

From: [nadene thorne](mailto:nadene.thorne)
To: manu.koenig@santacruzcounty.us; thekristenbrown@gmail.com; s.brown@cityofsantacruz.com; apedersen@ci.capitola.ca.us; vanessa.quieroz@cityofwatsonville.org; eduardo.montesino@cityofwatsonville.org; felipe.hernandez@santacruzcounty.us; justin.cummings@santacruzcounty.us; bruce.mcperson@santacruzcounty.us; zach.friend@santacruzcounty.us; rj12@comcast.net; openup@ucsc.edu; [Regional Transportation Commission](#)
Subject: Segment 9, Rail Trail EIR
Date: Tuesday, May 2, 2023 8:12:02 PM

Commissioners and others:

One of the most glaring failures of this EIR regards greenhouse gas emissions attendant to the Ultimate trail plan due to the extensive amount of concrete designed to squeeze this trail in next to the railroad tracks (tracks which may not even be usable in the future). While the EIR notes that GHG emissions are judged to be "Less than Significant" for Segment 9, in fact, as reported by Dr. Carey Pico, emissions in the range of 1,900 to 2,200 tons of CO₂, equivalent to 4.7 to 5.4 million gas car miles, or 18-21 million EV vehicle miles would be expected due to the excessive use of cement and solder steel posts in the Segment 9 Ultimate trail design. These projected emissions are more than 10 times higher than any CO₂ savings from any future train, or from savings due to expanded use of bicycles - and this is from only one of the rail trail segments. In light of this oversight-? on the part of the EIR producers, one has to ask, how does this project for an Ultimate trail plan as conceived make sense in view of the climate goals of the project?

Much of the public comment centered about the loss of trees, but in light of the GHG emissions due to the massive amounts of concrete, the destruction of trees, habitat, and soil with the Ultimate plan pales in consequence, even given the excessive cost - at \$30M per mile, more than widening the freeway.

The fallacy of this EIR is that it starts from the assumption that there will be rail service in the corridor, and on these 100+ year old tracks, at some time in the near future, an assumption which, given the results of the previous rail studies, seems entirely without basis. As a consequence, this document is full of contradictions and poor design elements, all jumbled up.

Regrettably, the misinformation and confusion sowed by those opposed to last June's Measure D makes any assumption about what one's constituents actually support - or are willing to pay for - in this corridor extremely dubious. It strikes me that we would be better served to pursue the so-called Interim or Phase 1 plan until we have the results of the ongoing rail study to more intelligently consider whether we aren't going backwards in climate action rather than forwards.

Nadene Thorne
[REDACTED]
Santa Cruz 95060

Subject: Request to Address Environmental Impact of Entire Rail-Trail Project, 5-2-2023

Since the Rail and Trail is designed for travel along the entire length of the project, from Davenport to Watsonville, it is inappropriate to break up assessment of the environmental impact of the project into pieces, as the Commission has done to this point. Environmentally sensitive parts of the project, with the highest densities of woodland and meadows supporting wild life, are likely to lie between the two urban centers and the impacts on these areas are not addressed in this piece-by-piece treatment. Furthermore, this treatment creates an increasing level of commitment and momentum without knowledge of the overall environmental impact and comparison with possible alternatives—effectively creating the illusion of an irreversible decision. It also sets a highly problematic precedent for other projects. The Commission should address the environmental impact of the entire Rail-Trail project before any further development is undertaken. Thank you for your consideration of this request.

Sincerely,
Susan Wright, Ph.D.
Bayview Drive
Aptos, CA

From: [redacted]
 To: [redacted]
 CC: [redacted]
 Subject: [redacted]
 Date: [redacted]
 Attachments: [redacted]

Dear Commissioners, Executive Director and Staff

Before approving any more trail designs, please establish a minimum standard level of service (LOS) for the MBSST.

The FHWA created a Shared-Use Path Level of Service Calculator (SUPLOS) as a simple method to help trail designers analyze the quality of service provided by shared-use paths of various widths that accommodate various travel mode splits. Trail width is an important component.

