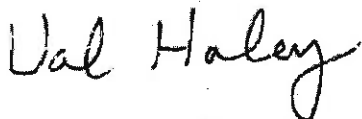
Sheriffs and rangers can't help prevent high foot traffic and damage of low growing, rare plants such as the Ben Lomond Spineflower (*Chorizanthe pungens* var. *hartwegiana*) that currently grow along the trail edges.

Conclusion

Please let me know if you would like any additional information about the sensitive resources and sensitive habitats at the Bonny Doon Ecological Reserve. I would be happy to show County staff some of the rare and endangered plant species that currently grow along the trail edges that could be damaged by increased foot traffic. I have prepared these comments to County Planning to the best of my knowledge.

Please help us "Preserve the Reserve" !

Sincerely,



Valerie Haley, Botanist
Native Vegetation Network
831 425 0687

cc: Terris Kasteen, California Department of Fish and Wildlife
Friends of the Bonny Doon Ecological Reserve
RBDA
USFWS

Randall Adams

From: Karrie Gaylord <karrieg@ymail.com>
Sent: Tuesday, March 19, 2019 4:02 PM
To: Randall Adams
Subject: Feedback on San Vicente Redwoods

Hi Randall,

Last week I attended a presentation given by Bryan Largay on the Land Trust's plans for the new San Vicente Redwoods Trails. As a Bonny Doon resident and avid trail runner I'm really thrilled about the plan and can't wait for it to officially open. Clearly you all have done a ton of work to make this happen so I'd like to express my gratitude for that!

I do have a comment on the planned usage, which I'm hoping you might relay to the appropriate committees. In short, **I would really love to see more mileage of the trails open up to dogs.** I have two lovely, active pups who are my frequent companions on trails both for their own joy and exercise as well as my safety. Sadly, I was quite surprised when I moved here about a year ago at how few trails there are which allowed them. We used to live in Washington state where dogs were welcome on nearly all trails excluding national parks. Here in Santa Cruz the public trail system is quite restrictive to canine company by comparison. As a privately owned trail system, I was very hopeful that San Vicente Redwoods would be more accommodating than the state/city parks.

Bryan outlined the plan to permit 1.5 miles along the entrance of the trails as open to dog walking. This is nice, but it's hardly a warm up for my lively crew! We frequently run 8-10 miles most days. It's curious to me that nearly all the trails are open to equestrians, who are great, but do leave piles of excrement and hoof divets everywhere they go. Most trail users including myself are willing to dodge these things but I have to admit it's frustrating to not allow leashed dogs whose owners pick up after them on the same trails.

Bryan mentioned that studies the Land Trust researched found wildlife to be undisturbed beyond a 200m zone around trails used by humans and other animals. This seems totally reasonable, given that over 90% of San Vicente's 8500 acres will be closed to access, preserving habitats for our lion and other wild friends. But I'm wondering- if this 200m zone has been deemed acceptable, why should it matter what species is doing the disruption - horse, human, or dog?

Please consider opening up more of San Vicente to our canine companions and the humans who love them.

Thank you kindly for your consideration,
Karrie Gaylord

Randall Adams

From: Brenda Barcelo <essencematpilates@gmail.com>
Sent: Wednesday, March 20, 2019 12:32 PM
To: Randall Adams
Subject: San Vicente

Hi Randall,

I'm one of many residents who will be highly affected by the opening of San Vicente park and I feel our concerns aren't addressed at all. Every time there's a meeting or I send an email, my worries are brushed off and the only thing that remains is the fact that the park will open according to plan, no matter what. Many of us are very unhappy about the large number of trees that will be removed to make parking lots. We were told there's nowhere else in the park to plant the same number of trees that will be taken out for the project. In a park as large as San Vicente, I have a very hard time believing there isn't any space at all in the whole area to plant 100+ trees to replace the park owners will be removing. In a time of great world distress about global warming, deforestation of any sort is an aberration. As a permit approval condition, please require the owners to plant the same or a larger number of trees elsewhere in the park to mitigate for the planned removal of trees.

Thank you,

--

Brenda Barceló
Certified Pilates Instructor
Balanced Body University

Randall Adams

From: David Jessen <djessen@ucsc.edu>
Sent: Thursday, March 21, 2019 11:20 AM
To: Randall Adams
Subject: San Vicente Redwoods/Laguna Tract

Randall,

I have reviewed all submitted documents regarding Land Trust of Santa Cruz County plans for trail system and management model in particular how it will apply to Laguna Tract which borders Bonny Doon Ecological Reserve (BDER). My wife and I have both grown up and lived in Bonny Doon our whole lives and have lived in the center of BDER for past 40 years raising our children and now grandchildren on this land. There are existing trails on Laguna Tract that will be part of proposed trail system that have been used since this land was owned by Lone Star/Cemex. Land Trust plan to open trails in phase 1 of project makes sense and shows good wisdom, having their collaboration and support along with our BDER community group that maintains reserve trails will promote safe and legal public use. Land Trust having also agreed to not promoting Laguna Tract in advertisement will help keep overall impact to BDER facilities and trails to a minimum and promote much slower evolution for increased use, allowing BDER to adjust realistically to visitor increases.

Best Regards,
Dave Jessen
854 Martin Rd.
Bonny Doon, CA

--

Dave Jessen
University of California Santa Cruz
Office 831-459-4808
Cell 831-359-3989
djessen@ucsc.edu



617 Water Street
Santa Cruz, CA 95060
831-426-0116
Fax 831-426-1166
info@landtrustsantacruz.org
www.landtrustsantacruz.org

Board of Trustees

Donna Murphy

Board Chair

Tren Bucas

Board Vice Chair

Thomas Jacob

Secretary

Jeffrey Warner

Treasurer

Mary Calley

Ana Espinoza

Bill Glaser

John Gichard

Rogelio Rince, Jr.

Kathleen Rose

Marieke Rotschild

Makely Sharp

Joyce Shrivizu

Robert Stephens

Emily Thomas

Executive Director

Stephen Shade

March 29, 2019

Randall Adams, Project Planner
Santa Cruz County Planning Department
701 Ocean Street, 4th Floor
Santa Cruz, California 95060

Via email: Randall.Adams@santacruzcounty.us

Re: Comments on Notice of Intent to Adopt a Mitigated Negative Declaration -
San Vicente Redwoods

Dear Mr. Adams,

The mission of the Land Trust of Santa Cruz County is to protect, care for, and connect people to the extraordinary lands that make this area special.

Thank you for providing the Land Trust of Santa Cruz County the opportunity to comment on the above-referenced document.

The Land Trust has the following comments:

Overall

- As the project proponent, we collaborated for six years with neighbors, experts from an array of disciplines, and staff from Santa Cruz County and other agencies. This effort strongly influenced the project, from our goals, to the design of trails and facilities, the construction guidelines, the management approach and partnerships, and the monitoring and adaptive management plan. This process enabled us to craft a project that goes to great lengths to avoid and minimize impacts.
- As part of this process we identified specific measures to minimize impacts, and incorporated them into our Public Access Plan (see Chapter 7). Many of these were also specified as mitigation measures in the IS-MND, and we are entirely comfortable with them. It may be noteworthy that were fully integrated into the project plan prior to submittal for County review.

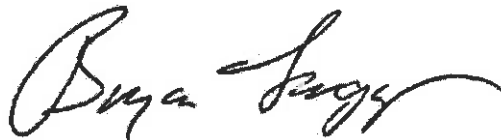
Specific Provisions

- The language of BR-3.1 is somewhat unclear in how it specifies that September and October is the best time for tree removal and trimming to avoid impacts to bats. As written it could be misinterpreted to mean the opposite. Please see the text in italics below.
 - *Construction Protocol BR-3.1. Tree removal and trimming, regardless of size, shall take place outside of both the maternity and hibernation period for special-status bats (between September and October) and avoid the breeding bird window per Protocols BR 3.4 and BR 3.5. Tree removal can take place during this period without a breeding bird or bat roost survey.*

- There is a minor inconsistency between two provisions, which both protect hibernation and maternity roosts for bats: Construction Protocols BR-3.1 (shown above) and BR-3.2 (please see the provision in italics below). We suggest resolving this by changing “shall take place” in BR-3.1 to “can take place”, or phrasing to that effect. The important guidance, based on our consultation with wildlife biologists with relevant expertise, is that September to October are the ideal period, but not the only period for managing vegetation while avoiding impacts. Operating outside that window, impacts can be avoided with appropriate surveys and the prohibition on removing vegetation where bats are found. We anticipate this was the meaning intended by the County, for otherwise measure BR-3.2 is contradictory of BR-3.1. We believe this change will provide for consistency while ensuring robust protection for the species.
 - *Construction Protocol BR-3.2. If removal of large trees (e.g., the DBH is greater than 12 inches) occurs during the bat roosting season (November through August), these trees shall be inspected by a qualified, County-approved biologist for the presence of bat roosts. If a maternity roost is detected, up to a 200-foot buffer shall be placed around the maternity site until the bats are no longer utilizing the site. Non-maternity roost sites can be removed under the direction of a qualified, County-approved biologist. Any large tree that will be removed shall be left on the ground for 24 hours before being taken offsite or being chipped. This period will allow any day-roosting bats the opportunity to leave before the tree is either removed from the area or is chipped.*

This concludes our comments on the document. Thank you for your effort in ensuring the protection of our County's environment.

Sincerely,



Bryan Largay

Bryan Largay
Conservation Director
Land Trust of Santa Cruz County

Randall Adams

From: Mark Lipson <mark.lipson137@gmail.com>
Sent: Friday, March 29, 2019 4:18 PM
To: Randall Adams
Subject: S.Vicente NMD App#181146 - comments

Intro

These comments are submitted by Mark Lipson, PO Box 69, Davenport CA 95017.

I am a resident of Davenport and have been farming certified organic produce since 1983 at the property which is encompassed within the San Vicente Redwoods project. That property is owned by the Molino Creek LLC partnership, of which I am the current President.

On behalf of Molino Creek LLC, we recognize and appreciate the efforts that the Land Trust of Santa Cruz County has made to solicit and heed our concerns as inholders. For 35 years we have worked cooperatively in succession with Lone Star, Cemex, LTSCC and the SVR Partners to protect and manage this remote area of the county's north coast.

Recommendation

I support acceptance of the NMD finding and approval of the application with the LTSCC's Public Access Plan. We support moving Phase I of the project forward so that the "adaptive management" concepts can be tested against reality.

However...

There is at least one very problematic aspect to the County's CEQA analysis which compels further comment. This defect is notable with respect to the multiple other, large-scale land-use changes occurring in the area. My hope is that the County's professional staff and elected/appointed decision makers will take a deeper, critical look at how the north coast's rapid transformation is being treated by the planning process.

***Initial Study/Env. Checklist, Section U.2, Mandatory Findings of Significance, Cumulative Impacts.**

This project takes place in immediate proximity to 3 other large-scale conversions of formerly private land to public access and visitor use. The assessment that the SVR project, "has no associated cumulative impacts" is completely unexplained and overtly inexplicable. The one-sentence analysis seems to make a mockery of the plain language embodied in the checklist at U.2. The County's planning process appears incapable or unwilling to recognize that this project will be operated in the context of opening the Cotoni-Coast Dairies Unit of the California Coastal National Monument, the Coastal Rail-Trail, and the potential conversion of the Cemex property to visitor-use access. The County is not serving the interests of its citizens by following this approach, nor is it serving the long-term interests of prospective visitors and users. Certainly the methodological challenges of cumulative-impact assessment may be severe. Nonetheless, it is absolutely necessary that the planning process recognize and confront the reality of interconnected impacts resulting from the convergence of these multiple, large-scale land-use and activity changes on the North Coast.

Thanks for your attention.

Mark Lipson, Molino Creek LLC

--

Mark Lipson
408-497-3673

Partner, Molino Creek Farming Collective, PO Box 69, Davenport, CA 95017 mark.lipson137@gmail.com
UCSC-CASFS, Organic Agriculture Policy Studies mdlipson@ucsc.edu
Consulting dba Pacific Plate Organics

Randall Adams

From: Jacob Pollock <pollock@ucsc.edu>
Sent: Friday, March 29, 2019 4:53 PM
To: Randall Adams
Subject: Comments on Application 181146
Attachments: Comments to the project.docx

The following attachments contain comments on Application 181146. The contents are also included directly in the email below.

Jacob F. Pollock PhD

(831) 566-0983

Dear Santa Cruz county, CA planners,

March 28, 2019

These are comments on the mitigated negative declaration for the San Vicente redwoods project, application number 181146. Overall, I am pleased with the detail however there are numerous omissions, some of which I have been able to document here. I also have a number of questions I hope you will be able to respond to.

The Initial Study states that Coulter pine is a non-native species (p11). Given that The Natural Resource Conservation Service plants database (<https://plants.sc.egov.usda.gov>), Jepson E Flora (<http://ucjeps.berkeley.edu/eflora/>), and the California Native Plant Society (Calscape.org) all show the San Vicente redwoods to be within the range and habitat of Coulter pine with extant populations to the north, south, and east, how do you justify calling it a non-native species? What is the biological and scientific basis for this justification?

Given that tracking data (santacruzpumas.org) shows the San Vicente Redwoods to be heavily used by Puma and that research by Dr Chris Wilmers shows a strong avoidance and feeding disruption behavior by Pumas due to the sound of humans, ow do you justify including only the single mitigation measure of closing the property at night to protect this species and its habitat? How do you justify even this single measure when these animals are not exclusively nocturnal? Given the vague nature of the adaptive management strategies (see below) how do you justify these as mitigations for protecting the cougar? What are the biological and scientific basis for these justifications?

The initial Study states that, the "Access Plan's adaptive management approach would ensure the sensitive habitat on the project site are preserved and protected in perpetuity," (p 59). Adaptive management implies using varying management strategies with specific goals, specific measurable targets and monitoring progress towards these goals with specific action thresholds and changing (i.e. adapting) these monitoring strategies as needed to bring these goals within specified limits. The adaptive management overview in Appendix 2 of the plan contains only vague strategies for each conservation value with no specific goals, no monitoring details, no measurable targets, no action thresholds, and vague alternate strategies (adaptions), and no measurable limits to ensure that the alternate strategies meet these limits. For example, conservation value 1 has an adaptive management strategy as follows, "monitor and enforce rule violations; adjust engagement and enforcement efforts." The other management strategies in Appendix 2 are similarly vague. Given the lack of details for adaptive management, how do you justify a mitigated negative declaration? How will you ensure that these adaptive management strategies will mitigate impacts when there are no details? If there are goals, measurable

targets, detailed monitoring plans, action thresholds, specific management adaptations, etc, what are the biological justifications for these?

