



**Environmental Committee for the SLV
VALLEY WOMEN'S CLUB of San Lorenzo Valley
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April 11, 2016

Todd Sexauer, Environmental Planner
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Dear Mr. Sexauer,

Thank you for keeping us informed as things progress on Mt. Hermon Association's *Felton Meadow Project*. We do have some comments regarding your Notice of Preparation (NOP) of the Draft Environmental Impact Report.

All too often the EIR process may distort the original intent of the California Environmental Quality Act – to assure the development of environmentally sound, beneficial projects, while preventing environmentally unsound developments by examining and rejecting those projects, or aspects of projects, that are fallaciously reasoned or impossible to mitigate. All too often an EIR may be designed to *appear* to comply with CEQA but fails to protect the environment by presenting mitigations that claim to solve problems but only facilitate construction by disguising the true losses. We are counting on our County Planning Department, as the Lead Agency, to be the community and environmental protector, as the parameters of the DEIR are defined, and the results examined and evaluated.

First, please refer to our previous letter, dated November 11, 2015, for a number of concerns that still need to be addressed in the EIR. (letter attached) Second, please refer to the letters originally written in response to the Mitigated Negative Declaration, from the San Lorenzo Valley Water District, the Santa Cruz City Water Department, NOAA and CA State Fish & Wildlife, as well as any letters they may write in direct response to the NOP. Their concerns are also ours.

In addition, we hope the DEIR will candidly address the following concerns:

Part of the problem in the original RFP for the EIR is the over-dependence on old and most likely outdated, unrelated or incomplete information from past reports; Planning should reconsider this and require new research and analyses by skilled and unbiased experts. This is true of traffic, water, biological resources, and geology, at minimum.

Social concerns: 1. We feel that there is likely incomplete follow-through, or inadequate completion, of requirements from Mt. Hermon's Master Plan and its amendments. Due to this, the County must require that a thorough examination and analysis of that Plan's requirements be undertaken, the cumulative impacts of the plethora of amendments be enumerated, and a list of incomplete or inadequate requirements be made. Then, before allowing this major additional Amendment to the Master Plan be granted, all previous requirements must be shown to be fulfilled, inspected and confirmed.

Any construction or development that has taken place but was not specifically defined in the Master Plan or its amendments (the newly expanded zip line/canopy tours?) needs to be added and its impacts (water use, impacts to riparian corridor, etc.) be addressed and mitigations defined and completion enforced. (Examples of past and current problems include: *discharge of water from the Zayante dam and from their irrigation pond (a former wetlands they filled in) into Bean Creek; night lighting installed that is not consistent with the needs of the June Beetle; paving of Sandhills area done without take authorization; building the BMX course by the Ponderosa Lodge entrance (also in the Sandhills and since removed); routine removal of instream wood, building in the Bean Creek riparian corridor of a paint ball course (about 2009) without a riparian exception; possible lack of compliance with Fish & Wildlife Code permitting process for diversion by the Fieldhouse on the irrigation pond; the zipline at Redwood Camp over Zayante Creek.*)

2. There is no guarantee that, once built, the Velocity Bike Park will be able to continue to operate indefinitely, or to be maintained at high standards imperative to preventing destructive impacts. Bike Velocity operations, in general, face extremely expensive financial demands and significant safety issues, even without this project's environmentally necessary, on-going maintenance requirements. The DEIR should address this issue since, once completed, the negative environmental impacts are permanent and of increasing damage potential over time. If it becomes financially unviable, as has happened with many bike parks from London to California, there should be a bond to guarantee that the land will be restored to its original state.

3. The current proposal proposes massive grading of the land, large buildings, lots of cars and buses, and significant water and drainage issues, in stark contrast to Mt. Hermon's early descriptions of it being "natural" with "open space," and only limited use by the relatively small number of summer campers (as opposed to use by a far greater number of year-round out-of-towners and local users). Those early descriptions sought to reassure local residents that their property values and quality of life would not be detrimentally impacted. We feel the EIR should address the possibility that cumulative impacts on Mt. Hermon residents and other surrounding neighborhoods, be investigated, defined, and an evaluation be made of whether mitigations can effectively protect those neighbors' lives, homes, roads and quality of life.