The MBSST has been described as mostly 12 feet wide. CalTrans however explains that all trails must have two 2-foot shoulders (paved or unpaved). **Shoulders are not considered part of the traveled way** (1). Setbacks from fixed objects (i.e. fence posts/walls) are also required. Because the Ultimate path is mostly contained between fences the "traveled way" is mostly 8 feet wide, which is CalTrans minimum for Class 1. There is a portion of Segment 9 (not on a structure) that is less than minimum (2). An AASHTO guide explains that an 8-foot path should only be used in rare instances where bicycle use is expected to be low and pedestrian use not more than occasional (3). The MBSST EIR explains "high pedestrian activity level is defined as 20 or more pedestrians per hour." (4). Trail planners for Segment 9 anticipate 187-276 users/hour in each direction.

The EIR describes Segment 9 as "a 12-foot trail inclusive of shoulders" with LOS grades of C, D and E. However, using 8 feet as width in the SUPLOS calculator, scores are mostly F "significant user conflicts should be expected." (5) A trail perceived to be unsafe will discourage use by the most vulnerable users: children, elderly and those with disabilities.

Until recently the MBSST has been conceptual. For years, RTC decisions have been made based on assumptions that the both rail and trail will fit within the corridor. The community has been assured it could have both. Now it's time to see and compare what was once envisioned to what is possible.

Most of General Plan for the Cities and County of Santa Cruz has established a minimum acceptable LOS of D for car traffic but there are no City/County objectives or policies which dictate LOS of trails. **Please don't settle for F.** Since the goal is to increase the use by bikes and pedestrians and minimize user conflicts, I ask the commission to establish a minimum standard LOS before any more trail designs are approved in order to assure that future trails are safe and accessible to all, meet the needs of the community and align with the original goals and objectives established in the MBSST Master Plan.

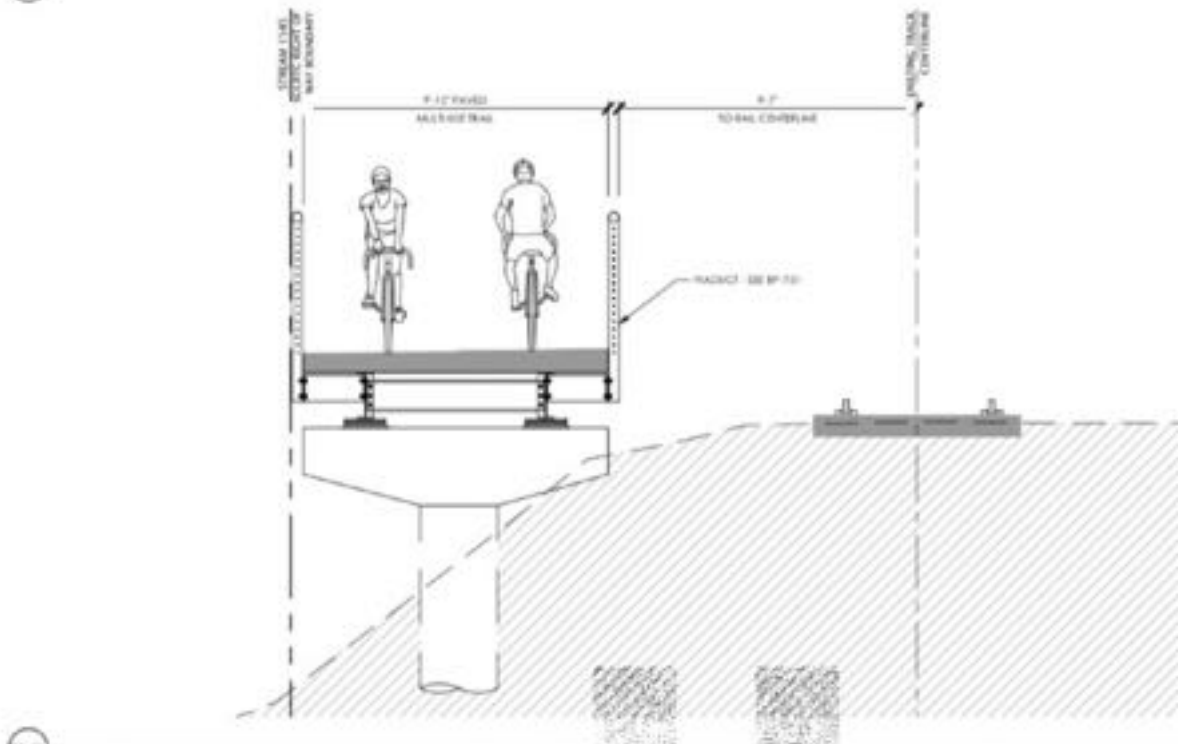
Thanks for your consideration.