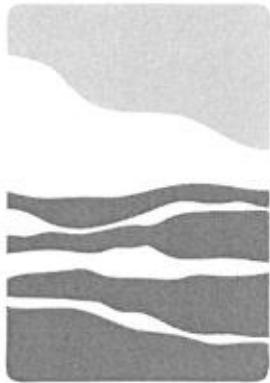
Similarly, the Mitigation Monitoring and Reporting Program contains few details of what will be measured in the monitoring program, what the baseline and target measures are that will require a mitigation effort to bring the measure within compliance levels. Specifically, how will the mitigation measures for BIO-1 through BIO-7 be monitored? What quantitative or other measures will be used? What are the measurable limits that will indicate they are out of compliance?, what actions will be taken to bring them back into limits to achieve mitigation? How will the public be informed about the implementation and monitoring of these mitigation measures which are used to justify a finding of mitigated negative declaration?

The initial study states that hiking biking riding horseback and dog walking all have similar effects on trail erosion and on wildlife. Is there any science to show this is true? What is that science? How did you determine that these uses are similar in their effects on erosion and wildlife? What specific monitoring will be done to ensure that these effects are similar in the case of San Vicente redwoods?

If I were to appeal to the Coastal Commission if I believe portions of this Mitigated Negative Declaration or the responses to my questions are insufficient to mitigate the impacts of the project or protect the conservation values of the area, how would the county and the project proponents coordinate a response to such an appeal?

Sincerely,

Jacob F Pollock PhD



**LAND
TRUST**
OF SANTA CRUZ
— COUNTY —

617 Water Street
Santa Cruz, CA 95060
831-429-6116
Fax 831-429-1166
info@landtrustsantacruz.org
www.landtrustsantacruz.org

Board of Trustees

Tom Burns
Board Chair

Thomas Jacob
Board Vice Chair

Kate Anderton
Secretary

Jeffrey Werner
Treasurer

Katherine Beiers

Mary Culley

Ana Espinoza

Bill Gielow

John Gilchrist

Donna Murphy

Kathleen Rose

Marieke Rothschild

Melody Sharp

Joyce Shimizu

Emily Thomas

Executive Director
Stephen Slade

May 23, 2019

Randall Adams, Planner
County of Santa Cruz
701 Ocean Street, 4th Floor
Santa Cruz, CA 95060

Subject: Response to Comments Memo

Dear Randall Adams,

Please find attached our responses to the comments submitted by the public in regard to the Initial Study and Mitigated Negative Declaration (IS/MND) for the San Vicente Redwoods Public Access Plan, that were submittal on or before March 29, 2019.

We request that you include our response in your correspondence with the public so that they receive answers to their questions about the project. This response is not intended to address specific concerns related to the IS/MND document or the California Environmental Quality Act process.

A few themes emerged from the comments, which we address in the section General Responses to Comments. This is followed by Individual Responses to Comments, which consists of a table organized by commenter and comment number.

Sincerely,

Bryan Largay
Conservation Director
Land Trust of Santa Cruz County

Response to Comments Memo

The County of Santa Cruz distributed a Notice of Intent to adopt a Mitigated Negative Declaration for the proposed San Vicente Redwoods Public Access Plan, herein referred to as the “proposed project,” on Tuesday, February 12, 2019. This initiated a 30-day public comment period. The Land Trust requested that the County to extend the review period for 16 additional days, to ensure ample time for agencies and interested parties to submit comments on the Initial Study and Mitigated Negative Declaration (IS/MND). Comments were accepted through Friday, March 29, 2019.

Comments on the Public Review Draft of the IS/MND for the proposed project were received from the following agencies, organizations, and private individuals during the 46-day public review period. Each comment letter and comment has been assigned a letter and a number as indicated below. The comments are organized and categorized by:

- A = Agencies and Service Providers
- B = Private Individuals and Organizations

AGENCIES AND SERVICE PROVIDERS

- A1 Christine Duymich, Monterey Bay Air Resources District, March 14, 2019
A2 Susan Mason, Bonny Doon Fire and Rescue, March 15, 2019

PRIVATE INDIVIDUALS ORGANIZATIONS

- B1 Joal Steinberg, February 27, 2019
B2 Donna Karolchik, March 4, 2019
B3 James Feichtl, March 8, 2019
B4 Bob Schildgen, March 8, 2019
B5 Jayne Cerny, March 8, 2019
B6 Marcel Moran, March 8, 2019
B7 Kristin Womack, March 8, 2019
B8 Randall Kirschman, March 8, 2019
B9 Anil Gangoli, March 9, 2019
B10 Richard Rammer, March 9, 2019
B11 Virginia Leslie, March 9, 2019
B12 Ben Martin, March 9, 2019
B13 John Engell, March 10, 2019
B14 Henry Millstein, March 8, 2019
B15 Grey Hayes PhD, March 12, 2019

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

B16	Gillian Greensite, March 14, 2019
B17	Valerie Haley, Native Vegetation Network, March 16, 2019
B18	Karrie Gaylord, March 19, 2019
B19	Brenda Barceló, March 20, 2019
B20	Dave Jessen, March 21, 2019
B21	Bryan Largay, March 29, 2019
B22	Mark Lipson, March 29, 2019
B23	Jacob Pollock, March 29, 2019

This memo includes a reproduction of, and responses to, non-environmental issues raised during the public review period. Comments are presented in their original format in Appendix A, Comment Letters, of this response to comments memo. Comment letters in this memo follow the same order as listed above.

Responses to those individual comments are provided in this memo alongside the text of each corresponding comment. Letters are identified by category and each comment is labeled with the comment reference number in the margin. Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response.

The potential environmental impacts of the adoption and implementation of the proposed project was the subject of the IS/MND. However, during the review of the IS/MND, some commenters raised issues that relate to qualities of the proposed project itself or the project's community consequences or benefits, personal wellbeing and quality of life, and economic or financial issues (referred to here as "project merits"), rather than the environmental analyses or impacts and mitigations raised in the IS/MND. Similarly, some comments provided in response to the IS/MND express opinions for or against the project. These comments also do not pertain to the adequacy of the analysis or conclusions in the IS/MND, rather, these opinions also relate to the "project merits".

Although such opinions and comments on the project merits that were received during the CEQA process do not require responses pursuant to the CEQA process they do provide important input to the process of reviewing the project overall. The Land Trust of Santa Cruz County is the project applicant, herein referred to as the Land Trust, has prepared the following written responses to the comments that are on the project merits and not the environmental analysis prepared by the County. The County has prepared responses to issues related to the CEQA process raised during the public review period. Some overlap between these responses is likely.

GENERAL RESPONSES TO COMMENTS

While considering various comments on the project merits, it may be helpful to highlight a few general aspects of the property ownership, history and regional context. These include that the property is privately owned, it is subject to a conservation easement, the property has a long history of timber protection and limited residential use, and that 'north coast' area of Santa Cruz County is a locus of extensive nature-based recreation by the public.

COMMENTS AND RESPONSES MEMO**ABOUT THE LAND TRUST OF SANTA CRUZ COUNTY**

Comments asked about the capacity and experience of the Land Trust of Santa Cruz County (Land Trust) in regard to land and public access management. The Land Trust owns and manages 15,000 acres of land in Santa Cruz County across over 44 properties. The Land Trust manages six properties that are open for public access, which host about 15 miles of trails and an annual visitation of about 100,000. The Land Trust land management team has 9 staff and a \$1.5 million annual budget, which is anticipated to increase to \$2.0 million as new trails are opened. Staff and volunteers visit our properties on a daily to weekly basis, depending on visitation. The Land Trust developed the Public Access Plan and associated implementation strategies with consultation and review by managers and scientists from several resources management organizations and agencies, including the Bonny Doon Fire Safe Council, Bonny Doon Volunteer Firefighters, Bureau of Land Management (BLM), California Department of Forestry and Fire Protection (Cal FIRE), California Department of Fish and Wildlife (CDFW), California State Parks, City of Santa Cruz, Colorado State University Fort Collins, Midpeninsula Regional Open Space District, Northern Arizona University, Santa Cruz County Parks, Santa Cruz County Sheriff's Office, San Mateo County Parks, UC Santa Cruz, and the Wildlife Conservation Society.

PROPERTY OVERSIGHT AND NATURAL RESOURCES PROTECTION

Comments expressed interest in oversight and checks and balances related to natural resources protections. Considerable protections are in place for natural resources on the property that go above and beyond local, state and federal regulations. The entire property is subject to a conservation easement that extinguishes the right to most residential and commercial uses, apart from timber production and caretakers' quarters. As detailed in the Public Access Plan, the easement protects Conservation Values including Forests, Biodiversity, Watershed Protection, Viewshed Protection, and Landscape and Habitat Connections (such as wildlife corridors). The easement is recorded at the county. The Save the Redwoods League, a conservation organization celebrating its 100-year anniversary, owns this easement and performs annual monitoring to ensure its provisions are honored. If public access were to impair any of the Conservation Values, the Save the Redwoods League, as an accredited land trust, would have the obligation to intervene. Under the easement, they would have the right to compel the landowner to remedy impairments to the conservation values. Under a memorandum of understanding between the landowners and the Land Trust, the landowner can force the burden on the Land Trust.

EXISTING CONDITIONS

Some reviewers may have the impression that the property is pristine wilderness. The history of the property is one of relatively extensive land disturbance and human presence, considering its remote location and natural condition. The property was clear cut in the 1910s and 1920s, and was subject to extensive logging for timber and firewood through the 1960s to the 1980s. San Vicente Redwoods was also the site of a major limestone quarry through the 1960s, with extensive areas of disturbance associated with mining operations and tailings disposal. Approximately 16 timber harvests have been performed since 1992, each spanning hundreds of acres. About half of the land area of the property has been managed for timber during that time, with several management units harvested twice. 75 miles of roads have been built. In addition to forest disturbance, these operations result in truck and other vehicle

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

traffic along the main roads for several weeks each year. Inholdings with approximately 10 residences occur within the property. The Phase 1 and Phase 2 trails are located near roads that have, until recently, been used many times a day for residential vehicle access. Informal use of the fire road adjacent to Empire Grade by neighbors for dog walking and exercise has occurred for at least 10 years. This same road is planned to be converted into the Phase 1 trail where recreational use by dog walkers is proposed. The trail network is clustered in the portions of the property that have been subject to more intensive use in the past, while deep canyons, old growth trees and major streams are avoided. There are extensive existing roads on the property that were inherited from past land use. While we the proposed project would be able to use about 12 miles of these existing roads as trails, most are unsuitable for use as trails because they are steep, have poor drainage or are otherwise prone to erosion that cannot be properly managed while using the road as a trail. Other roads were not proposed for trail use because they would bring visitors to parts of the property that are closed. The proposed trail on the Laguna Tract follows an existing trail that is currently in regular use by neighbors and visitors to the Bonny Doon Ecological Reserve.

ENFORCEMENT

Comments touched on issues related to enforcement and the protection of natural resources. While the proposed project is intended for public benefit, it is located on private property, which distinguishes it in a variety of ways from a public park. The public access manager has the right to instruct anyone to leave the property if their behavior may damage natural resources. If they do not, they are subject to enforcement of laws governing trespass. The Land Trust has established a partnership with the Santa Cruz County Sheriff's Office to provide enforcement on the property, as described in the Public Access Plan.

OTHER RECREATIONAL AREAS IN THE PROJECT VICINITY

Reviewers expressed concern about cumulative impacts related to recreational use of the property, especially in its relationship to coastal access along Highway 1. This concern reflects increases in 'trash, traffic and trauma' observed in the Santa Cruz County North Coast area. The Land Trust shares these concerns, as they protect public access to the Davenport Bluffs area via a conservation easement. Extensive public access occurs at sites including the State Parks Natural Bridges, Wilder Ranch, Coast Dairies, Big Basin, and Ano Nuevo. Other natural areas frequented by the public include the County Parks Davenport Landing, Scott Creek, and Greyhound Rock, as well as Davenport Beach.

The Santa Cruz-San Mateo Unit of State Parks has annual visitation that is higher any Park System Unit north of Orange County, per the 2016 California State Park System Statistical Report.¹ These reports indicate total visitation to the Santa Cruz-San Mateo Unit was about 8 million in 2015/16 (the most recent year available) and 10.5 million in 2005/6. Notable in these statistics is the high visitation associated with beaches and famous old growth redwoods. In the vicinity of the project, visitation is highest at Henry Cowell (1.1 million), Natural Bridges State Beach (810,000), Big Basin (690,000), Wilder Ranch (470,000), San Gregorio State Beach (385,000). More remote mountain properties had lower visitation, such as

¹ California Department of Parks and Recreation, State Park System Statistical Report, http://www.parks.ca.gov/?page_id=23308.

COMMENTS AND RESPONSES MEMO

Castle Rock (125,000), Butano (57,000) and Portola Redwoods (37,000). During the most recent five years of reports, Wilder Ranch visitation ranged from 453,000 in 2014/15 and 491,000 in 2011/12. Santa Cruz County Parks does not release statistics individualized for its beaches along the Santa Cruz County North Coast, but estimated 1.6 million visits countywide in 2018. In the *Projected Visitor Counts and Parking Needs* report included in Attachment 10 of the IS/MND and as an appendix to the Traffic Impact Analysis included as Attachment 11 of the IS/MND, it is estimated that Cotoni-Coast Dairies would receive approximately 300,000 visits per year, an estimate influenced by its National Monument status and lack of a beach.

Visitation to San Vicente Redwoods is small in comparison to the extensive recreational access occurring and anticipated in the region. As described in the *Projected Visitor Counts and Parking Needs* report (see Attachment 10 of the IS/MND), the annual visitation estimate for San Vicente Redwoods at full buildout, is estimated to be between approximately 82,000 to 97,000.

Planned future public access in the region includes the North Coast Rail Trail, for which the Santa Cruz County Regional Transportation Commission recently completed the EIR process.² Conceptual level planning has been performed for two other areas, but these planning efforts have not yielded specific projects and environmental planning has not been performed. These include the following:

- 1) The re-use of the Davenport Cement Plant owned by CEMEX. The various alternatives for the Davenport Cement Plant reuse plan anticipate 250 or more campsites, guest rooms, cabins or residences. The visioning plan was presented to the County Board of Supervisors in February 2019. Additional information on the CEMEX property is available here <http://www.co.santa-cruz.ca.us/DavenportCementPlant.aspx>.
- 2) The management plan of the Cotoni-Coast Dairies owned by BLM. Public access to Cotoni-Coast Dairies is currently limited to guided hikes while the BLM develops a management plan for the property that will ensure public safety and protection of resources. The BLM will develop this plan through the National Environmental Policy Act (NEPA) process, which involves the community and stakeholders with open comment periods and possibly public meetings. Two public workshops to explore recreational access opportunities at the Cotoni-Coast Dairies site were held in December 2018. Additional information on the BLM property is available here <https://www.blm.gov/basic/programs-national-conservation-lands-california-california-coastal-national-monument-cotoni>.

