COUNTY OF SANTA CRUZ

PLANNING DEPARTMENT
701 OCEAN STREET, 4TH FLOOR, SANTA CRUZ, CA 95060
(831) 454-2580 FAX (831)454-2131 TDD (831) 454-2123
TOM BURNS, PLANNING DIRECTOR

NOTICE OF ENVIRONMENTAL REVIEW PERIOD

SANTA CRUZ COUNTY

APPLICANT: **County of Santa Cruz Planning Department**

APPLICATION NO.: **N/A Amendment to Co. Code Sec. 13.10.375 re: TP**

APN: **Countywide**

The Environmental Coordinator has reviewed the Initial Study for your application and made the following preliminary determination:

XX Negative Declaration
(Your project will not have a significant impact on the environment.)

_____ Mitigations will be attached to the Negative Declaration.

XX No mitigations will be attached.

_____ Environmental Impact Report
(Your project may have a significant effect on the environment. An EIR must be prepared to address the potential impacts.)

As part of the environmental review process required by the California Environmental Quality Act (CEQA), this is your opportunity to respond to the preliminary determination before it is finalized. Please contact Matt Johnston, Environmental Coordinator at **(831)** 454-3201, if you wish to comment on the preliminary determination. Written comments will be received until 5:00 p.m. on the last day of the review period.

Review Period Ends: **September 24, 2007**

Sarah Neuse
Staff Planner

Phone: **454-3290**

Date: **August 29, 2007**

Environmental Review Initial Study

Application Number: N/A

Date: 8/20/2007
Staff Planner: Sarah Neuse **454-3290**

I. OVERVIEW AND ENVIRONMENTAL DETERMINATION

APPLICANT: County of Santa Cruz

APN: N/A

OWNER: N/A

SUPERVISORAL DISTRICT: Various

LOCATION: countywide

SUMMARY PROJECT DESCRIPTION: This project is an amendment to Santa Cruz County Code section 13.10.375 addressing the **minimum** parcel size required in order to rezone property to the Timber Production (TP) **zone** district. **The** project would increase **the** required parcel size **from five** (5) to forty **(40)** acres, eliminating **the** option of rezoning for parcels less than forty acres **in size.** Parcels that are already zoned TP **will** not **be** affected.

ALL OF THE FOLLOWING POTENTIAL ENVIRONMENTAL IMPACTS ARE EVALUATED IN THIS INITIAL STUDY. CATEGORIES THAT ARE MARKED HAVE BEEN ANALYZED IN GREATER DETAIL BASED ON PROJECT SPECIFIC INFORMATION.

____	Geology/Soils	____	Noise
____	Hydrology/Water Supply/Water Quality	____	Air Quality
____	Biological Resources		Public Services & Utilities
X	Energy & Natural Resources		Land Use, Population & Housing
	Visual Resources & Aesthetics	____	Cumulative Impacts
____	Cultural Resources	X	Growth Inducement
	Hazards & Hazardous Materials		Mandatory Findings of Significance
____	Transportation/Traffic		

DISCRETIONARY APPROVAL(S) BEING CONSIDERED

____	General Plan Amendment		Grading Permit
	Land Division		Riparian Exception
____	Rezoning	X	Other: County Code Amendment
____	Development Permit	____	
____	Coastal Development Permit	____	

NON-LOCAL APPROVALS
Other agencies that must issue permits or authorizations: California Coastal Commission

ENVIRONMENTAL REVIEW ACTION
On the basis of this Initial Study and supporting documents:

__X__ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

___ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the attached mitigation measures have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.

___ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Matt Johnston

8/29/07
Date

For: Claudia Slater
Environmental Coordinator

II. BACKGROUND INFORMATION

EXISTING SITE CONDITIONS
Parcel Size: **N/A**
Existing Land Use: **N/A**
Vegetation: **N/A**
Slope in area affected by project: **N/A** ___ 0 - 30% ___ **31** – 100%
Nearby Watercourse: **N/A**
Distance To: **N/A**

ENVIRONMENTAL RESOURCES AND CONSTRAINTS

Groundwater Supply: **N/A**	Liquefaction: **N/A**
Water Supply Watershed: **N/A**	Fault Zone: **N/A**
Groundwater Recharge: **N/A**	Scenic Corridor: **N/A**
Timber or Mineral: *Yes*	Historic: **N/A**
Agricultural Resource: N/A	Archaeology: **N/A**
Biologically Sensitive Habitat: **N/A**	Noise Constraint: **N/A**
Fire Hazard: Possibly	Electric Power Lines: **N/A**
Floodplain: **N/A**	Solar Access: **N/A**
Erosion: **N/A**	Solar Orientation: **N/A**
Landslide: **N/A**	Hazardous Materials: **N/A**

SERVICES

Fire Protection: **N/A**	Drainage District: **N/A**
School District: **N/A**	Project Access: **N/A**
Sewage Disposal: **N/A**	Water Supply: N/A

PLANNING POLICIES

Zone District: Timber Production		Special Designation:
General Plan: Various		
Urban Services Line:	___ Inside	_X_ Outside
Coastal Zone:	_X_ Inside	_X_ Outside

PROJECT SETTING AND-BACKGROUND:
The project will increase the minimum lot size for rezoning to the Timber Production (TP) zone district. The current minimum acreage required to rezone property to the Timber Production zone district is **five** acres; this amendment would increase this size to 40 acres. This means that properties between ***5*** and ***40*** acres in size that are not currently in the Timber Production zone district will no longer have the opportunity to rezone to a zone district that allows timber harvesting, unless these properties are under the same ownership as **an** adjacent parcel zoned TP. Property that is already zoned TP will not be effected.

DETAILED PROJECT DESCRIPTION:

The proposed project would increase the minimum required acreage for rezoning property to the Timber Production (TP) zone district from five acres to forty acres. Attachment 1 shows a map of the affected parcels countywide. TP zoning is required for any parcel included in a commercial timber harvest, and the change in this section of the County Code will not prevent the Board of Supervisors from rezoning parcels they deem to be appropriate for timber harvests regardless of the size of the parcels. Under state law the Board has the power to establish a minimum parcel size, above which they must rezone parcels that meet the state requirements for Timber Production zoning. Parcels that are currently zoned TP will not be affected by this code amendment, nor will those parcels that are eligible for rezoning based on their location adjacent to another parcel zoned TP under the same ownership. All parcels countywide that are currently in zone districts that either allow or encourage Timber Production are illustrated in Attachment 2. Furthermore, the Board of Supervisors maintains the ability to rezone any parcel that qualifies as timberland to the TP zone district at their discretion. This clause protects the right of any property owner to apply for a TP rezoning, but allows the board to deny the application if they choose.

The state law governing Timberland Production, Government Code Sections **51**100-51180, specifies three ways in which land can be rezoned for timber production: first, properties meeting all the requirements of the local jurisdiction and state law relating to minimum parcel size and stocking standards, must be granted a rezoning by the local jurisdiction when requested by the property owner; second, parcels located next to and under the same ownership as property zoned TP must be rezoned by the local jurisdiction when requested by the property owner; third, a local jurisdiction has the power to rezone any property meeting the definition of timberland, regardless of the size or other condition of the parcel. The Board of Supervisors has decided to set the new minimum acreage for obligatory rezoning at forty acres and at this time, and has chosen to evaluate any applications in the final category on a case-by-case basis. The Board has not set any other criteria for these rezonings at this time.

There are over 4,000 acres in the County between 5 and 40 acres in size, and under the code amendment none of them would be entitled to the mandatory rezoning currently in place. Provided that the parcel is timberland, this could impact landowners who intend to harvest timber on their property in the future. Some of these parcels have undergone regular timber harvests in the past and some have not been harvested since much of the County was clear-cut early in the 20th Century. The logging infrastructure on the sites varies accordingly and some parcels maintain better access to the timber than others.

Of the parcels eliminated from rezoning by this amendment based on parcel size, less than half have a mapped timber resource. **While** the County's digital mapping should not be the exclusive reference for determining the location of timberland, the resource mapping does provide an indication of the heavily forested areas of the County, and shows that many of the parcels between 5 and 40 acres in size are located on land that is unlikely to produce commercially viable timber harvests and is more suited to agricultural uses or low density residential development. Attachments 3A, 3B, and 3C show these parcels overlaid on the Timber Resources layer, showing the limited overlap between the two data sets.

Additionally, when the Board of Supervisors approved this amendment in concept, a grace period was established to allow rezoning under the current 5-acre minimum through the end of 2007. Many property owners who own land affected by this amendment have been submitting applications for rezoning since the May 1st Board action on this item, further reducing the number **of** parcels impacted.

Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable

III. ENVIRONMENTAL REVIEW CHECKLIST

A. Geology and Soils

Does the project have the potential to:

1. Expose people or structures to potential adverse effects, including the risk of material loss, injury, or death involving:

A. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or as identified by other substantial evidence? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any change in the seismic risk to County residents or structures.

B. Seismic ground shaking? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any change in the seismic risk to County residents or structures.

C. Seismic-related ground failure, including liquefaction? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any change in the seismic risk to County residents or structures.

D. Landslides? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any change in the seismic risk to County residents or structures.

2. Subject people or improvements to damage **from** soil instability **as** a result of on- or off-site landslide, lateral spreading, to subsidence, liquefaction, or structural collapse? **X**

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in the landslide, lateral spreading, subsidence or liquefaction risk to County residents or structures.

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
3. Develop land with a slope exceeding 30%?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in the regulations governing development on slopes in the County.

4. Result in soil erosion or the substantial loss of topsoil?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; impact soil erosion.

5. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code(1994), creating substantial risks to property?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; create any risks to property.

6. Place sewage disposal systems in areas dependent upon soils incapable of adequately supporting the use of septic tanks, leach fields, **or** alternative waste water disposal systems?				X

Not Applicable – The project affects multiple parcels countywide but would not affect the placement of sewage disposal systems.

7. Result in coastal cliff erosion?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in coastal cliff erosion.

B. Hydrology, Water Supply and Water Quality

Does the project have the potential to:

1. Place development within a 100-year flood hazard area?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; affect the development of flood hazard areas.

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
2. Place development within the floodway resulting in impedance or redirection of flood flows?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in development within floodways.

3. Be inundated by a seiche or tsunami?				**X**

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in increased hazards from seiche or tsunami, despite the fact that the project could affect these areas.

4. Deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit, or a significant contribution to an existing net deficit in available supply, or a significant lowering of the local groundwater table?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; have any effect on groundwater supplies..

5. Degrade a public or private water supply? (Including the contribution of urban contaminants, nutrient enrichments, or other agricultural chemicals or seawater intrusion).				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any degradation of a water supply.

6. Degrade septic system functioning?				

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, affect any septic systems.

		significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
7	Alter the existing drainage pattern of the site or area, including the alteration of the course **of** a stream or river, in a manner which could result in flooding, erosion, or siltation on or off-site?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, affect drainage on any of the affected parcels.

8.	Create or contribute runoff which would exceed the capacity of existing or planned storm water drainage systems, or create additional source(s) of polluted runoff?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, create or contribute to runoff

9.	Contribute to flood levels or erosion in natural watercourses by discharges of newly collected runoff?				X

***Not** Applicable – The project affects multiple parcels countywide but would not, in and of itself, create or contribute to runoff.*

10.	Otherwise substantially degrade water supply or quality?			**X**	

*No Impact – **The** project will have no impact on water quality or quantity, and may improve quality in the long run **by** limiting potential timber harvests.*

C. Biological Resources

Does the project have the potential to:

1.	Have an adverse effect on any species identified as a candidate, sensitive, or special status species, in local or regional plans, policies, or regulations, or by the California Department of Fish and Game, or U.S. Fish and Wildlife Service?				X

No Impact – The project will limit potential timber harvests in the future, preserving forest habitat.

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
2. Have an adverse effect on a sensitive biotic community (riparian corridor), wetland, native grassland, special forests, intertidal zone, etc.)?			X	

No Impact – The project affects forested land throughout the County, which may include some special forests, but the result of the project will be to limit the logging potential in these forests slightly, achieving a positive effect on the biotic community.

3. Interfere with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native or migratory wildlife nursery sites?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, interfere with migration patterns of wildlife.

4. Produce nighttime lighting that will illuminate animal habitats?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in nighttime lighting.

5. Make a significant contribution to the reduction of the number of soecies of plants or animals?				**X**

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any reduction in the number of species of plants or animals.

6. Conflict with any local policies or ordinances protecting biological resources (such as the Significant Tree Protection Ordinance, Sensitive Habitat Ordinance, provisions of the Design Review ordinance protecting trees with trunk sizes of 6 inch diameters or greater)?				**X**

No Impact – The project limits the likelihood that parcels will be disturbed, and therefore will not conflict with any other local policies or ordinances, and may even have a positive effect on tree and habitat protection.

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
7. Conflict with the provisions of an adopted Habitat Conservation Plan, Biotic Conservation Easement, or other approved local, regional, or state habitat conservation plan?			X	

*No Impact – **The** project limits the likelihood that parcels will be disturbed, and therefore will not conflict with any Habitat Conservation Plan or Biotic Conservation Easement, and may even have a positive effect on habitat and biotic conservation.*

D. Energy and Natural Resources

Does the project have the potential to:

1. Affect or be affected by land designated as "Timber Resources" by the General Plan?			X	

*Less than Significant – The project applies to all parcels that are between 5 and **40** acres in size and meet the state definition of timberland and many of these parcels are either wholly or partially designated as "Timber Resources" in the General Plan. However, the majority of parcels carrying this designation are very large parcels used for timber harvesting and already zoned TP. Furthermore, the grace period established by the Board of Supervisors and discretion granted to local governments to rezone any property to TP limits the number of sites that would be precluded from harvesting timber under the amended ordinance.*

2. Affect or be affected by lands currently utilized for agriculture, or designated in the General Plan for agricultural use?			X	

*Less than Significant – The project applies to all parcels that are between 5 and **40** acres in size and meet the state definition of timberland. Many of these parcels are currently used for agriculture or designated as agriculture in the County's General Plan, but the agricultural **use** is not affected by this amendment. Parcels zoned CA outside the coastal zone are already permitted to harvest timber on any portion of the property containing commercially viable timber resources.*

3. Encourage activities that result in the use of large amounts of fuel, water, or energy, or use of these in a wasteful manner?			X	

No Impact – The project addresses the rezoning of land to allow timber harvesting, but does not directly impact timber harvesting activities, and therefore has no impact on the use of fuel, water, or energy.

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
4. Have a substantial effect on the potential use, extraction, or depletion of a natural resource (i.e., minerals or energy resources)?			X	

Less than Significant – The project will affect the number of parcels the County would be mandated to rezone if an application were made for timber harvesting, but has no effect on the thousands of acres already properly zoned to allow for timber harvests. Additionally, the grace period and discretion of the Board will allow properties to rezone to the Timber Production zone district at the request of the landowner. Once a property is zoned TP, the California Department of Forestry and Fire Prevention (CalFire) must approve a Timber Harvest Plan before any timber harvesting can take place. The state is responsible for ensuring that all environmental regulations are complied with and that the resource is not depleted or adversely impacted.

E. Visual Resources and Aesthetics

Does the project have the potential to:

1. Have an adverse effect on a scenic resource, including a visual obstruction of that resource?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in scenic resources.

2. Substantially damage scenic resources, within a designated scenic corridor or public view shed area including, but not limited to, trees, rock outcroppings, and historic buildings?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in scenic resources.

3. Degrade the existing visual character or quality of the site and its surroundings, including substantial change in topography or ground surface relief features, and/or development on a ridgeline?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in scenic resources.

	significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or NO Impact	Not Applicable
4. Create a new source of light or glare which would adversely affect day or nighttime views in the area?				X

*Not Applicable – The project affects multiple parcels countywide **but** would not, in and of itself; result in any change in scenic resources.*

5. Destroy, cover, or modify any unique geologic or physical feature?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any change in scenic resources.

F. Cultural Resources

Does the project have the potential to:

1. Cause an adverse change in the significance of a historical resource **as** defined in CEQA Guidelines 15064.5?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any change in historical resources.

2. Cause an adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines 15064.5?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in archaeological resources.

3. Disturb any human remains, including those interred outside of formal cemeteries?				X

*Not Applicable – **The** project affects multiple parcels countywide but would **not,** in and of itself; result in any disturbance to human remains.*

4. Directly or indirectly destroy a unique paleontological resource or site?				X

*Not Applicable – **The** project affects multiple parcels countywide but would **not,** in and of itself; result in any destruction of paleontological resources.*

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable

G. Hazards and Hazardous Materials

Does the project have the potential to:

1. Create a significant hazard to the public or the environment as a result of the routine transport, storage, use, or disposal of hazardous materials, not including gasoline or other motor fuels? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in the transport, storage, or use of hazardous materials.

2. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change to the publics exposure to hazardous materials.

3. Create a safety hazard for people residing or working in the project area as a result of dangers from aircraft using a public or private airport located within two miles of the project site? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in public exposure to aircraft or affect air travel patterns in any way..

4. Expose people to electromagnetic fields associated with electrical transmission lines? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; expose people to electromagnetic fields.

5. Create a potential fire hazard? X

Less than Significant – The project reduces the number of parcels countywide that are entitled to a non-discretionary rezoning to the Timber Production zone district. As such, it reduces the number of parcels throughout the County that could potentially harvest timber, which some may feel increases the risk that these parcels will be susceptible to forest fires. This ordinance

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable

amendment will not impact the state laws that allow a homeowner to remove dead or diseased trees from their property, clearing a 150 foot radius around their home and accessory structures, or from clearing three acres for a building site.

Furthermore, research on coastal Redwood-Douglas fir forests indicates that, when left in a natural state, these forests rarely ignite. The size of the older trees and the dark, damp climate of the understory are not conducive to crown fires[1]. However, when the canopy in these forests is opened through logging, the understory can become dried out and brittle, and the ratio of smaller to larger trees increases, raising the fuel load, and thus the fire hazard in redwood forests'. In Redwood-Douglass fir forests, fires that start in adjacent chaparral areas' can spread into the forest and climb a "ladder" of vegetation of increasing size until the crowns of the trees are reached. Thickly forested areas minimize this ladder effect by cutting down on immature trees and other ground-level vegetation that is present in forests where larger trees have been removed.

The project limits the number of parcels entitled to a rezoning, and does not affect parcels already zoned to allow for timber harvesting. The grace period established by the Board as well as the discretion to rezone granted to them by the state allows property owners concerned about the combustible nature of the forest to rezone their property to allow them to manage the forest as they choose. This ordinance amendment will have a minor effect on the forested lands of Santa Cruz County and will ***not*** *create, in and of itself, a fire hazard.*

6.	Release bio-engineered organisms or chemicals into the air outside of project buildings?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, release anything into the air,

H. Transportation/Traffic

[i] Montague, Richard E., ***Wildland Fire Analysis and Comments based on the San Jose Water Company W M P.*** **November** 7, 2006. -***Attached***

[2] Stephens, Dr. Scott, ***Letter to Rick Parfitt, Subject: Review of Fire Hazard Assessment section of San Jose Water Company NTMP.*** October 6th, 2006. -***Attached***

[3] Omi, **Philip** N., PhD., ***Report on San Jose Water Company Fire Hazard Assessment.*** October 1st, 2006. - *Attached*

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
Does the project have the potential *to:*				
1. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity **of** the street system (**i.e.**, substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; affect traffic patterns in the County.

2. Cause an increase in parking demand which cannot be accommodated by existing parking facilities?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any changes in County parking demand.

3. Increase hazards to motorists, bicyclists, or pedestrians?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; affect motorists, bicyclists, or pedestrians.

4. Exceed, either individually (the project alone) or cumulatively (the project combined with other development), a level of service standard established by the county congestion management agency for designated intersections, roads **or** highways?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in the levels of service of County roads.

l. Noise

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable

Does the project have the potential to:

1. Generate a permanent increase in ambient noise levels in the project vicinity above levels existing without the project? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in noise levels throughout the County.

2. Expose people to noise levels in excess of standards established in the General Plan, or applicable standards of other agencies? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in noise levels throughout the County.

3. Generate a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? **X**

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in noise levels throughout the County

J. Air Quality

Does the project have the potential to:
(Where available, the significance criteria established by the **MBUAPCD** may be relied upon to make the following determinations).

1. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? **X**

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; affect air quality.

2. Conflict with or obstruct implementation of an adopted air quality plan? X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; affect air quality

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
3. Expose sensitive receptors to substantial pollutant concentrations?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; affect air quality.

4. Create objectionable odors affecting a substantial number of people?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; affect air quality.

K. Public Services and Utilities

Does the project have the potential to:

1. Result in the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in the demand for public facilities.

a. Fire protection?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in the need for fire protection.

b. Police protection?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in the need for police protection.

c. Schools?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any change in the need for schools.

d. Parks or other recreational activities?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in the need for parks or recreational activities.

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
e. Other public facilities; including the maintenance of roads?				X

*Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in the **need** for public facilities.*

2. Result in the need for construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any change in the need for drainage facilities.

3. Result in the need for construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause Significant environmental effects?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any change in the need for wastewater facilities.

4. Cause a violation of wastewater treatment standards of the Regional Water Quality Control Board?				X

*Not Applicable – The project affects multiple parcels countywide but would not, in and of **itself;** result in any change in the treatment of wastewater.*

5. Create a situation in which water supplies are inadequate to serve the project or provide fire protection?				X

*Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result-in any change in water **supply** or demand.*

6. Result in inadequate access for fire protection?				X

*Not Applicable – **The** project affects multiple parcels countywide **but** would* not, in *and of itself; result in any change in access for fire protection.*

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
7. Make a significant contribution to a cumulative reduction of landfill capacity or ability to properly dispose of refuse?				X

*Not Applicable – **The** project affects multiple parcels countywide but would not, in and of itself; affect County landfill capacity.*

a. Result in a breach of federal, state, and local statutes and regulations related to solid waste management?				X

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself; result in any change in solid waste management in the County.

L. Land **Use,** Population, and Housing

Does the project have the potential to:

1. Conflict with any policy of the County adopted for the purpose of avoiding or mitigating an environmental effect?				X

***Not** Applicable – The project is **very** narrow in scope, affecting only the County code sections related to Timber Production rezonings, and makes this code more restrictive.*

2. Conflict with any County Code regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

*Not Applicable – The project is **very** narrow in scope, affecting **only** the County code sections related to Timber Production rezonings, and makes this code more restrictive.*

3. Physically divide an established community?				**X**

*Not Applicable – The project affects multiple parcels countywide but would **not,** in and of itself; divide any community.*

	Significant Or Potentially Significant Impact	Leis than Significant with Mitigation Incorporation	Less than Significant Or No Impact	Not Applicable
4. Have a potentially significant growth inducing effect, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	

Less than Significant - The project will have a less than significant growth inducing effect due to the many layers of resource and community planning regulations that limit parcel size and subdivisions in rural areas. The number of potential lots, based on current zoning, will not change due to this amendment, as the affected parcels have the option to subdivide presently and will continue to following this amendment. The parcels affected by the project will no longer have the option to rezone to TP and reduce their development density. As such, some might argue that these property owners will be forced to subdivide if they no longer have the option to harvest the timber on their properties. (Attachment I shows a map of all parcels between **5** *and 40 acres in size, countywide, that could be affected by this ordinance amendment.)*

To examine the validity of this argument an analysis of the growth potential of the affected parcels was performed which yielded results demonstrating the impact to be less than significant. All parcels in the County between ***5*** *and 40 acres in size, which are not currently zoned TP, PR, M-3, or CA (outside the Coastal zone) where timber harvesting is allowed, were selected and analyzed. The Developable Land definition (excluding slopes over 50%, areas of recent landslides, riparian corridors, and land within 50 feet of an active fault trace) was used to determine the buildable acreage on each parcel, and minimum lot size for various zone districts and general plan designations were then applied to determine which of these parcels might have the ability to subdivide. After further eliminating urban* **uses** *such as mobile home parks, shopping malls, and movie theatres from the list of parcels, this yielded a pool of 1,512 parcels, 49 of which had the 20 acres of buildable land required to create a second lot in any rural zone district. The minimum required densities for Groundwater Recharge Areas, Water Supply Watersheds, and Least Disturbed Watersheds, which in some cases are larger than 10 acres, were then applied to the 49 parcels, eliminating 6 more from potential subdivision.*

Throughout the County, a maximum of 43 new lots could be created from the parcels affected by this ordinance, and this number would likely shrink further under greater scrutiny. The County has many other ordinances in place that could affect the ability of a land owner to subdivide his or her lot. For example, a full rural matrix was not completed for each of the 1,512 parcels affected, and of the 43 with 20 acres of more of buildable land, it is likely that several more would fail to achieve a high enough score to subdivide. Forty-three is a small number compared to the number of parcels in the County, and ***is*** *less than significant because the number of potential lot splits is not affected by this ordinance change. The properties that could subdivide under the new ordinance are not currently zoned TP, and are therefore eligible to subdivide today. The project will make no change to that development density, as the amendment will not up-zone any property. Finally, property owners who wish to rezone to TP may still petition the Board to rezone their parcels, in which case the property would be subject to the reduced development densities in the TP zone district. None of the potentially*

	Significant Or Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than significant Or No Impact	Not Applicable

subdividable lots are located inside the coastal zone, so this ordinance amendment would have no impact on coastal resources.

The impact of the project on growth inducement is less than significant due to the variety of land use regulations governing density in the rural areas of Santa Cruz County, and also based on the facts that no change in current development potential has been made and that landowners may continue to petition for TP rezoning regardless of the parcel **size.**

See Attachment 4 for spreadsheets of supporting data on number of parcels affected.

5. Displace substantial numbers of people, or amount of existing housing, necessitating the construction **of** replacement housing elsewhere? **X**

Not Applicable – The project affects multiple parcels countywide but would not, in and of itself, result in any change in existing housing.

M. Non-Local Approvals

Does the project require approval of federal, state, or regional agencies?

