



Santa Cruz Bird Club

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Friday Oct 6, 2023

Dear Parks and Recreation Department,

Please accept these comments from the Santa Cruz Bird Club on the Wharf Master Plan and recirculated EIR for deliberation at your meeting on Monday October 9th.

The Santa Cruz Bird Club strongly requests that the Parks and Recreation Commission recommend to the Planning Commission and the City Council that Alternative 2- Modified Project be adopted for the Wharf Master Plan EIR. This Alternative, which can be found in Chapter 5, CEQA Considerations, of the 2020 EIR in Section 5.5.2 (Alternatives Considered), removes the lowered Western Walkway. This proposed new Walkway, eight feet below deck level and extending a third of the length of the Wharf on the western (Cowell Beach) side, not only visually bisects the pilings which was of great concern to the Historic Preservation Commission(who continued their meeting to further examine the issue) but also is a major barrier for the migratory, protected Pigeon Guillemots to access their nests under the Wharf. These migratory birds return from the far north every spring to their same nests under the Wharf. They are easily disturbed.

Alternative 2-Modified Project was determined in the EIR to be the environmentally superior alternative and in the words of the city, it "met all project objectives." That the city failed to adopt this Alternative without evidence was included in the 2022 Court's ruling which required the city to address their failure to adopt it. The city's claim that the Walkway is important to Wharf stability failed to mention that there are alternatives to achieve the same goal.

All the new construction for the Wharf under the Wharf Master Plan, such as the 200 ton boat landing on the eastside, the lowered viewing deck to the south, the additional boat landings and boat launchings will all present barriers to the nesting birds. However it is the lowered Western Walkway that most significantly affects the nesting birds.

With the adoption of Alternative 2, there are still a great deal of changes possible for the Wharf if that is desired. The protection of our migratory birds can be achieved with the simple adoption of Alternative 2, which achieves all project objectives.

The Santa Cruz Bird Club urges you to vote yes on this recommendation.

Sincerely,

Lisa Sheridan, President, Santa Cruz Bird Club

Jane Orbuch, Conservation Officer, Santa Cruz Bird Club