Specific projects have not been proposed in these cases. The concepts lack specificity with regard to timing, location, visitation, and visitor serving facilities that would enable the detailed analysis of impacts. However, it is apparent that visitors to the proposed San Vicente Redwoods project accessing from the vicinity of Highway (Hwy) 1 would be a small fraction of the total visitors to the area in such future scenarios.

² Santa Cruz County Regional Transportation Commission, North Coast Rail Trail, <https://sccrtc.org/projects/multi-modal/monterey-bay-sanctuary-scenic-trail/north-coast-rail-trail/>.

ACCESS TO SAN VICENTE REDWOODS

Because the number of visitors at the proposed project may affect traffic, parking needs, and enforcement, estimating visitor use was key to the planning, design, and environmental review processes of the proposed project. As stated above, the *Projected Visitor Counts and Parking Needs* report in Attachment 10 of the IS/MND includes a description of the methodology for the visitor estimation made for the proposed project. Key considerations for estimating visitor use include open space characteristics and facilities that will draw visitors, as well as the ease with which these facilities can be reached.

As previously stated, the annual visitation estimate for San Vicente Redwoods at full buildout, is estimated to be between approximately 82,000 to 97,000. At full buildout of the proposed project, half of that number would drive to the primary trailhead off Empire Grade and half of that number would access the area from the coast. Visitation to San Vicente Redwoods from the vicinity of Highway 1, at approximately 41,000 to 48,500, is similar to the inter-annual variation in visitation at Wilder Ranch State Park (38,000). Furthermore, it is reasonably foreseeable that some visitors to San Vicente Redwoods will be drawn away from outdoor experiences at Wilder Ranch and other parks in the region, resulting in a net effect on regional visitation that is less than additive.

PROPOSED EMPIRE GRADE STAGING

As described in the proposed Public Access Plan and the IS/MND, access to the project site is currently planned from the Empire Grade staging area only as this is the only property that the Land Trust has jurisdiction over. As such, the Land Trust can not plan or implement an access point or staging area on land owned by another entity.

As described in the IS/MND (see page 35) A *Projected Visitor Counts and Parking Needs* report dated January 12, 2016 was prepared for the proposed project (see Attachment 10 of the IS/MND). The visitor counts and parking needs projections were based on attendee levels at comparable parks and open spaces in the area, including The Forest of Nisene Marks State Park, Wilder Ranch State Park, and Sequoia Demonstration State Forest. The project is estimated to attract 13,140 to 14,600 people per year at initial opening, and as much as 83,220 to 97,090 people per year in the future. Note that future conditions are greater because they assume the opening of all proposed 38 miles of trails and the opening of planned parking area at BLM's Cotoni-Coast Dairies property, which could facilitate the higher estimated range of visitors to the project site.

As stated in the *Projected Visitor Counts and Parking Needs* report future trail connection(s) between San Vicente Redwoods and the Cotoni-Coast Dairies property would result in visitors utilizing both properties during one recreational experience and enable visitors to use staging areas at either property to access the connected trail system. Given the relationship of the two properties, it is anticipated that the visitation levels at one property will have direct implications to visitation and parking demand at the other property. As previously stated, the BLM visitation estimates at Cotoni-Coast Dairies were roughly projected to be 300,000 at full buildout. The increase in visitation is not likely to result in a substantial increase in visitors to the proposed San Vicente Redwoods' Empire Grade staging area. This is because many of the visitors at the National Monument are likely to be short-stay visitors of the immediate Monument area that will not use the trail network to access adjacent San Vicente Redwoods, and because the proposed San Vicente

COMMENTS AND RESPONSES MEMO

Redwoods staging area at Empire Grade will be more difficult to access from major highways. Any potential future Cotoni-Coast Dairies staging area was assumed to provide adequate capacity to accommodate future visitor use of that destination and to trail users that will park at Cotoni-Coast Dairies and connect to San Vicente Redwoods trails. In other words, no specific staging area just for the San Vicente Redwoods is anticipated.

While the IS/MND for the proposed Public Access Plan was considerate of the relationship between the proposed San Vicente Redwoods project and the future Cotoni-Coast Dairies, the Cotoni-Coast Dairies project has no specific plans for which to evaluate. Any proposed improvements, including access features, that are part of the proposed management plan currently being prepared for the Cotoni-Coast Dairies property would be reviewed under a separate NEPA environmental process by the BLM.

As described in the 2017 Traffic Impact Analysis (TIA) prepared for the proposed project, the visitation estimates are very low, especially during the weekday peak hours when traffic is normally a concern. Specifically, in section 3.2 of the 2017 TIA states that the weekend trip generation is projected to be 18 vehicles per hour in the busiest hour on a busy weekend. All other periods/months/weekdays will have lower estimates. Table C of the 2017 TIA shows that the project traffic increase on roadways would be negligible and the level of service or LOS on study roadways would continue to operate at acceptable LOS A to C without and with the project.

In addition, the proposed staging area on Empire Grade is remote and far from Hwy 1, and trips to the proposed staging area would be distributed on the roadway network. Per Section 3.3 (Figure 3) of the 2017 TIA the project trips would be distributed between several roads. The highest traffic will be 50 percent of the total on Hwy 9 to/from Felton, CA. A review of the circulation system shows that Santa Cruz, which is the largest city in the area that would likely originate most trips, has direct access to Hwy 9 not on Hwy 1. For these reasons, the project trips on Hwy 1 would be negligible and would not be cumulatively considerable and would not result in cumulative traffic impacts.

POTENTIAL FUTURE COTONI-COAST DAIRIES STAGING AREA(S)

As previously stated, at full buildout of the proposed project, it was assumed that half of the full buildout number (approximately 48,500 annual visitors) would drive to the primary trailhead off Empire Grade and half would access the area from the coast. However, for a conservative comparison, assuming staging area(s) on the Cotoni-Coast Dairies site with 90 spaces and given the same full buildout visitation estimates with the same characteristics assumed for the proposed Empire Grade staging area, the maximum number of peak hour trips would be 18 vehicles in the peak hour. This would represent the potential to add a small amount of thru traffic on Hwy 1. There would be no issues related to road hazards and traffic delays associated with specific parking areas because any potential future trailheads or staging areas from the vicinity of Hwy 1 that would connect to the proposed San Vicente Redwoods project would have to cross Cotoni-Coast Dairies (BLM) and would not have parking areas that are entered from Hwy 1.

Future potential trailheads to allow access to the site from the coast side would have to be constructed on property owned by BML, the Davenport Cement Plant (CEMEX), or the Cotoni-Coast Dairies inland properties (managed by the Trust for Public Land). There are no future potential parking areas that have been discussed which would service San Vicente Redwoods that are entered from Hwy 1. Early concepts

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

presented by the BLM and the County in relation to Cotoni-Coast Dairies and the Davenport Cement Plant, respectively, are located off of Hwy 1 on Swanton Road and Cement Plant Road. Future decisions by those landowners, with projects that have not yet been defined, would be required to determine whether, where, when and how San Vicente Redwoods trail visitors could access the proposed San Vicente Redwoods trails from the vicinity of Hwy 1.

Possible issues related to road hazards and traffic delays associated with specific parking areas can only be analyzed if and when such parking areas have been identified and designed. Swanton Road and Cement Plant Road do not exhibit adverse conditions related to excessive traffic.

For a comparison, the North Coast Rail Trail project, described above, anticipates a larger annual visitation along Hwy 1 than the proposed San Vicente Redwoods project, from the vicinity of Hwy 1. A review of the recently certified EIR for the North Coast Rail Trail project, described above, shows that the project trips for the North Coast Rail Trail project is 9 times higher than the proposed San Vicente Redwoods project at 150 vehicles/hour of which all would occur directly on Hwy 1. The recently certified EIR shows that the North Coast Rail Trail project would not result in direct traffic impacts. Transportation-related impacts associated with the North Coast Rail Trail project were considered less than significant except for traffic hazards and delays associated with parking areas that are entered from Hwy 1. The North Coast Rail Trail EIR concluded that cumulative impacts would occur due to added traffic on cross-streets that would provide vehicular access to the North Coast Rail Trail staging areas that are on Hwy 1. The certified EIR for the North Coast Rail Trail project determined that impacts from their project would be cumulatively considerable because of an existing deficiency on Hwy 1.

Any potential future traffic increase that would be attributable to the proposed San Vicente Redwoods project would be negligible and only occur along thru traffic on Hwy 1, not to cross-streets, where the cumulative impacts attributable to the North Coast Rails Trail project are expected to occur as described in the certified EIR. For these reasons, the proposed San Vicente Redwoods project would not be cumulatively considerable if a staging area were available allowing visitors to access the site from the coast side.

COMMENTS AND RESPONSES MEMO

INDIVIDUAL RESPONSES TO COMMENTS

We respond to each individual comments in Table 1, below. Individual comments are reproduced from the original comment letter along with the comment numbers and followed by the response. In total, the County received 25 comment letters with two letters from public agencies and 23 letters from members of the general public. Out of the 25 comment letters, five of the letters had comments that were related to the IS/MND. As stated above, the individual responses below are intended to address those comments that are on the project merits and not on the environmental analysis prepared by the County. We focus on technical topics rather than on expressions of support for or opposition to the project.

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
<i>Agencies and Service Providers</i>		
A1	Christine Duymich, Monterey Bay Air Resources District	
A1-1	Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the above-referenced document. The Air District has the following comments:	This comment is related to the environmental analysis prepared by the County.
A1-2	Air Quality	This comment is related to the environmental analysis prepared by the County.
MM AQ-1.1: The Air District appreciates the inclusion of the construction dust mitigation and control measures during construction/earth-moving operations.		
A1-3	Construction Equipment: The Air District recommends using cleaner than required construction equipment that conforms to ARB's Tier 3 or Tier 4 emission standards. With respect to diesel operated on-road and off-road construction vehicles, we further recommend that whenever feasible, construction equipment use alternative fuels such as compressed natural gas (CNG), propane, electricity or biodiesel. This would have the added benefit of reducing diesel exhaust emissions.	The Land Trust will gladly commit to cleaner than required construction equipment that conforms to California Air Resources Board's (ARB) Tier 3 or Tier 4 emission standards. The Land Trust will require contractors to demonstrate Tier 3 or Tier 4 compliance with an ARB certificate and will also indicate a preference for bidders who use alternative fuels in their staging area bid package.
A1-4	Permits Required	This comment is related to the environmental analysis prepared by the County.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
	Portable Construction Equipment: - If portable construction equipment, such as dredges and air compressors, are to be used during this project, please contact the Air District at (831) 647-9411 for permitting information.	
	A.3 Tree Removal: The proposed site preparation would result in the removal of 15 existing native and 40 non-native trees. During the tree removal process, if the trees are disposed of via wood chipping, please make sure to contact the Air District's Engineering Division at (831) 647-9411 to discuss if a Portable Registration is necessary for the wood chipper being utilized for this project.	
A2	Susan Mason, Bonny Doon Fire and Rescue	
A2-1	It is important to re-open the escape access from the Warren Drive loop out to the reserve. This was open for years and only recently has been allowed to overgrow. Last year, when there was a structure fire on Warren Drive, a piece of equipment responding to the fire tried to access through that route. It is important both as escape for residents and as access to medical and fire emergencies in the hiking tract.	The Land Trust will ensure safe and adequate access for emergency vehicles on the project property. However, the re-opening of the escape access to Warren Drive out of the reserve is not with the jurisdiction of the Land Trust. The road segment referred to in this comment is not on the project property, but on the adjacent Bonny Doon Ecological Reserve, which is owned by the CDFW. The Land Trust has communicated this information with Captain Mason and has forwarded her request to CDFW.
<i>Private Individuals and Organizations</i>		
B1	Joel Steinberg	
B1-1	The San Vicente Redwoods multiuse trail system will be a wonderful addition to our Santa Cruz outdoor experience. The more people are exposed to the beautiful Santa Cruz environment, the more they will work to protect it. I encourage you to work with the Santa Cruz Landtrust to shepherd this project along.	This comment is noted.
B2	Donna Karolchik	
B2-1	I cringed when I opened up your webpage re: Trails Impact on Nature: "Less than Significant". It shows a picture of a big pack of mountain bikers assaulting yet another backcountry trail. I'm dismayed that the Land Trust is catering to the local mountain bike lobby when planning trails at San Vicente Redwoods, but is restricting dogwalking access to	We provided a level of dog walking access that was supported by our expert advisors and review of the scientific literature. We applied a similar decision process to the extent of allowed hiking, mountain biking and equestrian use. In all cases our decisions were made without regard to financial contributions.

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
	such a small percentage of the trail network. Unfortunately, the mountain bikers in Santa Cruz are supported by a very lucrative industry that is willing to sink big dollars into making sure that every trail in Santa Cruz County is accessible; whereas us dogwalkers don't have that kind of big bucks lobby backing us ... we just want to have nice places to walk our dogs. I have heard the excuse that the Land Trust is worried about the impact on the mountain lions, but in my experience, the impact of mountain bikes on the environment far exceeds that of dogwalkers.	Please see also the response to comment B15-50 below.
	I wish I could be more excited about your plans for San Vicente Redwoods. Instead, they continue to sadden me.	
B3	James Feichtl	
B3-1	I fully support public access, but believe some of the trail system should be designated for hiking only (no horses, bikes, or dogs).	This comment is noted. We anticipate that equestrian use of the property will be relatively light and that many of the hike/horseback trails will provide a hiking-only experience most of the time.
B4	Bob Schildgen	
B4-1	Please preserve the San Vicente Redwoods!	This comment is noted.
B5	Jayne Cerny	
B5-1	Please preserve the beauty of the San Vicente Redwoods and create this preserve for the public to appreciate them.	This comment is noted.
B6	Marcel Moran	
B6-1	My name is Marcel Moran, I am a Bay Area resident, and avid hiker in the Santa Cruz Mountains. I am writing to endorse the plan submitted by the Land Trust of Santa Cruz County for 38 miles of trails in the San Vicente Redwoods. This new park will be a wonderful addition to the redwood forests of the county, and I cannot wait to visit them as a hiker!	This comment is noted.
B7	Kristin Womack	
B7-1	I strongly support the plan for 38 miles of trails put forward by the Trust for Public Land of Santa Cruz County in the San Vicente Redwoods Preserve!	This comment is noted.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
B8	Randall Kirschman	
B8-1	I am in favor of whatever promotes natural environments in this age of endless traffic and smartphone obsession.	This comment is noted.
B9	Anil Gangoli	
B9-1	I am writing to register my support for the plan, submitted by the Land Trust of Santa Cruz County, for approximately 38 miles of trails through San Vicente Redwoods. These trails will provide access for residents of Santa Cruz and neighboring counties to this beautiful preserve while taking the proper caution and care to mitigate impacts to it. Providing access is important because it allows the population to develop an appreciation for the land and to understand the value of public and donor investment to preserve it.	This comment is noted.
B10	Richard Rammer	
B10-1	I reviewed the trails plan submitted for the San Vicente Redwoods. I like the overall layout and the fact that the trails should reduce incursions into other areas. I hope it gets approval as I plan to help build the trails whenever time permits me to volunteer. I strongly favor preservation of our remaining Redwood habitat along our beautiful Northern California coast.	This comment is noted.
B11	Virginia Leslie	
B11-1	One of Santa Cruz County's biggest assets is its access to nature. Many people visit for a chance to spend time in the redwoods or at the coast. Letting the Land Trust of Santa Cruz County save a stretch of the San Vicente Redwoods and make it accessible to the public would add to the natural riches of the county.	This comment is noted.
B12	Ben Martin	
B12-1	I support the proposal prepared by the Land trust of Santa Cruz County, in conjunction with the Sempervirens Fund, to construct 38 miles of trails through the San Vincente redwoods.	This comment is noted.