- Coastal Commission — Yes X No ____

N. Mandatory **Findings of Significance**

1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant, animal, or natural community, or eliminate important examples of the major periods of California history or prehistory? Yes ____ No X

2. Does the project have the potential to achieve short term, **to** the disadvantage of long term environmental goals? **(A** short term impact on the environment is one which occurs in a relatively brief, definitive period of time while long term impacts endure well into the future) Yes No X

3. Does the project have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, and the effects of reasonably foreseeable future projects which have entered the Environmental Review stage)? Yes ____ No X

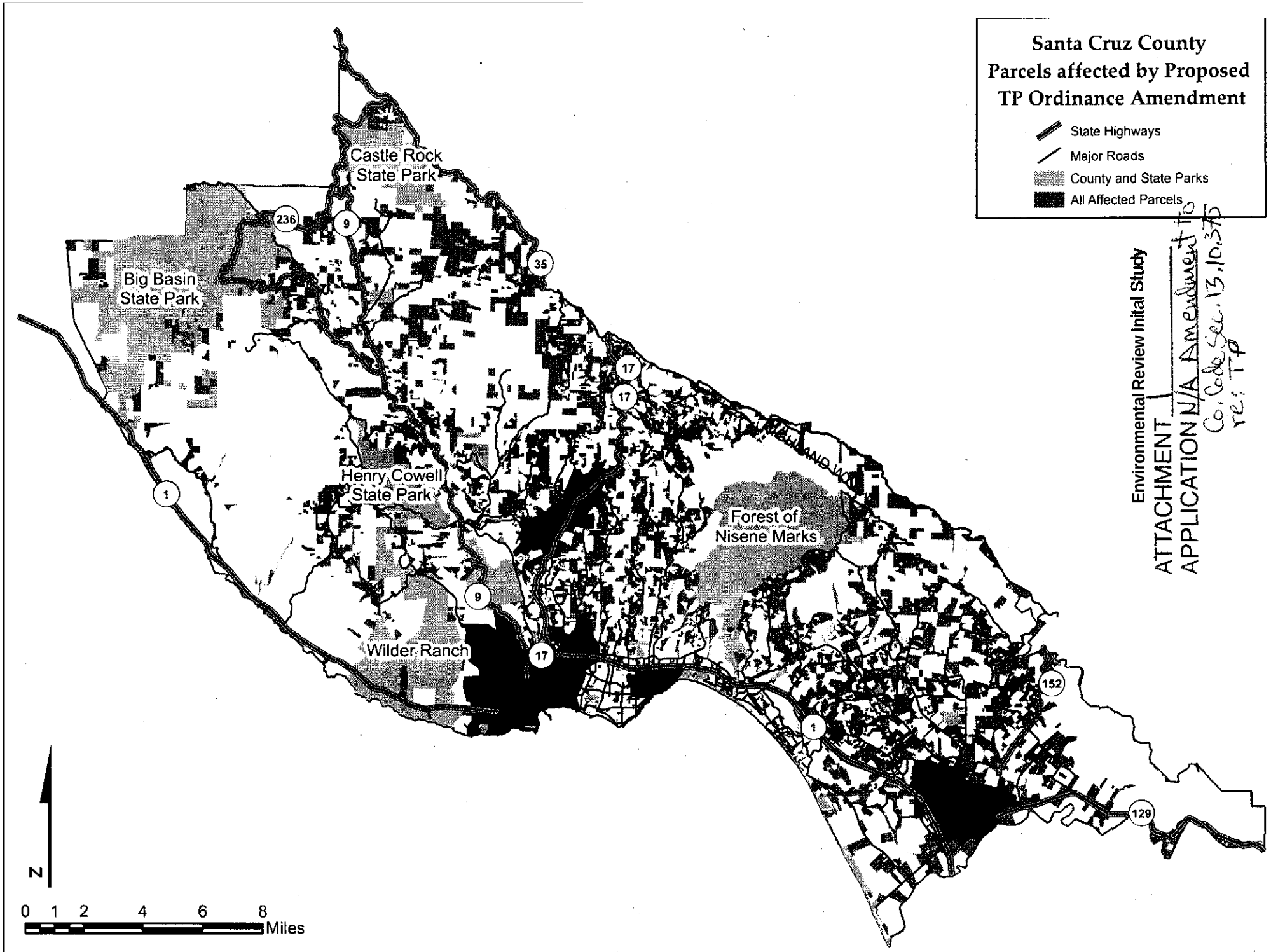
4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? Yes ____ No X

TECHNICAL REVIEW CHECKLIST

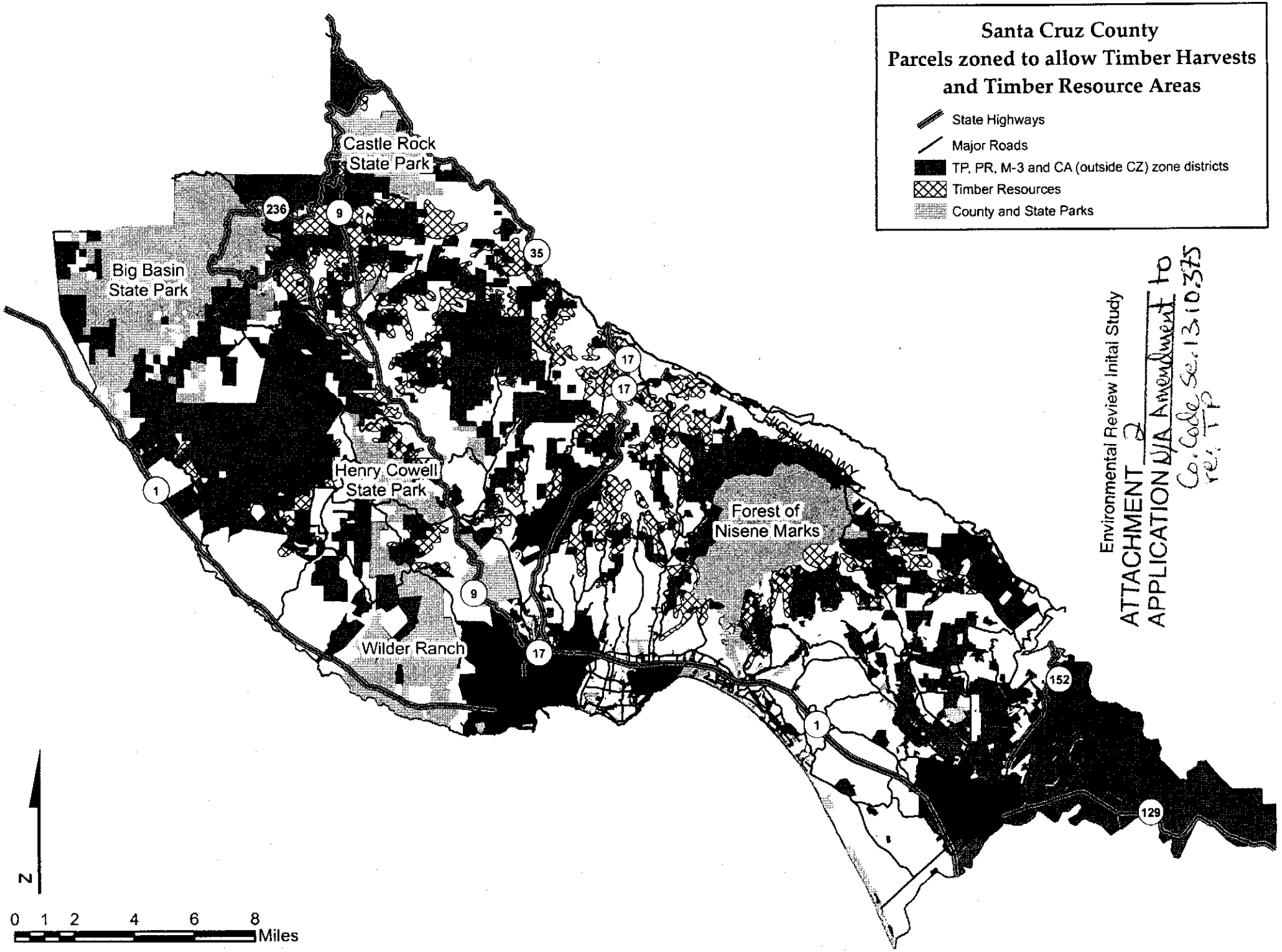
	REQUIRED	COMPLETED*	N/A
Agricultural Policy Advisory Commission (APAC) Review		X	
Archaeological Review		X	
Biotic Report/Assessment		X	
Geologic Hazards Assessment (GHA)		X	
Geologic Report		X	
Geotechnical (Soils) Report		X	
Riparian Pre-Site		X	
Septic Lot Check		X	
Other:		X	

Attachments:

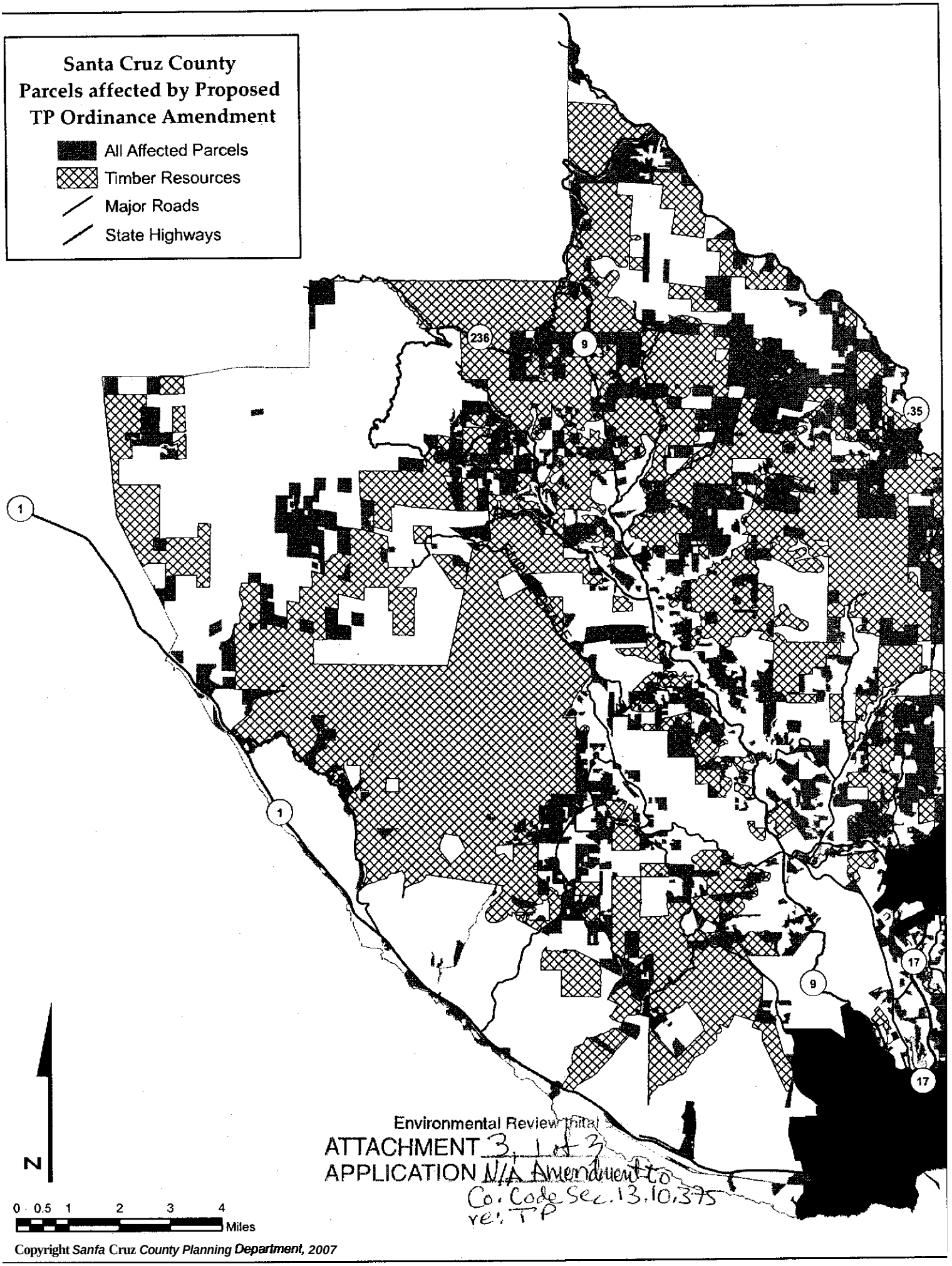
1. Map of parcels affected by proposed ordinance amendment
2. Map of TP zoned parcels with Timber Resource Areas
3. Maps of affected parcels with Timber Resource Areas
4. Spreadsheet of Growth Inducement Analysis
5. Text of proposed Ordinance amendment, underline/strikeout version
6. Montague, Richard **E.,** Wildland Fire Analysis and Comments based on the San Jose Water Company NTMP. November 7,2006.
7. Stephens, Dr. Scott, Letter to Rick Parfitt, Subject: Review of Fire Hazard Assessment section of San Jose Water Company NTMP. October 6th, 2006.
8. Orni, Philip N., PhD., Report **on** San Jose Water Company Fire Hazard Assessment. October 1st, 2006.



Environmental Review Inital Study
ATTACHMENT 1
APPLICATION N/A Amendment to Co. Code Sec. 13.10.375 re: TP



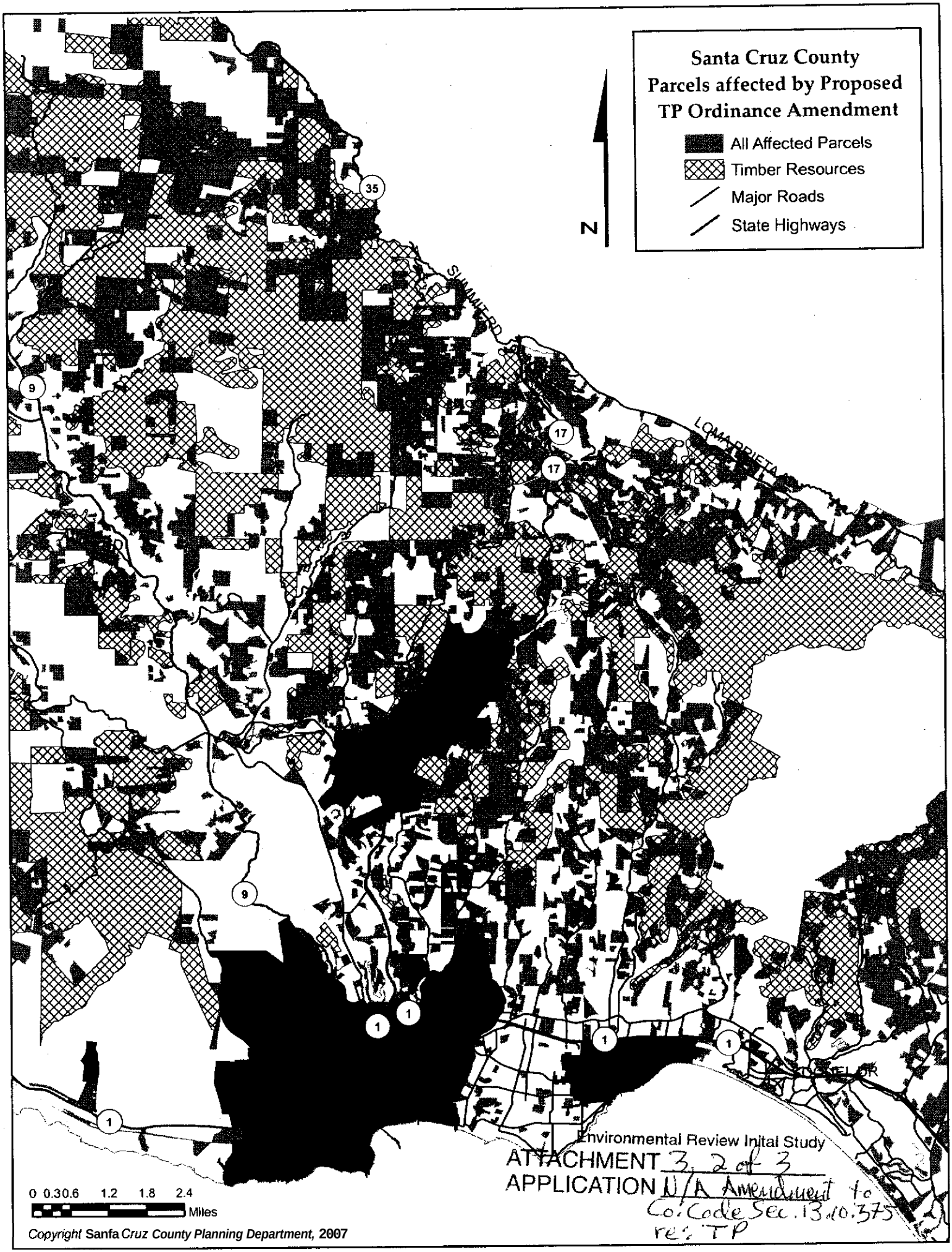
Environmental Review Inital Study
ATTACHMENT 2
APPLICATION N/A Amendment to Co. Code Sec. 13.10.375 re: TP

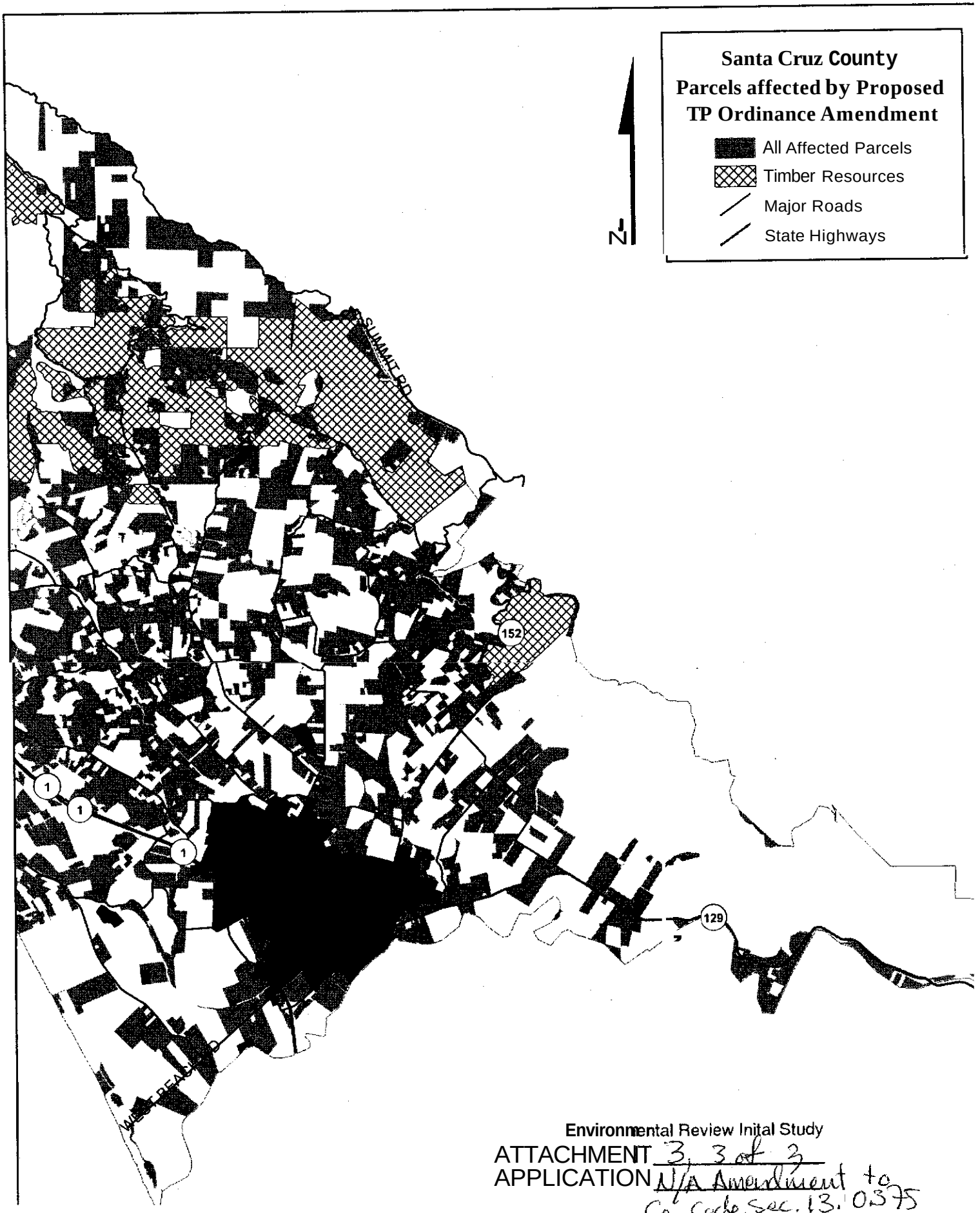


Environmental Review Initial

ATTACHMENT 3, 1 of 3

APPLICATION N/A Amendment to Co. Code Sec. 13.10.375 re: TP


Santa Cruz County
Parcels affected by Proposed
TP Ordinance Amendment
All Affected Parcels
Timber Resources
Major Roads
State Highways
N
SUMMIT RD
LOMA PRIETA
35
9
17
17
9
1
1
1
1
1
0 0.30.6 1.2 1.8 2.4
Miles
Copyright Santa Cruz County Planning Department, 2007
Environmental Review Inital Study
ATTACHMENT 3, 2 of 3
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP



Environmental Review Inital Study
ATTACHMENT 3, 3 of 3
APPLICATION N/A Amendment to Co. Code sec. 13.10.375 re: TP

APNNODASH	ACRES	ZONING	COASTAL_ZN	LDWATERSHE	WSWATERSHE	Unbuildable Area	Buildable Area	Buildable Acreage	# of Potential New L	Dividable?	
08013111	31.657	PR	No	No	Yes	41997.8294	1336998.171	30.69	0	No	- North Coast WS Watershed - 20 ac minimum
08013133	32.407	RA	Yes-Portion	No	Yes	144841.3409	1266819.659	29.08	0	No	- Coastal and WS Watershed
06420140	37.621	RA	No	No	Yes	394218.4114	1244563.589	28.57	1	Yes	
10608101	39.403	PR	No	No	Yes	480730.3380	1235670.662	28.37	1	Yes	
08909124	35.829	SU	No	No	Yes	350651.4014	1210038.599	27.78	1	Yes	
10301155	33.601	SU	No	No	No	256693.1844	1206969.816	27.71	1	Yes	
08038110	28.465	RA-O,RA	Yes	No	Yes	33767.3478	1206150.652	27.69	0	No	
08509202	28.274	PF	No	No	Yes	37377.8482	1194227.152	27.42	1	Yes	
10310126	37.562	SU	No	No	No	467681.5616	1168521.438	26.83	1	Yes	
08315118	37.904	SU	No	No	Yes	508147.0289	1142954.971	26.24	1	Yes	
10104108	39.212	A	No	No	No	567809.1088	1140245.891	26.18	1	Yes	
08616116	37.104	SU	No	No	Yes	478192.3604	1138064.640	26.13	1	Yes	
09715112	29.156	SU	No	No	Yes	135805.6434	1134214.357	26.04	1	Yes	
10122101	29.823	A	No	No	No	181136.3784	1117964.622	25.66	1	Yes	
08013128	25.604	RA	No	No	Yes	0.0000	1115291.000	25.60	1	Yes	
07831111	27.668	SU	No	Yes-Portion	Yes	98875.0057	1106324.994	25.40	0	No	- LD Watershed - 40 ac minimum
09101248	31.399	SU	No	No	Yes	261783.9387	1105938.061	25.39	1	Yes	
10503103	30.968	SU	No	No	No	249089.7371	1099865.263	25.25	1	Yes	
06423101	25.375	SU	No	No	Yes	7543.0823	1097806.918	25.20	1	Yes	
10324105	34.655	SU,RA	No	No	No	420676.2234	1088914.777	25.00	1	Yes	
10013102	38.730	RA-O	No	No	No	619929.9678	1067129.032	24.50	1	Yes	
10107107	35.447	A	No	No	No	479499.1368	1064582.863	24.44	1	Yes	
09716105	31.176	SU	No	No	Yes-Portion	309327.9431	1048686.057	24.07	1	Yes	
08726146	29.919	SU	No	No	Yes	258045.3476	1045240.652	24.00	1	Yes	
05711120	38.451	SU	No	Yes	No	639561.8763	1035353.124	23.77	0	No	- Coastal and LD Watershed
08908121	33.440	SU	No	No	Yes	429621.9187	1027019.081	23.58	1	Yes	
09518105	30.493	SU	No	No	Yes	302719.6613	1025546.339	23.54	1	Yes	
09102109	30.588	SU	No	No	Yes	307244.0167	1025155.983	23.53	1	Yes	
10306111	30.838	RA	No	No	No	319644.1936	1023670.806	23.50	1	Yes	
09201143	30.275	SU	No	No	Yes	302049.2321	1016750.768	23.34	1	Yes	
10316110	26.658	RA,PR	No	No	No	149627.6901	1011606.310	23.22	1	Yes	
10619112	32.740	SU	No	No	Yes	428173.9287	997994.071	22.91	1	Yes	
07020117	31.072	SU	No	No	Yes	357190.5823	996306.418	22.87	1	Yes	
09901107	30.409	A	No	No	No	337037.5824	987570.418	22.67	1	Yes	
10204118	37.585	SU	No	No	No	669973.7664	967234.234	22.20	1	Yes	
08522104	25.790	RA	No	No	Yes	165638.2204	957752.780	21.99	1	Yes	
09405107	23.635	RA-O-L	No	No	Yes-Portion	72937.2193	956623.781	21.96	1	Yes	
08018126	21.468	CA-P	Yes	No	Yes	0.0000	935139.000	21.47	0	No	- Coastal and WS Watershed
08604144	23.447	RA	No	No	Yes	92548.1854	928809.815	21.32	1	Yes	
10511136	29.510	R-1-15,SU	No	No	No	357447.2358	927990.764	21.30	1	Yes	
10301106	34.625	SU	No	No	No	584973.4408	923278.559	21.20	1	Yes	
10118227	29.696	A	No	No	No	392327.4687	901224.531	20.69	1	Yes	
07020112	37.125	SU	No	No	Yes	718998.7223	898155.278	20.62	1	Yes	
08950106	26.307	SU	No	No	Yes	248957.3937	896992.606	20.59	1	Yes	
10113106	36.490	A	No	No	No	699750.3129	889748.687	20.43	1	Yes	
06322150	37.438	RR	Yes	No	Yes	747459.7382	883357.262	20.28	0	No	- Coastal and WS Watershed
10103104	28.326	RA	No	No	No	358415.8449	875474.155	20.10	1	Yes	
06301133	35.924	SU,RA	Yes	No	Yes-Portion	689615.6353	875242.365	20.09	1	No	
08901120	21.279	SU	No	No	Yes	54385.3193	872542.681	20.03	1	Yes	
07020111	31.997	SU	No	No	Yes	522591.1210	871191.879	20.00	1	Yes	
									43		
08732102	34.671	SU	No	No	Yes	660626.5523	849638.448	19.51	Not Dividable		
07020114	36.364	SU	No	No	Yes	739019.1513	844993.849	19.40	Not Dividable		
08705203	25.142	SU	No	No	Yes	260630.9248	834552.075	19.16	Not Dividable		
09726112	39.954	SU	No	No	Yes-Portion	906118.3793	834292.621	19.15	Not Dividable		
10301102	25.658	RA	No	No	No	284008.3111	833652.689	19.14	Not Dividable		
08010216	19.474	PR	No	No	Yes	19429.7695	828873.231	19.03	Not Dividable		
09101251	37.105	RA	No	No	Yes	787788.2129	828492.787	19.02	Not Dividable		
09610109	18.784	SU	No	No	Yes	7617.0341	810621.966	18.61	Not Dividable		

