



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

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September 22, 2021

To: City of Santa Cruz City Council
809 Center Street, Santa Cruz, CA 95060

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

Meeting Date: September 28, 2021 Agenda Item No. 17

The Sierra Club opposes the pending proposal to amend the Pogonip Final Master Plan to relocate the Homeless Garden Project (HGP) from its original planned location in the Lower Meadow to the Upper Main Meadow of the Pogonip Open Space. The Sierra Club is supportive of the mission of the Homeless Garden Project, but as a commercial agricultural use the impacts of the proposed relocation to the Upper Main Meadow are too substantial to allow for such a change. This proposal raises significant concerns, and is a substantial change not supported by the prior Environmental Impact Report (EIR) approval. In fact, the EIR for the Pogonip Master Plan determined that the proposed relocation site was not a viable site for the HGP. This change in location also conflicts with numerous other priorities of the Pogonip Final Master Plan.

The original Pogonip planning process was years in duration, and included significant public input. A contentious aspect at that time was the siting of the HGP in the Pogonip at all, with the location in the Lower Meadow chosen despite being determined in the EIR to be the most impactful of the analyzed alternatives. Of note, a location for the HGP in the Main Meadow was wholly ruled out in the EIR due to impacts to wildlife habitat, protected species, and impacts to other uses.

The EIR for the Pogonip Master Plan stated that “(t)he Upper Main Meadow is not a viable garden location because of the presence of Ohlone tiger beetle habitat, mima-mounds, coastal terrace prairie, as well as historic preservation and visual issues.” Since the EIR process

in 1998, the Ohlone tiger beetle was registered as an endangered species under the Endangered Species Act, on Oct. 3, 2001. This furthers the restriction against this proposed relocation of the HGP. The EIR stated that should the Ohlone tiger beetle become listed that a formal consultation with the USFWS would be required and "the potential application for a "take" in the form of a Habitat Conservation Plan would be required." This species' remaining, fragmented, habitat is restricted to remnant patches of native grasslands on coastal terraces over a firm level substrate, which would also be an accurate description of the Upper Main Meadow.

The Sierra Club strongly supports the Homeless Garden Project. One of the founders of the HGP, Paul Lee, was also one of the leaders of the grassroots conservation movement that saved the Pogonip from urban development in the late 1970s. The Sierra Club acknowledges this debit and regrets the position that this project has been put in due to the lead contamination found at the site originally designated for the HGP. 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.

The Sierra Club believes that the HGP has other options available, which may include remediation of the originally designated site in Pogonip, or use of locations outside the Pogonip. However, the proposal to move the HGP site to the Upper Main Meadow should not be pursued.

Yours Sincerely,



Michael Guth, Conservation Chair



Micah Posner, Executive Committee Chair

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Sierra Club