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
B13 John Engell		
B13-1	As a long-time member of Sepervirens Fund, I strongly support the trail plan for the San Vicente Redwoods preserve.	This comment is noted.
B14 Henry Millstein		
B14-1	As a person who frequently hikes in Santa Cruz County, I wish to express my support for the plan for trails in San Vicente Redwoods by the Land Trust of Santa Clara County. I believe that public access to this area is essential to maintaining support for it as public open space. I hope that you will support this project going forward.	This comment is noted.
B15 Grey Hayes		
B15-1	Attached, please find my comments regarding the San Vicente Redwoods Public Access Plan and accompanying Initial Study/Mitigated Negative Dec. I submit these comments as a private citizen, an ecologist, and as one who has extensive familiarity with the biological and social communities in the region surrounding the proposed project. I am also a neighbor and a sometimes collaborator with the project proponents. In these regards, I have the highest esteem for the integrity and neighborliness of the individuals involved. I hope that the comments are received with this in mind - that I have long worked to improve the science, planning, analysis, and public participation in natural areas management, a subject that I teach at the University and have researched as a professional scientist. I hope that the County and the Project Proponents make some efforts to improve what has been proposed in response to my comments.	This comment serves as an introduction to the comment letter.
B15-2 Coastal Act Questions	What portion of the proposed project is in the State-designated Coastal Zone?	As shown in Attachment 5, Biological Resource Assessment, of the IS/MND the location of the project relative to the Coastal Zone is shown on Figure 2 the Biological Resources Assessment. The project includes approximately 35 miles of trail, with 59 percent or 20.5 miles of trail within the Coastal Zone. The proposed

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
		parking and staging area along Empire Grade Road are located outside of the Coastal Zone.
B15-3	What portion of proposed recreational trail use would take place in Environmentally Sensitive Habitat Areas (ESHA), which are protected by Coastal Commission policy?	Approximately 4.4 miles of trail occur within ESHAs defined by the Santa Cruz County LCP, including oak woodland, occurrences of rare plants (primarily Anderson's manzanita), streams, riparian habitat, wetlands (including both federal 3-parameter wetlands and Coastal Zone 1-parameter wetlands). The proposed trail would not pass through any other ESHAs. Of the 4.4 miles of the proposed trail that would go through ESHAs, 0.54 miles occurs in riparian habitat (including 0.33 miles on existing roads) and 4.01 miles occur in oak woodland (including 1.72 miles on existing roads). Note that these numbers include some overlap (e.g., some oak woodland also falls within the County's defined riparian zones). Of the 4.4 miles of the proposed trail within ESHAs, approximately 1.85 miles, or 42 percent, occur on existing roads that pass through ESHAs. Most ESHAs are afforded a 100-foot setback. The proposed project includes an additional 5.08 miles of trail that would pass through one or more ESHA buffers, with approximately 2.67 of those miles, or 53 percent, occurring on existing roads. The goals, policies, and implementing strategies as well as the design and maintenance guidelines, and construction protocols identified in the proposed Public Access Plan and as Mitigation Measures in the IS/MND were prepared to reduce environmental impacts, including impacts to ESHAs. Additionally, please see response to comment B15-5 for additional discussion on allowed uses in the ESHA.
B15-4	How has the project proponent consulted with the Coastal Commission about ESHA concerns?	As discussed on page 1-6 in Chapter 1, Introduction, of the proposed Public Access Plan, and on page 13 of the IS/MND, the Land Trust and the Conservation Partners solicited guidance from experts in the fields of conservation science, public access management, biological resources, cultural resources, and engineering. Regulatory Agency staff from CDFW and the Coastal Commission were also consulted as well as staff from the University of California Santa Cruz Puma Project. Through close coordination with technical experts, trail alignments were refined to minimize potential impacts to resources. For a complete description of the planning process please see pages 1-4 through 1-7 of the proposed Public Access Plan, and pages 88 and 89 of the IS/MND. Furthermore, as described on page 8-1 of the proposed Public Access Plan, the preparers of the Plan solicited input from agency partners and experts. For a complete list, please see page 8-1 of the Plan.

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
B15-5	What aspects of recreational trail use are permissible in ESHA?	As stated on page 84 of the IS/MND, the proposed project does not conflict with any regulations or policies adopted for the purpose of avoiding or mitigating an environmental effect. An "ESHA" is an "environmentally sensitive habitat area" as defined under the California Coastal Act of 1976 (Coastal Act). The Coastal Act's structure contemplates that ESHA determinations are made by a local government when adopting or amending its Local Coastal Plan (LCP). As shown on Figure 1 of the IS/MND (see page 3), the project site is in the <i>Santa Cruz County General Plan and Local Coastal Plan's</i> Bonny Doon Planning Area. The LCP regulates development and other activities within and adjacent to Environmentally Sensitive Habitats and defines required buffers or setbacks from such habitats. The LCP defines allowed uses within Environmentally Sensitive Habitats and their buffers and specifically identifies "non-motorized recreation and pedestrian trails" as an allowed use compatible with riparian habitat.
B15-6	To what degree must trails be redesigned to transform them from recreational to interpretive trails to meet the requirements of trail development through ESHA?	Also, please see responses to comments B15-2 and B15-3. Please see response to comment B15-5. The proposed Public Access Plan recognizes interpretive trails to be a recreational use.
B15-7	Mitigation Measures and Public Reporting Questions The approval process relies on a CEQA process of Mitigated Negative Declaration, requiring mitigation measures to be enacted and ongoing monitoring and maintenance to reduce certain impacts to below certain thresholds.	The comment is noted.
B15-8	What are the specific baseline versus thresholds of significance for the all of the potential impacts that require mitigation to bring the proposed project impacts to a level of "less than significant?"	This comment is related to the environmental analysis prepared by the County.
B15-9	To what degree does the Initial Study rely on the "Construction Protocols" (Plan, p. 7-25) included in the Access Plan in order to determine that a CEQA Mitigated Negative Declaration is sufficient for environmental review and approval? Which Protocols are omitted from the Plan in the Initial Study, and why?	This comment is related to the environmental analysis prepared by the County.
B15-10	To what degree does the Initial Study rely on the "Trail Maintenance Guidelines" (Plan, p. 7-38) included in the Access Plan in order to determine that a CEQA Mitigated Negative Declaration is sufficient for	This comment is related to the environmental analysis prepared by the County.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
B15-11	environmental review and approval? Which Guidelines are omitted from the Plan in the Initial Study, and why? To what degree does the Initial Study rely on the "adaptive management strategies" (Initial Study, p. 58) included in the Access Plan in order to determine that a CEQA Mitigated Negative Declaration is sufficient for environmental review and approval? Which specific strategies from the Plan are omitted as specific mitigations in the Initial Study, and why?	This comment is related to the environmental analysis prepared by the County.
B15-12	How will the public be informed about the implementation and monitoring of all of the mitigation measures that made it possible to rely on a Mitigated Negative Declaration process/approval, including success of the adaptive management strategies, construction protocols and trail maintenance guidelines?	This comment is related to the environmental analysis prepared by the County.
B15-13	Will the Lead Agency require regular reporting? If so, in the absence of quantitative thresholds to monitor, how will the project proponent know what must be included in those reports? Why has the public not been informed about these reporting requirements during this public review process?	This comment is related to the environmental analysis prepared by the County.
B15-14	Enforcement Questions The Plan and Initial Study seem to rely on policies and regulations with some education and signage to reduce the impacts of the extensive new recreational uses of this property. And yet, there is no clear dedication to enforcement mentioned.	This comment is related to the environmental analysis prepared by the County. Please see General Responses to Comments under subsection "Enforcement." The Land Trust recognizes that enforcement has a key role in helping to prevent unlawful issues and as a result, developed a partnership with the Santa Cruz County Sheriff's Office (County Sheriff) to ensure that together there is the capacity for enforcement. With respect to the commenter's opinion regarding extensive new recreational uses of the property, as described in the IS/MND (see page 17) most of the property (approximately 94 percent) would be closed to public access, which leaves 6 percent of the site for future recreational uses.
B15-15	What evidence does the Lead Agency cite to support that non-enforcement-based approaches work to deter uninvited recreational uses such as with this project?	Please see response to comment B15-14 above.

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
		Also, please see General Responses to Comments under subsection "About the Land Trust of Santa Cruz County," which describes Land Trust experience managing public access.
B15-16	To what extent are the Project Proponents dedicated to legal enforcement of the recreational use policies associated with the Plan?	The proposed Public Access Plan (page 6-3) details roles and responsibilities for implementing the proposed Plan. Specifically, the fifth bullet "Law Enforcement" identifies that "The Santa Cruz County Sheriff's Office (County Sheriff) will provide law enforcement to ensure compliance with state laws, and provide for public safety and protection of the Conservation Values." Also, please see response to comment B15-17 below.
B15-17	What specific County, State, or Federal laws/regulations/codes would the Project Proponents use to enforce use restrictions on the property?	As private property, laws related to trespass apply. According to Craig Wilson, the Undersheriff for Santa Cruz County, the Sheriff's Office will enforce state laws and applicable county ordinances on the San Vicente properties. Deputies will also enforce the formal rules, regulations and restrictions as developed and adopted by the owners of the San Vicente properties, which will be posted at the primary public access point. The proposed construction and operation of the proposed Public Access Plan would be required to comply with all the existing and applicable federal, State, and local regulations. The County, acting as the Leac Agency, would be responsible for overseeing the enforcement of the applicable regulations. Additionally, as described in the IS/MND (see page 88) and the proposed Public Access Plan (see page 3-2), Goal 2, Manage Risk and Safety, states the Conservation Partners' would provide patrol, monitoring, security, and signage for public safety and protection of resources. Please see General Responses to Comments under subsection "Enforcement."
B15-18	To what extent are law enforcement personnel dedicated to assuring prosecution of those laws?	According to Craig Wilson, the Undersheriff for Santa Cruz County, the Sheriff's Office intends to provide law enforcement and public safety services on the San Vicente properties as provided by contract with the Land Trust.
B15-19	To what extent is the District Attorney's office dedicated to assuring prosecution of those laws?	Please see responses to comments B15-15 and B15-17 for a discussion on illegal activities and plans for managing risk and safety, respectively. According to Craig Wilson, the Undersheriff for Santa Cruz County, the District Attorney accepts cases from law enforcement and evaluates those cases for

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
		prosecution. No separate contracts or agreements with the District Attorney is anticipated.
		Please see response to comment B15-18 with respect to enforcement.
B15-20	What evidence does the Lead Agency or Project Proponents cite for the ratio of trail users who abide by restrictions versus those who do not in natural areas in the region?	On trails managed by the Land Trust, described above in About the Land Trust, we observe very few issues associated with visitors not following rules. The vast majority of trail visitors to Land Trust properties are rule abiding. Some publicly managed properties in the region have substantial problems associated with unauthorized camping and dumping, and unauthorized trail construction and associated erosion and damage to vegetation. The Land Trust attributes the difference to our commitment to frequent monitoring and maintenance, and to our success building goodwill with the community.
B15-21	What level of effort do the Project Proponents believe will be necessary to control use to designated trails?	Please see response to comment B15-18 with respect to enforcement.
B15-22	How will the public access the statistics related to enforcement activities on the property?	Please see responses to comments B15-18 with respect to reporting and enforcement.
		Once the project is approved, it will be a private recreational use area subject to regulatory compliance for construction and operation. The Sheriff's Office will manage enforcement reporting and public access to records in a manner consistent with office policies.
B15-23	Conservation Easement-Project Purpose Questions The document informs the public of seemingly contradictory directions of the conservation easement: "...allowing for public access is a requirement of the Conservation Easement that protects the property." (Plan, p. 1-3; Initial Study p. 12) versus "The Conservation Easement gives the SRL the right to allow public access. (p. 1-5)"	As stated in the Draft Public Access Plan on page 1-5, the general purpose of the Conservation Easement, executed December 2014, is to preserve and protect in perpetuity the natural, ecological, habitat, scenic, open space, and forestry resources located on the property, including management and maintenance by the Grantor (POST and Sempervirens Fund) and the Grantor's successors. The Conservation Easement gives the SRL the right to allow public access. The Conservation Easement identifies seven Conservation Values and explains the role San Vicente Redwoods plays in providing each value. These are summarized in Chapter 2. The full text of the Conservation Values is provided in Appendix 1 (Conservation Values) of the Draft Public Access Plan. As described in the Conservation Value #7, <i>Public Recreation, Education, and Scientific Study</i> , describes the opportunities for public access on the site. Given the Conservation Values are to be upheld as part of complying with the Conservation Easement, the two terms