Sincerely,
 Johanna Lighthill

(1) CalTrans Highway Design Manual Ch 1000 Bicycle Transportation Design pp. 5-7.
[p1000-11y.pdf](#)



(2) A section of the Ultimate trail alignment near El Dorado narrows to 9'6" (5'6" traveled way). Segment 9 also consists of several viaducts on which the width rule is reduced. CalTrans specifies that "the clear width of a bike path on structures between railings shall not be less than 10 feet." The Little Oak Viaduct is less than 10' wide.



(3) AASHTO Guide for the Development of Bicycle Facilities 2012 p. 5-3.

https://ndotlocalaide.com/tech/resources/aashto-gbc_2012-bicycle.pdf

P. 5-6: "It is not desirable to place the pathway in a narrow corridor between two fences for long distances as this creates personal security issues ...pre-ents path users from lea- ing the path in an emergency and mpedes emergency response."

() SCCRTC MBSST FEIR p. .11-1

(5)DOT Shared Use Path L.e. el of Ser- ice (LOS) Calculator p 15 Table 6. Interpreting SUPLOS grades.

https://www.flhwa.dot.gov/_publications/research/safety/pedbike05138/05138.pdf

Using SUPLOS Calculator Segment 9 grades F F E F

Width 8'

Users 187-276 each direction (per project manager)

Mode split % of bikes/peds 68/27 and 76/19 (per project manager)

The image shows four screenshots of the SUPLOS Calculator spreadsheet, each representing a different segment of a project (9A, 9B, 9C, and 9D). Each screenshot displays a table with columns for Segment, Direction, LOS, and various performance metrics. The segments are labeled 9A, 9B, 9C, and 9D. The tables show data for different directions of travel and provide a summary of the overall project performance.

From: [Contact Request Form](#)
To: [Regional Transportation Commission](#)
Subject: New submission from Contact Form
Date: Sunday, April 30, 2023 9:47:10 PM

This Contact Request Form has been submitted by a member of the public to <http://secrte.org/contact-us/>.

Name

Carol Long

Email

[REDACTED]

Subject

RAIL AND TRAIL SEGMENTS 8, 9, TREE CUTTING MITIGATION

Your Message

Dear RTC Commissioners,

I am writing on in support of the letter from Pauline Seales of the Santa Cruz Climate Action Network to request greatly enhanced replacement mitigation for the trees needing to be cut for Trail segments 8,9, and future segments.

While we fully appreciate the Climate Benefits of the trail and rail long term, in the current crisis any reduction in short term carbon sequestration is should be reduced as much as possible.

Additionally, some people opposed to the rail may be expressing concern about trees as a misdirection tactic. Enhanced replacement ratios would help defuse this effort.

I have used iTree carbon analysis and the EIR chart 3.3-8 to estimate the carbon sequestration that will be lost. This indicated that even a 4:1 replacement ratio would take approximately 5 years to become equivalent to the trees removed before they were cut. – analysis attached.

We realize that tree replacement is expensive, and would be happy to help organize volunteer helpers to reduce the costs of planting and 2 years of summer watering.

Please consider our request for a 4:1 tree replacement ratio for 8,9 and future sections of the trail.

As a member of the SCCAN I fully support Pauline's offer of volunteer help with planting and watering the replacement trees.

Carol Long
Member
SCCAN

From: [Barry Scott](#)
To: [Pauline Seales](#)
Cc: [Regional Transportation Commission](#); [micheal saint](#); [Iwalani Faulkner](#); [Faina Segal](#); [Jessica Evans](#); [Barry Scott](#); [SC CAN discussion](#)
Subject: Re: Trail Segments 8,9 - 4:1 tree replacement
Date: Sunday, April 30, 2023 7:25:50 PM
Attachments: [image.png](#)

Thank you, Pauline,

I am grateful for your effort and letter and happy to support your request for a 4:1 mitigation ratio for tree replacement.

