



**SANTA CRUZ COUNTY
GROUP**

Of The Ventana Chapter

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

<https://www.sierraclub.org/ventana/santacruz>

email: sierraclubsantacruz@gmail.com

City of Santa Cruz Public Works Department

July 31, 2023

Nathan Nguyen, Director

809 Center Street, Room 201

Santa Cruz, California 95060

nnguyen@santacruzca.gov

Re: San Lorenzo River Levee Burrow Rodent Population Management and Vegetation Management

Dear Director Nguyen,

Members of the Sierra Club's Conservation Committee recently conducted several site visits to the full length of the lower reaches of the San Lorenzo River levee to better understand and assess the work done to manage the burrowing rodent population and repair the rodent damage by grouting. Members also inspected the results of the Vegetation Management work. We read the available documents on both projects and spoke with members of the stakeholder groups involved with river restoration and care.

The Sierra Club recognizes the importance of protecting the levees. The Club is also aware of the process underway for the city to obtain certification to meet FEMA criteria as well as the evaluation conducted by MBK Engineers towards this goal.

Regarding the two main levee projects, the Sierra Club offers these observations and recommendations:

VEGETATION MANAGEMENT

- The upcoming RFP (m409505/PW 2333) for annual vegetation management work, approved by the Transportation and Public Works Commission on 6/26/2023 is slated to appear before city council for discussion and approval in August, with work beginning September 1. We recognize that the city of Santa Cruz has undertaken this work with guidelines and restrictions as required by the US Army Corps of Engineers (USACE); however, as our recent visits to the riverine area show, there is currently a fairly dense

corridor of remaining vegetation, both native and volunteer, below the 20- foot cleared inboard bank.

- The RFP specifies that a survey for nesting birds shall be conducted by a qualified biologist no more than 3 days before starting work. However, no specifications are given for similar oversight of vegetation removal by a qualified botanist or for any training given to contractor personnel, though flagging of native plants is included. During the previous clearing and grouting, some native plantings which had been flagged were mistakenly noted as rodent burrows and removed, due to confusion in flag colors. Several non- native invasive plants were not removed, such as broom and castor bean. Had work crews received more complete training these errors might have been avoided. We ask that greater oversight and training be standard practice in future vegetation management and clearing. That plus better coordination with existing river stakeholder groups will help prevent future errors.
- We note that 2-6 of the USACE Engineering Pamphlet 1110-2-18 states the”...use of suitable vegetation, such as shrub forms of Salix (willow), riverward of the vegetation-free zone, is encouraged as an environmentally beneficial means to moderate the erosive potential of water currents and wave action.” With this in mind, we ask that the City retain or allow for regrowth of as much suitable woody vegetation as possible.
- We also ask that the City work with stakeholder groups to ensure that replacement plantings in the vegetation-free zone include mowable, native, non-woody seed mixes of both annual and perennial species to restore as much biodiverse habitat as is feasible.
- Zones in the levee area are of necessity both constructed and managed, but nonetheless contain scarce and valuable urban habitat for wildlife, add biodiversity, and provide beneficial semi-natural areas for residents and visitors to enjoy.
- The Sierra Club requests that these aspects of the river be given increased consideration in future vegetation management work, and that the upcoming RFP be amended to afford them greater attention.

RODENT CONTROL

We observed problems with the work done by the contractor to fill the rodent burrows with grout. There was much spilled grout on the levee including large quantities of grout broken into small pieces scattered over a wide area; non-rodent holes were filled with grout; other rodent holes left unfilled. The images at the end of this email document the problems. You now are no doubt aware of the poor job done by the contractor since by mid-day Tuesday (7/25/23) most of the discarded pieces of grout had been collected and removed. We trust that next year a different, more skilled contractor will be hired.

Perhaps a more suitable material than grout can be evaluated?

If the Public Works Department would like the Sierras Club’s support in making a case for such changes before the City Council, don’t hesitate to contact us.

Thank you for your consideration of these observations, recommendations, and requests. We would appreciate a response to this letter. We also look forward to working cooperatively with the City of Santa Cruz Public Works Department personnel in our mutual goal of managing and protecting all the varied aspects of the lower reaches of the San Lorenzo River.

Yours Sincerely,

Handwritten signature of Kristen Sandel in black ink.

Kristen Sandel, Conservation Committee Chair

Handwritten signature of Michael Guth in black ink.

Michael Guth, Executive Committee Chair
Santa Cruz Group of the Ventana Chapter of the Sierra Club

Cc:

calberti@santacruzca.gov

fwarren@santacruzca.gov

fkeeley@santacruzca.gov

kgiuliano@coastal-watershed.org



Unfilled rodent tunnels seen near the Mike Fox Park



Grout covering non-rodent depressions as well as rodent tunnels



Excessive grout debris spread during application