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
B15-24	In what ways has legal counsel determined that it is a requirement that the owners provide public access on the property?	"requirement" and "right to" public access are both appropriate to describe the purpose and intent of the Public Access Plan with respect to public access. Please see response to comment B15-23. The details for how the Conservation Easement and the associated Conservation Values were determined have no bearing on the approval of the IS/MND or the proposed Public Access Plan. Please see response to comment B15-18 with respect to enforcement.
B15-25	How does the cited easement language giving the property owner the 'right to allow public access' correlate with the requirement for public access?	Please see response to comment B15-23.
B15-26	How important was it to the Lead Agency review that the conservation easement may require versus allow public access?	Please see response to comment B15-23. The description of the Conservation Easement is intended to help the public and the decision-making bodies understand the background effort that was considered for developing the proposed Public Access Plan.
B15-27	What communications from the Easement holders including their legal counsel(s) indicate the degree to which public access must be allowed?	Please see response to comment B15-23. The details for how the Conservation Easement and the associated Conservation Values were determined have no bearing on the approval of the IS/MND or the proposed Public Access Plan. Please see response to comment B15-18 with respect to enforcement.
B15-28	"The Public Access Plan includes a Recreational Access Plan and a Research and Education Access Plan, though the focus of the Public Access Plan is recreational access and regional trail connections. While all research and educational activities are not necessarily open to the public, they are included as part of the Public Access Plan because of the education potential and because research and education will be supported by the same trails and access features required for recreational access. Research access will be managed by the owners, while educational and special use will be managed by the Land Trust."	The comment is noted.
B15-29	The Initial Study says "The purpose of the proposed San Vicente Redwoods Public Access Plan is to identify the short-and long-term vision and tools to initiate and maintain public access for at least 10 years." (Initial Study p. 12)	The comment is noted.
B15-30	How was the level of public access determined?	The type of public access is directly related to the implementation of the Conservation Values of the Conservation Easement. Please see response to comment B15-4 with respect to expert consultation early in the process.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
B15-31	Why was the level of public access not included in the CEQA project purpose statement?	This topic is addressed in the project description is included in the IS/MND on pages 12 through 21. The text under the subheading "Overview and Statement" is brief introduction to the remainder of the project description on the following nine pages, which provide a detailed description of the proposed public access features.
B15-32	How does the project proponent distinguish between public access and private access uses of the property?	Private access uses would not be open to the general public. As described on page 5-2 of the Draft Public Access Plan, research is not considered a type of public access but is discussed in this chapter because public access features have the potential to support research uses. Research uses may include a variety of project types ranging from short- to long-term projects; private projects to student or class projects; and site-based to landscape scale studies. San Vicente Redwoods provides ample opportunities for both natural and social science studies, as well as for research that extends across multiple protected open space areas. Research may be conducted within restoration, conservation reserves, or the working forest, pending a permit as discussed under Permit System, below, and in Chapter 6, Implementing the Plan. Research and higher education uses are not considered public access.
B15-33	How does the project proponent foresee the ratio of public access versus private access uses of the property over the course of the 10-year project timeframe?	Please see response to comment B15-18 with respect to enforcement.
B15-34	To what extent have public entities or private funding agencies mandated public access as part of their funding obligations? If so, to what extent have these funding obligations informed the project purpose?	Please see response to comment B15-18 with respect to enforcement.
B15-35	Public Outreach and Engagement Questions Extensive activities are outlined in the Plan and Initial Study including the types of attendees, but not the issues raised. Of the many activities, the document states that only the input from the community meetings was used to revise the Plan.	The commenter appears to interpret a statement that is specific to the September 2014 community meeting that describes that input given at that meeting was incorporated into the Draft Public Access Plan, as the only input considered for drafting the proposed Plan (see page 1-8). It is more accurate to interpret the whole of the description of the planning process that is summarized in Chapter 1, Introduction, starting on page 1-4 and continuing through page 1-8 of the Draft Public Access Plan as the methodology for preparing the Draft Public Access Plan. Additionally, the planning process and alternatives considered is provided in the IS/MND on pages 13 through 17.

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
		Our community outreach spanned six years and included over 100 meetings with community members. We considered all of the feedback in developing the plan and generated several rounds of revisions. Outreach included meeting with nearby residents, including the commenter, on several occasions. We also met with the Davenport North Coast Association board, which included a designated representative from the commenter's residential association, on several additional occasions.
B15-36	Why did the Plan authors spend so much time and money on public outreach and engagement?	The Land Trust of Santa Cruz County is dedicated to the community and natural resources of our region.
B15-37	In what ways did feedback from the community meetings affect the content and direction of the Plan?	A careful and thoughtful process was put into the development of the Draft Public Access Plan. This is described in Chapter 1, Introduction, starting on page 1-4 and continuing through page 8 of the Draft Public Access Plan. A summary of the planning process and alternatives considered was also provided in the IS/MND on pages 13 through 17.
B15-38	Why wasn't input from the other extensive public outreach and engagement activities used to revise the Plan?	Input from all outreach efforts was considered. It is important to note that not every suggestion and idea expressed during the outreach and planning process was implemented in the Plan. The proposed Public Access Plan represents the opinions and ideas of many people. Please see response to comment B15-35.
B15-39	How did the Plan authors apply social science tools to analyze and summarize the public input into the planning process?	Assuming the commenter understands "social science tools" to mean "surveys, interviews, focus groups, field observations, experimentation, existing data, and the like" the use of these methods is well documented in the Draft Public Access Plan and IS/MND. Please see response to comment B15-35.
B15-40	Trail Planning Questions "RECREATION 4.1 Designate a Skyline-to-Sea Trail corridor through San Vicente Redwoods, extending from Empire Grade to the Cotoñi-Coast Dairies property." (Plan, p 3-4)	The comment is noted.
B15-41	Questions How was it determined that regional trail connections are a priority for the property? What percentage of recreational needs will be met by this priority? How was this determined?	The planning process is provided in both the proposed Public Access Plan at pages 1-4 and 1-8 in the Introduction chapter and summarized in the IS/MND at pages 13 through 17 in Section II, Background Information. The level of information requested by the commenter is not available, nor does it have any bearing on the approval of the IS/MND or the proposed <i>Public Access Plan</i> . Please see responses to comments B15-18 with respect to enforcement and B15-37 and community input.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
	What socio-economic demographic is most likely to be served by such a priority?	
	How was this determined?	
B15-42	How was it determined that a Skyline-to-Sea Trail corridor should be a priority for the property?	Please see response to comment B15-41.
	What percentage of recreational needs will be met by this priority?	
	How was this determined?	
	What socio-economic demographic is most likely to be served by such a priority?	
	How was this determined?	
B15-43	"Trail planning for the Laguna tract has been conducted in coordination with CDFW..." (Initial Study, p. 28)	The comment is noted.
B15-44	Has the CDFW approved through trail use by the project proponents?	No formal approvals (i.e., permits) have been issued. As described on page 1-6 of the Public Access Plan, site visits were conducted with representatives from the County of Santa Cruz and the CDFW, and the proposed project was presented to California Coastal Commission. As described on page 4-11 of the proposed Public Access Plan, the Laguna Tract trail is an existing trail that is to be improved with minor reroutes to reduce potential for erosion. The Land Trust planned the trail improvements in coordination with CDFW staff. The Land Trust is complying with all Department requests and procedures in relation to the connections between the trails, and communicates regularly with CDFW staff in relation to this project. CDFW staff have requested collaboration in reserve management, and the Land Trust is willing to support that work. The Land Trust has a major initiative associated with conservation of biodiversity in the Santa Cruz Sandhills, and is well suited to provide such assistance. Also, as described on page 2-1 of the proposed Public Access Plan, potential connectivity between CDFW's Bonny Doon Ecological Reserve and San Vicente Redwoods: Laguna Tract is relatively unconstrained as existing, informal trail connections are already present between these properties. Given that formalization of this trail connection is a component of the proposed Public Access Plan, coordination with CDFW will still be necessary to address access

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
		and management concerns. Management of trails, visitor activities and parking will be coordinated with CDFW to be consistent with management of the Bonny Doon Ecological Reserve. The Conservation Partners will allocate resources to assist with patrol, maintenance and volunteer coordination, as discussed in Chapter 6 of the Public Access Plan. As a result of Land Trust involvement, the resources available for management will be substantially increased.
B15-45	What level of environmental review has CDFW undertaken in order to allow the current trail access, which would be less than the additional proposed access?	Please see response to comment B15-44 with respect to expert consultation early in the process.
B15-46	How does CDFW have the authority to permit uses for the next 10 years on an Ecological Reserve without an approved management plan?	Please see response to comment B15-44 with respect to expert consultation early in the process.
B15-47	Has the Coastal Commission previously communicated to CDFW about visitor use at the Ecological Reserve in the absence of an approved management plan?	Please see responses to comments B15-4 and B15-44 with respect to expert consultation early in the process.
B15-48	Would the target group for the Laguna Parcel trail – recreational trail users – be impacting Environmentally Sensitive Habitat Areas at the Bonny Doon Ecological Reserve?	The proposed connector trail would not impact the Bonny Doon Ecological Reserve during construction. The proposed trail would be adjacent to the Reserve and would connect to the existing trails in the Reserve. The informal trail that the proposed project would improve is already used by trail users at the Bonny Doon Ecological Reserve.
B15-49	How is the trail system at the Ecological Reserve, and, by extension into the Laguna Parcel, an interpretive trail versus a recreational trail?	Please see responses to comments B15-6 with respect to the use of the trails and B15-44 with respect to expert consultation early in the process.
B15-50	Alternatives Analysis Questions Allowed Uses; “Hiking, Bike Riding, Horseback Riding, and Dog Walking: These uses result in similar effects in regard to trail erosion, in that trail design and maintenance have a greater effect on erosion than the type of use.” (Initial Study, p. 16) How has the Lead Agency determined that these trail uses have comparable effects on trail erosion potential? What scientific evidence supports such a claim?	Hiking, bike riding, horseback riding, and dog walking are all types of “low-impact” recreational activities. Low-impact recreational uses does not include any motorized uses such as off-road vehicles such as dirt bikes or four-wheelers. Low-impact recreational uses are commonly defined as interpretive history and nature trails, wildlife viewing, bird watching, horseback riding, and mountain biking. This assertion is supported by the Visitor Experience and Resource Protection (VERP) Framework of the National Park Service (Belnap et al 1997, Anderson et al 1998, Manning 2001, Landres et al 2014), which was influenced by earlier work by the US Forest Service (Stankey 1985). Current National Park Service policy (National Park Service 2006) directs superintendents to use Belnap et al (1997) in evaluating the visitor impacts.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
		Sources: - Anderson, D. H., Lime, D. W., & Wang, T. L. (1998). Maintaining the quality of park resources and visitor experiences. A Handbook for Managers, University of Minnesota. 135 p. - Belnap, J., Freimund, W.A., Hammett, J., Harris, J., Hof, M., Johnson, G., Lime, D.W., Manning, R.E., McCool, S.F., Rees, M. (1997). VERP. The Visitor Experience and Resource Protection Framework. A Handbook for Planners and Managers. National Park Service, Denver CO. 103 p. - Landres, P., Stutzman, S., Vagias, W., Cook, C., Mills, C., Devine, T., Dingman, S., Lindholm, A., Stuebe, M., Memory, M. and Scott, R. (2014). Keeping it wild in the National Park Service: A user guide to integrating wilderness character into park planning, management, and monitoring. - Manning, R. (2001). Programs that work. Visitor experience and resource protection: a framework for managing the carrying capacity of National Parks. Journal of park and recreation administration, 19(1), 93-108. - National Park Service 2006. Visitor Experience and Resource Protection, Formal and Social Trail Assessments, for the Tuolumne Meadows Area, Fall 2006. - Stankey, G.H., D.N. Cole, R.C. Lucas, M.E. Petersen, and S.S. Frissell, 1985. The Limits of Acceptable Change (LAC) System for Wilderness Planning. General Technical Report INT-176. U.S. Forest Service, Intermountain Forest and Range Experiment Station, Ogden, UT. Additionally, the proposed Public Access Plan identifies that the Land Trust will develop and implement a Trail Maintenance Plan. A trail maintenance system will be developed by the Management Team and reviewed by the Leadership and Oversight Teams. Trail Maintenance Plan would minimize impacts to sensitive vegetation from use of the trail network, the trail maintenance system includes an annual monitoring program aimed at identifying maintenance issues (e.g., erosion) and other problems (e.g., nuisance trash areas or other impacts from trail users). The trail maintenance system would include specific methods for routinely documenting and implementing the necessary maintenance by the Public Access Manager.
B15-51	"These four uses also have been found to have similar impacts on wildlife." How has the Lead Agency determined that these trail uses have comparable effects on wildlife disturbance potential?	This comment is related to the environmental analysis prepared by the County. However, we provide discussion here because the protection of biodiversity and wildlife are central to the Land Trust's mission, and to the development of the

COMMENTS AND RESPONSES MEMO

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
	What scientific evidence supports such a claim?	project. Please also see the response to comment B15-50 above, and comment B16-4, below.
	How can the public understand the proposed project impacts when there is also a contradictory statement quoted in the Study from the Santa Cruz Puma Group "dog walking is understood to deter use of the area by medium and large mammals for sensitive life stage activities such as breeding and denning."	Larson and others (2016) performed a comprehensive literature review of the impacts of recreation on wildlife, and found very similar rates of adverse impacts in studies of hiking, biking, horseback riding and dog walking. Courtney Larson and coauthor Sarah Reed served as advisers on the proposed project. As discussed on page 1-6 in Chapter 1, Introduction, of the proposed Public Access Plan, and on page 13 of the IS/MND, the Land Trust and the Conservation Partners solicited guidance from experts including staff from the University of California Santa Cruz Puma Project. Through close coordination with technical experts, trail alignments were refined to minimize potential impacts to resources. For a complete description of the planning process please see pages 1-4 through 1-7 of the proposed Public Access Plan, and pages 88 and 89 of the IS/MND. As discussed in Chapter 6 of the proposed Public Access Plan, on page 6-7, and in the IS/MND on page 17, out of the 8,500-acre project site, 460 acres would be open to public access leaving approximately 94 percent of the project site closed. As part of the research and education component of the proposed San Vicente Redwoods Public Access Plan, these uses would be permitted throughout the property on a case-by-case basis. For this closed zone, the Public Access Plan's Management Team would focus management efforts on approving appropriate research and education uses, including the University of California Santa Cruz Puma Project, and preventing inappropriate access and addressing any trespass. As discussed in the IS/MND in Section III, Environmental Analysis, under the subtopic of Biological Resources in criterion #4, impacts to wildlife movement corridors were found to be less than significant and no mitigation is required. While the project site is recognized as an important wildlife movement corridor, the proposed trail system and staging area would not interfere substantially with the movement of the mountain lions or other native species. The location of the public access areas and the closed areas were selected specifically to provide large areas of core habitat and provide large closed areas around mountain lion denning areas that would minimize impacts to mountain lion breeding and connectivity to

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment # Comment

Response

adjacent habitat areas. As discussed in the IS/MND, mountain lions and other native species often utilize human-use trail networks.

The 2.5 miles of permitted dog walking would be at the beginning of trail network, adjacent to the staging area and Empire Grade, an arterial road with extensive residential use, and would not be located near the "closed" areas, which were designated in part to include breeding and denning habitat for medium and large mammals. Over 99 percent of the property is closed to dog walking. The 2.5 miles of trails where dog walking is planned are on fire roads close to Empire Grade and the residential neighborhoods and agricultural properties in the vicinity. Many of these properties have dogs. These fire roads have been used by members of the neighborhood for dog walking on for many years. This location and amount of daytime access was deemed to be suitable by the wildlife experts that provided technical expertise on the proposed Public Access Plan.