Barry

Barry Scott

Coastal Rail Santa Cruz

A not for profit organization

Battery-electric streetcar service is available today: coastfutura.org

On Sun, Apr 30, 2023 at 5:03 PM Pauline Seales [REDACTED] > wrote:



328

Getchell St, Santa Cruz, 95060

Dear RTC Commissioners,

I am writing on behalf of Santa Cruz Climate Action Network to request greatly enhanced replacement mitigation for the trees needing to be cut for Trail segments 8,9, and future segments. While we fully appreciate the Climate Benefits of the trail and rail long term, in the current crisis any reduction in short term carbon sequestration is should be reduced as much as possible.

Additionally, some people opposed to the rail may be expressing concern about trees as a misdirection tactic. Enhanced replacement ratios would help defuse this effort.

I have used iTree carbon analysis and the EIR chart 3.3-8 to estimate the carbon sequestration that will be lost. This indicated that even a 4:1 replacement ratio would take approximately 5 years to become equivalent to the trees removed before they were cut. – analysis attached.

We realize that tree replacement is expensive, and would be happy to help organize volunteer helpers to reduce the costs of planting and 2 years of summer watering.

Please consider our request for a 4:1 tree replacement ratio for 8,9 and future sections of the trail.

Sincerely, **Pauline Seales , organizer**

From: [Matt Farrell](#)
To: [Regional Transportation Commission](#); sbrown@cityofsantacruz.com; [Justin Cummings](#); [Andrew Schiffrin](#); [Mike Rotkin](#); [Larry Pageler](#); eduardo.montesino@cityofwatsonville.org; [Felipe Hernandez](#); [Quiroz-Carter Vanessa](#); thekristenbrown@gmail.com; apedersen@ci.capitola.ca.us; bruce.mcpherson@santacruzcounty.us; zach.friend@santacruzcounty.us; rj12@comcast.net; manu.koenig@santacruzcounty.us
Subject: Support for Acceptance of Segment 8 and 9 Final Environmental Impact Report
Date: Tuesday, May 2, 2023 2:27:02 PM
Attachments: [20230501 Letter of Support Item 29 Segments 8 and 9 FEIR.docx](#)

Chair Koenig and Commissioners,

We are very excited that the City of Santa Cruz has certified the Final Environmental Impact Report for Segments 8 and 9 of the Rail Trail. We are also very grateful for the work and diligence of RTC, Santa Cruz County and Santa Cruz City staff in bringing this project forward and for the city's selection of the ultimate trail as the preferred project.

I have attached the Santa Cruz County Friends of the Rail and Trail letter in support of the acceptance of the Segment 8 and 9 Final Environmental Impact Report (FEIR).

Matt Farrell
Board Chair
Santa Cruz County Friends of the Rail and Trail (FORT)

From: [Pauline Seales](#)
To: [Regional Transportation Commission](#)
Cc: [micheal saint](#); [Iwalani Faulkner](#); [Faina Segal](#); [Jessica Evans](#); [Barry Scott](#); [SC CAN discussion](#)
Subject: Trail Segments 8,9 - 4:1 tree replacement
Date: Sunday, April 30, 2023 5:03:34 PM
Attachments: [image.png](#)
[table 3.3-8.png](#)
[Rail Trail Trees - Sheet1 \(1\).pdf](#)



328 Getchell

St, Santa Cruz, 95060

Dear RTC Commissioners,

I am writing on behalf of Santa Cruz Climate Action Network to request greatly enhanced replacement mitigation for the trees needing to be cut for Trail segments 8,9, and future segments. While we fully appreciate the Climate Benefits of the trail and rail long term, in the current crisis any reduction in short term carbon sequestration is should be reduced as much as possible.

Additionally, some people opposed to the rail may be expressing concern about trees as a misdirection tactic. Enhanced replacement ratios would help defuse this effort.

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We realize that tree replacement is expensive, and would be happy to help organize volunteer helpers to reduce the costs of planting and 2 years of summer watering.

Please consider our request for a 4:1 tree replacement ratio for 8,9 and future sections of the trail.

