

DAVENPORT / NORTH COAST ASSOCIATION

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Mr. Zachary Ormsby, Field Manager
BLM Central Coast Field Office
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Re: Project for Northern Parking Area and Trailhead and Draft Environmental Assessment at Cotoni-Coast Dairies, a Unit of the California Coastal National Monument
(DOI-BLM-CA-C090-2023-0001-EA)

Dear Mr. Ormsby,

We respectfully submit this letter with our comments on the Project for Northern Parking Area and Trailhead Draft Environmental Assessment (EA). The Davenport / North Coast Association (DNCA) requests you give our comments serious consideration particularly as they are offered in the spirit of making the EA a clearer document and improving the outcomes of the proposed Project. We appreciate the April 12th on-site public meeting with you and your staff, which helped clarify several of our questions regarding the intent of the EA. For guidance in commenting on the EA, we consulted “A Citizen’s Guide to NEPA” on the BLM website. It states this process has two purposes,

“...ensuring that agencies consider the significant environmental consequences of their proposed actions and informing the public about their decision making.” It goes on to say, *“Citizens often possess helpful information about the potential environmental, social, and economic effects that proposed Federal actions may have on people, places, and resources. NEPA’s requirements provide you the opportunity to provide information to a Federal agency so it can take your input and unique perspective into account during the decision-making process.”*

Overall, the DNCA supports BLM’s preferred Alternative 1 and is generally supportive of the draft Project EA. Alternative 2, which shares its entrance with Warrenella Road, does not meet the projected parking demand, would be confusing for visitors, and would create conflicts with Warrenella vehicles. Alternative 3 would create uncontrollable parking demand on Cement Plant Road and SR1. We have some technical concerns and potential corrections, which we believe would improve the analysis to give the public a more accurate picture of the of the Project. While there may be other areas of the EA that deserve additional attention, our comments fall into three general categories: phasing, visitor use estimates, and traffic analysis.

DNCA's General Comments

1. We support BLM's preferred Alternative 1, among the non-eliminated alternatives, as it likely accommodates anticipated visitor demand for the foreseeable future and is less impactful on Warrenella Road and New Town residents than either of the other Alternatives.
2. We strongly support guiding visitors on SR1 to the north end of Cement Plant Road (CPR) as the access path to the Northern trailhead.
3. DNCA strongly supports all measures to forbid visitor parking along CPR and all safety measures to reduce CPR traffic.
4. As discussions between BLM and the County proceed regarding CPR traffic and parking management, DNCA urges good communication with New Town and Warrenella constituents. Please include a possibility of permit parking in New Town in the future, if necessary.
5. We strongly support the nighttime closure hours and the requirement that visitors may not leave C-CD while their car is parked in a BLM lot. For the sake of consistency, we hope these requirements can be replicated as the standard as the North Coast Facilities Management Plan is implemented.
6. We agree with the EA's increased number of visitors in comparison with the 2020 EA, particularly as there will only one entrance for the foreseeable future. However, we believe the calculations may not be correct.
7. As learned at the site walk, BLM is looking at innovative ways to minimize cattle fencing. DNCA supports this initiative.
8. DNCA is disappointed further progress has not been made in negotiations regarding the location of the RMZ3 southern parking area and urge BLM, Trust for Public Land, and other agencies to move forward as rapidly as possible. That entrance is critical to distributing the visitor demand across the Monument and relieving traffic and natural resource impacts at the northern end of the Monument.

Project Phasing

Considering the changed circumstances at the southern entrance since the original RMP, DNCA understands the strategy of a phased approach to opening C-CD. However, we believe it should be more clearly stated so the public understands BLM's plan in this regard.

1. In Section 2.4.3 of the EA, parking improvements at the RMZ3 southern trailhead are excluded from analysis in this EA due to no resolution with Trust for Public Land. That is unfortunate, but clear and understood.
2. To help clarify the intent of the proposed Project and the EA, we request a succinct Project scope description of Phase 1 and Phase 2 near the beginning of the EA. Please also include the planning horizon and visitor projections for each Phase.
3. Throughout the EA there is reference to Phases 1 and 2.
 - a. On page 69, phasing is mentioned and there is a description of Phase 1:
 - i. *"The C-CD RMPA calls for a two-phased approach to the implementation of public recreation facilities in cooperation with local and State governments. Phase 1 consists of developing the proposed parking area in RMZ 1, the Panther Gap/Yellow Bank Creek Trailhead in RMZ 3, and 17 miles of recreational trails for hiking, biking, and/or equestrian use."*
 - ii. The EA further states that here will be no Phase 2 without additional environmental analysis and a Coastal Commission Consistency Determination.
 - b. At the end of that paragraph the EA states:
 - i. *"If monitoring demonstrates that the Phase 1 recreational improvements are being effectively managed, then more trails and/or parking areas could be developed in Phase 2."*
 - ii. Does this statement mean Phase 2 could be implemented without additional environmental analysis?
 - c. Is the total 325,000 visitors per year the expected use when the RTC's improvements are complete at Panther Beach? Or is that the total expected at the tail end of the EA planning horizon in 2040.

