



**SANTA CRUZ COUNTY GROUP**  
**of the Ventana Chapter**

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September 8, 2021

To: City of Santa Cruz Parks and Recreation Commission  
809 Center Street, Santa Cruz, CA 95060

Re: Proposed Changes to Pogonip Master Plan – Homeless Garden Project site relocation

The Sierra Club offers the following comments regarding the pending proposal to amend the Pogonip Final Master Plan to relocate the Homeless Garden Project from its original planned location in the Lower Meadow to the Main Meadow of the Pogonip Open Space. Although our position on this proposed revision of the Master Plan is still pending, this proposal raises significant concerns, and should be viewed as a substantial change that may not be supported by the prior EIR approval. This change in location conflicts with numerous other priorities of the Pogonip Final Master Plan. The Plan foresaw possible environmental constraints on the Garden's usable acreage, indicating that the acreage would be reduced in that circumstance. Additionally, the impetus for this proposed change, that of lead contamination in the Lower Meadow, is itself of significant concern and may require remediation. We strongly urge the City to do a better job reaching out to citizens about the proposed changes, including erecting significant signage at all entrances to the Pogonip so as to allow the general public to consider whether or not this change is congruent with their vision for the Pogonip.

The Pogonip Final Master Plan (PFMP) designates your Commission as the lead advisory body on this issue:

"The Parks and Recreation Commission is the lead advisory body to the City Council for the review of the (Pogonip) Master Plan and EIR." 1-10

The prior work on the PFMP involved significant community involvement and environmental work.

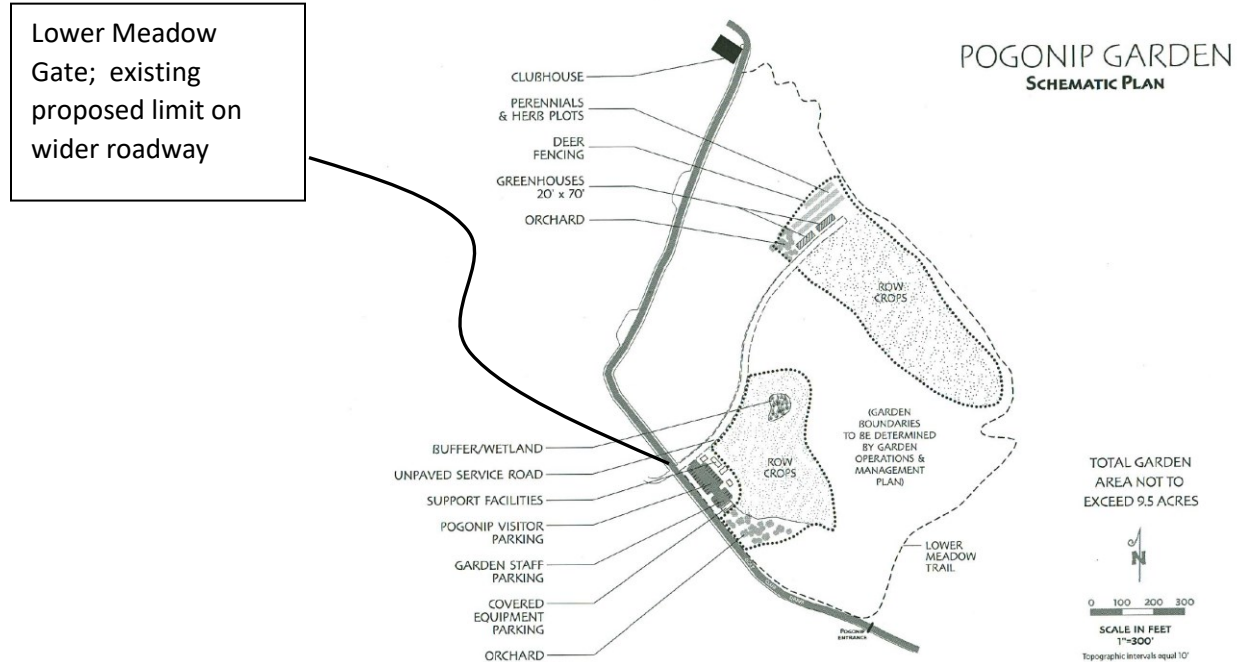
"An environmental constraints analysis was conducted as the first phase of the process." "The intent of the environmental constraints analysis was to identify Pogonip's sensitive biotic, geologic, hydrologic, cultural, and scenic resources and to provide preliminary evaluation of the effect of the proposed uses identified in the Mixed Land Use Plan on these resources."

Introduction, Chapter 1.

The Sierra Club asserts that the proposed change is of such a substantial nature that it requires a similar level of community interaction, and environmental review.

## Traffic and Road Impacts, Parking

With the previous location of the Garden site, the PFMP does not allow for large road improvements beyond the Lower Meadow Gate, limiting the 20-foot large road to a smaller ingress length. The road above the Lower Meadow Gate was to have restricted use, and thus be substantially for pedestrians.