Environmental Concerns:

Traffic – traffic worsens each year, especially with the economy coming back, so reviewing a study from 2014 that was, in turn, a review of a previous study is not acceptable. There must be an up-to-date traffic study and an accurate estimate of the number of cars and number of buses expected. This is also a Social Impact, so it is the actual number of vehicles that is important, not the percentage increase that disguises the true impact of more cars and buses. The question of when too many cars are too many should be addressed. How many new homes or expanded homes and businesses will have been added to the previous numbers? And what is the impact of continuing loss and underfunding of bus transportation? What population figures and commute numbers are being used? The DEIR should re-evaluate and consider all these concerns.

Also, construction that takes many years to complete and uses many trucks and heavy equipment coming and going; this is not addressed in past traffic studies and must be addressed.

Finally, limiting the count of cars to users of the site is inadequate. There will be many who come to check out the bike park and to watch the bike riders and rope climbers. This adds to short-term visits. How can that be estimated so it is included?

Water: We share the concerns of the SLVWD as defined in the letter from Environmental Analyst Jen Michelsen, as well as those from the City of Santa Cruz, including defining clearly the amounts of water to be used. We request that the issues the District brings up all be fully addressed in the DEIR. In addition, we would like to know what happened to plans to use the onsite well mentioned in previous versions of the project's description in the Mitigated Dec and the RFP and in public meetings, but dropped from the NOP.

We also question the dubious claims of off-setting water use by Mt. Hermon's conservation measures. First, those measures were required by previous Master Plan projects and amendments to assure *replenishment of the aquifer* (not just reduce its degradation), and therefore cannot be counted toward mitigating additional Felton Meadow use. Second, there is no mention of *additional* water use by Felton Meadow project users who come up to the Conference Center for whatever reason; what is that cumulative impact? Third, have the homes served by the Mt. Hermon Water Company also received the conservation implementations that the Conference Center now apparently has in place? This should have been done/must be done to confront impacts of current and increasing future drought years expected from climate change for this area, and also do not count as mitigation for the Meadow project. The DEIR should address this.

In the NOP the only treated recycled water is for the splash park; the only mention of re-using water for landscape irrigation is in relation to a pipe coming from the septic system to an in-ground drip system; clarification is needed about treatment and quality of this water.

The previous water-use studies that are being reviewed for this project's DEIR are pre-drought and therefore well outdated. They should be redone.

Soil & Geology: Massive amounts of viable, living topsoil will be removed by grading; the DEIR must address the impacts of this action. Small mammals (gophers, moles, rabbits) will be destroyed, impacting food sources for raptors and other species dependent on them. What are the impacts on wildlife? What are the impacts of efforts to prevent the return of gophers and other ground mammals that are destructive of playfields, gardens and landscaping? Those efforts should be defined and impacts considered, since many are environmentally damaging, especially to sensitive riparian species. (What methods does Mt. Hermon use on its other properties? Has that been considered in their previous construction projects?)

The requirements in this entire section are unclear and unspecific. For example, what are “background data analysis sources” (in Mapping of geologic hazards) and what does a “Discussion of local groundwater characteristics” *mean*? How will the various evaluations be made? By physical testing? (soil core analysis? measured absorption rates?) or from “Expert Opinion?”

What about evaluation of the effect of geologic hazards? This cannot be simply based on past studies of irrelevant development proposals or of existing conditions, but must include an evaluation of the preliminary grading plan with respect to *areas* of grading, cut and fill amounts and locations, slopes, road grades, retaining walls, access grading, and materials used, as well as an evaluation of the utility infrastructure plan to identify any offsite impacts associated with construction of bridges and the extension of utility lines to the project site. *And*, what are the impacts of waste water and storm water drainage infrastructure plans in relation to liquefaction, erosion, earthquake and severe storms?