Sincerely, **Pauline Seales , organizer**

From: [Susan Cavalieri](#)
To: [Regional Transportation Commission](#)
Subject: tree planting related to segments 8 and 9 of the rail trail
Date: Monday, May 1, 2023 10:41:19 AM

Dear RTC Commissioners,

As a member of the Santa Cruz Climate Action Network, I am also writing in support of planting 4 trees for each tree lost during construction of segments 8 and 9 of the rail trail.

As the climate continues to warm and the central coast experiences the impacts of the climate crisis the RTC needs to approve planting 4 small trees, for each mature tree lost, in order to maintain the same degree of sequestration after about 5 years.

By reducing transportation emissions, and by drawing down emissions, the Commission can begin to restore hope in our local communities after the storms of this past winter.

Thank you for your attention to the climate crisis.

Susan Cavalieri



Santa Cruz

From: [J Lighthill](#)
To: [Regional Transportation Commission](#)
Subject: EIR and Segment 9 tree removal
Date: Wednesday, May 3, 2023 9:01:23 AM

Dear RTC,

There are inconsistencies in the Seg 8&9 EIR related to tree removal.

In your agenda this week, The EIR executive summary says that 25% of all existing trees along the rail corridor need be removed for the Interim trail.

Yet, Table 3.3-8 says its 18%.

And yet Appendix A (tree demo) shows even fewer trees to be removed (113).

The EIR contains three different calculations.

Please consider *why* 113-124 trees need be removed to construct the Interim Trail.

As part of the ACL contract and obligation to the rail operator, the RTC has held vegetation control/maintenance contracts for several years. <https://sccrtc.org/projects/rail/maintenance/> These contracts have included clearing all vegetation to a width of 16.5-20 feet along the SCBRL. If the work has been performed as specified, **there should be no trees within the freight rail easement**, nor within Interim trail alignment—and certainly no mature heritage trees. In response to this comment, the FEIR explains that roots of trees may be in the way of construction which might warrant removal of a tree. 113-124 trees?

The tree demo plan shows trees slated for removal are mostly on the edge of or outside of the trail. Please consider whether an adjustment to the trail width might save these trees.

Additionally, the EIR implies that trail construction supersedes local Heritage Tree ordinances. DEIR p. 4-11 states that maintenance on the rail line falls under the provisions of the 1995 Interstate Commerce Commission Termination act, and because of such, removal of large trees within sensitive habitats (woodland oak and monarch roost sites) would not be protected by City Heritage and County Significant Tree ordinances. Again, if vegetation maintenance contracts have been performed to specifications, no trees need be removed for rail operation—only for Ultimate Trail construction. Please clarify whether the 1995 ICCT Act would pertain to trail construction.

I hope the RTC recognizes the inconsistencies and omissions in this EIR, and will choose not to rely on the information as it is presented.

Thanks for your consideration.

Johanna Lighthill



May 2, 2023

Chair Manu Koenig
Santa Cruz Regional Transportation Commission
1101 Pacific Avenue, Suite 250
Santa Cruz, CA 95060

SUBJECT: May 3 2023 RTC Agenda Item 29: Support for Certification of the the Final Environmental Impact Report (FEIR) for Segments 8 and 9 of the Rail Trail,

Chair Koenig and Commissioners,

Santa Cruz County Friends of the Rail and Trail (FORT) wishes to thank RTC staff, city of Santa Cruz staff, and Santa Cruz County staff who have collaborated in the research, outreach and diligent effort that has resulted in this important step forward for the rail and trail.

We have carefully reviewed this document; and find that there is substantial evidence that it is adequate. We also want to note that after looking carefully at the ultimate and interim trail options, the final EIR found that the ultimate trail option has less environmental impact and is therefore the preferred alternative. Based on this analysis, the lead agency, the City of Santa Cruz, selected the “ultimate trail” as the project to be constructed

Thank you for your time and consideration. We urge the commissioners to certify this EIR on Thursday.

We look forward to the completion and dedication of this critical active transportation addition to our transportation network.

Sincerely,

Matt Farrell
Chair, FORT

Dear SCC Regional Transportation Commission Chair & Commission Members,

I appreciate the opportunity to present my submission to you.