- d. When the location of RMZ3 parking has been resolved with Trust for Public Land, would that trigger the next environmental analysis? Is that Phase 2?
- e. It appears 17 miles of trails in RMZ3 will open during Phase 1 when the Panther pedestrian bridge is complete? Or is that part of Phase 2 and implemented independent of the Rail Trail bridge? Please clarify.
- f. In Appendix G on page 6, there is reference to Phases within each RMZ with similar numbering. This adds to the confusion related to the Phasing. Please clarify.

Appendix G: C-CD BLM Visitor Use Estimates (10/23)

There are some inconsistencies in Appendix G that need either clarification or correction. We are concerned the increased number of visitors during the summer is not accurately reflected and question the math on the north/south visitor split.

1. Appendix G projects an annual visitor use of approximately 190,000 during Phase 1 and assumes 75% of the visitor use would be on weekends split evenly between Saturday and Sunday. This results in 142,500 visitors on weekends spread across the entire year.
 - a. Divide 142,500 by 104 weekend days per year and the result is 1,370, which is the average daily weekend summer use during Phase 1 described at the bottom of page 2. Is that the way the 1,370 figure was created?
 - b. We agree that approximately 75% of the visitor use will be on weekends. While the annual percentage of weekday to weekend visitors will stay approximately the same, the number of visitors during the summer will be much higher.
 - i. By equally dividing the weekend use across the year, we believe the calculation does not accurately capture the higher use during the four summer months from mid-May through mid-September. Please be sure to weight the number of visitors to reflect higher use during summer months.
2. On page 2 the average daily weekend summer use is estimated at 1,370 visitors during Phase 1, with a split of 85% to RMZ1 (north) and 15% to RMZ2 (south). This paragraph goes on to say this *"...amounts to 1,028 visitors (85%) to the northern parking area in Phase 1, and another 342 visitors (15%) to the south parking area via the overpass crossing State Route 1 near Panther Gap and Yellow Bank Creek."*
 - a. Please recheck the math.
 - i. $1,370 \times 85\% = 1,165$ visitors to the north
 - ii. $1,370 \times 15\% = 205$ visitors to the south
 - iii. **If 1,370 is the correct number** for average daily summer weekend visitors (depends on the response to the prior comment), **visitors to the northern parking area should be increased by 137 visitors** and the Trip Generation Tables should be revised accordingly.
3. If the visitor counts are based solely on local parks (Wilder Ranch State Park, Nicene Marks State Park, Soquel Demonstration Forest and San Vicente Redwoods), DNCA believes they may be underestimated. The remarkable beauty of this varied landscape and the widespread publicity on conventional and social media C-CD will receive as a National Monument will likely result in a higher proportion of regional and national visitors on a typical summer weekend than calculated in the EA.
 - a. Due to the proximity to SR1, a major tourist corridor, DNCA suggests the number and ratio of local to out-of-town visitors to C-CD will bear greater similarity to units of the Golden Gate National Recreation Area than our local state parks. We urge BLM to include those in your comparable analysis.
 - b. This may affect the SR1 weekend peak summer traffic turn assumptions in the Updated Focused Traffic Study.
4. DCNA strongly recommends BLM conduct in cooperation with CalTrans annual peak traffic counts north and south on SR1 at the CPR intersection along with counts on CPR measuring trips turning off SR1 to the Monument. We also recommend hose counts just south of the northern parking area entry drive to determine traffic on CPR.

4. Appendix G page 7 states: *“A large percent of the other visitors from beyond the region are also likely to make short stops at the BLM parking area to take advantage of services, but scarcely utilize the recreational trail system.”* Without a substantiated percentage, this statement minimizes the predominant recreational use of C-CD. Out of town visitors will have heard about and want to explore the Monument and are not going to stop just to use the restroom.

Updated Focused Traffic Study for the Cotoni-Coast Dairies Project (12/20/23)

In the Traffic Study analysis there are areas that need improvement as they may not provide the public with an accurate picture of Project traffic impacts.