As discussed on page 1-6 in Chapter 1, Introduction, of the proposed Public Access Plan, and on page 13 of the IS/MND, the Land Trust and the Conservation Partners solicited guidance from experts in the fields of conservation science, public access management, biological resources, cultural resources, and engineering. Regulatory Agency staff from CDFW and the Coastal Commission were also consulted as well as staff from the University of California Santa Cruz Puma Project. Through close coordination with technical experts, trail alignments were refined to minimize potential impacts to resources. For a complete description of the planning process please see pages 1-4 through 1-7 of the proposed Public Access Plan, and pages 88 and 89 of the IS/MND. Furthermore, as described on page 8-1 of the proposed Public Access Plan, the preparers of the Plan solicited input from agency partners and experts. For a complete list, please see page 8-1 of the Plan.

Please also see response to comment 16-4.

Source:

- Larson, C. L., Reed, S. E., Merenlender, A. M., & Crooks, K. R. (2016). Effects of Recreation on Animals Revealed as Widespread through a Global Systematic Review. PLoS one, 11(12)

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
B15-52	Education Questions "EDUCATION 2.1 Encourage research projects that will inform management of public access, such as studies that monitor environmental impacts of visitors on the reserves." (Plan, p. 3-5)	The comment is noted.
B15-53	Why do the project proponents limit the research to that which informs management of public access?	Scientific research is not the emphasis of this plan. Research is the responsibility of our Conservation Partners. The Land Trust anticipates supporting and collaborating on research related to public access to inform management. Please see responses to comments B15-18 with respect to enforcement and B15-37 with respect to community input.
B15-54	Biological Impacts Questions "D. BIOLOGICAL RESOURCE: Would the project: 4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (Initial Study, p. 59)	The comment is noted.
B15-55	The Plan (p.) notes that dog walking would have a substantive adverse effect on cougar nursery sites. The Initial Study appears to rely on Plan components as mitigations without listing them as such, including: - "property will be closed at night providing wildlife an opportunity to move through public access areas" - the adaptive management strategies of the proposed San Vicente Redwoods Public Access Plan	This comment is related to the environmental analysis prepared by the County. Please see response to comment B15-51. The management elements noted by the commenter would further support the movement of wildlife and are not intended to be the sole features to mitigate impacts to wildlife movement.
B15-56	"Construction Protocol BR-1.8. Where wetlands or streams cannot be avoided, appropriate approvals from the USACE (for impacts to regulated wetlands or areas below the ordinary high water mark of regulated streams) and/or the RWQCB and the CDFW (for impacts to regulated wetlands, riparian vegetation, or areas below the top of bank of regulated streams) shall be secured prior to initiating work in these areas. The measures included in any such authorizations shall be incorporated into the design." (Initial Study, p. 56)	The comment is noted.
B15-57	Are wetlands considered ESHA by the Coastal Commission?	Wetlands are considered an ESHA by the Coastal Commission. Please see response to comment B15-3.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
B15-58	What kind of consultation and permitting is possible or will be required to develop recreational trails in wetlands according to Coastal Commission policy?	The permit coordination task is assumed to be ongoing throughout the 10-year timeline. The United States Army Corps of Engineers (USACE) must process and approve a Section 404 Nationwide Permit, the Regional Water Quality Control Board (RWQCB) must certify the use of the Section 404 (USACE) permit and process a Section 401 Water Quality Certification, and the CDFW must approve a California Fish and Game Code Section 1602 Streambed Alteration Agreement (SAA).
B15-59	How many linear feet and acres of trail or other access infrastructure, including the proposed parking lot, will pass through Coastal Commission ("1 parameter") ESHA wetland?	As described in the Project Description of the IS/MND (see page 34), the project construction timeline is approximately 9 years. The precise number requested by the commenter would be determined at the time of permitting. Crossing are designed to avoid impacts to ESHAs. The IS/MND assumed that the proposed project includes approximately 422 linear feet of trail pass through Coastal Zone 1-parameter wetlands. Approximately 400 feet, or 95 percent, occurs on existing roads where common rush (<i>Juncus patens</i>) has become established within the roadbed due to underlying soil compaction which acts as a restrictive barrier to water infiltration, thereby creating a shallow, perched water table. The establishment of common rush on old roadbeds is common in redwood forest where high levels of precipitation from fog drip, combined with the restrictive layer in the roadbed, results in relatively consistent moisture within the top 1 to 3 inches of the roadbed that is sufficient to support common rush and other species that are often associated with natural wetlands. However, these roadbed rush patches do not support the functions and values of naturally occurring wetlands. The proposed parking lot along Empire Grade Road is located outside of the Coastal Zone and will not impact Coastal Zone or other federal or state regulated wetlands.
B15-60	Public Services Questions O. PUBLIC SERVICES "Would the project: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services?" (Initial Study, p. 88).	Please see responses to comments B15-2 and B15-3. The comment is noted.

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
B15-61	"Policy Access 2.3. Work with partners to ensure adequate provision of emergency services." What data does the Lead Agency rely on to establish no potential significant impacts under this section?	This comment is related to the environmental analysis prepared by the County. The Land Trust is committed to compensating the Santa Cruz County Sheriff's Office and the Santa Cruz County Fire Department for their effort as it relates to this project.
B15-62	How has the Lead Agency been informed of the baseline requirements of local agencies in police or fire agency responses to emergencies associated with recreational trail use?	Both the Santa Cruz County Sheriff's Office and the Santa Cruz County Fire Department, which provide services to the project site and surrounding area have provided input on the proposed Public Access Plan. As described on page 8-1 of the proposed Public Access Plan, the preparers of the Plan solicited input from agency partners and experts. For a complete list, please see page 8-1. As described in the proposed Public Access Plan on page 6-16, emergency services include police, fire, and medical services. Emergency services will be provided by the Santa Cruz County Fire Department, which is managed by CAL FIRE. The Land Trust will develop a safety and emergency management plan in collaboration with CAL FIRE and the Santa Cruz County Sheriff's Office that identifies specific roles and responsibilities. The plan will include but not be limited to the response strategies identified in Table 6-3, Emergency Prevention and Response Strategies. Additionally, as described in the proposed Public Access Plan and the IS/MND (see page 18) safety features include, that for fire protection services, filled from a water truck through an access manway and a 4-inch wharf hydrant would be installed. The fire hydrant would be located a minimum 50 feet and a maximum 150 feet from the restroom building. The water tanks would be mounted on an 8-inch prepared and compacted subgrade. Circulation design within the parking area would be constructed to meet all emergency vehicle turning radii standards and clear signage would mark these locations. Cameras and a standard emergency call box would be installed and routinely monitored by the Property Manager. Cameras would be installed at various locations and the emergency call box would be mounted on the restroom building. The single-speaker emergency call box would have a water tight enclosure and be vandal resistant. Please see response to comment B15-10 with respect to the proposed Public Access Plan's goals, policies, and implementing strategies as well as the design and maintenance guidelines, and construction protocols reduce impacts.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
B15-63	Does the Lead Agency rely on the policies listed in this section as mitigations?	This comment is related to the environmental analysis prepared by the County.
B15-64	What is the baseline government facility capacity in the service area?	This comment is related to the environmental analysis prepared by the County.
B15-65	How has the Lead Agency determined that the additional recreational use will not require additional government facilities? P. Recreation	The comment is noted.
	"Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?" (Initial Study, p. 89)	
B15-66	The Initial Study fails to mention of the Bonny Doon Ecological Reserve and the Cotoni Coast Dairies properties in this analysis.	This comment is related to the environmental analysis prepared by the County.
B15-67	What is the baseline state of trail use including physical deterioration of trails at the Bonny Doon Ecological Reserve?	This comment is related to the environmental analysis prepared by the County.
B15-68	How has the Lead Agency determined that additional use of the Bonny Doon Ecological Reserve would not substantively deteriorate the trails on this sensitive and highly erosive area?	This comment is related to the environmental analysis prepared by the County.
B15-69	What are the specific thresholds of significance applied in this case? How have the project proponents assured that their negotiations and plans are not 'pre-dispositional' to federal decision making processes for the Cotoni Coast Dairies property?	Decisions on the proposed project have no binding effect on the BLM or Cotoni-Coast Dairies. The proposed project is wholly within privately held property and no federal lands or monies is or would be applied to the project. Please see response to comment B15-18 with respect to enforcement. Additionally, note that, as described on page 8-1 of the proposed Public Access Plan, the preparers of the Plan solicited input from agency partners and experts. For a complete list, including the BLM and California State Parks, please see page 8-1 of the Plan.
B15-70	How do the project proponents envision allowing adjacent natural areas managers to control the level of use on their lands with the trails at the Laguna tract and Skyline-to-Sea?	As described in Chapter 6, the Phasing Plan calls for Phase 3 trails, which connect to the Cotoni-Coast Dairies property to be opened only after trails on that property are developed and the property is opened to the public. The timing and location of those trails are to be determined by the Bureau of Land Management. Public Access to the Laguna Tract trails is through the Bonny Doon Ecological Reserve, not

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
		the other way around as implied by the comment. Management decisions by the CDFW public access to the reserve will continue to be made by CDFW.
		The Land Trust will continue to coordination with both of these managing entities, which were consulted with extensively as part of the preparation of the proposed Public Access Plan. For a complete description of the planning process please see pages 1-4 through 1-7 of the proposed Public Access Plan, and pages 88 and 89 of the IS/MND. Also see page 8-1 for a complete list of agency partners and experts that were consulted as part of the planning process.
B15-71	How will the project proponents cooperatively manage for the recreational, social, and biological carrying capacities of these adjacent lands?	The Land Trust will continue to collaborate with BLM and CDFW in response to their requests for assistance. Whether carrying capacity is a lens through which they analyze resource management is a decision to be made by those agencies.
		As described in the proposed Public Access Plan (see page 1-1) and in the IS/MND (see page 12) the POST and Sempervirens Fund are currently responsible for the protection and management of the property, the SRL is responsible for the monitoring and enforcement of the Conservation Easement, and the Land Trust would be responsible for implementing the proposed San Vicente Redwoods Public Access Plan as the Public Access Manager.
B15-72	How might the project proponents attempt to influence future managers who might consider closing the through trails on their lands, therefore affecting the use of the proposed project?	Please see response to comment B15-71.
B15-73	What would be the baseline state of adjacent trail use without the Skyline-to-Sea proposed plan component on the Cotoni Coast Dairies property?	Please see response to comment B15-18 with respect to enforcement. Please see response to comment B15-18 with respect to enforcement.
B15-74	How has the Lead Agency determined that additional use of the Skyline-to-Sea proposed plan component on the Cotoni Coast Dairies property would not substantively deteriorate the trails on that area?	This comment is related to the environmental analysis prepared by the County.
B15-75	What are the specific thresholds of significance applied in this case? U. MANDATORY FINDINGS OF SIGNIFICANCE	This comment is related to the environmental analysis prepared by the County.
	"2. Does the project have impacts that are individually limited, but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in	

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
	connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?" (Initial Study, p. 102).	
	The Initial Study fails to list any connection of increased recreational use with other current and emerging future projects with which some of the project proponents are involved, such as Cotoi Coast Dairies, Cement Plant Reuse, the Rail Trail, Wilder Ranch, County Beaches, etc. In order to effectively establish cumulative impacts analysis, one must first establish a baseline and then analyze expected increases during the timeframe of the project.	
B15-76	Why does the traffic impact analysis only examine effects of Empire Grade, when significant increased use is anticipated by the 'Skyline-to-Sea' aspect of the proposal, hence affecting Highway 1 traffic? What are the cumulative impacts of the proposed project which will coincide with increased Highway 1 traffic?	This comment is related to the environmental analysis prepared by the County. Please see General Responses to Comments under subsection "Access to San Vicente Redwoods."
B15-77	State Parks has calculated use of its North Coast parks, why were these data not presented to the public to establish a recreational use baseline?	This comment is related to the environmental analysis prepared by the County. Please see General Responses to Comments under subsection "Access to San Vicente Redwoods."
B15-78	What is the current recreational use (# users) baseline for Wilder Ranch State Park?	This comment is related to the environmental analysis prepared by the County. Please see General Responses to Comments under subsection "Access to San Vicente Redwoods."
B15-79	What is the current recreational use (# users) baseline for County beaches in the vicinity of the proposed project alternatives?	This comment is related to the environmental analysis prepared by the County. Please see General Responses to Comments under subsection "Access to San Vicente Redwoods."
B15-80	What is the current recreational use (# users) baseline for Davenport Beach, where users share a parking lot that will also serve the Skyline-to-Sea proposed trail?	This comment is related to the environmental analysis prepared by the County. Please see General Responses to Comments under subsection "Access to San Vicente Redwoods."

COMMENTS AND RESPONSES MEMO**TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT**

Comment #	Comment	Response
B15-81	What is the current recreational use baseline (# users) for bicyclists using the Highway 1 corridor adjacent to the proposed project alternatives, including major bicycling events?	This comment is related to the environmental analysis prepared by the County. Please see General Responses to Comments under subsection "Access to San Vicente Redwoods."
B15-82	What % increase is projected over what is currently experienced in the vicinity of the proposed project alternatives?	This comment is related to the environmental analysis prepared by the County. Please see General Responses to Comments under subsection "Access to San Vicente Redwoods."
B15-83	What are thresholds of significance for cumulative effects for additional recreational users presented by this project, including on: Parking in areas in the vicinity of the Skyline-to-Sea trailhead on Swanton Road	This comment is related to the environmental analysis prepared by the County. Please see General Responses to Comments under subsection "Access to San Vicente Redwoods."
B15-84	What are the cumulative effects of this proposed project on wildlife, especially migratory and nursery behaviors, when taken into consideration with: - Forestry activities on the property - Stewardship activities on the property - Non-public use of the property	This comment is related to the environmental analysis prepared by the County. Please see General Responses to Comments under subsection "Existing Conditions."
B16 Gillian Greensite, Sierra Club, Santa Cruz County Group		
B16-1	Thank you for the opportunity to read and comment on the Draft Initial Study and Mitigated Negative Declaration (IS/MND) for the San Vicente Redwoods Project. Unfortunately, the IS/MND does not effectively mitigate all impacts of this substantive project to less than significant. The Sierra Club requests that an EIR be prepared to fully assess and mitigate outstanding impacts to less-than-significant and examine project alternatives that would cause less damage to the very sensitive ecosystem in which it is located.	This comment serves as an introduction to the comment letter.
B16-2	Educational signage is used as a mitigation measure, but such measures are typically highly ineffective. To make sure there's no trash, for example, the project would need many animal-proof trash receptacles, and you will need an employee to walk the trails every day and pick up trash.	This comment is related to the environmental analysis prepared by the County. Please see General Comments, About the Land Trust. Please see response to comment B15-20.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
		We plan to monitoring the amount of trash and scale our patrol and visitor engagement to the findings in order to minimize trash on the ground. We also plan City parks see lots of trash. However, the comment makes assertions that are inconsistent with best practices and observed outcomes for rural parks. Many resource agencies that manage public access, notably Midpeninsula Regional Open Space District, often only signage to 'pack your trash', and observe excellent results. This best practice is taught in the West Valley College Park Management Program. Trash and recycling would be routinely removed by the property manager (see IS/MND page 98). As discussed on IS/MND page 18, clear signage would be posted near the picnic area to indicate that all trash is required to be packed out or put in the trash receptacle. Up to four trash and recycling receptacles with an approximate 110-gallon capacity to hold two standard 55-gallon recycle-type bags would be located at the parking area. Trash receptacles would be ADA-compliant with a wildlife-proof internal single point selflatching system on the service hatch. Trash receptacles would be welded with 14-gauge construction and mounted on concrete pads at the restroom buildings. Picnic areas would either include wildlife-proof trash receptacles or clear signage stating that trash must be packed out (see IS/MND page 35). Trash would be removed at least weekly, and at a frequency sufficient to prevent trash overflow at the receptacles and to minimize wildlife-attracting odors. All trash and recycling receptacles would be wildlife-proof. Signage and visitor education would instruct visitors to pack out and/or properly dispose of all waste. Litter, food scraps, and dog waste would be picked up and disposed of as part of regular monitoring and patrol activities. (please see IS/MND page 36). Note that the use of signage is not a mitigation measure required to reduce any impact to a less-than-significant level but is one of many tools applied by the Plan to help with trash-related hazards and impacts to wildlife. Please see response to comment B15-10 for additional discussion on mitigation measures and implementation of the proposed Public Access Plan.