ATTACHMENT 2
Environmental Review Initial Study
APPLICATION NO. AMENDMENT TO

10548101	20.104	SU	No	No	No	65105.0365	810614.964	18.61	Not Dividable
08901116	26.034	SU	No	No	Yes	324819.3600	809207.640	18.58	Not Dividable
10016101	34.727	PR	No	No	No	709200.9207	803519.079	18.45	Not Dividable
10548102	20.097	SU	No	No	No	89636.1739	785778.826	18.04	Not Dividable
08828115	24.831	A	No	No	Yes	296422.6094	785199.391	18.03	Not Dividable
09307110	20.530	SU	No	No	Yes	110962.7128	783311.287	17.98	Not Dividable
08609209	26.596	SU	No	No	Yes	380898.3411	777634.659	17.85	Not Dividable
09501128	19.661	RA	No	No	Yes	94718.6428	761697.357	17.49	Not Dividable
10324107	22.745	SU	No	No	No	232068.2197	758688.780	17.42	Not Dividable
09118103	24.673	SU	No	No	Yes	317209.8811	757551.119	17.39	Not Dividable
08901156	22.398	SU	No	No	Yes	218855.5612	756804.439	17.37	Not Dividable
10016107	23.245	A	No	No	No	256229.9936	756302.006	17.36	Not Dividable
10104116	24.979	A	No	No	No	336770.0506	751294.949	17.25	Not Dividable
08317106	29.258	RA,R-1-15,SU	No	No	Yes	531424.2405	743069.760	17.06	Not Dividable
10625134	25.210	SU	No	No	Yes	355370.9903	742775.010	17.05	Not Dividable
09314145	26.136	SU	No	No	Yes	397788.9110	740704.089	17.00	Not Dividable
09101283	26.757	A	No	No	Yes	426918.0441	738613.956	16.96	Not Dividable
08614109	20.066	SU	No	No	Yes	138445.6219	735650.378	16.89	Not Dividable
06403115	29.858	SU	No	No	Yes	567875.0709	732745.929	16.82	Not Dividable
08315112	27.144	RA,R-1-15,SU	No	No	Yes	452144.0654	730268.935	16.76	Not Dividable
10307118	21.155	RA	No	No	No	192516.2143	728982.786	16.74	Not Dividable
08923105	35.389	SU	No	No	Yes	817108.4556	724432.544	16.63	Not Dividable
08814115	17.557	SU	No	No	Yes	44244.9041	720537.096	16.54	Not Dividable
10745114	17.724	SU,A	No	No	Yes	61648.5230	710411.477	16.31	Not Dividable
09327325	30.110	SU	No	No	Yes	603016.0935	708575.907	16.27	Not Dividable
10004109	38.294	SU	No	No	No	965574.1807	702499.819	16.13	Not Dividable
07020113	33.568	SU	No	No	Yes	761143.9516	701082.048	16.09	Not Dividable
08316103	18.724	SU	No	No	Yes	119568.0512	696055.949	15.98	Not Dividable
09725118	23.030	SU	No	No	Yes-Portion	308408.6184	694768.382	15.95	Not Dividable
08613103	18.868	RA	No	No	Yes	128655.0942	693255.906	15.91	Not Dividable
08648123	17.451	SU	No	No	Yes	67913.1893	692254.811	15.89	Not Dividable
10625133	21.708	SU	No	No	Yes	253886.8038	691700.196	15.88	Not Dividable
10708120	19.189	A-O	No	No	Yes	144362.6713	691501.329	15.87	Not Dividable
09103107	20.120	A	No	No	Yes	189989.9712	686422.029	15.76	Not Dividable
08909123	21.079	SU	No	No	Yes	232730.1509	685457.849	15.74	Not Dividable
9015105	24.119	SU	No	No	Yes	366767.6749	683869.325	15.70	Not Dividable
09910101	32.036	SU	No	No	No	712185.9916	683283.008	15.69	Not Dividable
10523170	16.901	A	No	No	No	54298.0887	681905.911	15.65	Not Dividable
10014117	31.750	A	No	No	No	701583.9809	681426.019	15.64	Not Dividable
10708108	16.326	A	No	No	Yes	29718.3482	681420.652	15.64	Not Dividable
09115132	22.594	SU	No	No	Yes	306201.6530	677989.347	15.56	Not Dividable
10505116	15.936	SU	No	No	No	16863.3841	677300.616	15.55	Not Dividable
08509209	19.567	SU	No	No	Yes	176387.2692	675939.731	15.52	Not Dividable
10011101	22.835	A-O	No	No	No	322967.6847	671744.315	15.42	Not Dividable
09201133	21.136	SU	No	No	Yes	250751.6931	669934.307	15.38	Not Dividable
08614108	18.615	SU	No	No	Yes	142430.9507	668438.049	15.35	Not Dividable
10323110	27.191	SU,RA	No	No	No	521614.4515	662807.549	15.22	Not Dividable
10304101	20.227	SU	No	No	No	222851.3561	658233.644	15.11	Not Dividable
10204111	27.446	RA	No	No	No	538080.0571	657463.943	15.09	Not Dividable
10612136	17.527	SU	No	No	Yes	108300.7068	655165.293	15.04	Not Dividable
09327205	21.685	SU	No	No	Yes	292907.9226	651701.077	14.96	Not Dividable
09813110	38.289	SU	No	No	Yes	1019609.3014	648252.699	14.88	Not Dividable
06404111	16.806	SU	No	No	Yes	89372.9467	642687.053	14.75	Not Dividable
09302318	19.237	SU	No	No	Yes	196289.7652	641678.235	14.73	Not Dividable
08608233	15.726	SU	No	No	Yes	43400.3644	641644.636	14.73	Not Dividable
08911141	18.126	SU	No	No	Yes	148144.5457	641416.454	14.72	Not Dividable
09103106	17.196	A	No	No	Yes	110656.3782	638390.622	14.66	Not Dividable
03913115	27.835	SU	No	No	No	574976.9100	637523.090	14.64	Not Dividable
08901159	26.863	SU	No	No	Yes	536282.3209	633877.679	14.55	Not Dividable
09715109	22.096	SU	No	No	Yes-Portion	329453.4852	633066.515	14.53	Not Dividable

Environmental Review Inital Study
ATTACHMENT 4 2 of 26
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: 1-4

08814126	18.181	SU	No	No	Yes	158982.6858	632965.314	14.53 Not Dividable
08901158	23.690	SU	No	No	Yes	399744.1017	632201.898	14.51 Not Dividable
08612303	15.062	SU	No	Yes-Portion	Yes-Portion	23930.8345	632175.166	14.51 Not Dividable
08902127	18.045	SU	No	No	Yes	156530.7395	629505.261	14.45 Not Dividable
10614126	15.349	SU	No	No	Yes	40990.6752	627599.325	14.41 Not Dividable
09723102	23.818	SU	No	No	Yes-Portion	412427.7734	625092.227	14.35 Not Dividable
10602211	14.990	SU	No	No	Yes	28666.3948	624291.605	14.33 Not Dividable
10511139	20.509	SU	No	No	No	270231.1534	623147.847	14.31 Not Dividable
09510120	19.122	SU	No	No	Yes	210868.9690	622076.031	14.28 Not Dividable
10318126	18.481	RA	No	No	No	183816.4149	621201.585	14.26 Not Dividable
09114103	18.959	SU	No	No	Yes	209756.2004	616100.800	14.14 Not Dividable
09116122	17.498	SU	No	No	Yes	150988.8096	611209.190	14.03 Not Dividable
09905146	16.485	A	No	No	Yes-Portion	108997.0000	609089.000	13.98 Not Dividable
10615139	18.035	SU	No	No	Yes	181098.2684	604501.732	13.88 Not Dividable
08733102	15.212	SU	No	No	Yes	58420.9367	604205.063	13.87 Not Dividable
04029102	24.845	RA-O	No	No	No	479272.0812	602978.919	13.84 Not Dividable
08732109	15.028	SU	No	No	Yes	52589.8081	602008.192	13.82 Not Dividable
08316102	19.838	SU	No	No	Yes	265622.4567	598526.543	13.74 Not Dividable
07011129	19.173	RA-O,SU	No	No	Yes	237383.9600	597778.040	13.72 Not Dividable
07013113	21.104	A	No	No	Yes	321996.7721	597299.228	13.71 Not Dividable
10201140	26.330	RA	No	No	No	550141.2689	596780.731	13.70 Not Dividable
09907106	20.697	RA	No	No	No	308500.5706	593079.429	13.62 Not Dividable
10011104	21.294	A	No	No	No	334889.9065	592687.094	13.61 Not Dividable
10617109	14.338	SU	No	No	Yes	38097.7239	586473.276	13.46 Not Dividable
08522211	19.711	SU	No	No	Yes	279441.6107	579176.389	13.30 Not Dividable
08903161	21.103	SU	No	No	Yes	341287.7112	577939.289	13.27 Not Dividable
08902110	17.654	SU	No	No	Yes	195347.2147	573666.785	13.17 Not Dividable
09307114	16.484	SU	No	No	Yes	144516.0880	573518.912	13.17 Not Dividable
10010121	19.476	A	No	No	No	277405.9389	570968.061	13.11 Not Dividable
06420120	28.141	SU	No	No	Yes	655678.8163	570142.184	13.09 Not Dividable
10417119	23.401	SU	No	No	No	449856.1278	569507.872	13.07 Not Dividable
06219107	13.363	A	No	No	Yes	13214.1585	568877.842	13.06 Not Dividable
08728101	18.465	SU	No	No	Yes	236726.5184	567603.482	13.03 Not Dividable
09812104	16.728	SU	No	No	Yes	161912.6126	566742.387	13.01 Not Dividable
09116130	37.032	A-L	No	No	Yes	1046931.1162	566166.884	13.00 Not Dividable
10021113	13.644	A	No	No	No	28712.4009	565605.599	12.98 Not Dividable
08703106	27.817	PR	No	No	Yes	646358.9586	565362.041	12.98 Not Dividable
10315131	15.357	RA	No	No	No	104298.4578	564647.542	12.96 Not Dividable
05720113	17.292	CA-P	Yes	Yes	No	188648.1075	564575.893	12.96 Not Dividable
09312201	27.237	SU	No	No	Yes	624389.3685	562063.632	12.90 Not Dividable
10551103	20.806	SU	No	No	No	345581.5598	560747.440	12.87 Not Dividable
09907110	16.256	RA	No	No	No	148620.3224	559510.678	12.84 Not Dividable
10523169	20.279	A	No	No	No	327781.1207	555550.879	12.75 Not Dividable
07001138	15.696	RA-O	No	No	Yes	131397.5798	552311.420	12.68 Not Dividable
08705308	12.980	SU	No	No	Yes	15327.9660	550086.034	12.63 Not Dividable
07021112	18.791	RA	No	No	Yes	273158.2463	545375.754	12.52 Not Dividable
09305154	33.439	SU	No	No	Yes	912849.5496	543768.450	12.48 Not Dividable
08723125	14.674	SU	No	No	Yes	96659.9251	542523.075	12.45 Not Dividable
08905113	13.784	SU	No	No	Yes	62545.0107	537874.989	12.35 Not Dividable
08515302	14.246	SU	No	No	Yes	85814.0313	534744.969	12.28 Not Dividable
10012109	22.094	A	No	No	No	428340.2244	534067.776	12.26 Not Dividable
10740125	14.027	SU,RA	No	No	Yes	81595.6674	529405.333	12.15 Not Dividable
10539109	13.699	SU	No	No	No	67525.3130	529216.687	12.15 Not Dividable
08950110	31.768	SU	No	No	Yes	856643.7879	527177.212	12.10 Not Dividable
08911139	27.611	SU	No	No	Yes	675721.8699	527008.130	12.10 Not Dividable
10417102	21.542	SU	No	No	No	411694.7566	526692.243	12.09 Not Dividable
10749125	18.605	RA	No	No	Yes-Portion	284909.3136	525522.686	12.06 Not Dividable
08733104	16.156	SU	No	No	Yes	179655.0072	524102.993	12.03 Not Dividable
09106120	12.704	SU	No	No	Yes	30636.1241	522728.876	12.00 Not Dividable
10620102	16.532	RA	No	No	Yes	198861.2098	521265.790	11.97 Not Dividable

Environmental Review Initial Study

ATTACHMENT 4 3 of 26

APPLICATION N/A Amendment to Co. Code See 13.10.375 re: TPZ

10620147	16.661	RA,A	No	No	Yes	204878.6973	520858.303	11.96	Not Dividable
08901139	15.002	SU	No	No	Yes	134578.9592	518916.041	11.91	Not Dividable
07033109	19.486	A	No	No	Yes-Portion	330396.2674	518397.733	11.90	Not Dividable
09901117	34.699	A	No	No	No	996257.6026	515226.397	11.83	Not Dividable
07013117	26.011	A	No	No	Yes	618432.3078	514593.692	11.81	Not Dividable
10614132	14.416	SU	No	No	Yes	113962.1743	513987.826	11.80	Not Dividable
09118102	18.160	SU	No	No	Yes	277638.9131	513406.087	11.79	Not Dividable
08901157	24.298	SU	No	No	Yes	547024.1112	511404.889	11.74	Not Dividable
10614115	24.453	SU	No	No	Yes	554056.0278	511127.972	11.73	Not Dividable
10650101	32.564	SU	No	No	Yes	907600.9727	510882.027	11.73	Not Dividable
10755111	16.297	SU	No	No	Yes	199604.1702	510309.830	11.72	Not Dividable
05612140	17.638	A	No	No	No	258148.4184	510174.582	11.71	Not Dividable
09311208	13.267	SU	No	No	Yes	69947.4644	507954.536	11.66	Not Dividable
06421177	15.117	SU	No	No	Yes	150807.9270	507668.073	11.65	Not Dividable
09104215	19.950	SU	No	No	Yes	364632.9729	504395.027	11.58	Not Dividable
10647111	20.123	SU	No	No	Yes	373144.3665	503407.634	11.56	Not Dividable
09635157	28.752	SU	No	No	Yes	749044.4904	503386.510	11.56	Not Dividable
08723118	16.687	SU	No	No	Yes	223698.1448	503202.855	11.55	Not Dividable
09114172	20.219	SU	No	No	Yes	381954.5631	498771.437	11.45	Not Dividable
10708118	19.618	CA,RA,SU	No	No	Yes	360853.3021	493727.698	11.33	Not Dividable
10626102	25.375	SU	No	No	Yes	611782.0163	493566.984	11.33	Not Dividable
09711117	18.240	RA	No	No	Yes-Portion	303181.9779	491353.022	11.28	Not Dividable
08705401	26.246	SU	No	No	Yes	652634.1688	490627.831	11.26	Not Dividable
09307111	22.269	SU	No	No	Yes	479882.9920	490154.008	11.25	Not Dividable
08901161	13.296	SU	No	No	Yes	95271.8290	483892.171	11.11	Not Dividable
10104131	13.657	A	No	No	No	111991.9290	482921.071	11.09	Not Dividable
08705307	13.794	SU	No	No	Yes	118142.5956	482743.404	11.08	Not Dividable
09118105	11.575	SU	No	No	Yes	23977.6210	480238.379	11.02	Not Dividable
09119115	17.371	SU	No	No	Yes	277566.6830	479093.317	11.00	Not Dividable
09114140	24.362	SU	No	No	Yes	582693.2506	478525.749	10.99	Not Dividable
09116106	23.273	SU	No	No	Yes	535392.0979	478361.902	10.98	Not Dividable
07202204	18.332	PR	No	No	Yes	320478.1839	478057.816	10.97	Not Dividable
09115136	18.938	SU	No	No	Yes	346909.1436	478031.856	10.97	Not Dividable
08705313	10.882	SU	No	No	Yes	0.0000	474021.000	10.88	Not Dividable
08912183	20.020	SU,PF	No	No	Yes	399048.9238	473008.076	10.86	Not Dividable
09726129	19.916	SU	No	No	Yes-Portion	394769.2733	472786.727	10.85	Not Dividable
09408132	17.003	RA-O	No	No	Yes	268077.1675	472593.833	10.85	Not Dividable
04005103	13.249	RA-O	No	No	No	105745.7085	471359.292	10.82	Not Dividable
10552101	16.432	SU	No	No	No	245120.8630	470649.137	10.80	Not Dividable
08908110	17.276	SU	No	No	Yes	283389.3615	469159.639	10.77	Not Dividable
08901136	10.743	SU	No	No	Yes	0.0000	467954.000	10.74	Not Dividable
09118101	12.759	SU	No	No	Yes	88283.5653	467506.435	10.73	Not Dividable
08527104	25.828	SU	No	No	Yes	659350.5077	465738.492	10.69	Not Dividable
08010217	10.692	RA	No	No	Yes	0.0000	465724.000	10.69	Not Dividable
09116133	27.087	SU	No	No	Yes	715133.8181	464770.182	10.67	Not Dividable
10749102	12.249	RA	No	No	No	70556.5312	463015.469	10.63	Not Dividable
04029108	10.796	RA	No	No	No	7627.4530	462656.547	10.62	Not Dividable
08908109	19.700	SU	No	No	Yes	396009.3670	462117.633	10.61	Not Dividable
09118106	11.668	SU	No	No	Yes	47316.7940	460937.206	10.58	Not Dividable
10608107	17.438	SU	No	No	Yes	300101.0582	459512.942	10.55	Not Dividable
10103137	16.561	RA	No	No	No	262858.8530	458533.147	10.53	Not Dividable
07034103	12.086	SU	No	No	Yes	68750.0847	457713.915	10.51	Not Dividable
10618107	28.107	A	No	No	Yes	766971.7291	457359.271	10.50	Not Dividable
10650102	22.614	SU	No	No	Yes	530021.0850	455038.915	10.45	Not Dividable
08612301	10.418	SU	No	No	Yes	0.0000	453821.000	10.42	Not Dividable
09722201	12.405	SU	No	No	Yes-Portion	89221.5632	451122.437	10.36	Not Dividable
09302317	15.832	SU	No	No	Yes	239069.1599	450564.840	10.34	Not Dividable
09509118	26.569	SU	No	No	Yes	706894.1469	450459.853	10.34	Not Dividable
08901137	10.355	SU	No	No	Yes	2631.3120	448426.688	10.29	Not Dividable
08717102	18.929	SU	No	No	Yes	376389.3980	448155.602	10.29	Not Dividable

Environmental Review Initial Study
ATTACHMENT 4 of 26
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

8608247	14.900	SU	No	No	Yes	202043.4492	447002.551	10.26	Not Dividable
08012114	10.252	A-O	Yes	No	Yes	0.0000	446562.000	10.25	Not Dividable
09028101	28.479	SU	No	No	Yes	794054.7932	446477.207	10.25	Not Dividable
08909118	18.970	SU	No	No	Yes	380542.4796	445792.520	10.23	Not Dividable
06421180	15.190	SU	No	No	Yes	216971.3094	444704.691	10.21	Not Dividable
10004128	12.016	A	No	No	No	79356.8427	444042.157	10.19	Not Dividable
09904124	12.216	A	No	No	No	88097.2188	444023.781	10.19	Not Dividable
09314115	10.290	SU	No	No	Yes	4817.6408	443433.359	10.18	Not Dividable
08526223	13.655	PR,R-1-15	No	No	Yes	152597.4238	442207.576	10.15	Not Dividable
09715108	10.554	SU	No	No	Yes-Portion	18328.8616	441422.138	10.13	Not Dividable
07618127	12.511	SU	No	No	Yes	104538.3785	440447.622	10.11	Not Dividable
08013120	10.098	RA	No	No	Yes	0.0000	439888.000	10.10	Not Dividable
08901153	11.447	SU	No	No	Yes	59142.4828	439488.517	10.09	Not Dividable
08901150	10.353	SU	No	No	Yes	13494.0262	437469.974	10.04	Not Dividable
08515204	23.833	SU	No	No	Yes	601171.3330	436990.667	10.03	Not Dividable
06302106	10.014	A-O	Yes	No	Yes-Portion	0.0000	436210.000	10.01	Not Dividable
08723129	11.861	SU	No	No	Yes	80580.6233	436090.377	10.01	Not Dividable
08901151	10.302	SU	No	No	Yes	12796.7241	435939.276	10.01	Not Dividable
09610101	10.495	SU	No	No	Yes	21234.0395	435906.961	10.01	Not Dividable
08705202	23.642	SU	No	No	Yes	594110.3868	435745.613	10.00	Not Dividable
08923112	10.027	SU	No	No	Yes	1642.3006	435153.699	9.99	Not Dividable
08726104	17.765	SU	No	No	Yes	339072.3269	434763.673	9.98	Not Dividable
08901146	19.561	SU	No	No	Yes	417476.8888	434580.111	9.98	Not Dividable
09101242	20.344	SU	No	No	Yes	452230.2391	433936.761	9.96	Not Dividable
10307143	12.460	C-1,RA	No	No	No	110038.7287	432724.271	9.93	Not Dividable
06302122	9.920	RA	Yes	No	Yes-Portion	0.0000	432107.000	9.92	Not Dividable
10650103	26.884	SU	No	No	Yes	739147.7070	431906.293	9.92	Not Dividable
10107103	11.860	A-P	No	No	No	85007.8435	431618.157	9.91	Not Dividable
09114171	18.019	SU	No	No	Yes	354135.3764	430774.624	9.89	Not Dividable
10523171	10.715	A	No	No	No	36499.0793	430226.921	9.88	Not Dividable
10614136	10.375	A,SU	No	No	Yes	22253.5466	429676.453	9.86	Not Dividable
09119101	10.061	SU	No	No	Yes	9354.8385	428896.162	9.85	Not Dividable
09708128	13.156	RA	No	No	Yes-Portion	144608.4662	428479.534	9.84	Not Dividable
08522212	16.063	SU	No	No	Yes	272041.4863	427680.514	9.82	Not Dividable
10647104	14.419	SU	No	No	Yes	200982.9055	427099.095	9.80	Not Dividable
09501127	11.321	RA	No	No	Yes	66108.3854	427015.615	9.80	Not Dividable
10614107	13.381	SU	No	No	Yes	156657.3217	426211.678	9.78	Not Dividable
09119117	16.997	SU	No	No	Yes	315106.7739	425288.226	9.76	Not Dividable
08818118	13.034	SU	No	No	Yes	142959.1979	424786.802	9.75	Not Dividable
08644102	11.536	R-1-15	No	Yes-Portion	Yes	78511.6368	423987.363	9.73	Not Dividable
10614140	9.726	SU	No	No	Yes	0.0975	423677.903	9.73	Not Dividable
10614139	13.027	SU	No	No	Yes	144016.9942	423419.006	9.72	Not Dividable
09103116	10.734	SU	No	No	Yes	44834.3190	422725.681	9.70	Not Dividable
07831113	24.053	PR	No	No	Yes	626157.9958	421603.004	9.68	Not Dividable
06324112	11.345	RR	Yes	No	Yes	74101.9306	420088.069	9.64	Not Dividable
07817147	15.619	SU	No	No	Yes	260369.7997	420005.200	9.64	Not Dividable
10523173	9.912	A	No	No	No	12097.3923	419679.608	9.63	Not Dividable
09305144	18.809	SU	No	No	Yes	399817.2771	419493.723	9.63	Not Dividable
06302126	10.129	RA	Yes	No	Yes	21791.6080	419428.392	9.63	Not Dividable
09506233	28.100	SU	No	No	Yes	804891.9615	419152.039	9.62	Not Dividable
06421185	10.482	SU	No	No	Yes	37959.5104	418640.490	9.61	Not Dividable
09106131	14.802	SU	No	No	Yes	226311.1579	418478.842	9.61	Not Dividable
06437106	21.281	SU	No	No	Yes	509045.1286	417974.871	9.60	Not Dividable
08509205	15.245	SU	No	No	Yes	248146.0298	415933.970	9.55	Not Dividable
08901140	10.686	SU	No	No	Yes	51441.4628	414037.537	9.50	Not Dividable
08612302	9.504	SU	No	Yes-Portion	Yes-Portion	0.0000	413988.000	9.50	Not Dividable
09726131	32.849	SU	No	No	Yes-Portion	1017144.4907	413776.509	9.50	Not Dividable
09008102	27.534	SU	No	No	Yes	786598.0693	412783.931	9.48	Not Dividable
10615134	18.704	RA-O	No	No	Yes	403117.0585	411623.942	9.45	Not Dividable
10025104	11.276	RA	No	No	No	80088.6747	411109.325	9.44	Not Dividable