From: Infrastructure, Chapter 7; 7.1 Transportation and Circulation

"To accommodate the proposed uses at Pogonip, the existing Golf Club Drive alignment between the Pogonip entrance and the Lower Meadow will be widened to provide a 20-foot all weather surface, which includes a 10-foot travel lane." 7-1

"Beyond the Lower Meadow gate, the paved access route to the clubhouse and Upper Meadow parking will be designed as a service driveway. The paved surface will be widened to twelve feet with turnouts as needed. Access to the Upper Meadow parking area will be restricted and controlled for clubhouse events only." 7-2

Parking Guidelines: "Utilize the Upper Meadow parking for clubhouse events only." "Require users of the Outdoor Education Camp to carpool, use a bus or shuttle system, or utilize alternative modes to access the camp as part of the permit process for utilizing the camp area." 7-4

It is clear that the proposed change will have a significant effect on traffic up to the Upper Meadow, as well as requiring a different scale of roadway. The proposed change also would require more parking usage, and more regularly, at the Upper Meadow.

If this proposed change is implemented, regular automobile use should not be extended through to the Upper Meadow area. If additional parking is needed it should be added adjacent to Spring Street on public or private property. Eliminating automobile access to the farm would address a major component of its potential impact.

## **Pogonip Plan foresaw possible environmental limitations of the Garden site size**

The PFMP discussed the possibility that the 9 ½ acres site could be impacted by environmental concerns, as has now happened. The Plan provides the solution that the acreage for the Garden be reduced.

“The garden site will be limited to 9 ½ acres. The acreage may be further reduced due to environmental concerns.” (emphasis added)

“The schematic design for the Pogonip Garden aims to contribute to the visual experience at Pogonip, not detract from it.” 2-9

If implemented, the visual impacts from the proposed relocation should be mitigated by, at minimum, effective visual screening of buildings and fences with native trees and shrubs.

## **Clubhouse Use**

The PFMP calls for maximization of views of the Upper Meadow from the Clubhouse area, which will instead be severely impacted by a relocation of the Garden site to the Upper Meadow.

Visitor Facilities and Special Uses, Chapter 2: 2.1 Pogonip Community Clubhouse, Clubhouse Grounds

“Design landscaped grounds to maximize views of the meadow, the City, and Monterey Bay from the clubhouse and event grounds. 2-5

## **Lead Contamination**

As the County of Santa Cruz discovered during review of the Los Altos Rod & Gun Club proposed expansion in 2012, a recreational sport shooting facility can cause elevated levels of lead in water samples downstream. Depending upon what type of clay targets may have been used, there can be an accumulation of sulfur in the soil column which combines with stormwater, lowering the pH of the soil, which then can, under certain circumstances, contribute to the solubilization and mobilization of heavy metals including lead. It appears that the primary motivation of the proposed location change for the Garden is that lead was discovered in the Lower Meadow area, and that this lead may be residual from target shooting. Faced with this problem, the City then creates a new set of problems by proposing a location change for the Garden site. The contamination problem still exists. The City property may be impacting properties directly downflow, which appear to include organic farms.

Relocation of the proposed Homeless Garden Project site does not solve the lead contamination problem. Lead contamination from the Pogonip is now possibly leaching into local waterbodies and both fresh and marine wildlife. The City needs to commit, in the context of this project, to investigating the lead contamination and remediating, as appropriate.

## **Biological Resource Impacts**

The Sierra Club is very concerned regarding the adverse environmental impacts associated with the proposed amendments to the Pogonip Master Plan. Installing an intensive farm in the middle of an open space area -- at either location -- may attract and foster "mezzo predators" found in the urban fringe -- racoons, skunks, opossums, weasels, gray foxes, rats, feral cats and even ground squirrels (known to eat bird eggs). Numerous ecological studies and models have demonstrated that these mezzo-predator animals can decimate songbird and raptor populations, both ground-nesting and tree-nesting birds. Mitigation: Any Master Plan amendment should include the following mitigation measures: require fine mesh fencing surrounding all garden, mulch and food storage areas to exclude urban fringe wildlife, require covered and locked trash cans, require daily litter sweeps of the garden, grounds and surrounding area, and plant vegetated filter strips around garden to inhibit nutrient runoff. Also, allow organic only

with no petroleum-based amendments or pesticides. Limit visitor hours to nonclients to designated hours to minimize traffic conflicts and human activity, with certain weekdays having no visitor activities.

Also of concern is the potential of the HGP to introduce invasive nonnative weeds to the Pogonip main meadow. Boot brushes should be installed and required use at all garden gates, and mitigation measures should be included: require HGP to survey the meadow on a monthly basis for invasive plants, allow no invasive plants to be cultivated at the garden and only sterile seeds used in erosion control and cover crops.

### **Summary**

The Sierra Club has a favorable view of the Homeless Garden Project and empathizes with the position that this project has been put in due to the findings of lead contamination at the site that it was slated to occupy for many years. It is very unfortunate that, despite a vigorous public process that allowed for the Garden to move to the lower Pogonip, the City of Santa Cruz did not foresee the lead contamination on this site despite its historic use as a skeet shooting range.

If the City decides to proceed with considering the proposed move, it must complete a full environmental review process for the new project. The proposed change represents a major amendment to the completed planning and environmental review documents that were prepared for the original project approval more than 20 years ago.

Thank you for your consideration of these comments.

Yours Sincerely,



Michael Guth, Conservation Chair



Micah Posner, Executive Committee Chair

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