COMMENTS AND RESPONSES MEMO

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
B16-3	Given the number of sensitive species, dogs absolutely should not be allowed on these trails.	Please see response to comment B15-51.
B16-4	There's no discussion of the impacts on wildlife of the long-term use of trails by people. Significant impacts include reducing the abundance of nesting birds and woodrats near trails and reducing the foraging area available to some species (see, for example, attached study of the effects of trail use on western pond turtle. Studies of this caliber must be provided for all sensitive species in this project area).	The Land Trust is dedicated to biodiversity and wildlife conservation, and, as described in the Public Access Plan and Biological Resources Assessment, carefully designed all aspects of Public Access (activities, trail layout, construction approach, management and monitoring) to ensure these conservation values are protected. The commenter incorrectly asserts that impacts from long-term use by people has not been evaluated. The CEQA evaluation is for both the implementation of the proposed Public Access Plan as well as the construction and operation of the staging area and trail. To the degree the proposed goals, policies, and implementation strategies, as well as design and maintenance guidelines, and construction protocols ensure resource protection, they have been identified in each environmental topic of the IS/MND. Furthermore, as described in the IS/MND (see page 17) most of the property (approximately 94 percent) would be closed to public access, which leaves 6 percent of the site for future recreational uses. The conclusions in the IS/MND are based on these percentages of land uses over the period of construction and long-term operation – i.e., impacts on wildlife by people on the trails over the duration of the project. As described in proposed Public Access Plan and the IS/MND the adaptive management as described in the proposed Public Access Plan is an approach to developing actions that are appropriate by manage the staging area and trails. Adaptive management strategies may change over time as need based on the monitoring and tracking of use and site conditions. Please see response to comment B23-5 for further discussion on adaptive management and mitigation measures. The effects of human disturbance through trail use on various wildlife species are not universal. Some species are much more tolerant of disturbance while some will be more sensitive. Wildlife response to disturbances associated with trail use can vary depending on a number of factors including, but not limited to, type and duration of the disturbance, species, time of year, component of the species life history disturbed, and habitat. Trail use and impacts along San Francisco Bay, which serves as a critical migratory stop over for birds along the Pacific flyway, found no major differences in the number, species richness, or activity of shorebirds for

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
		areas with and without trails. Landscape-level factors, such as the quality and quantity of habitat, foraging opportunities and resources, and predation risks were considered more influential than overall trail use. Other research has found temporary and more long-term impacts to wildlife species based on trail use, including disturbances to breeding activity and potential introduction of non-native species of vegetation. The most comprehensive study in the region was performed by Reilly and others (2017), who deployed arrays of game cameras on and near trails in 241 locations in 48 open and 37 closed protected areas in the San Francisco Bay Area. They found that hiking, mountain biking, and equestrians had no effect on the occurrence of mountain lions, coyotes, bobcat, grey fox and mule deer. They found that dog walking had a negative effect on the occurrence of mountain lions. There is no clear consensus in the literature regarding trail use impacts and wildlife; however, there are approaches to minimize impacts that may occur. The proposed trail alignment and design has incorporated a number of approaches intended to minimize trail use impacts to wildlife species. An example of this is the design and construction of the trails will result in little to no change in canopy cover, as understory and brush along the trail alignments will be cleared. This is anticipated to minimize and avoid permanent habitat impacts associated with edge effects where a large break in canopy and cleared areas could alter available habitat and use by native wildlife species. Additionally, trails will have specific designations which will limit or restrict what type of recreational activity can occur. Please also see the response to comment B15-51. Source: Reilly, M. L., Tobler, M. W., Sonderegger, D. L., & Beier, P. (2017). Spatial and temporal response of wildlife to recreational activities in the San Francisco Bay ecoregion. <i>Biological Conservation</i> (207) 117–126.
B16-5	The project should locate woodrat houses and avoid impacts to them. No evidence is provided to support the assertion that dismantling the houses, which can be used for decades, is a viable mitigation measure.	Extensive survey work was conducted to evaluate the alignment and document woodrat nests present within the Study Area. Dusky-footed woodrats only use and occupy a small portion of the number of their available nests, with some nest seldom or never occupied. Due to the high density of woodrat nests in the Study Area, complete avoidance of all nests is infeasible. Where possible, woodrat nests will be avoided; however, when avoidance is not possible, hand disablement of a

COMMENTS AND RESPONSES MEMO

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
B16-6	The Initial Study inadequately mitigates the impact of dogs on medium and large mammals, which the UCSC Puma Project confirms is a significant impact. Locating the dog walking areas adjacent to Empire Grade and requiring leashes have shown to be ineffective in deterring illegal usage in all other open space lands in the county. More documentation and effective mitigations should be considered if you are going to allow activities that have serious environmental consequences.	nest by a biologist and the relocation of material outside of the disturbance footprint will occur. This represents a standard measure prescribed by CDFW to minimize impacts on San Francisco dusky-footed woodrat and is implemented in Santa Cruz and San Mateo Counties. The method includes the disassembling of woodrat nests under the supervision of a biologist and scatter the nest materials. The biologist is present to check the nest during disassembly to check for young woodrats. If young are not present, the nest is fully disassembled and the material scattered. Materials are scattered because in some cases the abundance of materials required to build a nest are a limiting resource. By scattering the material, that resource is still available even if the original nest site is not. If young are present, a layer of material is placed back onto the nest which is then protected with a no disturbance buffer for a period of time. The time a buffer is in place varies by the status of the nest but is implemented to give the young time to mature and leave the nest, or for the female to move the young to another nest. By taking this approach materials are present for woodrats to construct new nests, and any young are protected until they are able to leave the nest. Because woodrats can use and occupy many nests, protections are in place to mitigate impacts to more vulnerable young, and the relocation of nest material resources are still available to build new nests, disturbance due to dismantling is considered a less-than-significant impact. Sources: - Innes, R.J., D.H. Van Vuren, D.A. Kelt, M.L. Johnson, J.A. Wilson, and P.A. Stine. 2007. Habitat associations of dusky-footed woodrats (<i>Neotoma fuscipes</i>) in mixed-conifer forest of the Northern Sierra Nevada. <i>Journal of Mammalogy</i> 88(6):1523-1531. - Zeiner, D.C., Laudenslayer, W.F. and Mayer, K.E., 1990. California's Wildlife (Vol. 3): Mammals. California Statewide Wildlife Habitat Relationships System. PP 246-247. Please see response to comment B15-51. This comment is related to the environmental analysis prepared by the County.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
B16-7	An Environmental Impact Report is the appropriate level of review for such a substantial project in a sensitive ecosystem. The environmental impacts documented here require an EIR.	This comment is related to the environmental analysis prepared by the County.
	Thank you for considering these comments.	
B17	Valerie Haley, Native Vegetation Network	
B17-1	Thank you for the opportunity to make comments on the San Vicente Redwoods Public Access Plan. I attended the recent RBDA meeting and presentation of the Plan by Bryan Largay on March 13, 2019. He said that the comment period has been extended until March 29th, 2019. As you may know, I am an advocate for the Bonny Doon Ecological Reserve and the conservation of the Santa Cruz Sandhills. I served as the docents and volunteers coordinator at the Ecological Reserve from 1994 to 2017. I appreciate the efforts of the Land Trust and its consultants. There are many positive aspects of the San Vicente Redwoods Access Plan; however, I have concerns about potential impacts to sensitive resources along the Ecological Reserve trails, since these trails will be used to access the Laguna Tract in the land locked parcel to the east of the Reserve. According to Bryan Largay, the consultants for the San Vicente Redwoods Trail Access Plan estimate that 90,000 people per year will use the trail system at full build out of Phase 1 and Phase 2. Phase 1 will serve as a testing ground to monitor the level of public use, traffic, impacts to biological resources from bikes, horses and hikers, the success of rangers and law enforcement, trash, erosion, and trail conditions. If the results of monitoring show low impacts, and that the minimization measures in the Public Access Plan are working, more trails will be built as part of Phase 2. Over the last 25 years at the Ecological Reserve, we have had an average of about 20 to 25 people using the trails at the Reserve per day, except on days when there are guided nature walks and field trips sponsored by	This comment serves as an introduction to the comment letter.

COMMENTS AND RESPONSES MEMO

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
B17-2	CNPS, high schools or college classes. The CNPS walks and most field trips have been limited to 20 people in order to minimize impacts to the Santa Cruz Sandhills habitat. The following comments pertain to the proposed phasing of the Public Access Plan, and how the trails are publicized. 1. Omit Ecological Reserve and Laguna Tract from Phase 1. I strongly recommend that the currently proposed access routes through the Bonny Ecological Reserve to the proposed Laguna Tract trails be eliminated from the Phase 1 testing phase. The highly sensitive Zayante Sandhills habitat and the associated rare and endangered plants in the Ecological Reserve are the most sensitive areas included in the entire Access Plan, and should not be part of the Phase 1 testing phase. Once opened, several years of monitoring are needed in the proposed trail system located to the west of Crest Ranch to determine law enforcement needs, the level of use, number of visitors and impacts due to the 90,000 people (hikers, bike riders, and horse riders) estimated to use the trail system. Once the level of public use and the extent of human impacts are better known in the trails west of Crest Ranch, more accurate mitigation and minimization measures may be developed for the sensitive habitats in the Ecological Reserve. It does not seem logical to have the most sensitive habitat developed in Phase 1 of the Trails Plan (testing phase). According to Terris Kasteen with the Dept. of Fish and Wildlife, a Memorandum of Understanding regarding access through the Ecological Reserve still needs to be prepared with Conditions of Approval. 2. Publicity, Trail Maps and Internet Graphics. Full Build Out Maps of both Phase 1 and Phase 2 should not be publicized until Phase 1 is deemed successful. For the first 1 to 2 years after opening the trail system, only the developed trails in Phase 1 should be illustrated on websites, kiosks and map handouts. This will help keep people out of areas that may not have trails developed yet or access is dangerous. It	The comment is noted. As described in the proposed Public Access Plan and the IS/MND, the Laguna Tract trail is an existing trail that is to be improved with minor reroutes to reduce potential for erosion. This trail will be accessible only through existing trails on the CDFW Bonny Doon Ecological Reserve. The visitation estimate of approximately 90,000 is for the main portion of the San Vicente Redwoods property, which is located about 7 miles from the Bonny Doon Ecological Reserve. Existing trail users visiting the Bonny Doon Ecological Reserve are anticipated to be the primary users when the existing trail on San Vicente Redwoods is formally opened. An increase in visitation to the Bonny Doon Ecological Reserve is not expected. Trail planning for the Laguna Tract has been conducted in coordination with CDFW. CDFW staff and Bonny Doon Ecological Reserve volunteers have expressed enthusiasm for the increased patrols and assistance with maintenance at the Bonny Doon Ecological Reserve that the project proponent can provide as part of routine management of the Laguna Tract trails. Please see response to comment B15-44 for additional discussion on the Laguna Tract. The Land Trust intends to treat the trails at the main San Vicente Redwoods property and those at the Laguna Tract as distinct management units when it comes to sharing information with the public. We anticipate publicizing the two areas separately, with the Laguna Tract trails receiving substantially less emphasis. We intend to provide information in a manner such that members of the public do not arrive at the Bonny Doon Ecological Reserve thinking they are at the main San Vicente Redwoods property.
B17-3	2. Publicity, Trail Maps and Internet Graphics. Full Build Out Maps of both Phase 1 and Phase 2 should not be publicized until Phase 1 is deemed successful. For the first 1 to 2 years after opening the trail system, only the developed trails in Phase 1 should be illustrated on websites, kiosks and map handouts. This will help keep people out of areas that may not have trails developed yet or access is dangerous. It	The Land Trust intends to treat the trails at the main San Vicente Redwoods property and those at the Laguna Tract as distinct management units when it comes to sharing information with the public. We anticipate publicizing the two areas separately, with the Laguna Tract trails receiving substantially less emphasis. We intend to provide information in a manner such that members of the public do not arrive at the Bonny Doon Ecological Reserve thinking they are at the main San Vicente Redwoods property.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
	will also help keep visitor use lower in the trails that are not opened or managed yet. There needs to be more discussion about advertising the location Ecological Reserve portion of the trail system. We need to keep public use low in the Reserve.	
	Sheriffs and rangers can't help prevent high foot traffic and damage of low growing, rare plants such as the Ben Lomond Spineflower (Chorizanthe pungens var. hartwegiana) that currently grow along the trail edges.	
B17-4	Conclusion Please let me know if you would like any additional information about the sensitive resources and sensitive habitats at the Bonny Doon Ecological Reserve. I would be happy to show County staff some of the rare and endangered plant species that currently grow along the trail edges that could be damaged by increased foot traffic. have prepared these comments to County Planning to the best of my knowledge.	We are also big fans of the Santa Cruz Sandhills. The Land Trust's Save the Sandhills initiative has protected eight properties with robust populations of threatened and endangered species. We look forward to collaborating to ensure the stewardship of these biodiversity hotspots.
	Please help us "Preserve the Reserve" !	
B18	Karrie Gaylord	
B18-1	Last week I attended a presentation given by Bryan Largay on the Land Trust's plans for the new San Vicente Redwoods Trails. As a Bonny Doon resident and avid trail runner I'm really thrilled about the plan and can't wait for it to officially open. Clearly you all have done a ton of work to make this happen so I'd like to express my gratitude for that! I do have a comment on the planned usage, which I'm hoping you might relay to the appropriate committees. In short, I would really love to see more mileage of the trails open up to dogs. I have two lovely, active pups who are my frequent companions on trails both for their own joy and exercise as well as my safety. Sady, I was quite surprised when I moved here about a year ago at how few trails there are which allowed them. We used to live in Washington state where dogs were welcome on nearly all trails excluding national parks. Here in Santa Cruz the public	The comment is noted. Note the length of trails with access for dog walking is 2.5 miles of trail. Please see the response to comments B15-51 and B16-4 for additional discussion of this topic.