Environmental Review Inital Study

ATTACHMENT 4, 5 of 26

APPLICATION N/A Amendment to Co. Code Sec. 13.1035 re: TP

09331129	14.541	SU	No	No	Yes	222579.4889	410844.511	9.43	Not Dividable
09524104	25.496	SU	No	No	Yes-Portion	699984.0496	410619.950	9.43	Not Dividable
08901134	13.065	SU	No	No	Yes	158781.1625	410345.838	9.42	Not Dividable
08509201	9.564	SU	No	No	Yes	7763.2821	408865.718	9.39	Not Dividable
08726106	9.651	SU	No	No	Yes	12450.5999	407942.400	9.37	Not Dividable
10016106	12.680	A	No	No	No	144541.0853	407785.915	9.36	Not Dividable
08526201	16.381	SU	No	No	Yes	305897.4603	407655.540	9.36	Not Dividable
10503127	10.518	RA,SU	No	No	No	50780.9022	407402.098	9.35	Not Dividable
08726117	9.492	SU	No	No	Yes	6318.8167	407132.183	9.35	Not Dividable
10014123	15.819	A	No	No	No	283911.6289	405149.371	9.30	Not Dividable
08013121	9.806	RA	No	No	Yes	22199.3890	404946.611	9.30	Not Dividable
10511130	11.764	RA	No	No	No	107569.0085	404850.992	9.29	Not Dividable
08421106	21.217	SU	No	No	Yes	519462.7325	404769.268	9.29	Not Dividable
08705323	9.454	SU	No	No	Yes	8888.2894	402945.711	9.25	Not Dividable
06421179	12.954	SU	No	No	Yes	161476.7129	402804.287	9.25	Not Dividable
09305120	9.762	SU	No	No	Yes	22891.2750	402357.725	9.24	Not Dividable
07817130	9.464	SU	No	No	Yes	9995.3166	402268.683	9.23	Not Dividable
08901144	14.753	SU	No	No	Yes	241425.9171	401236.083	9.21	Not Dividable
10541109	14.586	SU	No	No	No	235205.2412	400152.759	9.19	Not Dividable
08647101	9.178	SU	No	No	Yes	0.0000	399811.000	9.18	Not Dividable
10549101	9.978	RA	No	No	No	36554.9522	398072.048	9.14	Not Dividable
09904125	10.521	A	No	No	No	60586.6658	397717.334	9.13	Not Dividable
08903170	11.820	SU	No	No	Yes	117562.9601	397302.040	9.12	Not Dividable
09339104	10.887	R-1-40AC	No	No	Yes	77639.6150	396598.385	9.10	Not Dividable
10539113	16.236	SU	No	No	No	311296.3024	395935.698	9.09	Not Dividable
10541110	12.141	SU	No	No	No	134385.6007	394480.399	9.06	Not Dividable
08901152	11.338	SU	No	No	Yes	99538.2786	394338.721	9.05	Not Dividable
08901142	10.032	SU	No	No	Yes	42797.7393	394202.261	9.05	Not Dividable
09813175	21.331	SU	No	No	Yes	536564.9183	392619.082	9.01	Not Dividable
08705404	26.467	SU	No	No	Yes	760400.9019	392487.098	9.01	Not Dividable
08012116	8.988	A-O	Yes	No	Yes	0.0000	391498.000	8.99	Not Dividable
08604134	15.637	SU	No	No	Yes	290077.4965	391074.504	8.98	Not Dividable
09201105	18.826	SU	No	No	Yes	430384.6668	389694.333	8.95	Not Dividable
09712111	18.314	RA-O	No	No	Yes	408135.8643	389602.136	8.94	Not Dividable
07817131	9.628	SU	No	No	Yes	30095.3864	389302.614	8.94	Not Dividable
09114104	9.718	SU	No	No	Yes	34447.8367	388883.163	8.93	Not Dividable
09509113	11.259	SU	No	No	Yes	102474.4523	387979.548	8.91	Not Dividable
08723115	11.371	RA	No	No	Yes	108202.1054	387136.895	8.89	Not Dividable
10101109	17.542	A	No	No	No	377107.7851	387014.215	8.88	Not Dividable
09115104	14.863	SU	No	No	Yes	261833.4703	385619.530	8.85	Not Dividable
10647101	11.798	SU	No	No	Yes	128986.8457	384941.154	8.84	Not Dividable
10301159	10.949	RA	No	No	No	92996.2058	383922.794	8.81	Not Dividable
10004139	10.756	A	No	No	No	85959.2629	382578.737	8.78	Not Dividable
08717107	11.097	SU	No	No	Yes	101437.1458	381935.854	8.77	Not Dividable
08726105	9.472	SU	No	No	Yes	31263.5115	381340.489	8.75	Not Dividable
08614107	9.502	SU	No	No	Yes	32664.5235	381248.477	8.75	Not Dividable
10102214	11.330	A	No	No	No	112995.4311	380523.569	8.74	Not Dividable
08901166	10.001	SU	No	No	Yes	55344.3830	380279.617	8.73	Not Dividable
08617131	15.312	SU	No	No	Yes	286934.0721	380036.928	8.72	Not Dividable
08941123	23.697	RA,SU	No	No	Yes	652957.7644	379303.236	8.71	Not Dividable
05724102	24.450	A	Yes	Yes	No	685830.4024	379223.598	8.71	Not Dividable
09114133	10.294	SU	No	No	Yes	69188.5138	379217.486	8.71	Not Dividable
10110111	11.308	A	No	No	No	113342.5759	379213.424	8.71	Not Dividable
08901162	12.636	SU	No	No	Yes	171542.0423	378898.958	8.70	Not Dividable
08729135	19.024	SU	No	No	Yes	449811.8890	378870.111	8.70	Not Dividable
06436204	10.488	RA	No	No	Yes	78608.6733	378231.327	8.68	Not Dividable
08908101	11.018	SU	No	No	Yes	101827.7549	378103.245	8.68	Not Dividable
06308118	9.976	RA	Yes	No	Yes-Portion	58020.9995	376527.001	8.64	Not Dividable
08902122	20.767	SU	No	No	Yes	529675.4195	374925.581	8.61	Not Dividable
09114128	19.506	SU	No	No	Yes	475315.1008	374345.899	8.59	Not Dividable

Environmental Review Initial Study
ATTACHMENT 4 to Exhibit 26
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

08908104	12.506	SU	No	No	Yes	170765.1932	374001.807	8.59	Not Dividable
06421184	8.986	SU	No	No	Yes	17447.5585	373982.442	8.59	Not Dividable
10302212	9.784	RA	No	No	No	52618.5611	373572.439	8.58	Not Dividable
08723113	17.317	SU	No	No	Yes	380801.9047	373505.095	8.57	Not Dividable
10204105	13.812	RA	No	No	No	228767.7723	372892.228	8.56	Not Dividable
07020103	14.957	RA	No	No	Yes	278774.3298	372748.670	8.56	Not Dividable
06421182	8.659	SU	No	No	Yes	4629.9529	372557.047	8.55	Not Dividable
09344201	12.179	SU	No	No	Yes	158545.7370	371952.263	8.54	Not Dividable
08608234	11.037	SU	No	No	Yes	110303.7120	370446.288	8.50	Not Dividable
04036133	17.793	RA	No	No	No	405930.6635	369121.337	8.47	Not Dividable
08948103	12.866	SU	No	No	Yes	192232.4272	368205.573	8.45	Not Dividable
08908138	16.137	SU	No	No	Yes	335098.2480	367823.752	8.44	Not Dividable
08732108	9.100	SU	No	No	Yes	28581.3005	367818.700	8.44	Not Dividable
10647105	20.911	SU	No	No	Yes	543085.6616	367801.338	8.44	Not Dividable
08726108	9.995	SU	No	No	Yes	67891.1336	367487.866	8.44	Not Dividable
10614114	10.008	SU	No	No	Yes	68898.5991	367050.401	8.43	Not Dividable
10307151	11.083	RA	No	No	No	116157.8152	366612.185	8.42	Not Dividable
10511129	11.551	R-1-3AC,SU,RA	No	No	No	136613.0420	366545.958	8.41	Not Dividable
04005204	11.752	RA	No	No	No	145512.5747	366422.425	8.41	Not Dividable
10503104	11.890	RA	No	No	No	151865.1856	366078.814	8.40	Not Dividable
09327228	25.779	SU	No	No	Yes	757184.2380	365760.762	8.40	Not Dividable
09327227	25.867	SU	No	No	Yes	761122.6071	365635.393	8.39	Not Dividable
08909139	10.381	SU	No	No	Yes	87217.0685	364988.932	8.38	Not Dividable
10305119	16.407	RA	No	No	No	350183.4934	364508.507	8.37	Not Dividable
09311218	19.216	SU	No	No	Yes	472857.8203	364201.180	8.36	Not Dividable
08315105	18.900	SU	No	No	Yes	459304.4220	363999.578	8.36	Not Dividable
09103118	19.286	RA	No	No	Yes	476107.9169	363970.083	8.36	Not Dividable
08726107	9.410	SU	No	No	Yes	46496.0297	363417.970	8.34	Not Dividable
09306102	10.688	SU	No	No	Yes	102328.4727	363224.527	8.34	Not Dividable
09201137	10.138	SU	No	No	Yes	79487.7083	362131.292	8.31	Not Dividable
08908117	9.826	SU	No	No	Yes	66209.2008	361792.799	8.31	Not Dividable
09907101	8.699	RA	No	No	No	17904.0544	361021.946	8.29	Not Dividable
08608240	13.398	SU	No	No	Yes	223009.4739	360586.526	8.28	Not Dividable
09314130	14.863	SU	No	No	Yes	287363.7147	360069.285	8.27	Not Dividable
08814168	9.597	SU	No	No	Yes	58361.9976	359679.002	8.26	Not Dividable
08820142	19.925	SU	No	No	Yes	508605.9635	359316.037	8.25	Not Dividable
08909167	10.598	SU	No	No	Yes	103042.1575	358621.843	8.23	Not Dividable
09114127	19.513	SU	No	No	Yes	491752.7983	358254.202	8.22	Not Dividable
09101226	9.704	SU	No	No	Yes	65727.8675	356996.133	8.20	Not Dividable
09305121	8.946	SU	No	No	Yes	33353.9527	356347.047	8.18	Not Dividable
09101249	9.934	SU	No	No	Yes	76783.1795	355954.821	8.17	Not Dividable
08949103	9.461	SU	No	No	Yes	57437.2804	354685.720	8.14	Not Dividable
10233101	19.169	RA	No	No	No	482186.4117	352800.588	8.10	Not Dividable
08953106	14.251	SU	No	No	Yes	268084.0429	352692.957	8.10	Not Dividable
09822103	8.087	SU	No	No	Yes	0.0000	352280.000	8.09	Not Dividable
10014116	10.203	A	No	No	No	92208.8594	352221.141	8.09	Not Dividable
08608235	8.976	SU	No	No	Yes	38968.9966	352047.003	8.08	Not Dividable
08901138	13.153	SU	No	No	Yes	221761.3595	351172.641	8.06	Not Dividable
08909163	10.450	SU	No	No	Yes	104127.2832	351081.717	8.06	Not Dividable
09101255	17.222	RA	No	No	Yes	399768.8994	350440.101	8.04	Not Dividable
09116127	12.950	SU	No	No	Yes	213813.5186	350277.481	8.04	Not Dividable
09509105	17.219	SU	No	No	Yes	399856.8049	350206.195	8.04	Not Dividable
10523172	9.814	A	No	No	No	77492.9540	349989.046	8.03	Not Dividable
09311202	17.072	SU	No	No	Yes	394051.8561	349583.144	8.03	Not Dividable
08910162	10.655	SU	No	No	Yes	115762.1700	348360.830	8.00	Not Dividable
06421189	12.035	SU	No	No	Yes	176657.2069	347597.793	7.98	Not Dividable
08952103	11.053	SU	No	No	Yes	134332.0296	347157.970	7.97	Not Dividable
09114167	19.310	SU	No	No	Yes	494713.4582	346445.542	7.95	Not Dividable
04023203	9.776	RA-O	No	No	No	79478.2185	346344.782	7.95	Not Dividable
06701106	7.949	SU-O	No	No	Yes	1962.3256	344284.674	7.90	Not Dividable

Environmental Review Initial Study
ATTACHMENT 4, 7 of 26
APPLICATION N/A Amendment - Co. Code Sec. 13.10.375 re: TX

09327332	10.141	SU	No	No	Yes	97508.2675	344225.733	7.90 Not Dividable
08951108	17.181	SU	No	No	Yes	404450.7757	343944.224	7.90 Not Dividable
08909142	10.363	SU	No	No	Yes	107954.1801	343445.820	7.88 Not Dividable
08705315	9.794	SU	No	No	Yes	83512.8565	343123.144	7.88 Not Dividable
09710146	9.743	SU	No	No	Yes	81990.4649	342419.535	7.86 Not Dividable
08908137	9.793	SU	No	No	Yes	85072.3858	341508.614	7.84 Not Dividable
10612124	22.291	RA	No	No	Yes	629518.3429	341482.657	7.84 Not Dividable
07020109	10.488	RA	No	No	Yes	115792.9905	341057.010	7.83 Not Dividable
09314127	8.549	RA	No	No	Yes	32394.4935	340003.507	7.81 Not Dividable
09101267	9.816	SU	No	No	Yes	89136.9179	338447.082	7.77 Not Dividable
08948104	11.981	SU	No	No	Yes	183644.9757	338239.024	7.76 Not Dividable
08608227	11.131	SU	No	No	Yes	147110.3303	337736.670	7.75 Not Dividable
04023237	8.777	RA	No	No	No	44812.5409	337523.459	7.75 Not Dividable
09116124	11.135	R-1-10AC,SU	No	No	Yes	149176.9679	335865.032	7.71 Not Dividable
08726118	9.343	SU	No	No	Yes	71173.2973	335798.703	7.71 Not Dividable
09118104	17.336	SU	No	No	Yes	420920.8790	334250.121	7.67 Not Dividable
08705352	24.761	SU	No	No	Yes	744604.9325	334003.068	7.67 Not Dividable
10749124	10.123	RA	No	No	Yes-Portion	108219.5855	332741.415	7.64 Not Dividable
09329151	15.142	SU	No	No	Yes	327659.4420	331941.558	7.62 Not Dividable
10543105	11.357	SU	No	No	No	163191.6433	331518.357	7.61 Not Dividable
10755108	13.960	RA	No	No	Yes	276706.0647	331405.935	7.61 Not Dividable
08811144	12.975	SU	No	No	Yes	234132.2171	331037.783	7.60 Not Dividable
10006104	11.194	A	No	No	No	156801.9847	330825.015	7.59 Not Dividable
08811118	11.802	SU	No	No	Yes	183417.2732	330676.727	7.59 Not Dividable
09714110	11.336	SU	No	No	Yes-Portion	163449.4978	330356.502	7.58 Not Dividable
10705133	8.932	SU	No	No	Yes	58865.7773	330191.223	7.58 Not Dividable
10636109	10.849	SU	No	No	Yes	142734.6487	329862.351	7.57 Not Dividable
08012115	8.421	A-O	Yes	No	Yes	37262.6609	329562.339	7.57 Not Dividable
08421113	22.592	R-1-20,SU	No	No	Yes	654586.7519	329513.248	7.56 Not Dividable
08727108	9.460	SU	No	No	Yes	82986.2210	329077.779	7.55 Not Dividable
10708113	10.889	A	No	No	Yes	145393.1182	328929.882	7.55 Not Dividable
09101253	8.649	SU	No	No	Yes	48133.8149	328618.185	7.54 Not Dividable
09108145	11.475	SU	No	No	Yes	171716.2696	328136.730	7.53 Not Dividable
09329136	15.433	SU	No	No	Yes	344449.2218	327796.778	7.53 Not Dividable
10101108	11.480	A	No	No	No	172325.2034	327754.797	7.52 Not Dividable
05612131	20.843	A	No	No	No	580894.1587	327005.841	7.51 Not Dividable
08949104	11.270	SU	No	No	Yes	163972.7098	326957.290	7.51 Not Dividable
08607123	9.923	SU	No	No	Yes	106469.2586	325790.741	7.48 Not Dividable
10301162	7.551	RA	No	No	No	3378.2178	325524.782	7.47 Not Dividable
10302208	8.508	RA	No	No	No	45371.6393	325237.361	7.47 Not Dividable
08901160	12.725	SU	No	No	Yes	229251.4868	325063.513	7.46 Not Dividable
09527117	14.272	SU	No	No	Yes-Portion	296991.2256	324697.774	7.45 Not Dividable
07013114	19.891	A	No	No	Yes	541985.5977	324473.402	7.45 Not Dividable
10505117	10.546	SU	No	No	No	135490.6287	323886.371	7.44 Not Dividable
10542109	9.792	SU	No	No	No	103163.1651	323364.835	7.42 Not Dividable
05720111	7.967	A	Yes	Yes	No	23864.0522	323198.948	7.42 Not Dividable
08910161	10.587	SU	No	No	Yes	138554.2476	322612.752	7.41 Not Dividable
09327201	13.768	SU	No	No	Yes	278284.2798	321457.720	7.38 Not Dividable
09709116	8.055	RA	No	No	Yes-Portion	29682.8930	321184.107	7.37 Not Dividable
08911147	10.486	SU	No	No	Yes	138024.0894	318743.911	7.32 Not Dividable
08615118	17.477	RA,SU	No	No	Yes	442556.0278	318731.972	7.32 Not Dividable
10325114	10.203	RA	No	No	No	126688.0982	317773.902	7.30 Not Dividable
06421188	7.859	SU	No	No	Yes	25729.6201	316601.380	7.27 Not Dividable
09327329	13.310	SU	No	No	Yes	263688.5387	316091.461	7.26 Not Dividable
06438116	8.125	PR	No	Yes-Portion	Yes	38073.2021	315870.798	7.25 Not Dividable
09725114	16.341	RA	No	No	No	396391.8937	315416.106	7.24 Not Dividable
04014109	9.969	R-1-3AC	No	No	No	118845.6557	315407.344	7.24 Not Dividable
08728108	16.101	SU	No	No	Yes	386522.7782	314856.222	7.23 Not Dividable
09710145	16.587	SU	No	No	Yes	408118.1443	314426.856	7.22 Not Dividable
09627102	8.436	RA-O	No	No	No	53820.8928	313654.107	7.20 Not Dividable

Environmental Review Inital Study
ATTACHMENT 4 of 26
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

08909166	10.141	SU	No	No	Yes	128744.7702	312994.230	7.19	Not Dividable
08705311	8.705	SU	No	No	Yes	66475.5966	312707.403	7.18	Not Dividable
08607121	9.875	SU	No	No	Yes	118568.8832	311567.117	7.15	Not Dividable
09314106	9.416	SU	No	No	Yes	99495.5791	310647.421	7.13	Not Dividable
09714111	9.508	SU	No	No	No	103607.3171	310573.683	7.13	Not Dividable
08948102	15.138	SU	No	No	Yes	349503.9134	309902.087	7.11	Not Dividable
09101202	12.785	SU	No	No	Yes	247632.9074	309283.093	7.10	Not Dividable
08903152	13.848	SU	No	No	Yes	294157.5065	309042.494	7.09	Not Dividable
08723117	11.162	SU	No	No	Yes	177885.1216	308309.878	7.08	Not Dividable
08951109	19.392	SU,RA	No	No	Yes	536504.9141	308201.086	7.08	Not Dividable
07811104	25.077	SU	No	No	Yes	784173.6874	308185.313	7.07	Not Dividable
09326141	9.781	SU	No	No	Yes	117923.7908	308137.209	7.07	Not Dividable
05720114	11.525	A	Yes	Yes-Portion	No	193956.9322	308058.068	7.07	Not Dividable
09706109	14.292	SU	No	No	Yes	314855.5749	307701.425	7.06	Not Dividable
08901122	9.803	SU	No	No	Yes	119746.8321	307290.168	7.05	Not Dividable
07931113	10.505	RA	No	No	Yes	151063.7229	306522.277	7.04	Not Dividable
08911110	10.857	SU	No	No	Yes	167057.3798	305884.620	7.02	Not Dividable
07020104	10.076	RA	No	No	Yes	133120.0713	305788.929	7.02	Not Dividable
09712113	11.168	SU	No	No	Yes	181423.8694	305065.131	7.00	Not Dividable
09114105	9.484	SU	No	No	Yes	108566.3770	304576.623	6.99	Not Dividable
04002210	7.059	RA	No	No	No	3270.2683	304233.732	6.98	Not Dividable
10012102	11.300	A	No	No	No	188087.1957	304136.804	6.98	Not Dividable
07931108	13.388	RA	No	No	Yes	279598.1046	303583.895	6.97	Not Dividable
09726125	10.139	SU	No	No	No	138327.9288	303318.071	6.96	Not Dividable
09302314	9.714	SU	No	No	Yes	119831.5541	303289.446	6.96	Not Dividable
06420184	6.987	SU	No	No	Yes	1217.5879	303156.412	6.96	Not Dividable
08818117	9.871	SU	No	No	Yes	127569.7997	302400.200	6.94	Not Dividable
09910112	8.324	RA	No	No	No	60214.7735	302377.227	6.94	Not Dividable
08901149	10.007	SU	No	No	Yes	133914.5124	301983.488	6.93	Not Dividable
10010123	8.558	A	No	No	No	71001.3239	301802.676	6.93	Not Dividable
10314126	18.639	RA	No	No	No	510369.3590	301549.641	6.92	Not Dividable
09329132	20.407	SU	No	No	Yes	587533.6334	301389.367	6.92	Not Dividable
06324113	10.460	RR	Yes	No	Yes	154895.0112	300743.989	6.90	Not Dividable
06302119	6.886	RA	Yes	No	Yes	0.0000	299940.000	6.89	Not Dividable
08012113	9.217	A-O	Yes	No	Yes	101672.4459	299836.554	6.88	Not Dividable
09101225	9.921	SU	No	No	Yes	132551.0114	299586.989	6.88	Not Dividable
08608238	8.023	SU	No	No	Yes	49921.4010	299574.599	6.88	Not Dividable
09101282	11.513	SU	No	No	Yes	202017.3113	299491.689	6.88	Not Dividable
10541107	7.474	SU	No	No	No	26224.5185	299358.482	6.87	Not Dividable
09108144	9.661	SU	No	No	Yes	122579.7658	298244.234	6.85	Not Dividable
06402120	8.934	RA	No	Yes	Yes	91281.1291	297886.871	6.84	Not Dividable
10314125	11.945	RA	No	No	No	222932.3367	297397.663	6.83	Not Dividable
08614101	9.697	SU	No	No	Yes	124998.2682	297392.732	6.83	Not Dividable
08727103	9.897	SU	No	No	Yes	134069.5421	297041.458	6.82	Not Dividable
08649130	7.629	R-1-15	No	No	Yes	35669.4192	296664.581	6.81	Not Dividable
08902128	10.829	SU	No	No	Yes	175893.1987	295827.801	6.79	Not Dividable
08724101	10.223	SU	No	No	Yes	150137.8549	295171.145	6.78	Not Dividable
08717101	22.137	SU	No	No	Yes	669654.3512	294627.649	6.76	Not Dividable
09305119	7.065	SU	No	No	Yes	113158.0898	294611.910	6.76	Not Dividable
08528204	7.108	RA	No	No	Yes	115304.2054	294311.795	6.76	Not Dividable
06301128	6.750	RA-O	Yes	No	No	0.0000	294029.000	6.75	Not Dividable
08656107	6.849	RA	No	No	Yes	5399.5937	292929.406	6.72	Not Dividable
09115107	9.674	SU	No	No	Yes	128519.1331	292877.867	6.72	Not Dividable
09717104	13.633	SU	No	No	No	301156.9149	292682.085	6.72	Not Dividable
09711124	8.550	SU	No	No	No	180102.8106	292334.189	6.71	Not Dividable
08726101	16.709	SU	No	No	Yes	138146.5268	289714.473	6.65	Not Dividable
09104211	22.065	SU	No	No	Yes	171992.4573	289141.543	6.64	Not Dividable
09645103	9.785	SU-O-L	No	No	Yes-Portion	137185.0804	289042.920	6.64	Not Dividable
09407106	9.815	A	No	No	Yes	139357.0084	288190.992	6.62	Not Dividable
08907174	15.730	SU	No	No	Yes	297046.3082	288141.692	6.61	Not Dividable

Environmental Review Inital Study
ATTACHMENT 4, 9 of 26
APPLICATION N/A Amendment
Co. Code Sec. 13.10.3
re: TP