The County should be very clear and specific and demand the highest level of relevance and accuracy.

Waterways: We share the concerns of NOAA, and those of CA State Fish & Wildlife and request that the issues they identify be thoroughly addressed because of the proximity of Zayante Creek (crucial to Coho and Steelhead restoration prospects) and to the San Lorenzo River.

Land Use & Zoning (including General Plan Amendment): As previously pointed out, the Mt. Hermon Master Plan has issues to be addressed before Zoning and General Plan changes are allowed on the properties. Importantly, this section needs a comparison of the zone district, and its specific definitions of use, both before and after development.

The lack of understanding of the Felton Town Plan’s requirement to protect the viewsheds must be recognized. Again and again the protection of the rural and bucolic nature of the approaches to town and thus to the Valley are stressed in the Town Plan. This development will radically alter the appearance of the property. The Town Plan demands the protection of the view corridors from Mt. Hermon Rd. and Graham Hill Rd. as an area of particular scenic value worthy of preservation and values an open space and green belt. (Even the controversial previous plan for housing would have protected over 65% of the natural existing habitat as open space, including the broad hillside.) This is protected by law and those concerns should be better considered in the DEIR.

It must be noted that, in the NOP chart, the General Plan Land Use Designation, when it changes from R-UVL to PR, loses any mention of GH (Geologic Hazards) and L (Historic Landmarks). An explanation of this should be included, along with the ramifications of the change.

Air Quality – Questions of airborne particles due to the action of the bikes on “engineered soil” (which is not defined nor described) need to be addressed, as does the pollution brought by the additional vehicles.

Waste water – We question that a “preliminary drainage report” can begin to be adequate. The DEIR needs to address the specific change to the ability of the site *after* development to absorb or discharge rain run-off in a significantly expanded report.

Water runoff – The DEIR should better address where water channeled into the complex drainage system will go, since there is little chance of it being absorbed for restoration of the aquifer? What impact will imported soil and engineered soil have? And what is the severity level of a given storm that the plan is based on? (5-year, 25-year, 50-year??) This is not defined, nor is the plan’s ability to deal with a series of severe storms in one season as in the Storm of ’82, but is of great concern since the plan design provides for overflow from the drainage swale onto Graham Hill Rd. and threatens Felton Grove.

In addition, we are concerned about storms during construction, which are bound to occur. Mt. Hermon has a bad track record for preventing erosion during construction with significant harm to Bean Creek and to Zayante Creek during two separate projects that we had direct involvement in. (One was a storm during construction of the Fieldhouse that very severely impacted Bean Creek, and then,, in the Fall of 2015, during construction of the gymnasium at Redwood Camp , there was significant erosion into Zayante Creek when a storm hit— and again no erosion control measures were in place. Neither was dealt with until the County was called in by concerned people. With construction planned for over 4 to 6 years or so, what guarantee is there that, as changes are made, erosion will be prevented?

The landscape plan is not adequately addressed in the NOP, nor in the RFP. or Mitigated Dec, but is accepted as fine. Enormous sections, however, are described as being covered with “Existing Native Grasses,” especially on the steep slope of the Hillside Flow Trails. Whether this will even exist after grading is in question, as is how the use of the Bike Flow Trails may impact those slopes. This must be considered in the DEIR.

Cumulative Impacts: This must be taken seriously, with in-depth consideration of every facet. We have previously pointed out some areas of concern and depend on the Planning Department’s insistence on a careful examination and reporting on this issue.

Alternative Analysis: We feel that this is very important. Consideration of removal of the major environmentally dangerous parts of the proposal should be a high priority of the DEIR.

We sincerely appreciate the opportunity to comment on the NOP for the Felton Meadow Project's DEIR. We feel it is important that this process has been undertaken, and we understand the immense complexity of the proposal and the time and effort that you and others must dedicate to the EIR process.

Gratefully yours,

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cc: Supervisor Bruce McPherson and other Members of the Board