COMMENTS AND RESPONSES MEMO

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
	trail system is quite restrictive to canine company by comparison. As a privately owned trail system, I was very hopeful that San Vicente Redwoods would be more accommodating than the state/city parks. Bryan outlined the plan to permit 1.5 miles along the entrance of the trails as open to dog walking. This is nice, but it's hardly a warm up for my lively crew! We frequently run 8-10 miles most days. It's curious to me that nearly all the trails are open to equestrians, who are great, but do leave piles of excrement and hoof divets everywhere they go. Most trail users including myself are willing to dodge these things but I have to admit it's frustrating to not allow leashed dogs whose owners pick up after them on the same trails. Bryan mentioned that studies the Land Trust researched found wildlife to be undisturbed beyond a 200m zone around trails used by humans and other animals. This seems totally reasonable, given that over 90% of San Vicente's 8500 acres will be closed to access, preserving habitats for our lion and other wild friends. But I'm wondering- if this 200m zone has been deemed acceptable, why should it matter what species is doing the disruption - horse, human, or dog? Please consider opening up more of San Vicente to our canine companions and the humans who love them.	
B19	Brenda Barcelo	
B19-1	I'm one of many residents who will be highly affected by the opening of San Vicente park and I feel our concerns aren't addressed at all. Every time there's a meeting or I send an email, my worries are brushed off and the only thing that remains is the fact that the park will open according to plan, no matter what. Many of us are very unhappy about the large number of trees that will be removed to make parking lots. We were told there's nowhere else in the park to plant the same number of trees that will be taken out for the project. In a park as large as San Vicente, I have a very hard time believing there isn't any space at all in the	As described in the IS/MND, 40 non-native trees and 15 native trees to be removed that are 12 inches or greater in diameter at breast height (DBH). Over 150 native trees that are 12 inches DBH or greater would be retained for the staging area. The proposed trails would occupy less than 6 percent of the entire site. No trees greater than 12 inches are proposed for removal in association with trail construction. No large trees (over 40 inches DBH) would be removed in association with the project. Many of the rare plants in the project area, particularly in the staging area, are shrubs and wildflowers.

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
	whole area to plant 100+ trees to replace the park owners will be removing. In a time of great world distress about global warming, deforestation of any sort is an aberration. As a permit approval condition, please require the owners to plant the same or a larger number of trees elsewhere in the park to mitigate for the planned removal of trees.	
B20	David Jensen	
B20-1	I have reviewed all submitted documents regarding Land Trust of Santa Cruz County plans for trail system and management model in particular how it will apply to Laguna Tract which borders Bonny Doon Ecological Reserve (BDER). My wife and I have both grown up and lived in Bonny Doon our whole lives and have lived in the center of BDER for past 40 years raising our children and now grandchildren on this land. There are existing trails on Laguna Tract that will be part of proposed trail system that have been used since this land was owned by Lone Star/Cemex. Land Trust plan to open trails in phase 1 of project makes sense and shows good wisdom, having their collaboration and support along with our BDER community group that maintains reserve trails will promote safe and legal public use. Land Trust having also agreed to not promoting Laguna Tract in advertisement will help keep overall impact to BDER facilities and trails to a minimum and promote much slower evolution for increased use, allowing BDER to adjust realistically to visitor increases.	The comment is noted.
B21	Bryan Largay, Land Trust of Santa Cruz County	
B22	Mark Lipson	
B22-1	<u>Intrc</u> These comments are submitted by Mark Lipson, PO Box 69, Davenport CA 95017. I am a resident of Davenport and have been farming certified organic produce since 1983 at the property which is encompassed within the San Vicente Redwoods project. That property is owned by the Molino Creek LLC partnership, of which I am the current President.	The comment is noted.

COMMENTS AND RESPONSES MEMO

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
	On behalf of Molino Creek LLC, we recognize and appreciate the efforts that the Land Trust of Santa Cruz County has made to solicit and heed our concerns as inholders. For 35 years we have worked cooperatively in succession with Lone Star, Cemex, LTSCC and the SVR Partners to protect and manage this remote area of the county's north coast. <u>Recommendation</u> I support acceptance of the NMD finding and approval of the application with the LTSCC's Public Access Plan. We support moving Phase I of the project forward so that the "adaptive management" concepts can be tested against reality.	
B22-2	<u>However...</u> There is at least one very problematic aspect to the County's CEQA analysis which compels further comment. This defect is notable with respect to the multiple other, large-scale land-use changes occurring in the area. My hope is that the County's professional staff and elected/appointed decision makers will take a deeper, critical look at how the north coast's rapid transformation is being treated by the planning process. *Initial Study/Env. Checklist, Section U.2, Mandatory Findings of Significance, Cumulative Impacts. This project takes place in immediate proximity to 3 other large-scale conversions of formerly private land to public access and visitor use. The assessment that the SVR project, "has no associated cumulative impacts" is completely unexplained and overtly inapplicable. The one-sentence analysis seems to make a mockery of the plain language embodied in the checklist at U.2. The County's planning process appears incapable or unwilling to recognize that this project will be operated in the context of opening the Cotoni-Coast Dairies Unit of the California Coastal National Monument, the Coastal Rail Trail, and the potential conversion of the Cemex property to visitor-use access. The County is not serving the interests of its citizens by following this	This comment is related to the environmental analysis prepared by the County. The Land Trust collaborates extensively on north coast resource management with County Parks, State Parks, the Bureau of Land Management, the California Department of Fish and Wildlife, the County Sheriff's Office, the Regional Transportation Commission and private landowners. We plan to continue to collaborate and share resources so that all of the various holdings are well managed. Please also see response to comment B15-75. Also, please see General Response to Comments under subsections "Other Recreational Areas in the Project Vicinity" and "Access to the San Vicente Redwoods".

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
	approach, nor is it serving the long-term interests of prospective visitors and users. Certainly the methodological challenges of cumulative-impact assessments may be severe. Nonetheless, it is absolutely necessary that the planning process recognize and confront the reality of interconnected impacts resulting from the convergence of these multiple, large-scale land-use and activity changes on the North Coast.	
B23	Jacob Pollock	
B23-1	The following attachments contain comments on Application 181146. The contents are also included directly in the email below.	This comment serves as an introduction to the comment letter.
B23-2	These are comments on the mitigated negative declaration for the San Vicente redwoods project, application number 181146. Overall, I am pleased with the detail however there are numerous omissions, some of which I have been able to document here. I also have a number of questions I hope you will be able to respond to.	This comment serves as an introduction to the comment letter.
B23-3	The Initial Study states that Coulter pine is a non-native species (p11). Given that The Natural Resource Conservation Service plants database (https://plants.sc.egov.usda.gov), Jepson E Flora (http://ucjeps.berkeley.edu/eflora/), and the California Native Plant Society (Calscape.org) all show the San Vicente redwoods to be within the range and habitat of Coulter pine with extant populations to the north, south, and east, how do you justify calling it a non-native species? What is the biological and scientific basis for this justification?	The commenter is correct, Coulter pine is native to California and is listed as occurring in the Central Western geographic subdivision of California, which includes the Santa Cruz mountains. This does suggest that Coulter pine is native to the Santa Cruz mountains; however, upon deeper examination, it appears that the Jepson Manual's description of the species' native range is too generous. The 1925 version of Jepson's Manual of Flowering Plants of California describes the range of Coulter pine as: "Dry rocky mountain slopes, 3000 to 6500 ft.: Mt Diablo (1200 ft.), Mt. Hamilton, San Carlos and Santa Lucia Ranges to the mts. of S. Cal." Based on anecdotal evidence from an unpublished management plan prepared for the site circa 1970-1980 (Nadia Hamey, local forester, personal communication, April 12, 2019), Coulter pines in the San Vicente Redwoods were planted at the site. This was a strategy practiced by forest managers some decades ago intended to convert chaparral and oak woodland into conifer forests. The fact that the species is not native to the Santa Cruz Mountains and was planted at the site is supported by a general lack of records in the California Consortium of Herbaria for this species in Santa Cruz Mountains: there are only three herbarium records of the species within Santa Cruz County and all three are collections from

COMMENTS AND RESPONSES MEMO

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment # Comment

Response

2003/2004 along Empire Grade Road, suggesting that the species was not historically present and is only a relatively recent introduction to areas along Empire Grade Road. This is further supported by the fact that Coulter pine is not listed in John Thomas's Flora of the Santa Cruz Mountains (1965). The 1972 mapping of forest tress in California by Griffin and Critchfield provides further support, showing no native stands of Coulter pine within Santa Cruz County.

Based on these lines of evidence, we determined that although Coulter pine is native to California and occurs in nearby mountain ranges, and we believe it is not native to the Santa Cruz Mountains and treat it as an introduced species.

Given that tracking data (santacruzpumas.org) shows the San Vicente Redwoods to be heavily used by Puma and that research by Dr. Chris Wilmers shows a strong avoidance and feeding disruption behavior by Pumas due to the sound of humans, how do you justify including only the single mitigation measure of closing the property at night to protect this species and its habitat? How do you justify even this single measure when these animals are not exclusively nocturnal? Given the vague nature of the adaptive management strategies (see below) how do you justify these as mitigations for protecting the cougar? What are the biological and scientific basis for these justifications?

As discussed on page 1-6 in Chapter 1, Introduction, of the proposed Public Access Plan, and on page 13 of the IS/MND, the Land Trust and the Conservation Partners solicited guidance from experts in the fields of conservation science, public access management, biological resources, cultural resources, and engineering. Regulatory Agency staff from CDFW and the Coastal Commission were also consulted as well as staff from the University of California Santa Cruz Puma Project. Through close coordination with technical experts, trail alignments were refined to minimize potential impacts to resources. For a complete description of the planning process please see pages 1-4 through 1-7 of the proposed Public Access Plan, and pages 88 and 89 of the IS/MND. Furthermore, as described on page 8-1 of the proposed Public Access Plan, the preparers of the Plan solicited input from agency partners and experts. For a complete list, please see page 8-1 of the Plan.

Please see response to comment B15-51 regarding impacts to mountain lions.

Also see response to comment B23-5 for additional information on the adaptive management approach described in the proposed Public Access Plan.

The Initial Study states that, the "Access Plan's adaptive management approach would ensure the sensitive habitat on the project site are preserved and protected in perpetuity," (p 59). Adaptive management implies using varying management strategies with specific goals, specific measurable targets and monitoring progress towards these goals with specific action thresholds and changing (i.e. adapting) these monitoring strategies as needed to bring these goals within specified limits. The

As discussed in the proposed Public Access Plan, the Public Access Manager will implement adaptive management strategies to ensure protection of the seven Conservation Values. Adaptive management as described in the proposed Public Access Plan is not a specific action, but instead is an approach to developing Public that are appropriate by manage the staging area and trails. Adaptive management strategies may change over time as need based on the monitoring and tracking of use and site conditions. As identified in the proposed Public Access Plan, the

COMMENTS AND RESPONSES MEMO, LAND TRUST OF SANTA CRUZ COUNTY

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
B23-6	adaptive management overview in Appendix 2 of the plan contains only vague strategies for each conservation value with no specific goals, no monitoring details, no measurable targets, no action thresholds, and vague alternate strategies (adaptions), and no measurable limits to ensure that the alternate strategies meet these limits. For example, conservation value 1 has an adaptive management strategy as follows, "monitor and enforce rule violations; adjust engagement and enforcement efforts." The other management strategies in Appendix 2 are similarly vague. Given the lack of details for adaptive management, how do you justify a mitigated negative declaration? How will you ensure that these adaptive management strategies will mitigate impacts when there are no details? If there are goals, measurable targets, detailed monitoring plans, action thresholds, specific management adaptations, etc, what are the biological justifications for these? Similarly, the Mitigation Monitoring and Reporting Program contains few details of what will be measured in the monitoring program, what the baseline and target measures are that will require a mitigation effort to bring the measure within compliance levels. Specifically, how will the mitigation measures for BIO-1 through BIO-7 be monitored? What quantitative or other measures will be used? What are the measurable limits that will indicate they are out of compliance?, what actions will be taken to bring them back into limits to achieve mitigation? How will the public be informed about the implementation and monitoring of these mitigation measures which are used to justify a finding of mitigated negative declaration?	following will be monitored and tracked to inform management decisions: visitor compliance with regulations; development of unauthorized trails; trail and drainage feature conditions; signage and furnishings conditions; occurrence of food waste, dog waste, and horse waste; available capacity of the staging area; perspectives of the Property Manager and restoration project managers; and visitor satisfaction. The comment incorrectly cites the IS/MND at page 59. The text on page 59 states that "In addition, the proposed San Vicente Redwoods Public Access Plan's adaptive management approach would <u>further ensure the sensitive habitats on the project site are preserved and protected in perpetuity</u>. This statement is preceded by the CEQA mitigation measures (see criterion D.4) that are required to reduce impacts to less-than-significant levels. This comment is related to the environmental analysis prepared by the County.
B23-7	The initial study states that hiking biking riding horseback and dog walking all have similar effects on trail erosion and on wildlife. Is there any science to show this is true? What is that science? How did you determine that these uses are similar in their effects on erosion and wildlife? What specific monitoring will be done to ensure that these effects are similar in the case of San Vicente redwoods? If I were to appeal to the Coastal Commission if I believe portions of this Mitigated Negative Declaration or the responses to my questions are insufficient to mitigate the impacts of the project or protect the	Please see our response to comment B15-50 and B15-51. In addition to fulfilling the permit conditions of the regulatory agencies, we anticipate monitoring a variety of parameters, as detailed outlined in Chapter 6 and Appendix 2 of Public Access Plan. This comment is related to the environmental analysis prepared by the County.
B23-8		

COMMENTS AND RESPONSES MEMO

TABLE 1 RESPONSE TO COMMENTS ON THE PROJECT MERITS OF THE SAN VICENTE REDWOODS PUBLIC ACCESS PLAN PROJECT

Comment #	Comment	Response
	conservation values of the area, how would the county and the project proponents coordinate a response to such an appeal?	