My input for the Coastal Rail Trail Segments 8 and 9 is my long time resident perspective of potentially balancing the Project's Objectives with the environment, construction cost/time components for effective & productive result.

Thank you for taking the time to read on.

The FEIR is asking the decision makers to decide which of the presented Segments 8 and 9 design options fosters their informed decision-making for an environmentally superior trail that fulfills the objectives of the proposed Project based on a meaningful evaluation of trail options' environment impacts. See FEIR APPENDIX INFO 1

The public strongly advocated for 'The alternatives should have included a 12- to 16-foot-wide Trail Only alternative and a 12- foot-wide optional Interim Trail.'(FEIR Master Response A ' Alternatives Analysis' summary)

Although a comprehensive 12' Alternative 2 trail FEIR evaluation/analysis is omitted, the FEIR supports the public's advocacy for a '12 ft Interim trail is built over the tracks' as the most environment/tree friendly option, because it requires a 124 tree removal instead of cutting down 381 trees for the "Ultimate Trail"- a savings of 257 trees.

The '12 ft Interim trail is built over the tracks' Alternative does fulfill the Projects Purpose and Objectives & is also supported by these considerations:

- The challenging Segment 9 topography can be addressed environment, cost & time effectively thus benefit the Hiawatha ravine & the Projects' waterbodies.
- The future use of the tracks is unclear until the RTC study determines the feasibility of an electric train.
- The EIR/FEIR/RTC Report estimates that it will be 20 – 30 years before passenger rail is implemented.
- Saving the 257 trees for 20–30 years is environment, cost & time effective.
- Holds up the City's HiAP ordinance for the human & environment quality of life.
- In the next 20–30 years the 257 saved trees will supply the most carbon sequestering, oxygen production, pollutant filtering of any other trail option while achieving the trail objectives of the proposed Project. See FEIR APPENDIX INFO 3
- This option would minimize the adverse effect of the Scenic Resources and Vistas (Impact AES--1). See FEIR Appendix INFO 1

The above considerations are validated by the CEQA guidelines:

1. According to CEQA Guidelines, Section 15126.6(a) this option qualifies, because it avoids or substantially lessen any of the significant effects of the project.
2. The FEIR 23.2 response states that (CEQA Guidelines, Sections 15125[a][1], 15126.2[a]) applies the general rule of assessing environmental impacts based on

existing environmental conditions & not evaluating circumstances that are 20–30 years down the line such as the “Ultimate Trail” outcome.

According to CEQA VI FINDINGS REGARDING ALTERNATIVES under A. LEGAL REQUIREMENTS FOR ALTERNATIVES (CEQA Guidelines § 15364) it stands to reason that the '12 ft Interim trail is built over the tracks' qualifies as feasible.

Based on the FEIR the RTC Report deems the 2. Alternative 2: Interim Trail with Rail Preservation as infeasible including rationals that

- A. the Fiber Reinforced Polymer (FRP) should not rely on rail wood ties support due to decay;
- B. FRP costs more than asphalt;
- C. requires additional fencing due to trail elevation.

These obstacles deserve further explorations such as

- Does A. indicate that no trains should rely on the wood ties although they are much heavier than FRP decking?
- B. introduces an interesting component: The Rail/Trail Project's intention is to reduce fossil use. Therefore it is worth evaluating if asphalt production uses less fossil fuel/energy than FRP manufacturing.
- C. actually requires only additional fence on one side compared to Ultimate Trail. That additional cost could be off-set by eliminating drop off by slope filling the trail elevation with the excavated retaining wall soil thus avoiding soil hauling cost.

The FEIR suggests that a lack of a comprehensive 12' Alternative 2 Trail analysis does not deprive the decision makers of a meaningful evaluation to foster informed decision-making of Environmentally Superior Alternative.

This raises the questions:

1. Did the lack of analysis information foster decision making evaluation of the Alternative 2 according to CEQA VI FINDINGS REGARDING ALTERNATIVES & other CEQA guidelines?
2. Upon the 'Certification of the Final Environmental Impact Report' at what point/ time does the RTC/County exercise their evaluation ability to decide about feasible alternatives as defined by CEQA?

Sincerely,
Jane Mio