07202207	7.437	RA	No	No	Yes	36333.8292	287624.171	6.60 Not Dividable
08314102	8.981	SU	No	No	Yes	104151.5093	287046.491	6.59 Not Dividable
10315124	7.550	PF	No	No	No	41913.0137	286974.986	6.59 Not Dividable
09636108	23.593	SU	No	No	Yes	741987.1444	285736.856	6.56 Not Dividable
10612137	8.016	RA	No	No	Yes-Portion	63563.7569	285632.243	6.56 Not Dividable
10602213	6.792	RA	No	No	Yes	11832.3691	284038.631	6.52 Not Dividable
09706110	8.527	SU	No	No	Yes	87476.9159	283948.084	6.52 Not Dividable
10301154	11.361	SU	No	No	No	211500.8009	283392.199	6.51 Not Dividable
08531101	10.257	RA	No	No	Yes	163607.6593	283182.341	6.50 Not Dividable
09113106	18.943	SU	No	No	Yes	542426.2142	282741.786	6.49 Not Dividable
09608108	8.790	SU	No	No	Yes	100257.2428	282649.757	6.49 Not Dividable
09104214	19.988	SU	No	No	Yes	588151.3847	282524.615	6.49 Not Dividable
06302130	6.594	SU,RA	Yes	No	Yes	4775.2432	282455.757	6.48 Not Dividable
08705322	9.946	SU	No	No	Yes	151202.5503	282060.450	6.48 Not Dividable
08705305	11.533	SU	No	No	Yes	220473.6438	281909.356	6.47 Not Dividable
09501207	9.745	RA	No	No	Yes	142892.7143	281578.286	6.46 Not Dividable
10547110	25.621	SU	No	No	No	834832.7367	281205.263	6.46 Not Dividable
10755110	8.284	SU	No	No	Yes	79703.2782	281128.722	6.45 Not Dividable
06137109	6.423	SU-O	No	No	Yes	0.0000	279780.000	6.42 Not Dividable
06301134	6.412	RA	Yes	No	Yes-Portion	0.0000	279288.000	6.41 Not Dividable
07817103	6.483	SU	No	No	Yes	3784.8265	278634.174	6.40 Not Dividable
08727106	9.976	SU	No	No	Yes	156068.5286	278487.471	6.39 Not Dividable
08705306	12.730	SU	No	No	Yes	276711.3033	277817.697	6.38 Not Dividable
07817104	6.768	SU	No	No	Yes	17963.3431	276836.657	6.36 Not Dividable
09115128	9.895	SU	No	No	Yes	154815.4904	276209.510	6.34 Not Dividable
09906108	6.522	SU,RA	No	No	Yes-Portion	7925.3181	276190.682	6.34 Not Dividable
08833103	8.903	SU	No	No	Yes	111647.5306	276175.469	6.34 Not Dividable
05724110	9.205	A	Yes	Yes	No	125412.2610	275563.739	6.33 Not Dividable
09408125	6.676	A	No	No	Yes	15495.8682	275332.132	6.32 Not Dividable
08611141	19.599	SU	No	No	Yes	578449.9846	275300.015	6.32 Not Dividable
08724114	7.755	SU	No	No	Yes	62673.5862	275148.414	6.32 Not Dividable
07208101	22.708	PR	No	Yes-Portion	Yes	714089.8784	275069.122	6.31 Not Dividable
09334107	19.300	SU	No	No	Yes	566520.2768	274207.723	6.29 Not Dividable
09114126	9.291	SU	No	No	Yes	130747.6229	273973.377	6.29 Not Dividable
10012105	18.399	A	No	No	No	527510.4260	273934.574	6.29 Not Dividable
09906105	9.981	RA	No	No	Yes-Portion	162709.9621	272083.038	6.25 Not Dividable
08622162	10.054	SU	No	No	Yes	166222.1363	271730.864	6.24 Not Dividable
10004135	8.849	A	No	No	No	113998.5359	271451.464	6.23 Not Dividable
09815140	19.065	RA	No	No	Yes	559466.8967	270991.103	6.22 Not Dividable
08942130	7.762	RA	No	No	Yes	67703.2085	270423.792	6.21 Not Dividable
08608230	9.354	SU	No	No	Yes	137266.5199	270184.480	6.20 Not Dividable
09720109	11.610	SU	No	No	Yes	235954.5141	269755.486	6.19 Not Dividable
07904116	15.766	SU	No	No	Yes	417571.3185	269198.682	6.18 Not Dividable
09115108	9.428	SU	No	No	Yes	142500.3084	268179.692	6.16 Not Dividable
10403122	6.586	RA	No	No	No	19269.2972	267618.703	6.14 Not Dividable
10102216	14.308	A	No	No	No	355894.3610	267377.639	6.14 Not Dividable
08607158	9.784	RA,SU	No	No	Yes	158848.1528	267352.847	6.14 Not Dividable
08642103	7.592	R-1-15	No	No	Yes	63433.0711	267266.929	6.14 Not Dividable
08522216	15.713	SU	No	No	Yes	417353.6482	267105.352	6.13 Not Dividable
10301135	9.507	RA	No	No	No	147062.7436	267060.256	6.13 Not Dividable
04029103	9.590	RA	No	No	No	151912.4676	265824.532	6.10 Not Dividable
08732107	9.039	SU	No	No	Yes	128037.0472	265682.953	6.10 Not Dividable
09314129	14.193	SU	No	No	Yes	352842.6470	265422.353	6.09 Not Dividable
08705310	9.580	SU	No	No	Yes	151947.5922	265357.408	6.09 Not Dividable
09726127	9.635	SU	No	No	Yes-Portion	154361.0296	265348.970	6.09 Not Dividable
05724114	11.350	A	Yes	Yes	No	229104.4030	265292.597	6.09 Not Dividable
10101107	11.496	A	No	No	No	235627.9237	265134.076	6.09 Not Dividable
10539143	17.473	SU	No	No	No	496086.4767	265041.523	6.08 Not Dividable
06404106	7.632	RA	No	No	Yes	67871.8985	264569.102	6.07 Not Dividable
08705312	10.056	SU	No	No	Yes	173513.4496	264522.550	6.07 Not Dividable

Environmental Review Inital Study
ATTACHMENT 4 to 26
APPLICATION D/A Amendment to
Co. Code Sec. 13.10.375
re: TP

09817117	8.138	RA	No	No	Yes	90031.5848	264445.415	6.07	Not Dividable
09114154	11.966	RA-O	No	No	Yes	257476.9459	263782.054	6.06	Not Dividable
08907154	10.056	SU	No	No	Yes	174465.5589	263583.441	6.05	Not Dividable
09517263	6.323	SU	No	No	No	11882.8015	263537.199	6.05	Not Dividable
08613102	6.038	RA	No	No	Yes	0.0000	263009.000	6.04	Not Dividable
10113105	9.709	A	No	No	No	160085.6907	262818.309	6.03	Not Dividable
09115137	9.871	SU	No	No	Yes	167355.2089	262621.791	6.03	Not Dividable
08936101	13.555	SU	No	No	Yes	328113.5317	262334.468	6.02	Not Dividable
10539138	9.144	SU	No	No	No	136101.3213	262192.679	6.02	Not Dividable
08920117	14.349	SU	No	No	Yes	363123.8907	261928.109	6.01	Not Dividable
08512108	18.645	SU	No	No	Yes	550506.2502	261672.750	6.01	Not Dividable
08908118	6.799	SU	No	No	Yes	34502.4064	261647.594	6.01	Not Dividable
09905137	12.997	A	No	No	No	304571.4818	261598.518	6.01	Not Dividable
09723116	10.767	SU	No	No	No	208050.2889	260979.711	5.99	Not Dividable
10413110	6.681	RA	No	No	No	30090.9057	260913.094	5.99	Not Dividable
10612138	7.609	A-P,RA	No	No	Yes	70541.3636	260894.636	5.99	Not Dividable
09302311	10.016	SU	No	No	Yes	175969.5017	260337.498	5.98	Not Dividable
08903158	20.559	SU	No	No	Yes	635812.3629	259727.637	5.96	Not Dividable
10636110	8.861	SU	No	No	Yes	126411.8027	259578.197	5.96	Not Dividable
10614137	11.330	SU	No	No	Yes	234119.7370	259404.263	5.96	Not Dividable
08706839	11.541	SU	No	No	Yes	243483.8322	259257.168	5.95	Not Dividable
10324106	7.073	RA	No	No	No	48889.8118	259215.188	5.95	Not Dividable
09512148	10.442	RA	No	No	Yes	196250.9993	258615.001	5.94	Not Dividable
09119113	17.614	SU	No	No	Yes	509073.3481	258213.652	5.93	Not Dividable
09725115	17.794	SU	No	No	No	517248.3966	257856.603	5.92	Not Dividable
04033107	7.052	RA	No	No	No	49688.0211	257489.979	5.91	Not Dividable
09101263	10.187	SU	No	No	Yes	187027.1818	256707.818	5.89	Not Dividable
08901167	8.618	SU	No	No	Yes	118751.5591	256650.441	5.89	Not Dividable
08910164	10.534	SU	No	No	Yes	202246.9703	256617.030	5.89	Not Dividable
08909160	10.057	SU	No	No	Yes	181736.5294	256350.471	5.88	Not Dividable
08950102	11.316	SU	No	No	Yes	236609.6360	256332.364	5.88	Not Dividable
09332106	7.103	RA	No	No	Yes	53211.9649	256210.035	5.88	Not Dividable
09346101	6.020	RA	No	No	Yes	6215.7951	256020.205	5.88	Not Dividable
09101260	10.403	SU	No	No	Yes	197249.9759	255911.024	5.87	Not Dividable
10542110	13.034	SU	No	No	No	312113.2349	255634.765	5.87	Not Dividable
08527107	12.894	SU	No	No	Yes	306148.0497	255503.950	5.87	Not Dividable
06302121	5.849	RA	Yes	No	Yes	0.0000	254771.000	5.85	Not Dividable
06436201	10.438	RA	No	No	Yes	200492.4993	254202.501	5.84	Not Dividable
10552103	11.471	SU	No	No	No	245486.2891	254172.711	5.84	Not Dividable
09101262	10.194	SU	No	No	Yes	189948.2846	254087.715	5.83	Not Dividable
08615117	12.070	SU	No	No	Yes	271707.4474	254058.553	5.83	Not Dividable
09501116	6.009	RA	No	No	Yes	8394.8590	253363.141	5.82	Not Dividable
09608120	7.933	SU	No	No	Yes	92328.8781	253212.122	5.81	Not Dividable
09101203	8.798	SU	No	No	Yes	130875.2301	252377.770	5.79	Not Dividable
07801116	14.891	SU	No	No	Yes	396519.6136	252145.386	5.79	Not Dividable
09317126	8.282	RA	No	No	Yes	108790.1787	251965.821	5.78	Not Dividable
09901103	12.738	A	No	No	No	303049.5053	251835.495	5.78	Not Dividable
06437105	8.318	SU	No	No	Yes	110757.6722	251553.328	5.77	Not Dividable
09302312	11.426	SU	No	No	Yes	246871.4288	250854.571	5.76	Not Dividable
08909149	10.524	SU	No	No	Yes	207587.7664	250843.234	5.76	Not Dividable
10539108	13.261	SU	No	No	No	326808.9341	250822.066	5.76	Not Dividable
10543109	11.973	SU	No	No	No	270832.0329	250730.967	5.76	Not Dividable
09710143	5.982	RA	No	No	Yes	10116.8988	250474.101	5.75	Not Dividable
08315124	11.559	SU	No	No	Yes	253152.0985	250374.902	5.75	Not Dividable
10511120	8.607	SU	No	No	No	124636.9036	250271.096	5.75	Not Dividable
09715107	10.718	SU	No	No	Yes	217053.6471	249812.353	5.73	Not Dividable
09101231	9.598	SU	No	No	Yes	168559.2420	249535.758	5.73	Not Dividable
10323111	15.271	RA	No	No	No	415731.8699	249472.130	5.73	Not Dividable
04023209	6.290	RA	No	No	No	24747.5138	249258.486	5.72	Not Dividable
08939120	10.046	RA	No	No	Yes	188471.8856	249151.114	5.72	Not Dividable

Environmental Review Initial Study
ATTACHMENT 4 Page 26
APPLICATION [illegible]

09336105	16.176	SU	No	No	Yes	455522.4243	249093.576	5.72	Not Dividable
06302125	7.192	RA	Yes	No	Yes	65089.1992	248184.801	5.70	Not Dividable
09101208	12.478	SU	No	No	Yes	295487.3940	248075.606	5.70	Not Dividable
08608237	7.433	SU	No	No	Yes	76781.2566	246996.743	5.67	Not Dividable
10307120	5.815	SU,RA	No	No	No	6332.8376	246966.162	5.67	Not Dividable
09708115	7.144	RA	No	No	No	64316.3438	246872.656	5.67	Not Dividable
04009152	6.130	RA	No	No	No	20244.1301	246759.870	5.66	Not Dividable
07033110	10.663	A	No	No	Yes	217769.9941	246713.006	5.66	Not Dividable
09905145	7.451	A	No	No	No	78187.5461	246393.454	5.66	Not Dividable
08724113	6.369	SU	No	No	Yes	31272.8577	246180.142	5.65	Not Dividable
09818103	7.031	SU	No	No	Yes	61017.7711	245272.229	5.63	Not Dividable
09817109	12.615	RA	No	No	Yes	305111.2841	244416.716	5.61	Not Dividable
08733103	9.426	SU	No	No	Yes	166253.1999	244335.800	5.61	Not Dividable
06801104	15.611	RA	No	No	No	435901.4589	244111.541	5.60	Not Dividable
08705351	26.862	SU	No	No	Yes	926103.0705	244005.930	5.60	Not Dividable
08901129	9.391	SU	No	No	Yes	165680.0281	243406.972	5.59	Not Dividable
09119110	24.081	SU	No	No	Yes	805713.0345	243250.966	5.58	Not Dividable
09115103	10.637	SU	No	No	Yes	220322.0169	243009.983	5.58	Not Dividable
09341116	6.769	RA	No	No	Yes	51866.6804	242973.320	5.58	Not Dividable
09326169	8.086	SU	No	No	Yes	109318.6144	242920.386	5.58	Not Dividable
09817120	8.359	RA	No	No	Yes	121208.3550	242899.645	5.58	Not Dividable
08814129	8.912	SU	No	No	Yes	146093.0301	242091.970	5.56	Not Dividable
09608112	8.048	SU	No	No	Yes	108759.6616	241790.338	5.55	Not Dividable
10305123	15.194	RA	No	No	No	421087.2886	240749.711	5.53	Not Dividable
08733101	10.711	SU	No	No	Yes	225991.4674	240582.533	5.52	Not Dividable
09119109	21.992	SU	No	No	Yes	717489.9926	240487.007	5.52	Not Dividable
08953111	6.759	SU	No	No	Yes	54079.8747	240350.125	5.52	Not Dividable
09116128	8.379	SU	No	No	Yes	124950.8725	240054.128	5.51	Not Dividable
09901115	10.147	A	No	No	No	202197.5670	239807.433	5.51	Not Dividable
08716114	10.250	RA	No	No	Yes	206955.9199	239542.080	5.50	Not Dividable
09108109	24.527	SU	No	No	Yes	829479.7122	238923.288	5.48	Not Dividable
08907158	15.502	SU	No	No	Yes	436779.2424	238469.758	5.47	Not Dividable
10543123	6.699	SU	No	No	No	53566.3270	238238.673	5.47	Not Dividable
08012109	5.456	SU	Yes	No	Yes	0.0000	237673.000	5.46	Not Dividable
08723128	6.277	RA,SU	No	No	Yes	36045.8501	237401.150	5.45	Not Dividable
09302308	6.915	RA	No	No	Yes	64546.6088	236651.391	5.43	Not Dividable
08814185	9.596	SU	No	No	Yes	181419.2903	236582.710	5.43	Not Dividable
10614134	23.655	RA	No	No	Yes	793933.2255	236457.775	5.43	Not Dividable
08903115	19.936	SU	No	No	Yes	632199.4148	236202.585	5.42	Not Dividable
10009111	15.998	A	No	No	No	461154.3903	235708.610	5.41	Not Dividable
08613101	5.410	RA	No	No	Yes	0.0000	235653.000	5.41	Not Dividable
07817125	12.859	SU	No	No	Yes	324800.0387	235336.961	5.40	Not Dividable
10301104	6.243	RA	No	No	No	36924.8644	235029.136	5.40	Not Dividable
10632113	7.947	RA	No	No	Yes	111879.4509	234302.549	5.38	Not Dividable
10301144	6.005	SU	No	No	No	27308.3855	234263.615	5.38	Not Dividable
08902112	9.116	SU	No	No	Yes	163446.9207	233636.079	5.36	Not Dividable
07809122	6.572	RA	No	No	Yes	53763.1112	232527.889	5.34	Not Dividable
08727102	9.745	SU	No	No	Yes	192287.2883	232224.712	5.33	Not Dividable
04006110	8.934	RA	No	No	No	157103.8261	232080.174	5.33	Not Dividable
09906107	7.284	RA	No	No	Yes-Portion	86327.5199	230953.480	5.30	Not Dividable
08607109	6.445	RA-O	No	No	Yes	49796.5894	230952.411	5.30	Not Dividable
08901145	8.026	SU	No	No	Yes	119083.6078	230518.392	5.29	Not Dividable
10003137	13.790	A	No	No	No	370167.7986	230512.201	5.29	Not Dividable
09104216	11.436	SU	No	No	Yes	267774.6756	230394.324	5.29	Not Dividable
09717106	6.375	SU	No	No	No	47752.4696	229952.530	5.28	Not Dividable
09316203	9.885	RA-O	No	No	Yes	200691.0176	229880.982	5.28	Not Dividable
09104212	11.389	SU	No	No	Yes	266590.6880	229517.312	5.27	Not Dividable
09101266	10.167	SU	No	No	Yes	213361.2459	229496.754	5.27	Not Dividable
04034107	14.395	RA	No	No	No	398605.1691	228445.831	5.24	Not Dividable
10121103	31.573	A	No	No	No	1147083.8796	228246.120	5.24	Not Dividable

Environmental Review Inital Study
ATTACHMENT 1 of 12 of 26
APPLICATION MA Amendment to
Co. Code Sec. 13.10.375
re: 1-4

09101214	10.994	SU	No	No	Yes	251703.7895	227177.211	5.22 Not Dividable
09326158	6.002	RA	No	No	Yes	34566.0058	226873.994	5.21 Not Dividable
06402103	5.334	RA	No	Yes-Portion	Yes	5622.7818	226740.218	5.21 Not Dividable
06302131	5.217	RA	Yes	No	Yes	528.1633	226730.837	5.21 Not Dividable
08616115	6.413	RA	No	No	Yes	53040.4953	226305.505	5.20 Not Dividable
10301132	7.624	RA	No	No	No	106357.1605	225731.840	5.18 Not Dividable
08902151	8.747	SU	No	No	Yes	155428.1846	225586.815	5.18 Not Dividable
08124108	22.053	SU	No	No	Yes	735180.9825	225426.018	5.18 Not Dividable
09726128	9.964	SU	No	No	Yes-Portion	209924.2329	224125.767	5.15 Not Dividable
06421187	5.726	SU	No	No	Yes	25389.2062	224047.794	5.14 Not Dividable
08814181	6.498	SU	No	No	Yes	59333.5593	223731.441	5.14 Not Dividable
08901148	10.050	SU	No	No	Yes	214176.7563	223605.244	5.13 Not Dividable
10302204	10.210	RA	No	No	No	221355.6036	223388.396	5.13 Not Dividable
09013114	9.142	SU	No	No	Yes	174988.3980	223215.602	5.12 Not Dividable
09302310	10.809	SU	No	No	Yes	247966.2119	222865.788	5.12 Not Dividable
09626112	7.474	RA	No	No	Yes-Portion	102736.2600	222824.740	5.12 Not Dividable
09114118	6.993	SU	No	No	Yes	81882.4832	222733.517	5.11 Not Dividable
10552102	7.690	SU	No	No	No	112352.2545	222607.746	5.11 Not Dividable
09402110	13.430	SU	No	No	Yes	362945.4645	222078.536	5.10 Not Dividable
08501140	5.592	SU	No	No	Yes	21612.0613	221994.939	5.10 Not Dividable
09343103	6.233	RA	No	No	Yes	49988.6333	221510.367	5.09 Not Dividable
09114138	11.693	SU	No	No	Yes	288283.5796	221075.420	5.08 Not Dividable
06702111	5.069	RA	No	No	Yes	152.3410	220650.659	5.07 Not Dividable
09518110	10.637	SU	No	No	Yes	243117.5865	220247.414	5.06 Not Dividable
06702104	5.055	RA	No	No	Yes	0.0000	220215.000	5.06 Not Dividable
04009153	5.265	RA	No	No	No	9473.1165	219868.884	5.05 Not Dividable
08501138	6.140	SU	No	No	Yes	47595.2723	219865.728	5.05 Not Dividable
07931118	7.391	RA	No	No	Yes	102176.7181	219761.282	5.05 Not Dividable
06440108	5.302	R-1-5	No	No	Yes	11587.5326	219383.467	5.04 Not Dividable
09901118	8.175	A	No	No	No	136903.4278	219201.572	5.03 Not Dividable
10503141	9.289	SU	No	No	No	185571.0969	219045.903	5.03 Not Dividable
08910160	10.530	SU	No	No	Yes	239942.4899	218725.510	5.02 Not Dividable
06436203	6.782	RA	No	No	Yes	76741.5788	218674.421	5.02 Not Dividable
06301125	5.259	RA-O	Yes	No	No	10596.8791	218478.121	5.02 Not Dividable
06420134	10.325	PR	No	No	Yes	231973.2762	217796.724	5.00 Not Dividable
10009107	5.587	A	No	No	No	25786.4414	217569.559	4.99 Not Dividable
10503152	16.294	RA,CA	No	No	No	492185.6729	217567.327	4.99 Not Dividable
06440101	5.166	SU	No	No	Yes	7634.7628	217404.237	4.99 Not Dividable
10415136	11.260	RA	No	No	No	273242.3989	217259.601	4.99 Not Dividable
10010101	8.359	A	No	No	No	146900.8175	217208.183	4.99 Not Dividable
10542111	24.841	SU	No	No	No	864925.1977	217156.802	4.99 Not Dividable
10021135	6.211	RA-O	No	No	No	53485.4385	217077.562	4.98 Not Dividable
09520154	7.948	A	No	No	No	129258.6279	216947.372	4.98 Not Dividable
04027148	8.853	RA	No	No	No	168759.7230	216872.277	4.98 Not Dividable
04009147	5.541	RA	No	No	No	24601.7661	216783.234	4.98 Not Dividable
08910169	10.661	SU	No	No	Yes	247623.2796	216756.720	4.98 Not Dividable
09327330	11.920	SU	No	No	Yes	303032.2662	216184.734	4.96 Not Dividable
04002222	6.666	RA	No	No	No	75042.1559	215317.844	4.94 Not Dividable
05711122	9.937	SU	Yes	Yes	No	217696.5856	215153.414	4.94 Not Dividable
10414105	5.617	RA	No	No	No	29950.8303	214708.170	4.93 Not Dividable
09904153	7.646	A	No	No	No	118865.5144	214189.486	4.92 Not Dividable
05612132	20.449	A	No	No	No	677052.1939	213693.806	4.91 Not Dividable
09714105	35.120	SU	No	No	Yes-Portion	1316260.0010	213559.999	4.90 Not Dividable
09326110	8.665	SU	No	No	Yes	164098.3677	213360.632	4.90 Not Dividable
09101273	5.004	SU	No	No	Yes	4820.1643	213133.836	4.89 Not Dividable
10301117	7.658	RA	No	No	No	120509.8322	213068.168	4.89 Not Dividable
08811142	6.700	SU	No	No	Yes	79000.0056	212835.994	4.89 Not Dividable
04029109	6.583	RA	No	No	No	74388.9988	212359.001	4.88 Not Dividable
10109104	7.369	RA	No	No	No	108673.3753	212312.625	4.87 Not Dividable
09116115	9.075	R-1-10AC	No	No	Yes	183228.6552	212097.345	4.87 Not Dividable

ATTACHMENT 4, 13 of 26
APPLICATION N/A Amendment
Environmental Review/Initial Study
Co. Code Sec. 13.10.37
re: TP

09115160	7.166	SU	No	No	Yes	100537.6423	211631.358	4.86 Not Dividable
08607122	10.073	SU	No	No	Yes	227317.2327	211472.767	4.85 Not Dividable
08820141	25.603	SU	No	No	Yes	903836.1843	211431.816	4.85 Not Dividable
09815113	7.719	SU	No	No	Yes	125039.0953	211199.905	4.85 Not Dividable
06302123	5.308	SU	Yes	No	Yes	20078.7100	211149.290	4.85 Not Dividable
08501137	7.019	SU	No	No	Yes	94844.3730	210922.627	4.84 Not Dividable
09326130	5.278	RA	No	No	Yes	18997.1456	210897.854	4.84 Not Dividable
09327331	9.449	SU	No	No	Yes	200943.8769	210647.123	4.84 Not Dividable
08608239	7.309	SU	No	No	Yes	108013.0479	210360.952	4.83 Not Dividable
09116131	31.530	A	No	No	Yes	1163230.6900	210222.310	4.83 Not Dividable
10542141	7.783	SU	No	No	No	129524.2339	209496.766	4.81 Not Dividable
08910170	10.938	SU	No	No	Yes	267047.3170	209425.683	4.81 Not Dividable
10551105	10.810	SU	No	No	No	261650.1836	209254.816	4.80 Not Dividable
04005210	11.341	RA	No	No	No	284810.8025	209203.198	4.80 Not Dividable
06421183	5.430	SU	No	No	Yes	27763.0520	208771.948	4.79 Not Dividable
08723116	6.658	SU	No	No	Yes	81316.2076	208699.792	4.79 Not Dividable
09119105	9.019	SU	No	No	Yes	184414.5667	208432.433	4.78 Not Dividable
09326111	8.782	SU	No	No	Yes	174708.4936	207834.506	4.77 Not Dividable
10104119	6.490	A	No	No	No	75018.9873	207666.013	4.77 Not Dividable
09115159	6.043	SU	No	No	Yes	55990.7913	207246.209	4.76 Not Dividable
08946132	6.231	RA	No	No	Yes	64293.9199	207129.080	4.76 Not Dividable
05630106	5.210	A	No	No	No	20052.4616	206909.538	4.75 Not Dividable
09717103	6.676	SU	No	No	No	84026.0098	206776.990	4.75 Not Dividable
09327304	9.716	RA	No	No	Yes	216640.7723	206583.228	4.74 Not Dividable
09708125	7.698	RA	No	No	Yes-Portion	128826.7918	206493.208	4.74 Not Dividable
08910168	10.937	SU	No	No	Yes	269998.1413	206403.859	4.74 Not Dividable
08951110	5.566	SU	No	No	Yes	36100.1409	206344.859	4.74 Not Dividable
08936112	7.205	SU	No	No	Yes	107612.9537	206222.046	4.73 Not Dividable
08909134	10.312	SU	No	No	Yes	243012.9786	206190.021	4.73 Not Dividable
07013119	11.887	A	No	No	Yes	312011.9095	205773.091	4.72 Not Dividable
07021119	5.561	RA	No	No	Yes	36845.9199	205407.080	4.72 Not Dividable
08617125	5.426	RA	No	No	Yes	31856.1119	204499.888	4.69 Not Dividable
08726145	19.543	SU	No	No	Yes	646836.8006	204465.199	4.69 Not Dividable
08814152	5.094	SU	No	No	Yes	17532.7270	204359.273	4.69 Not Dividable
08922203	6.114	SU	No	No	Yes	62116.0789	204203.921	4.69 Not Dividable
09101221	9.047	SU	No	No	Yes	190111.7381	203957.262	4.68 Not Dividable
07031135	8.017	R-1-20,A	No	No	Yes	145313.9525	203920.048	4.68 Not Dividable
08608223	10.102	SU	No	No	Yes	236843.7135	203213.287	4.67 Not Dividable
08908124	5.409	SU	No	No	Yes	32625.0657	203005.934	4.66 Not Dividable
09710144	6.754	RA	No	No	Yes	91233.5115	202980.489	4.66 Not Dividable
10543106	10.222	SU	No	No	No	242530.0465	202759.954	4.65 Not Dividable
08908108	7.248	SU	No	No	Yes	113047.3454	202658.655	4.65 Not Dividable
08946113	5.989	RA	No	No	Yes	58321.0393	202538.961	4.65 Not Dividable
10541121	17.339	SU	No	No	No	552748.1762	202519.824	4.65 Not Dividable
10632117	5.590	RA	No	No	Yes	41416.9178	202075.082	4.64 Not Dividable
10309130	12.059	RA	No	No	No	323256.0262	202037.974	4.64 Not Dividable
08607154	5.823	RA	No	No	Yes	52109.2428	201532.757	4.63 Not Dividable
09340108	22.802	RA	No	No	No	791998.9026	201276.097	4.62 Not Dividable
10022112	5.106	A	No	No	No	21310.9297	201123.070	4.62 Not Dividable
09711116	5.331	RA	No	No	Yes-Portion	31211.1501	201023.850	4.61 Not Dividable
09101258	11.435	SU	No	No	Yes	297241.1984	200868.802	4.61 Not Dividable
10632105	6.677	RA	No	No	Yes	90014.6682	200853.332	4.61 Not Dividable
08909159	10.958	SU	No	No	Yes	276504.4154	200839.585	4.61 Not Dividable
08938112	8.722	SU	No	No	Yes	179503.4256	200417.574	4.60 Not Dividable
08907156	10.353	SU	No	No	Yes	250831.6571	200148.343	4.59 Not Dividable
09726134	38.147	SU	No	No	Yes-Portion	1462018.3517	199686.648	4.58 Not Dividable
09101223	8.577	SU	No	No	Yes	174054.6594	199578.341	4.58 Not Dividable
08936103	5.758	RA	No	No	Yes	51245.2144	199552.786	4.58 Not Dividable
08614105	5.019	RA	No	No	Yes	19142.4864	199467.514	4.58 Not Dividable
09302313	9.985	SU	No	No	Yes	235519.3347	199428.665	4.58 Not Dividable

