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March 25, 2024

Tony Elliot, Director  
Noah Downing, Park Planner  
City of Santa Cruz Department of Parks and Recreation  
809 Center Street  
Santa Cruz, California

**Re: San Lorenzo Park Redesign**

Dear Mr. Elliot and Mr. Downing:

On January 8th, 2024, the City of Santa Cruz Parks and Recreation Commission listened to hours of testimony on the proposed San Lorenzo Park Redesign Plan. The overwhelming majority of individuals and group representatives who spoke regarding the Riverlands advocated for a full habitat recovery or restoration, opposing both the staff's proposal to establish a large multi-purpose lawn and the consultant's indication to limit habitat enhancement only to low-growing herbaceous vegetation.

Following the public hearing, the Commission voted unanimously to defer any recommendation on the Riverlands pending analysis of the effect of riparian recovery on flood capacity. In response, staff indicated in an email to conservation groups after the meeting that the redesign plan would include no recommendation for the Riverlands other than additional study of habitat restoration and flood capacity improvement options.

Preliminary engineering studies indicate that expansion of riparian woodland in the benchlands could increase the risk of flooding in the park area if no additional flood capacity were developed. City consultant ESA submitted two preliminary flood capacity improvement concepts, both of which would utilize a large area within the benchlands to establish steep-sided flood channels with engineered banks and floors. These structures not only would reduce the area available for habitat recovery but might not achieve their alleged benefit. ESA did not explain how the capacity of these basins, constructed within a sediment-accreting riverbed, would be maintained during large flood events.

Native riparian habitats are adapted to large flood events. The high-water flows scour out trees and understory and create gaps in the woodland canopy that foster regrowth of young trees, shrubs and herbaceous plants. Riparian wildlife has adapted to these cyclical scouring events. Some species of riparian birds are woodland residents, some utilize understory habitat. Allowing the natural ecological cycle to operate not only maximizes functional capacity of the habitat but helps maintain flood capacity, as some of the "roughness" associated with a riparian woodland is scoured away during flood events.

Any engineering analysis of flood capacity must account for the scour cycles associated with riparian habitat. The consultant must have expertise in ecological processes as well as hydrologic modeling, and a history of high-quality consulting work, preferably in Santa Cruz County. Prior to awarding any engineering contracts, the City should carefully evaluate the history of the firms and their local reputation.

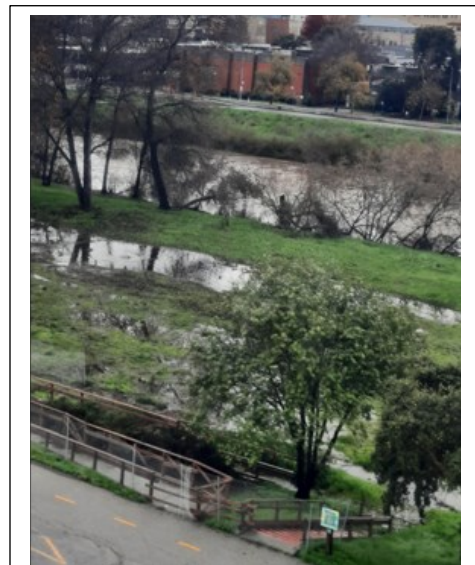
The evaluation of flood capacity should also include consideration of constructing a low floodwall on the east side of the benchlands like the mosaic wall on the west side of the river. A low wall could simultaneously increase the flood capacity, provide banquet seating and facilitate habitat recovery. Sliding gates could be installed to maintain access points to the flood plain recovery area.

A seasonal multipurpose lawn intruded into the habitat recovery area would be expensive to maintain, as it would need to be cleared and replanted every year that it is flooded and covered with debris and sediment. A lawn also would be water-consuming, ecologically destructive and unnecessary for public use.

The existing Duck Island amphitheater on the upper terrace provide adequate areas for special events and concerts without the need for a second amphitheater, while the trails and resting sites on the Riverlands would provide much needed opportunities for accessible open space recreation, education and scientific study within the City of Santa Cruz. Trails are a vital component of the Sierra Club mission to provide access to and education about the natural environment. Trails in San Lorenzo Park would provide vital accessibility that is close to both senior and affordable housing.

It is time for the City of Santa Cruz to finally realize its long-standing intention to restore habitat on the San Lorenzo River. The City of Santa Cruz San Lorenzo Urban River Plan established goals for habitat restoration and protection. But, aside from improvements proposed for access points and Jesse St. Marsh, the River Plan did not propose restoration of riparian corridors and thereby failed to actualize its own goals. Habitat restoration was also advocated by the City Council's River Restoration Committee, which requested that, before accepting the 1988 San Lorenzo Park Master Plan, the City Council should revise the plan to incorporate "designation of the benchland area as a biological enhancement area." By restoring the natural function of the benchlands area, Santa Cruz would reverse much of the damage that past generations have imposed on this sensitive and critical riparian area and wildlife habitat. Large scale events and performances are incompatible with habitat restoration and should be eliminated from the Riverlands use plan.

The low-growing native herbaceous vegetation proposed by the consultant would have little more habitat value than the lawn itself, and like the lawn would be costly to maintain, requiring replacement every time it was washed away or was covered with mud, which will be most winters as Climate Change advances. Natural "habitat" in a constant state of active disturbance is not



*Riverlands after a moderate rain, 1/22/24*

habitat. Riparian woodland, by contrast, is self-colonizing and self-maintaining, floodplain-resilient, climate resilient, beautiful and vital to sustaining riparian birds and other wildlife.

#### **Sierra Club and Santa Cruz Bird Club Recommendation**

The Sierra Club and Santa Cruz Bird Club recommend that the final proposed San Lorenzo Park Redesign recommended by the City of Santa Cruz Parks and Recreation Department Staff should include the following elements:

- Delete any reference to a multi-purpose lawn on the Riverlands in the park design, at least until engineering and ecological studies have been completed.
- Delete any reference to an overlooking amphitheater that relies on a lawn. There would be no purpose in such a facility unless the Parks and Recreation Commission endorses the lawn itself.
- Direct staff to design a flood capacity and habitat recovery study of the Riverlands, including a detailed engineering study of options for increasing flood capacity while maximizing ecological recovery, with riparian woodland enhancement if feasible.
- Specify that this study includes analysis of non-invasive options such as installing a floodwall or berm.
- Encourage staff to review the regional history of potential contractors (such as ESA) and their local reputation prior to selecting the firm.
- Document the importance of riparian woodlands and propose to re-establish this habitat in San Lorenzo Park Riverlands to the greatest extent feasible.
- Retain the existing duck pond and stage and expand the amphitheater that provides a valuable entertainment venue along with valuable habitat. The popular, brilliantly designed, family-oriented pond / amphitheater facility provides refuge for waterfowl during flood events, a valuable food source for herons, ducks and geese, a recreation destination for close-up nature photography and a wonderful destination for children to interact closely with wildlife. The proposed redesign would bulldoze the historic duck pond and replace it with lawn. Lawn areas can be cleverly incorporated anywhere, so it is mystifying why this would be proposed. The duck pond and Duck Island Amphitheater are well worth the maintenance cost and should be preserved.

Thank you sincerely for your consideration.

Respectfully,



Mike Guth  
Chair  
Sierra Club Executive Committee  
Santa Cruz, County Group



Lisa Sheridan  
President  
Santa Cruz Bird Club

cc: Mayor Fred Keeley, City of Santa Cruz