1. The warrant sheets for the CPR/SR1 intersection refer to it as a tee intersection. It is in fact a four-leg cross intersection with Davenport Landing Road (DLR) acting as a continuation of CPR. It appears the analysis only considers the effects of vehicles turning on CPR from north or southbound SR 1. In fact, there will also be as many vehicles that turn onto DLR to go to the accessible beach. Those cars create a hazard (particularly the northbound SR 1 cars that stop while waiting to turn left onto DLR) and that intersection has been the site of several serious accidents given the dynamics of that intersection. (including a full speed rear ending of a SR1 northbound vehicle waiting to turn into DLR driven by the spouse of a DNCA board member)
 - a. The analysis should look at that intersection as a four-leg intersection with particular attention to northbound SR1 traffic as it comes down a hill with a passing lane as it approaches the SR1/CPR/DLR intersection.
 - b. The dynamic of a SR1 northbound car stopped and waiting to turn left into DLR and a northbound vehicle decelerating to turn right into CPR creates a very unsafe situation for those vehicles and through traffic.
2. The SR1 center line pavement marking should be a solid double line both south and north of the CPR/DLR intersection for several hundred yards to improve driver safety. (a CalTrans issue)
3. On the “Warrant 3: Peak Hour Traffic Volumes and Delay” pages in the analysis for both the weekday and weekend counts the date is Thursday September 28, 2023.
 - a. September 28th is not during the summer and is neither a time frame during which SR1 traffic volumes would be highest, nor when C-CD would experience its peak visitors.
 - b. Thursday is a weekday and does not provide an accurate count of weekend traffic volumes.
4. Traffic Volumes should be taken at two different time timeframes during the height of the summer season and include two different weekdays and two different weekends to average out anomalies.
5. The C-CD RMPA Management Action-TTM-4 allows parking on Cement Plant Road. This is a deep concern for the local community. This runs counter to the assumptions of the EA preferred Alternative 1, which provides 68 spaces in response to a peak demand of 55. As we learned during the site walk, there may be spaces on BLM property at the north end of CPR, please identify the location and what might trigger their implementation so there is no misunderstanding.
6. On page 39 the EA states: *“The grading of the parking area and trailhead would not exceed 8% running slope to comply with U.S. Access Board guidance. Ensuring these universal accessibility standards would have long- term moderate beneficial impacts on recreation resources because visitors with disabilities would have an improved recreational experience at C-CD, given improved access to recreational trails and other facilities.”*
 - a. Please confirm the parking area would meet both this 8% maximum running slope and the cross-slope requirements of the Access Board.
 - b. This paragraph also implies there would be universal access at the trailhead and recreational trails from the parking lot location. Please clarify the extent of Universal Access to be expected in RMZ1 and, if the accessibility standard for recreational trails is less stringent, please describe.
7. The EA assumes 30 visitors per trail mile (VPTM) in RMZ1 and 20 VPTM in RMZ2. This is due to the sole reliance on the Rail Trail parking lot at Panther Beach. There appears to be no analysis of the safety and parking capacity impacts this imposes on the visitors to Panther Beach or the Rail Trail looking for parking at that location.

8. As we learned at the site walk the location of the northern parking drive will be a range between 160'-190' north of Warrenella Road depending on encroachment discussions with the County.
 - a. The EA states the entry drive for Alternative 1 is 190 feet north of the intersection of Warrenella and Cement Plant Roads. The Updated Focused Traffic Study, the drive is 160 feet north of Warrenella Road. Please clarify.
9. As BLM indicated during the site walk, a planted berm along Warrenella Road starting at the gate will be built for visual screening of the Alternative 1 parking area from New Town and SR1. Please articulate that in the EA.
10. As BLM indicated during the site walk, large vehicles and RVs over a certain length will not be permitted to enter the northern parking area. Please clarify where signage with that information will be located. that emergency vehicles will have access.
11. As discussed during the site walk, we request the "No Left Turn" sign at the northern parking area exit say only that and not mention "Local Traffic Only."
12. Please work with CalTrans and/or other agencies to provide adequate signage on SR1 so visitors have ample time to anticipate the exit. Currently some beach visitors stop unexpectedly to turn off SR1.

Thank you for this opportunity to comment on the Project Environmental Assessment. Please let me know if you have any questions regarding this letter.

Sincerely,



Katie Webb
Davenport / North Coast Association
Board Chair

cc: Justin Cummings, Santa Cruz County Supervisor, District 3 (and Brown)
John Laird, State Senator, District 17 (Woodruff, Suddes)
Gail Pellerin, Assemblymember, District 27 (McCarty)
Jimmy Panetta, Congressmember, District 19 (Brusa, Garcia, Davison)
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Dan Carl, Central Coast District Director, California Coastal Commission
Grace Blakeslee, Senior Transportation Planner, Santa Cruz County Regional Transportation Commission
Christy Fischer, Conservation Director, Trust for Public Land
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Susan Petrie, Stewardship Project Manager, Peninsula Open Space Trust
DNCA Board Members
Friends of the North Coast
Rural Bonny Doon Association
Molino Creek residents (Lipson)