Environmental Review Inital Study
ATTACHMENT 4, 14 of 26
APPLICATION N/A Amendment to
Co, Code Sec. 13.10.375
re; TP

09116112	7.802	R-1-10AC,SU	No	No	Yes	140964.0340	198889.966	4.57	Not Dividable
09102145	8.567	RA	No	No	Yes	174614.2473	198580.753	4.56	Not Dividable
09328255	7.592	SU	No	No	Yes	132139.0148	198547.985	4.56	Not Dividable
09302316	10.278	SU	No	No	Yes	249514.2530	198175.747	4.55	Not Dividable
10543121	12.509	SU	No	No	No	346856.6168	198047.383	4.55	Not Dividable
09726126	9.560	SU	No	No	No	218825.5943	197617.406	4.54	Not Dividable
06801107	5.854	RA	No	No	No	57973.8322	197041.168	4.52	Not Dividable
10004136	6.834	A	No	No	No	100675.7399	196996.260	4.52	Not Dividable
09307102	5.250	RA	No	No	Yes	31707.4196	196993.580	4.52	Not Dividable
05612125	15.164	RA	No	No	No	463981.0940	196550.906	4.51	Not Dividable
09904141	5.247	A	No	No	No	32196.7274	196356.273	4.51	Not Dividable
09506234	6.479	SU	No	No	Yes	86089.3080	196128.692	4.50	Not Dividable
08902174	8.665	SU	No	No	Yes	181446.9344	196003.066	4.50	Not Dividable
08903156	14.612	SU	No	No	Yes	440573.4527	195917.547	4.50	Not Dividable
10708123	19.288	A-O	No	No	Yes	644510.2214	195678.779	4.49	Not Dividable
09645102	10.298	A-O	No	No	Yes-Portion	253004.5863	195596.414	4.49	Not Dividable
10104120	6.405	A	No	No	No	83778.0897	195218.910	4.48	Not Dividable
09817116	5.109	RA	No	No	Yes	27613.0261	194926.974	4.47	Not Dividable
08941122	19.188	SU	No	No	Yes	640973.7831	194870.217	4.47	Not Dividable
10004134	8.357	A	No	No	No	169384.0652	194642.935	4.47	Not Dividable
09805102	5.398	RA-O	No	No	No	40591.5344	194566.466	4.47	Not Dividable
08705321	19.151	SU	No	No	Yes	639948.9396	194262.060	4.46	Not Dividable
09003113	10.591	SU	No	No	Yes	267212.7754	194114.225	4.46	Not Dividable
09712107	5.499	SU	No	No	Yes	45466.0326	194071.967	4.46	Not Dividable
10410144	5.060	RA	No	No	No	26560.1851	193864.815	4.45	Not Dividable
08909165	10.485	SU	No	No	Yes	263249.2630	193489.737	4.44	Not Dividable
09716106	5.179	SU	No	No	Yes-Portion	33280.6065	192315.394	4.41	Not Dividable
08814184	9.257	SU	No	No	Yes	211139.9858	192079.014	4.41	Not Dividable
08811137	10.380	SU	No	No	Yes	261114.4904	191018.510	4.39	Not Dividable
08521203	5.208	RA	No	No	Yes	35882.5037	190979.496	4.38	Not Dividable
09326132	6.800	RA	No	No	Yes	105400.9567	190813.043	4.38	Not Dividable
08932206	6.682	RA	No	No	Yes	100363.2426	190719.757	4.38	Not Dividable
10615138	12.904	SU	No	No	Yes	371800.0303	190294.970	4.37	Not Dividable
10631106	5.266	RA	No	No	Yes	39709.5415	189664.459	4.35	Not Dividable
09101274	11.241	SU	No	No	Yes	300416.7882	189251.212	4.34	Not Dividable
10005134	13.919	A	No	No	No	417641.7105	188663.290	4.33	Not Dividable
08901135	12.507	SU	No	No	Yes	356761.5108	188042.489	4.32	Not Dividable
10512137	10.404	A	No	No	No	265319.8918	187895.108	4.31	Not Dividable
10539127	6.245	SU	No	No	No	84482.8084	187548.192	4.31	Not Dividable
08945101	13.376	SU	No	No	Yes	395526.1260	187140.874	4.30	Not Dividable
10755109	5.078	SU	No	No	Yes	34184.1998	187010.800	4.29	Not Dividable
09114155	8.235	SU	No	No	Yes	171979.0908	186753.909	4.29	Not Dividable
09704121	5.434	SU	No	No	Yes	50157.7373	186557.263	4.28	Not Dividable
07013110	5.167	A	No	No	Yes-Portion	38616.0873	186470.913	4.28	Not Dividable
10003119	10.198	A	No	No	No	257900.9041	186342.096	4.28	Not Dividable
07904102	10.334	SU	No	No	Yes	265153.0797	185005.920	4.25	Not Dividable
09106130	8.309	SU	No	No	Yes	177064.1601	184884.840	4.24	Not Dividable
10103121	5.736	A	No	No	No	65757.2237	184112.776	4.23	Not Dividable
10305122	6.353	RA	No	No	No	92882.5085	183842.492	4.22	Not Dividable
10103151	5.221	A	No	No	No	44070.9374	183336.063	4.21	Not Dividable
08315103	7.988	SU,RA	No	No	Yes	164894.7198	183044.280	4.20	Not Dividable
10635111	5.667	SU	No	No	Yes	64104.2074	182739.793	4.20	Not Dividable
09312215	12.020	SU	No	No	Yes	341275.5609	182313.439	4.19	Not Dividable
04017303	5.133	R-1-3AC	No	No	No	41617.8962	181981.104	4.18	Not Dividable
09101204	8.980	SU	No	No	Yes	209197.6830	181975.317	4.18	Not Dividable
08909161	11.174	SU	No	No	Yes	304799.9936	181924.006	4.18	Not Dividable
10749118	5.837	RA	No	No	No	72651.2604	181622.740	4.17	Not Dividable
06301109	10.966	SU	Yes	No	Yes	296071.2505	181610.750	4.17	Not Dividable
09635147	7.616	SU	No	No	Yes	150171.3309	181593.669	4.17	Not Dividable
08728107	9.068	SU	No	No	Yes	214080.4537	180912.546	4.15	Not Dividable

Environmental Review Initial Study
ATTACHMENT 4, 15 of 26
APPLICATION N/A Amendment to Co. Code Sec. 13.10.37 re: TP

09106116	5.368	RA	No	No	Yes	53258.2618	180563.738	4.15 Not Dividable
08705304	7.625	SU	No	No	Yes	151695.4883	180448.512	4.14 Not Dividable
09509126	5.660	SU	No	No	Yes	66167.7250	180360.275	4.14 Not Dividable
09326159	6.050	RA	No	No	Yes	83339.7367	180215.263	4.14 Not Dividable
09101277	7.322	SU	No	No	Yes	138764.1532	180188.847	4.14 Not Dividable
08727104	10.137	SU	No	No	Yes	261542.9324	180041.068	4.13 Not Dividable
09327215	6.014	SU	No	No	Yes	81923.2431	180039.757	4.13 Not Dividable
08902160	9.635	SU	No	No	Yes	239678.3115	180024.689	4.13 Not Dividable
10636111	6.708	RA	No	No	Yes	112705.9991	179493.001	4.12 Not Dividable
08902111	10.124	SU	No	No	Yes	262362.7755	178628.225	4.10 Not Dividable
10109107	7.209	RA	No	No	No	136046.9430	177978.057	4.09 Not Dividable
10009131	6.754	A	No	No	No	116283.1067	177926.893	4.08 Not Dividable
06801106	9.347	RA	No	No	No	229529.8240	177634.176	4.08 Not Dividable
04047101	7.577	R-1-3AC,R-1-15	No	No	No	152589.5209	177475.479	4.07 Not Dividable
08638107	7.878	SU	No	No	Yes	165682.4095	177467.591	4.07 Not Dividable
10101106	7.142	RA-O	No	No	No	134132.7315	176980.269	4.06 Not Dividable
08726109	9.429	SU	No	No	Yes	233809.2677	176926.732	4.06 Not Dividable
10612123	6.297	RA	No	No	Yes	97383.6700	176894.330	4.06 Not Dividable
10026106	6.667	A	No	No	No	113635.1750	176780.825	4.06 Not Dividable
10020101	5.535	A	No	No	No	64682.8915	176430.109	4.05 Not Dividable
08938115	7.002	SU	No	No	Yes	129028.1475	175992.853	4.04 Not Dividable
08910165	10.504	SU	No	No	Yes	282063.8461	175487.154	4.03 Not Dividable
08917102	10.014	SU	No	No	Yes	261217.2310	174984.769	4.02 Not Dividable
09336109	6.150	SU	No	No	Yes	94033.6761	173848.324	3.99 Not Dividable
09708125	5.053	SU	No	No	Yes	46889.2019	173209.798	3.98 Not Dividable
09114125	8.436	SU	No	No	Yes	194290.6823	173182.318	3.98 Not Dividable
08820109	11.348	SU	No	No	Yes	321202.9278	173125.072	3.97 Not Dividable
08522213	14.756	SU	No	No	Yes	469965.0929	172791.907	3.97 Not Dividable
10301151	5.284	RA	No	No	No	57408.9733	172754.027	3.97 Not Dividable
09718102	8.312	SU	No	No	Yes-Portion	189307.0220	172746.978	3.97 Not Dividable
08608224	5.916	SU	No	No	Yes	85037.1239	172649.876	3.96 Not Dividable
08820143	29.303	SU	No	No	Yes	1103988.6576	172441.342	3.96 Not Dividable
09114156	6.926	SU	No	No	Yes	129607.1366	172105.863	3.95 Not Dividable
09013113	6.859	SU	No	No	Yes	126776.5816	172018.418	3.95 Not Dividable
04034105	11.723	RA	No	No	No	338973.2739	171688.726	3.94 Not Dividable
10110121	6.040	A	No	No	No	91450.0129	171665.987	3.94 Not Dividable
08936102	5.214	RA	No	No	Yes	55804.4135	171319.587	3.93 Not Dividable
08932110	5.085	RA	No	No	Yes	50315.3571	171187.643	3.93 Not Dividable
09635135	10.661	SU	No	No	Yes	293263.6475	171139.353	3.93 Not Dividable
09314135	11.663	SU	No	No	Yes	337525.0458	170533.954	3.91 Not Dividable
09302304	6.602	RA	No	No	Yes	117073.1999	170492.800	3.91 Not Dividable
07313101	11.129	RA	No	No	Yes	314444.4324	170348.568	3.91 Not Dividable
09115129	5.548	SU	No	No	Yes	71701.2226	169971.777	3.90 Not Dividable
09328285	7.020	SU	No	No	Yes	135915.4104	169887.590	3.90 Not Dividable
09119111	7.224	SU	No	No	Yes	144842.6304	169823.370	3.90 Not Dividable
09119104	10.966	SU	No	No	Yes	308312.2001	169353.800	3.89 Not Dividable
09311210	5.500	SU	No	No	Yes	70326.5405	169270.460	3.89 Not Dividable
08902173	10.081	SU	No	No	Yes	269947.2258	169172.774	3.88 Not Dividable
09408124	6.321	A	No	No	Yes	106432.1373	168902.863	3.88 Not Dividable
09324111	5.979	RA	No	No	Yes	91672.1174	168789.883	3.87 Not Dividable
08727105	9.550	SU	No	No	Yes	247449.7407	168569.259	3.87 Not Dividable
09119106	11.052	SU	No	No	Yes	312943.7537	168495.246	3.87 Not Dividable
08904139	29.665	SU	No	No	Yes	1123900.8614	168321.139	3.86 Not Dividable
10635115	5.967	RA	No	No	Yes	91701.2294	168221.771	3.86 Not Dividable
05724101	10.878	A	Yes	Yes	No	305609.4526	168219.547	3.86 Not Dividable
08909141	10.467	SU	No	No	Yes	287830.0714	168128.929	3.86 Not Dividable
10607112	6.078	RA	No	No	Yes	96723.8736	168029.126	3.86 Not Dividable
10301149	5.655	RA	No	No	No	78541.5017	167771.498	3.85 Not Dividable
09327211	5.493	SU	No	No	Yes	71762.3566	167522.643	3.85 Not Dividable
10755105	8.431	SU	No	No	Yes	199859.7828	167415.217	3.84 Not Dividable

Environmental Review Inital Study
ATTACHMENT 4 16 of 26
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

06435118	5.945	RA	No	No	Yes	91641.7236	167340.276	3.84 Not Dividable
09307128	9.150	SU	No	No	Yes	231485.8397	167085.160	3.84 Not Dividable
09645104	10.336	SU	No	No	Yes-Portion	284098.6190	166135.381	3.81 Not Dividable
08501147	5.111	SU	No	No	Yes	56694.9243	165932.076	3.81 Not Dividable
09408121	9.831	A	No	No	Yes	262627.2186	165602.781	3.80 Not Dividable
10542112	8.403	SU	No	No	No	200705.5827	165329.417	3.80 Not Dividable
09904109	5.433	A	No	No	No	71585.4466	165058.553	3.79 Not Dividable
10106108	5.243	A	No	No	No	63492.7453	164878.255	3.79 Not Dividable
09326131	5.002	RA	No	No	Yes	53228.9744	164669.026	3.78 Not Dividable
09305122	5.941	SU	No	No	Yes	94753.5461	164023.454	3.77 Not Dividable
09307103	6.084	SU	No	No	Yes	101414.2888	163593.711	3.76 Not Dividable
10301153	5.153	SU	No	No	No	60898.8358	163562.164	3.75 Not Dividable
09610108	9.649	SU	No	No	Yes	256880.4788	163448.521	3.75 Not Dividable
10631105	6.631	RA	No	No	Yes	125478.2995	163350.701	3.75 Not Dividable
09115105	8.037	SU	No	No	Yes	186928.3234	163164.677	3.75 Not Dividable
09119112	7.363	SU	No	No	Yes	157640.0240	163076.976	3.74 Not Dividable
09101222	10.822	SU	No	No	Yes	308705.0379	162687.962	3.73 Not Dividable
08529127	10.319	RA,SU	No	No	Yes	287271.6473	162231.353	3.72 Not Dividable
09407124	8.321	A	No	No	Yes	200424.7296	162052.270	3.72 Not Dividable
10620142	5.261	SU	No	No	Yes	67672.4014	161499.599	3.71 Not Dividable
08901165	10.393	SU	No	No	Yes	291459.3446	161250.655	3.70 Not Dividable
10647107	9.300	SU	No	No	Yes	244568.0604	160552.940	3.69 Not Dividable
09116119	16.180	R-1-20AC	No	No	Yes	544303.3846	160512.615	3.68 Not Dividable
08949102	5.578	SU	No	No	Yes	83345.7613	159652.239	3.67 Not Dividable
05630205	21.547	A	No	No	No	778999.6353	159578.365	3.66 Not Dividable
09115158	9.867	SU	No	No	Yes	270251.5472	159545.453	3.66 Not Dividable
08923111	5.747	RA	No	No	Yes	90848.7190	159493.281	3.66 Not Dividable
08932212	8.250	RA	No	No	Yes	200192.7531	159168.247	3.65 Not Dividable
08902166	7.334	SU	No	No	Yes	160362.3590	159114.641	3.65 Not Dividable
04027161	6.760	RA	No	No	No	135350.2475	159113.753	3.65 Not Dividable
10014121	5.304	A	No	No	No	72035.6386	159004.361	3.65 Not Dividable
10617110	5.652	SU	No	No	Yes	87205.1729	158976.827	3.65 Not Dividable
09115124	5.587	SU	No	No	Yes	84583.9284	158787.072	3.65 Not Dividable
08902153	9.176	SU	No	No	Yes	241019.1185	158696.882	3.64 Not Dividable
08901130	9.567	SU	No	No	Yes	258196.1226	158525.877	3.64 Not Dividable
07831103	9.519	PR	No	No	Yes	256795.5212	157847.479	3.62 Not Dividable
10552104	10.671	SU	No	No	No	307055.4538	157778.546	3.62 Not Dividable
10005149	5.706	A	No	No	No	91170.4482	157398.552	3.61 Not Dividable
08908123	5.199	SU	No	No	Yes	69657.7022	156796.298	3.60 Not Dividable
10710109	8.193	SU,RA	No	No	Yes-Portion	200244.5445	156643.456	3.60 Not Dividable
10003136	13.691	A	No	No	No	439782.8082	156600.192	3.60 Not Dividable
10615140	18.826	SU	No	No	Yes	663601.8933	156467.107	3.59 Not Dividable
05720107	5.325	A	Yes	Yes	No	75545.7341	156418.266	3.59 Not Dividable
05612133	7.875	A	No	No	No	187484.3354	155536.665	3.57 Not Dividable
08724104	5.383	SU	No	No	Yes	79800.5581	154665.442	3.55 Not Dividable
08834103	9.893	SU	No	No	Yes	276467.1577	154461.842	3.55 Not Dividable
09339404	8.171	R-1-40AC	No	No	Yes	202391.8937	153540.106	3.52 Not Dividable
10307145	5.145	SU	No	No	No	70709.4734	153424.527	3.52 Not Dividable
08811117	9.938	SU	No	No	Yes	279559.1806	153348.819	3.52 Not Dividable
09608114	7.969	SU	No	No	Yes	193926.8542	153223.146	3.52 Not Dividable
09101224	8.583	SU	No	No	Yes	220811.5701	153055.430	3.51 Not Dividable
09116129	6.462	SU	No	No	Yes	128601.0583	152873.942	3.51 Not Dividable
08732106	7.091	SU	No	No	Yes	156562.9963	152337.004	3.50 Not Dividable
08724111	7.310	SU	No	No	Yes	166492.1313	151931.869	3.49 Not Dividable
08703103	39.890	PR	No	No	Yes	1585831.0139	151764.986	3.48 Not Dividable
10410145	5.427	RA	No	No	No	84998.7296	151405.270	3.48 Not Dividable
08902168	10.181	SU	No	No	Yes	292168.0865	151301.914	3.47 Not Dividable
10543108	9.029	SU	No	No	No	242366.5914	150927.409	3.46 Not Dividable
10017113	7.501	A	No	No	No	176102.2494	150632.751	3.46 Not Dividable
08224173	9.745	SU	No	No	Yes	273976.7213	150521.279	3.46 Not Dividable

Environmental Review Initial Study
ATTACHMENT 4 / Ref 26
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.32

08934105	6.160	RA	No	No	Yes	118172.1207	150159.879	3.45 Not Dividable
07817115	19.501	SU	No	No	Yes	700211.7923	149271.208	3.43 Not Dividable
09116113	6.702	SU	No	No	Yes	142954.5693	148968.431	3.42 Not Dividable
10305113	5.160	RA	No	No	No	76299.5704	148470.430	3.41 Not Dividable
10307134	5.343	SU	No	No	No	84311.9322	148442.068	3.41 Not Dividable
09711122	5.051	SU	No	No	No	71673.2555	148368.745	3.41 Not Dividable
09645101	9.556	RA-O	No	No	Yes-Portion	268201.7787	148052.221	3.40 Not Dividable
08814167	9.792	SU	No	No	Yes	279052.4580	147494.542	3.39 Not Dividable
09708126	8.531	RA	No	No	Yes-Portion	224268.1354	147360.865	3.38 Not Dividable
07011126	6.208	RA	No	No	Yes	123158.4771	147273.523	3.38 Not Dividable
07913101	18.737	SU,R-1-15	No	Yes-Portion	Yes	669381.6742	146798.326	3.37 Not Dividable
10505102	7.232	SU	No	No	No	168276.0041	146729.996	3.37 Not Dividable
09101259	5.024	SU	No	No	Yes	72275.9612	146548.039	3.36 Not Dividable
09114170	7.768	SU	No	No	Yes	192214.8934	146172.107	3.36 Not Dividable
10542113	7.650	SU	No	No	No	187629.6985	145608.302	3.34 Not Dividable
08948101	8.578	SU	No	No	Yes	228402.4642	145235.536	3.33 Not Dividable
05724111	6.238	A	Yes	Yes	No	126829.1975	144890.803	3.33 Not Dividable
09305151	7.166	SU	No	No	Yes	167331.7548	144810.245	3.32 Not Dividable
10302207	12.420	RA	No	No	No	396614.6255	144415.375	3.32 Not Dividable
04005136	6.040	A	No	No	No	118885.6089	144218.391	3.31 Not Dividable
08727101	10.860	SU	No	No	Yes	329063.5886	143978.411	3.31 Not Dividable
04011112	5.201	RA	No	No	No	82575.3340	143977.666	3.31 Not Dividable
08610103	8.953	RA	No	No	Yes	246410.4791	143581.521	3.30 Not Dividable
08910171	10.641	SU	No	No	Yes	320183.1911	143332.809	3.29 Not Dividable
08705403	23.122	SU	No	No	Yes	864435.8950	142743.105	3.28 Not Dividable
04002203	6.673	RA	No	No	No	148283.3006	142382.699	3.27 Not Dividable
08728110	9.935	RA	No	No	Yes	290386.2914	142366.709	3.27 Not Dividable
08607140	5.089	RA	No	No	Yes	79546.9419	142148.058	3.26 Not Dividable
09527105	5.373	SU	No	No	Yes	92166.9291	141892.071	3.26 Not Dividable
08529101	5.360	SU	No	No	Yes	92800.9184	140695.082	3.23 Not Dividable
08910167	11.090	SU	No	No	Yes	342994.7546	140103.245	3.22 Not Dividable
05612126	5.748	A	No	No	No	110299.9312	140088.069	3.22 Not Dividable
10110128	7.289	A	No	No	No	177452.9625	140046.038	3.22 Not Dividable
09326148	5.448	SU	No	No	Yes	97385.6997	139928.300	3.21 Not Dividable
06435127	5.995	RA	No	No	Yes	121655.1052	139495.895	3.20 Not Dividable
04002209	6.233	RA	No	No	No	132216.4786	139283.521	3.20 Not Dividable
10102229	5.572	A	No	No	No	103830.3847	138879.615	3.19 Not Dividable
07812123	10.053	SU	No	No	Yes	299235.4393	138665.561	3.18 Not Dividable
08907173	5.640	SU	No	No	Yes	107060.5111	138599.489	3.18 Not Dividable
08946141	6.140	RA	No	No	Yes	129313.3069	138143.693	3.17 Not Dividable
10705205	7.050	RA	No	No	Yes	169216.6033	137892.397	3.17 Not Dividable
10403123	7.506	RA	No	No	No	189393.0036	137569.996	3.16 Not Dividable
05720109	5.779	A	Yes	Yes	No	114337.6182	137410.382	3.15 Not Dividable
08909148	10.332	SU	No	No	Yes	314055.0521	136027.948	3.12 Not Dividable
10005130	5.355	A	No	No	No	97802.8374	135447.163	3.11 Not Dividable
09706132	5.660	SU	No	No	Yes	111404.2027	135161.797	3.10 Not Dividable
04036112	6.590	RA	No	No	No	152014.2633	135061.737	3.10 Not Dividable
10417101	5.614	SU	No	No	No	109730.4260	134795.574	3.09 Not Dividable
09520169	21.451	SU	No	No	No	799856.4534	134549.547	3.09 Not Dividable
10647108	7.834	SU	No	No	Yes	207037.8167	134206.183	3.08 Not Dividable
10541122	14.047	SU	No	No	No	478409.8514	133491.149	3.06 Not Dividable
09101254	10.650	RA	No	No	Yes	330496.5447	133409.455	3.06 Not Dividable
09324101	6.371	RA	No	No	Yes	144745.5889	132783.411	3.05 Not Dividable
04036109	5.629	RA	No	No	No	112436.3485	132751.652	3.05 Not Dividable
09509138	6.438	SU	No	No	Yes	148196.7113	132259.289	3.04 Not Dividable
07021120	6.128	RA	No	No	Yes	134736.0006	132196.999	3.03 Not Dividable
05720104	5.251	A	Yes	Yes	No	97761.1966	130975.803	3.01 Not Dividable
08814130	8.319	SU	No	No	Yes	232083.6895	130286.311	2.99 Not Dividable
09101237	5.488	SU	No	No	Yes	108958.5701	130101.430	2.99 Not Dividable
10631101	5.215	RA	No	No	Yes	98579.2219	128589.778	2.95 Not Dividable

Environmental Review Initial Study
ATTACHMENT 4, 18 of 26
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

09317158	5.941	RA	No	No	Yes	131008.0273	127786.973	2.93 Not Dividable
08902144	10.228	SU	No	No	Yes	317938.9259	127592.074	2.93 Not Dividable
09611106	28.846	SU	No	No	Yes	1129365.6650	127185.335	2.92 Not Dividable
09115135	9.680	SU	No	No	Yes	294510.6698	127135.330	2.92 Not Dividable
10533106	5.819	RA	No	No	No	126619.8066	126876.193	2.91 Not Dividable
09101252	8.413	RA	No	No	Yes	240123.0842	126334.916	2.90 Not Dividable
10313121	6.642	RA	No	No	No	163702.5740	125632.426	2.88 Not Dividable
08724105	20.170	SU	No	No	Yes	753262.7147	125325.285	2.88 Not Dividable
08902145	10.074	SU	No	No	Yes	313685.2466	125127.753	2.87 Not Dividable
08726148	5.617	SU	No	No	Yes	121209.5284	123488.472	2.83 Not Dividable
09901125	5.884	A	No	No	No	133371.1938	122925.806	2.82 Not Dividable
08907171	5.294	SU	No	No	Yes	107935.4793	122668.521	2.82 Not Dividable
08902157	5.282	SU	No	No	Yes	107670.5186	122428.481	2.81 Not Dividable
08726152	6.267	SU	No	No	Yes	150885.0701	122125.930	2.80 Not Dividable
08726102	12.058	SU	No	No	Yes	403429.2713	121822.729	2.80 Not Dividable
10543122	10.785	SU	No	No	No	348212.6948	121573.305	2.79 Not Dividable
09342119	38.666	SU	No	No	Yes	1562776.5497	121530.450	2.79 Not Dividable
06436106	7.099	R-1-1AC,RA	No	No	Yes	187803.5435	121416.457	2.79 Not Dividable
08940130	5.828	RA	No	No	Yes	132846.8646	121040.135	2.78 Not Dividable
07904117	7.782	SU	No	No	Yes	218013.0530	120964.947	2.78 Not Dividable
09101213	10.971	SU	No	No	Yes	356976.4887	120923.511	2.78 Not Dividable
08811139	5.694	SU	No	No	Yes	127571.0238	120479.976	2.77 Not Dividable
08705309	10.388	SU	No	No	Yes	332208.3306	120289.669	2.76 Not Dividable
07813219	9.950	RA	No	No	Yes	314085.8338	119352.166	2.74 Not Dividable
09326175	9.851	RA,SU	No	No	Yes	309774.3402	119327.660	2.74 Not Dividable
10201108	5.326	RA	No	No	No	112763.0114	119228.989	2.74 Not Dividable
09329125	5.213	SU	No	No	Yes	108157.0181	118915.982	2.73 Not Dividable
09101279	6.634	SU	No	No	Yes	170517.7607	118474.239	2.72 Not Dividable
09101212	13.899	SU	No	No	Yes	487765.3907	117671.609	2.70 Not Dividable
07208128	5.891	SU	No	No	Yes	139474.2062	117150.794	2.69 Not Dividable
09721107	10.015	SU	No	No	Yes	319279.3216	116989.678	2.69 Not Dividable
09342109	5.521	RA	No	No	Yes	123944.8778	116543.122	2.68 Not Dividable
09328254	5.941	SU	No	No	Yes	142427.7653	116359.235	2.67 Not Dividable
08529123	6.146	RA	No	No	Yes	151381.8357	116331.164	2.67 Not Dividable
08716153	5.922	RA	No	No	Yes	142061.7456	115885.254	2.66 Not Dividable
10302210	7.547	RA	No	No	No	213238.7784	115492.222	2.65 Not Dividable
10539136	7.058	SU	No	No	No	192248.6097	115201.390	2.64 Not Dividable
07238101	6.792	RA,R-1-1AC	No	No	Yes	180677.1981	115200.802	2.64 Not Dividable
09114162	5.746	SU	No	No	Yes	135095.0357	115190.964	2.64 Not Dividable
10009117	10.135	A	No	No	No	326485.6320	114979.368	2.64 Not Dividable
08728109	9.518	RA	No	No	Yes	299748.6509	114867.349	2.64 Not Dividable
08949107	5.889	SU	No	No	Yes	141934.5995	114607.401	2.63 Not Dividable
10533102	5.104	RA	No	No	No	108007.5969	114302.403	2.62 Not Dividable
08902113	9.699	SU	No	No	Yes	308408.0878	114060.912	2.62 Not Dividable
09101265	5.178	SU	No	No	Yes	111573.4441	113966.556	2.62 Not Dividable
09114151	6.011	SU	No	No	Yes	149206.3465	112640.654	2.59 Not Dividable
09106128	5.653	SU	No	No	Yes	133915.4844	112343.516	2.58 Not Dividable
08726149	9.607	SU	No	No	Yes	306276.8616	112221.138	2.58 Not Dividable
08907159	5.048	SU	No	No	Yes	108565.8758	111324.124	2.56 Not Dividable
09718105	10.949	SU	No	No	No	365629.6882	111304.312	2.56 Not Dividable
08901132	10.437	SU	No	No	Yes	343543.1609	111092.839	2.55 Not Dividable
10003114	5.560	A	No	No	No	131909.2156	110268.784	2.53 Not Dividable
09102123	8.564	RA	No	No	Yes	263059.6821	110006.318	2.53 Not Dividable
08902114	9.311	SU	No	No	Yes	295986.7297	109580.270	2.52 Not Dividable
09101218	9.355	SU	No	No	Yes	297926.0754	109563.925	2.52 Not Dividable
05724112	5.557	A	Yes	Yes	No	133500.8836	108560.116	2.49 Not Dividable
09101234	5.306	SU	No	No	Yes	122988.7750	108133.225	2.48 Not Dividable
08941121	6.288	SU	No	No	Yes	165978.6202	107936.380	2.48 Not Dividable
08316119	6.210	RA,R-1-15	No	No	Yes	163422.9026	107075.097	2.46 Not Dividable
09119108	9.475	SU	No	No	Yes	305678.4013	107067.599	2.46 Not Dividable

Environmental Review Initial Study
ATTACHMENT 4, 19 of 26
APPLICATION #/A Amendment
Co. Code Sec. 13.10372

08726103	17.849	SU	No	No	Yes	670737.2952	106748.705	2.45	Not Dividable
09119103	8.991	SU	No	No	Yes	284996.8130	106657.187	2.45	Not Dividable
09723117	5.628	SU	No	No	No	138905.9485	106229.052	2.44	Not Dividable
10430119	7.650	RA,PR	No	No	No	227165.6880	106087.312	2.44	Not Dividable
08814128	8.563	SU	No	No	Yes	267173.5068	105810.493	2.43	Not Dividable
09104219	10.098	SU	No	No	Yes	334634.5092	105223.491	2.42	Not Dividable
08522214	7.924	SU	No	No	Yes	240685.8671	104477.133	2.40	Not Dividable
10417116	14.658	RA	No	No	No	534438.3734	104074.627	2.39	Not Dividable
09327209	5.144	RA	No	No	Yes	120516.4577	103538.542	2.38	Not Dividable
08510118	7.115	SU	No	No	Yes	206469.5061	103440.494	2.37	Not Dividable
08902155	7.207	SU	No	No	Yes	210481.3685	103434.632	2.37	Not Dividable
10009102	5.968	A	No	No	No	156838.2436	103109.756	2.37	Not Dividable
06420114	15.237	SU	No	No	Yes	560695.1288	103034.871	2.37	Not Dividable
08717105	18.821	SU	No	No	Yes	717570.9153	102273.085	2.35	Not Dividable
08911132	5.121	SU	No	No	Yes	120869.3143	102210.686	2.35	Not Dividable
08910166	11.326	SU	No	No	Yes	391232.4958	102136.504	2.34	Not Dividable
10647102	15.452	SU	No	No	Yes	571150.0061	101923.994	2.34	Not Dividable
09023105	5.316	RA	No	No	Yes	130443.2875	101118.713	2.32	Not Dividable
08616119	9.881	SU	No	No	Yes	329580.8891	100835.111	2.31	Not Dividable
04002208	7.846	RA	No	No	No	241057.4195	100705.581	2.31	Not Dividable
08814131	8.431	SU	No	No	Yes	266566.8017	100667.198	2.31	Not Dividable
10005120	5.670	A	No	No	No	146849.5688	100154.431	2.30	Not Dividable
09709102	25.134	RA	No	No	Yes	995216.0358	99609.964	2.29	Not Dividable
09028102	11.065	SU	No	No	Yes	382510.6281	99476.372	2.28	Not Dividable
10705202	6.883	RA	No	No	Yes	200535.3621	99293.638	2.28	Not Dividable
10630122	15.442	SU	No	No	Yes	573443.5780	99196.422	2.28	Not Dividable
08902146	10.866	SU	No	No	Yes	374676.9267	98657.073	2.26	Not Dividable
09527102	5.286	SU	No	No	Yes	131886.6771	98354.323	2.26	Not Dividable
09527103	5.251	SU	No	No	Yes	130931.2504	97798.750	2.25	Not Dividable
10541103	17.508	SU	No	No	No	665030.4415	97614.559	2.24	Not Dividable
09329142	9.529	SU	No	No	Yes	318638.1893	96429.811	2.21	Not Dividable
08811145	5.092	SU	No	No	Yes	125847.9787	95963.021	2.20	Not Dividable
08936116	6.315	SU	No	No	Yes	179763.6816	95321.318	2.19	Not Dividable
09723152	14.291	RA	No	No	No	527452.7909	95043.209	2.18	Not Dividable
08301101	6.786	RA	No	No	Yes	200714.2637	94866.736	2.18	Not Dividable
05612127	9.172	A	No	No	No	304980.7731	94540.227	2.17	Not Dividable
09710140	5.590	RA	No	No	Yes	149190.4141	94320.586	2.17	Not Dividable
09723142	9.645	RA	No	No	No	326303.7416	93848.258	2.15	Not Dividable
10006153	5.846	A	No	No	No	160908.2819	93760.718	2.15	Not Dividable
07921132	5.408	RA	No	Yes-Portion	Yes	141921.7707	93669.229	2.15	Not Dividable
07921101	9.909	SU,RA	No	Yes-Portion	Yes	337996.9648	93653.035	2.15	Not Dividable
09104218	10.261	SU	No	No	Yes	353953.3389	93019.661	2.14	Not Dividable
07023127	5.945	RA	No	No	Yes	166381.0614	92566.939	2.13	Not Dividable
09326177	9.169	RA,SU	No	No	Yes	307543.5591	91856.441	2.11	Not Dividable
10106205	5.006	A	No	No	No	126381.4979	91694.502	2.11	Not Dividable
08941115	6.179	SU	No	No	Yes	177456.9431	91690.057	2.10	Not Dividable
09104213	10.334	SU	No	No	Yes	359076.2887	91093.711	2.09	Not Dividable
07202203	19.904	SU	No	No	Yes	776427.6784	90599.322	2.08	Not Dividable
05724103	7.200	A	Yes	Yes	No	223214.4270	90425.573	2.08	Not Dividable
09301139	6.344	SU	No	No	Yes	186343.0678	89997.932	2.07	Not Dividable
10540106	16.226	RA	No	No	No	616815.6383	89969.362	2.07	Not Dividable
07828101	8.764	SU	No	No	Yes	291849.5779	89913.422	2.06	Not Dividable
08724112	7.656	SU	No	No	Yes	243763.3488	89727.651	2.06	Not Dividable
09114173	6.032	SU	No	No	Yes	173283.2179	89463.782	2.05	Not Dividable
09101240	5.397	SU	No	No	Yes	145860.8414	89229.159	2.05	Not Dividable
09717109	5.056	SU	No	No	No	131178.6752	89075.325	2.04	Not Dividable
08724110	6.885	SU	No	No	Yes	210913.3899	88987.610	2.04	Not Dividable
10539137	5.753	SU	No	No	No	161731.4164	88870.584	2.04	Not Dividable
09620129	22.230	SU	No	No	Yes	880070.4416	88279.558	2.03	Not Dividable
09314107	6.534	SU	No	No	Yes	197085.8649	87545.135	2.01	Not Dividable

Environmental Review Initial Study
ATTACHMENT 4 20 of 26
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

08124110	7.091	SU,RA	No	No	Yes	221607.1265	87288.874	2.00 Not Dividable
08901164	*10.068*	*SU*	*No*	*No*	*Yes*	*352716.5853*	*86706.415*	*1.99 Not Dividable*
09506238	18.107	SU	No	No	Yes	702688.1962	86043.804	1.98 Not Dividable
10755106	11.559	RA	No	No	Yes	417659.4948	85853.505	1.97 Not Dividable
9813111	25.006	SU	No	No	Yes	1004921.5146	84328.485	1.94 Not Dividable
07801107	9.307	SU	No	No	Yes	322364.4246	83032.575	1.91 Not Dividable
09718104	5.726	SU	No	No	No	166477.3796	82927.620	1.90 Not Dividable
07812124	5.208	RA	No	No	Yes	144545.0627	82302.937	1.89 Not Dividable
09101239	6.315	SU	No	No	Yes	193683.7727	81418.227	1.87 Not Dividable
10003135	9.309	A	No	No	No	324967.5987	80517.401	1.85 Not Dividable
10009116	5.104	A	No	No	No	141838.5815	80508.419	1.85 Not Dividable
08834104	7.414	SU	No	No	Yes	242574.9003	80373.100	1.85 Not Dividable
10026103	7.176	A	No	No	No	232829.1006	79743.899	1.83 Not Dividable
08938116	5.279	SU	No	No	Yes	150296.2495	79642.751	1.83 Not Dividable
09114153	5.563	SU	No	No	Yes	163189.8120	79144.188	1.82 Not Dividable
04027160	5.532	RA	No	No	No	162283.7719	78674.228	1.81 Not Dividable
08732105	8.652	SU	No	No	Yes	298261.9133	78607.087	1.80 Not Dividable
07801119	5.172	RA	No	Yes-Portion	Yes	147329.7893	77973.211	1.79 Not Dividable
08714105	7.002	SU	No	No	Yes	228115.4250	76878.575	1.76 Not Dividable
10539141	18.713	SU	No	No	No	738297.1669	76839.833	1.76 Not Dividable
10533111	5.265	RA	No	No	No	152610.7759	76733.224	1.76 Not Dividable
08953110	6.676	SU	No	No	Yes	214535.7026	76285.297	1.75 Not Dividable
09316225	6.606	RA	No	No	Yes	212022.9679	75734.032	1.74 Not Dividable
08834105	8.288	SU	No	No	Yes	285886.0236	75153.976	1.73 Not Dividable
09901126	5.346	A	No	No	No	*157870.3822*	*75012.618*	*1.72 Not Dividable*
09316223	10.754	RA	No	No	Yes	393719.5729	74742.427	1.72 Not Dividable
09527112	10.251	SU	No	No	Yes	371880.6310	74633.369	1.71 Not Dividable
08940119	5.908	RA	No	No	Yes	182877.0060	74473.994	1.71 Not Dividable
10005114	5.374	A	No	No	No	161204.0613	72892.939	1.67 Not Dividable
08814139	9.513	SU	No	No	Yes	341952.6408	72436.359	1.66 Not Dividable
09116109	11.777	SU	No	No	Yes	441296.5345	71693.466	1.65 Not Dividable
09314144	10.424	SU	No	No	Yes	382441.2376	71615.762	1.64 Not Dividable
08512114	12.094	R-1-15,SU	No	No	Yes	455618.6421	71217.358	1.63 Not Dividable
08905121	20.102	SU	No	No	Yes	806222.8339	69401.166	1.59 Not Dividable
09104220	10.343	SU	No	No	Yes	381761.4381	68771.562	1.58 Not Dividable
09114159	*9.578*	*SU*	*No*	*No*	*Yes*	349257.5470	67976.453	1.56 Not Dividable
08529120	8.667	RA	No	No	Yes	309863.0867	67673.913	1.55 Not Dividable
10631103	6.696	RA	No	No	Yes	224377.9833	67293.017	1.54 Not Dividable
09120104	8.961	SU	No	No	Yes	323184.2680	67136.732	1.54 Not Dividable
08820128	12.350	SU	No	No	Yes	470964.0120	67002.988	1.54 Not Dividable
08902147	10.790	SU	No	No	Yes	403629.3372	66367.663	1.52 Not Dividable
08905132	8.477	SU	No	No	Yes	303425.1888	65844.811	1.51 Not Dividable
10619103	10.386	SU	No	No	Yes	386832.8521	65571.148	1.51 Not Dividable
10540107	14.545	RA	No	No	No	568035.7723	65560.228	1.51 Not Dividable
09718111	5.955	SU	No	No	No	194020.6949	65376.305	1.50 Not Dividable
10302209	5.000	RA	No	No	No	153196.0882	64604.912	1.48 Not Dividable
10540110	12.561	SU	No	No	No	484477.1243	62669.876	1.44 Not Dividable
08941116	8.778	SU	No	No	Yes	319715.3386	62658.661	1.44 Not Dividable
10635108	9.629	RA	No	No	Yes	357226.1996	62233.800	1.43 Not Dividable
04006111	5.861	RA	No	No	No	193751.3874	61567.613	1.41 Not Dividable
08902167	12.010	SU	No	No	Yes	462016.1552	61139.845	1.40 Not Dividable
09634150	10.821	SU	No	No	Yes	410798.6706	60568.329	1.39 Not Dividable
10121104	19.221	A	No	No	No	777273.9680	59996.032	1.38 Not Dividable
10503106	5.403	RA	No	No	No	175424.3357	59927.664	1.38 Not Dividable
09717116	9.129	SU	No	No	No	337794.3114	59878.689	1.37 Not Dividable
10540111	14.888	SU	No	No	No	589830.8017	58710.198	1.35 Not Dividable
09104222	5.020	SU	No	No	Yes	161537.7508	57136.249	1.31 Not Dividable
05612139	5.155	A	No	No	No	167841.3903	56699.610	1.30 Not Dividable
04033114	6.650	RA	No	No	No	*233524.8466*	*56132.153*	*1.29 Not Dividable*
08905135	25.162	SU	No	No	Yes	1040323.1413	55721.859	1.28 Not Dividable

Environmental Review Initial Study
ATTACHMENT 4 Revised 2/6
APPLICATION A/PA Amendment to
Co. Code Sec. 13.10.375
Yes, I.P.

08820127	9.840	SU	No	No	Yes	373882.7309	54727.269	1.26 Not Dividable
08940121	5.530	RA	No	No	Yes	186353.0918	54550.908	1.25 Not Dividable
07817133	10.975	SU	No	No	Yes	423833.1353	54226.865	1.24 Not Dividable
08529122	7.898	RA	No	No	Yes	290557.9879	53485.012	1.23 Not Dividable
07236164	9.310	SU	No	No	Yes	352572.7634	52968.237	1.22 Not Dividable
08902165	10.125	SU	No	No	Yes	388248.4518	52813.548	1.21 Not Dividable
09023104	5.115	RA	No	No	Yes	170633.1617	52171.838	1.20 Not Dividable
10630108	6.023	RA	No	No	Yes	210346.1120	52021.888	1.19 Not Dividable
10401129	5.596	RA	No	No	No	193467.7750	50278.225	1.15 Not Dividable
09301164	17.918	SU	No	No	Yes	731015.1852	49505.815	1.14 Not Dividable
09104227	5.682	SU	No	No	Yes	198775.4058	48723.594	1.12 Not Dividable
09715113	27.605	SU	No	No	Yes	1154162.3311	48324.669	1.11 Not Dividable
09328208	6.016	SU	No	No	Yes	215702.7822	46349.218	1.06 Not Dividable
09527106	9.616	SU	No	No	Yes	372511.1705	46344.829	1.06 Not Dividable
09301142	9.994	SU	No	No	Yes	389869.0075	45468.993	1.04 Not Dividable
10615116	9.369	SU	No	No	Yes	363411.0178	44723.982	1.03 Not Dividable
09815106	26.512	SU	No	No	Yes	1110651.6427	44201.357	1.01 Not Dividable
08910178	5.290	SU	No	No	Yes	186376.2827	44051.717	1.01 Not Dividable
04033116	5.239	RA	No	No	No	184472.0681	43736.932	1.00 Not Dividable
10103152	6.484	A	No	No	No	240270.2622	42164.738	0.97 Not Dividable
09708127	13.021	RA	No	No	Yes	525535.7653	41670.235	0.96 Not Dividable
09520148	7.988	A	No	No	No	306743.8462	41235.154	0.95 Not Dividable
10323113	6.947	RA	No	No	No	261924.3910	40695.609	0.93 Not Dividable
08901131	9.550	SU	No	No	Yes	375393.8251	40622.175	0.93 Not Dividable
09815142	10.039	RA	No	No	Yes	397288.3545	40022.646	0.92 Not Dividable
08910177	5.291	SU	No	No	Yes	190580.7704	39883.230	0.92 Not Dividable
09715114	5.299	SU	No	No	No	191487.9381	39318.062	0.90 Not Dividable
09520168	8.919	A,SU	No	No	No	349235.5876	39269.412	0.90 Not Dividable
10606101	5.127	RA	No	No	Yes	185071.4772	38277.523	0.88 Not Dividable
09527109	6.145	SU	No	No	Yes	229595.4962	38086.504	0.87 Not Dividable
09640105	5.251	RA	No	No	Yes	190731.5830	38002.417	0.87 Not Dividable
07921164	9.980	SU	No	Yes	Yes	398787.3540	35947.646	0.83 Not Dividable
09120105	9.642	SU	No	No	Yes	384534.6794	35471.321	0.81 Not Dividable
10608126	16.807	SU,RA	No	No	Yes	697045.7943	35055.206	0.80 Not Dividable
09720110	5.172	SU	No	No	Yes	191291.7572	34016.243	0.78 Not Dividable
09301143	10.491	SU	No	No	Yes	423159.5767	33849.423	0.78 Not Dividable
08702115	12.532	SU	No	No	Yes	512383.4864	33490.514	0.77 Not Dividable
08820129	9.877	SU	No	No	Yes	397036.1581	33212.842	0.76 Not Dividable
09342102	21.066	SU	No	No	Yes	886344.4933	31290.507	0.72 Not Dividable
07817132	11.784	SU	No	No	Yes	485786.2014	27526.799	0.63 Not Dividable
07810104	6.513	RA	No	No	Yes	256866.9123	26823.088	0.62 Not Dividable
05720103	5.436	A	Yes	Yes	No	210388.7239	26397.276	0.61 Not Dividable
07828103	6.784	RA	No	No	Yes	269354.5252	26164.475	0.60 Not Dividable
09723136	18.641	SU	No	No	No	786028.5964	25962.404	0.60 Not Dividable
04009135	7.510	RA	No	No	No	301190.4091	25949.591	0.60 Not Dividable
10541118	12.144	SU	No	No	No	503081.6715	25897.329	0.59 Not Dividable
09116132	22.220	A	No	No	Yes	942159.6768	25749.323	0.59 Not Dividable
08814140	9.523	SU	No	No	Yes	389371.3978	25460.602	0.58 Not Dividable
09104217	10.279	SU	No	No	Yes	422289.9518	25460.048	0.58 Not Dividable
05720122	5.248	A	Yes	Yes	No	204636.9868	23945.013	0.55 Not Dividable
08902164	10.405	SU	No	No	Yes	429484.9513	23760.049	0.55 Not Dividable
10747112	7.211	RA	No	No	Yes	291361.7096	22765.290	0.52 Not Dividable
10614128	7.633	SU	No	No	Yes	309804.3669	22695.633	0.52 Not Dividable
09104223	5.187	SU	No	No	Yes	203508.3046	22417.695	0.51 Not Dividable
08728105	13.951	SU	No	No	Yes	585651.6416	22056.358	0.51 Not Dividable
09119107	10.820	SU	No	No	Yes	451093.1207	20216.879	0.46 Not Dividable
09817102	11.824	SU	No	No	Yes	494867.6023	20196.398	0.46 Not Dividable
10401146	13.533	RA	No	No	No	570359.4970	19128.503	0.44 Not Dividable
08713113	5.101	SU	No	No	Yes	204753.5916	17457.408	0.40 Not Dividable
09640106	6.966	RA	No	No	Yes	286437.2400	17003.760	0.39 Not Dividable

Environmental Review Initial Study
ATTACHMENT 4, 2 of 26
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

08726129	7.325	RA	No	No	Yes	302150.6666	16943.333	0.39 Not Dividable
09509111	15.410	SU	No	No	Yes	656050.5977	15230.402	0.35 Not Dividable
09520107	5.152	A	No	No	No	209496.1166	14912.883	0.34 Not Dividable
09817101	16.777	SU	No	No	Yes	716083.4511	14704.549	0.34 Not Dividable
09712112	9.030	SU	No	No	Yes	379027.2839	14338.716	0.33 Not Dividable
04009155	5.737	RA	No	No	No	235642.6373	14252.363	0.33 Not Dividable
09327202	5.191	SU	No	No	Yes	211986.1769	14127.823	0.32 Not Dividable
09107103	6.425	SU	No	No	Yes	267121.8317	12738.168	0.29 Not Dividable
09511133	5.670	SU	No	No	Yes	235213.7088	11766.291	0.27 Not Dividable
10547109	13.696	SU	No	No	No	585548.7533	11055.247	0.25 Not Dividable
09815103	23.306	SU	No	No	Yes	1004623.2596	10585.740	0.24 Not Dividable
10541115	9.161	SU	No	No	No	389040.3414	10017.659	0.23 Not Dividable
08617147	9.312	RA	No	No	Yes	396219.1741	9417.826	0.22 Not Dividable
09114158	*6.885*	*SU*	*No*	*No*	*Yes*	*290781.9885*	*9107.012*	*0.21 Not Dividable*
07901119	13.320	R-1-15	No	No	Yes	571684.8283	8536.172	0.20 Not Dividable
08529125	8.889	RA	No	No	Yes	378687.1938	8523.806	0.20 Not Dividable
10539140	12.382	SU	No	No	No	530970.9385	8391.061	0.19 Not Dividable
08834102	9.980	SU	No	No	Yes	426381.7867	8360.213	0.19 Not Dividable
07901115	7.963	R-1-15	No	No	Yes	338583.9948	8266.005	0.19 Not Dividable
08722103	32.283	SU	No	No	Yes	1398311.9966	7916.003	0.18 Not Dividable
08901163	10.121	SU	No	No	Yes	433065.6961	7803.304	0.18 Not Dividable
07831106	11.700	PR	No	No	Yes	501979.7876	7691.212	0.18 Not Dividable
09520141	21.408	A	No	No	No	924871.2504	7670.750	0.18 Not Dividable
09509125	5.080	SU	No	No	Yes	213901.9887	7362.011	0.17 Not Dividable
10541117	6.219	SU	No	No	No	263640.1362	7247.864	0.17 Not Dividable
09807105	19.876	SU	No	No	Yes	858605.9628	7193.037	0.17 Not Dividable
08902159	8.028	SU	No	No	Yes	343132.4942	6571.506	0.15 Not Dividable
08909162	9.818	SU	No	No	Yes	421823.2676	5832.732	0.13 Not Dividable
10505141	11.408	SU	No	No	No	491124.6405	5815.360	0.13 Not Dividable
10740126	9.779	SU,RA	No	No	Yes	420271.4760	5720.524	0.13 Not Dividable
10547102	5.838	SU	No	No	No	248844.4330	5464.567	0.13 Not Dividable
09314134	5.066	SU	No	No	Yes	215903.1547	4766.845	0.11 Not Dividable
09626102	8.232	RA	No	No	Yes	354019.4221	4553.578	0.10 Not Dividable
10416124	10.580	RA	No	No	No	456698.2944	4146.706	0.10 Not Dividable
09511134	7.289	SU	No	No	Yes	313707.2369	3790.763	0.09 Not Dividable
10416122	5.934	RA	No	No	No	254765.3445	3723.655	0.09 Not Dividable
08726127	9.859	RA	No	No	Yes	425788.6737	3660.326	0.08 Not Dividable
10401126	7.594	RA	No	No	No	327243.9713	3566.029	0.08 Not Dividable
09331130	6.609	RA	No	No	Yes	284877.0740	2995.926	0.07 Not Dividable
04033108	8.957	RA	No	No	No	387611.5796	2548.420	0.06 Not Dividable
10547103	5.270	SU	No	No	No	227352.8314	2202.169	0.05 Not Dividable
09508134	13.058	SU	No	No	Yes	566809.8819	1983.118	0.05 Not Dividable
09715115	6.701	SU	No	No	Yes-Portion	290599.2015	1279.798	0.03 Not Dividable
09328207	5.097	SU	No	No	Yes	220936.8906	1071.109	0.02 Not Dividable
10504126	7.802	A	No	No	No	339355.8401	494.160	0.01 Not Dividable
09715110	27.811	SU	No	No	Yes	1211036.7043	395.296	0.01 Not Dividable
10530107	26.304	A-O	No	No	No	1145481.0979	299.902	0.01 Not Dividable
09328284	*5.195*	*SU*	*No*	*No*	*Yes*	*226044.3686*	*264.631*	*0.01 Not Dividable*
10401138	6.090	RA	No	No	No	265184.1890	114.811	0.00 Not Dividable
09501119	5.961	SU	No	No	Yes	259559.7951	100.205	0.00 Not Dividable
08932125	6.271	RA	No	No	Yes	273134.0477	37.952	0.00 Not Dividable
10547101	9.459	SU	No	No	No	412005.0019	33.998	0.00 Not Dividable
10615136	17.740	A	No	No	Yes	772721.7528	22.247	0.00 Not Dividable
09015103	7.477	SU	No	No	Yes	325666.1664	18.834	0.00 Not Dividable
09512149	17.193	RA,SU	No	No	Yes	748914.5121	0.488	0.00 Not Dividable
10615132	12.226	SU	No	No	Yes	532566.5163	0.484	0.00 Not Dividable
09719107	5.080	SU	No	No	Yes	221272.5309	0.469	0.00 Not Dividable
09510124	9.650	SU	No	No	Yes	420336.5456	0.454	0.00 Not Dividable
10551101	9.903	SU	No	No	No	431389.5570	0.443	0.00 Not Dividable
10615122	9.589	SU	No	No	Yes	417712.5582	0.442	0.00 Not Dividable

Environmental Review Initial Study
ATTACHMENT 4 23 of 26
APPLICATION A/A Amendment to
Co. Code Sec. 13.10.375

09108121	5.264	SU	No	No	Yes	229283.5615	0.438	0.00 Not Dividable
09507105	10.092	SU	No	No	Yes	439619.5618	0.438	0.00 Not Dividable
10615117	10.097	SU	No	No	Yes	439816.5634	0.437	0.00 Not Dividable
08702108	9.027	SU	No	No	Yes	393194.5882	0.412	0.00 Not Dividable
09626101	13.166	RA-O	No	No	Yes	573530.5898	0.410	0.00 Not Dividable
09506231	10.064	RA	No	No	Yes	438381.5925	0.407	0.00 Not Dividable
09719111	6.001	SU	No	No	Yes	261381.5934	0.407	0.00 Not Dividable
10608117	7.093	RA	No	No	Yes	308974.6026	0.397	0.00 Not Dividable
09726132	20.207	SU	No	No	No	880212.6072	0.393	0.00 Not Dividable
09719105	6.266	SU	No	No	Yes	272965.6155	0.384	0.00 Not Dividable
09646110	24.149	SU	No	No	Yes	1051932.6176	0.382	0.00 Not Dividable
10003134	7.411	A	No	No	No	322817.6197	0.380	0.00 Not Dividable
10504147	7.451	A	No	No	No	324548.6311	0.369	0.00 Not Dividable
08529115	5.184	SU	No	No	Yes	225822.6516	0.348	0.00 Not Dividable
09807191	5.852	RA	No	No	Yes	254892.6517	0.348	0.00 Not Dividable
09808115	20.151	SU	No	No	Yes	877781.6541	0.346	0.00 Not Dividable
09508130	5.884	SU	No	No	Yes	256291.6645	0.335	0.00 Not Dividable
10541112	8.479	SU	No	No	No	369359.6912	0.309	0.00 Not Dividable
09107106	5.922	SU	No	No	Yes	257962.6943	0.306	0.00 Not Dividable
09301135	5.222	SU	No	No	Yes	227458.7046	0.295	0.00 Not Dividable
09723148	20.340	SU	No	No	No	886018.7054	0.295	0.00 Not Dividable
10401147	5.945	RA	No	No	No	258943.7062	0.294	0.00 Not Dividable
10530108	21.223	A-O	No	No	No	924481.7159	0.284	0.00 Not Dividable
10615124	7.272	RA	No	No	Yes	316764.7251	0.275	0.00 Not Dividable
08702126	9.635	SU	No	No	Yes	419681.7264	0.274	0.00 Not Dividable
09506225	6.777	SU	No	No	Yes	295205.7301	0.270	0.00 Not Dividable
09620126	5.581	RA	No	No	Yes	243088.7352	0.265	0.00 Not Dividable
09508129	6.026	SU	No	No	Yes	262504.7440	0.256	0.00 Not Dividable
09508105	22.694	SU	No	No	Yes	988564.7507	0.249	0.00 Not Dividable
09621107	10.091	RA	No	No	Yes	439546.7554	0.245	0.00 Not Dividable
10615125	23.037	A	No	No	Yes	1003495.7664	0.234	0.00 Not Dividable
10530106	21.345	A-O	No	No	No	929800.7718	0.228	0.00 Not Dividable
10542134	10.425	SU	No	No	No	454132.7731	0.227	0.00 Not Dividable
10615110	37.463	A	No	No	Yes	1631902.7795	0.221	0.00 Not Dividable
09505110	9.906	PR	No	No	Yes	431506.8066	0.193	0.00 Not Dividable
10401133	5.418	RA	No	No	No	236018.8105	0.190	0.00 Not Dividable
08529112	5.678	SU	No	No	Yes	247353.8138	0.186	0.00 Not Dividable
09508107	19.629	SU	No	No	Yes	855048.8177	0.182	0.00 Not Dividable
09301161	16.085	SU	No	No	Yes	700680.8216	0.178	0.00 Not Dividable
09726120	5.075	SU	No	No	No	221052.8240	0.176	0.00 Not Dividable
09809117	10.385	SU	No	No	Yes	452390.8264	0.174	0.00 Not Dividable
09508108	6.942	SU	No	No	Yes	302404.8471	0.153	0.00 Not Dividable
10416119	5.958	RA	No	No	No	259513.8867	0.113	0.00 Not Dividable
10542136	14.714	SU	No	No	No	640959.8955	0.105	0.00 Not Dividable
09726133	5.013	SU	No	No	No	218352.8968	0.103	0.00 Not Dividable
09506223	14.863	SU	No	No	Yes	647442.9026	0.097	0.00 Not Dividable
09108107	7.918	SU	No	No	Yes	344907.9145	0.085	0.00 Not Dividable
08711123	5.737	SU,R-1-15	No	No	Yes	249903.9195	0.081	0.00 Not Dividable
09508110	12.050	SU	No	No	Yes	524901.9217	0.078	0.00 Not Dividable
09506221	10.348	SU	No	No	Yes	450769.9247	0.075	0.00 Not Dividable
10101113	6.185	A	No	No	No	269405.9309	0.069	0.00 Not Dividable
09706130	8.572	SU	No	No	Yes	373398.9417	0.058	0.00 Not Dividable
10401132	7.764	RA	No	No	No	338207.9432	0.057	0.00 Not Dividable
08702116	5.344	SU	No	No	Yes	232775.9442	0.056	0.00 Not Dividable
09723135	17.959	SU	No	No	No	782306.9498	0.050	0.00 Not Dividable
10615131	11.046	SU	No	No	Yes	481181.9561	0.044	0.00 Not Dividable
10406118	5.964	RA	No	No	No	259790.9760	0.024	0.00 Not Dividable
09508113	11.803	SU	No	No	Yes	514117.9928	0.007	0.00 Not Dividable
09520147	8.983	A	No	No	No	391286.9983	0.002	0.00 Not Dividable
09623119	5.033	RA	No	No	Yes	219258.0085	-0.008	0.00 Not Dividable

Environmental Review Inital Study
ATTACHMENT 4 of 26
APPLICATION N/A Amendment to

10547108	7.494	SU	No	No	No	326452.0342	-0.034	0.00	Not Dividable
10405119	5.802	RA	No	No	No	252753.0351	-0.035	0.00	Not Dividable
09505111	7.212	PR	No	No	Yes	314145.0365	-0.036	0.00	Not Dividable
10705104	12.880	SU	No	No	Yes	561069.0483	-0.048	0.00	Not Dividable
10530103	23.442	SU	No	No	No	1021143.0605	-0.061	0.00	Not Dividable
09622136	15.255	RA	No	No	Yes	664513.0889	-0.089	0.00	Not Dividable
10747104	24.167	RA,A	No	No	Yes	1052711.0896	-0.090	0.00	Not Dividable
08726141	9.792	SU	No	No	Yes	426559.0927	-0.093	0.00	Not Dividable
10406119	7.948	RA	No	No	No	346227.0989	-0.099	0.00	Not Dividable
09808107	6.640	SU	No	No	Yes	289244.1064	-0.106	0.00	Not Dividable
10614138	13.476	SU	No	No	Yes	587017.1125	-0.113	0.00	Not Dividable
10619108	10.209	SU	No	No	Yes	444714.1161	-0.116	0.00	Not Dividable
08648116	6.014	RA	No	No	Yes	261986.1161	-0.116	0.00	Not Dividable
09808105	7.619	SU	No	No	Yes	331880.1255	-0.126	0.00	Not Dividable
10551104	6.293	SU	No	No	No	274144.1306	-0.131	0.00	Not Dividable
08529114	16.214	SU	No	No	Yes	706288.1328	-0.133	0.00	Not Dividable
09723151	9.883	RA	No	No	No	430510.1354	-0.135	0.00	Not Dividable
10608120	6.115	RA	No	No	Yes	266360.1487	-0.149	0.00	Not Dividable
09702102	18.782	SU-L	No	No	Yes	818147.1574	-0.157	0.00	Not Dividable
07827315	5.206	VA	No	No	Yes	226777.1575	-0.158	0.00	Not Dividable
09815111	5.121	SU	No	No	Yes	223062.1622	-0.162	0.00	Not Dividable
04009122	5.331	RA	No	No	No	232206.1695	-0.169	0.00	Not Dividable
07819174	6.917	R-1-3AC	No	No	Yes	301319.1818	-0.182	0.00	Not Dividable
09624108	26.110	SU	No	No	Yes	1137331.1846	-0.185	0.00	Not Dividable
07811103	8.102	RA	No	No	Yes	352944.1898	-0.190	0.00	Not Dividable
08703105	14.741	PR	No	No	Yes	642101.1900	-0.190	0.00	Not Dividable
10307142	5.831	SU	No	No	No	254006.1945	-0.195	0.00	Not Dividable
10405118	5.257	RA	No	No	No	229016.2025	-0.203	0.00	Not Dividable
08715111	5.718	RA	No	No	Yes	249091.2076	-0.208	0.00	Not Dividable
08615121	10.148	SU	No	No	Yes	442051.2174	-0.217	0.00	Not Dividable
10504146	5.038	A	No	No	No	219468.2249	-0.225	0.00	Not Dividable
08713104	10.460	SU	No	No	Yes	455633.2465	-0.247	0.00	Not Dividable
10416118	6.271	RA	No	No	No	273144.2538	-0.254	0.00	Not Dividable
10619102	22.484	SU	No	No	Yes	979385.2634	-0.263	0.00	Not Dividable
10542123	5.057	SU	No	No	No	220269.2746	-0.275	0.00	Not Dividable
10504116	5.281	A	No	No	No	230052.2867	-0.287	0.00	Not Dividable
05626101	14.600	A	No	No	No	635955.2917	-0.292	0.00	Not Dividable
05627105	13.279	A	No	No	No	578416.2938	-0.294	0.00	Not Dividable
10542115	12.306	SU	No	No	No	536035.2970	-0.297	0.00	Not Dividable
09508109	18.341	SU	No	No	Yes	798947.3002	-0.300	0.00	Not Dividable
9807108	33.905	CA,SU	No	No	Yes	1476894.3012	-0.301	0.00	Not Dividable
09621115	20.702	SU	No	No	Yes	901777.3078	-0.308	0.00	Not Dividable
09726118	5.052	SU	No	No	No	220071.3081	-0.308	0.00	Not Dividable
09707120	10.175	SU	No	No	Yes	443213.3136	-0.314	0.00	Not Dividable
10542108	21.569	SU	No	No	No	939526.3145	-0.314	0.00	Not Dividable
10607109	5.718	RA	No	No	Yes	249068.3176	-0.318	0.00	Not Dividable
09815104	5.078	SU	No	No	Yes	221189.3219	-0.322	0.00	Not Dividable
09720101	5.021	SU	No	No	Yes	218696.3253	-0.325	0.00	Not Dividable
10530102	18.745	SU	No	No	No	816548.3421	-0.342	0.00	Not Dividable
08726128	9.844	SU	No	No	Yes	428826.3463	-0.346	0.00	Not Dividable
10415140	28.535	RA	No	No	No	1242967.3500	-0.350	0.00	Not Dividable
08717106	18.726	SU	No	No	Yes	815710.3505	-0.350	0.00	Not Dividable
09506218	16.928	SU	No	No	Yes	737365.3537	-0.354	0.00	Not Dividable
09807106	7.381	SU	No	No	Yes	321528.3584	-0.358	0.00	Not Dividable
09707118	5.605	RA	No	No	Yes	244161.3652	-0.365	0.00	Not Dividable
10542124	16.036	SU	No	No	No	698518.3662	-0.366	0.00	Not Dividable
09507104	21.621	SU	No	No	Yes	941793.3803	-0.380	0.00	Not Dividable
10416113	5.105	RA	No	No	No	222357.3950	-0.395	0.00	Not Dividable
10615133	8.511	SU	No	No	Yes	370727.4003	-0.400	0.00	Not Dividable
10405106	13.895	RA	No	No	No	605274.4124	-0.412	0.00	Not Dividable

Environmental Review Inital Study
ATTACHMENT 4, 25 of 26
APPLICATION N/A Amendment - Co. Code Sec. 13.10.37 res TP

07001103	13.942	RA	No	No	Yes	607306.4158	-0.416	0.00 Not Dividable
10542135	10.755	RA-O,SU	No	No	No	468492.4241	-0.424	0.00 Not Dividable
07210142	9.373	R-1-6AC,R-1-15	No	No	Yes	408305.4257	-0.426	0.00 Not Dividable
09507112	12.327	RA-O	No	No	Yes	536953.4510	-0.451	0.00 Not Dividable
09723150	16.771	SU	No	No	No	730557.4539	-0.454	0.00 Not Dividable
10608118	5.241	RA	No	No	Yes	228307.4650	-0.465	0.00 Not Dividable
08702102	10.559	SU	No	No	Yes	459930.4690	-0.469	0.00 Not Dividable
10405102	5.044	RA	No	No	No	219730.4713	-0.471	0.00 Not Dividable
09719106	6.920	SU	No	No	Yes	301419.4747	-0.475	0.00 Not Dividable
10530105	17.250	A-O	No	No	No	751421.4789	-0.479	0.00 Not Dividable
09706103	6.261	SU	No	No	Yes	272713.4865	-0.486	0.00 Not Dividable

Environmental Review Initial Study
ATTACHMENT 4, 26 of 26
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

Ordinance No. _____

ORDINANCE AMENDING COUNTY CODE SECTIONS 13.10.375, OF THE SANTA CRUZ COUNTY CODE REGARDING THE TIMBER PRODUCTION ZONE DISTRICT

The Board of Supervisors of the County of Santa Cruz ordains as follows:

SECTION I

The Santa Cruz County Code is hereby amended by changing Subsection 13.10.375 (c) 6 to read as follows:

The land area to be rezoned shall be in the ownership of one person, as defined in Section 38106 of the Revenue and Taxation Code, and shall be comprised of single or contiguous parcels consisting of at least ~~five~~ forty acres in area.

SECTION II

This Ordinance shall take effect on the 31st day afler the date of final passage outside the Coastal Zone and upon certification by the California Coastal Commission within the Coastal Zone.

PASSED AND ADOPTED this _____ day of _____,2007, by the Board of Supervisors of the County of Santa Cruz by the following vote:

AYES: SUPERVISORS
NOES: SUPERVISORS
ABSENT: SUPERVISORS
ABSTAIN: SUPERVISORS

_____
Chairperson, Board of Supervisors

Environmental Review Inital **Study**
ATTACHMENT 5
APPLICATION N/A Amendment to Co. Code Sec. 13.10.375 re: TP

ATTEST: _____
Clerk of the Board

APPROVED **AS** TO FORM: _____
County Counsel

Copies to: Planning
County Counsel

November 7,2006

Wildland Fire Analysis and Comments

Based upon the
San Jose Water Company Non-industrial Timber Management Plan (NTMP)
Dated October 18,2005 and the San Jose Water Company Fire Hazard Assessment prepared by TSS Consultants dated May 2006

By Richard E. Montague
FIREWISE 2000, Inc

1.0 INTRODUCTION

This wildland fire analysis of the San Jose Water Company Non-industrial Timber Management Plan (NTMP) and the Fire Hazard Assessment by TSS Consultants addresses my comments in regard to the overall accumulative affects of wildland fire within and adjacent to the San Jose Water Company Upper Los Gatos Creek Watershed lands covered by the NTMP. This analysis is not written to either support the proposed NTMP nor to support a decision to maintain the watershed in a status quo management option. The purpose of this analysis is to review both of the stated documents and make comments and recommendations based upon this review. It is my intent to determine the positive and negative affects of a potential wildland fire based upon each one of the various watershed(s) NTMP management options and/or the continuing management of the watershed under its present condition

This wildland fire analysis is based upon my personal and professional experience during 34+ years as a wildland fire manager and 19 years as a wildland fire consultant. Also within this time period, I had 30+ years as a Registered California Forester (#905). My wildland fire expertise was gained at the most complex level and concluded as an Incident Commander (IC) on a National Interagency Management Team, and five years as the Regional Fire and Aviation Director for the Pacific Southwest Region (California) from 1982 to 1987. My earlier forester experience included assignments as project sales forester and District Fire Manager on the Redwood Purchase Unit, Del Norte County, Assistant Ranger and District Ranger on two coastal timber dominated Ranger Districts in Humboldt and Trinity Counties. My forester experience involved management of coast redwood, Douglas-fir and other related timber stand harvesting practices (including cable, helicopter and tractor), plus implementing the many fuel treatment options for reducing the activity fuels created by these timber harvesting practices. In addition, my overall fire and forester background included the introduction of prescribed fire as a management tool within natural (untreated) coast redwood and Douglas fir landscapes as a means to reduce fuel loading. It also involved fire hazard and risk reduction within managed timber harvesting and thinning activity fuel beds

The stated purpose listed in the San Jose Water Company Fire Hazard Assessment prepared by TSS Consultants was not to be a full fire management plan, but an fire hazard assessment to quantify the wildfire hazard, determine how future management activities may affect fire behavior, and provide vegetation management recommendations to protect the water quality within the Upper Los Gatos Watershed managed by the San Jose Water Company (SJWC). The primary management goal of the watershed is to protect water quality.

The Non-Industrial Timber Management Plan (NTMP) was initially planned to be the primary tool for accomplishing the management recommendations listed in the San Jose Water Company Fire Hazard Assessment.

Environmental Review Inital Study
ATTACHMENT 6, 1 of 3
APPLICATION N/A Amendment to Co. Code Sec. 13.10.375 re: TP

2.0 STATED INTENT OF THE SAN JOSE WATER COMPANY NON-INDUSTRIAL TIMBER HARVEST PLAN

The Upper Los Gatos Creek watershed was logged in the late 1890s and early 1900. No significant timber harvesting operations have taken place since 1900. Two large fires have occurred within the Study Area since 1900. The first large fire was the 9,000-acre Australian Creek Fire in 1961. The second fire was the 13,000-acre Lexington Fire in 1985. These two Wildland fires burned primarily along the drier mature brush covered eastern slopes of Australian Creek Drainage and spread into the mature coast redwood and Douglas fir slopes west of Australian Creek. The 1985 Lexington Fire reached several neighboring residential communities (Aldercroft Heights, Holy City, Chemeketa Park and along Thompson, Summit and Morrill Roads) destroying and/or threatening homes.

As mitigation against any further wildland fire threat to the watershed's (water quantity and quality) natural resource values and surrounding communities, the San Jose Water Company has recommended selective harvesting of the mature Douglas-fir and redwood overstory trees as a means to remove any potential crown fire threat to the watershed. Funds obtained from the timber harvest operations will be applied to help mitigate against activity created fuels and to treat other San Jose Water Company natural fuels adjacent to residential development

3.0 HOW THE ANALYSIS WAS CONDUCTED

This Wildland fire analysis is based upon a two-day visit by Richard E. Montague, CEO, FIREWISE 2000, Inc. on October 29-30, 2005 to the San Jose Water Company watersheds and surrounding community developments, participating in an on-site visit to view the proposed timber harvest areas with the consultant who prepared the NTHP and on-site discussions with a Vice President of the San Jose Water Company. In addition, I had the opportunity to have person-to-person interviews with local citizens, Mid-Peninsula Regional Open Space District Managers and conduct phone interviews with local California Department of Forestry and Fire Protection (CDF) managers.

In preparation for this analysis, I reviewed various USDA Forest Service and other technical research documents relating to the basic principles of forest fuel reduction techniques for untreated natural stands and timber harvest activity fuels within a coast redwood and Douglas fir ecosystems.

The Wildland Fire Hazard Assessment by TSS Consultants (the San Jose Water Company fire consultant) was not completed at the time of my initial assessment. However, in the meantime I was able to review the Fire Hazard Assessment dated May 2006. It is now appropriate for me to comment on the results of the assessment. It is my professional opinion that the conclusions and recommendations presented by TSS Consultants were based upon incomplete or unsubstantiated data. At best I feel it can only be used as a simulated exercise for possible planning purposes and should not be used for actual prediction of wildland fire spread and fire behavior within the Upper Los Gatos Creek watershed.

4.0 COMMENTS AND RECOMMENDATIONS

Historical data indicates that these two wildfires spread primarily within the various chaparral patches and the ground fuels within the coast redwood and Douglas fir stands rather than the mature tree crowns. It is true that the untreated natural fuels, as demonstrated in the Australian Creek and Lexington Fires, are also known to support wildland fire intensity and spread. However, as previously stated the principal carrier of fire was the large tracts of native brush (chaparral), the dead and dying broken tree tops from a prior year heavy snow storm and the various dead and live ground fuels (brush, tree saplings and poles) lying beneath the mature tree stands. Mature coast redwood stands usually will not support a crown fire without a heavy accumulation of ground fuels. Thinning of these mature Douglas fir and coast redwood trees to reduce the potential for a crown fire is not economically sound. The closed crowns and local fog conditions maintain the ground fuels to a much higher live and dead fuel moisture condition; therefore, producing a low fire spread and intensity. To open up the normally dense crown cover to more sunlight

and solar heating will reduce live and dead fuel moistures, thereby increasing fire spread, fire intensity and flame lengths.

The timber harvesting techniques proposed for this selective harvesting (cable, helicopter and tractor yarding) will create activity fuels which will burn at a much higher rate of spread, fire intensity and produce longer flame lengths than if the Douglas fir and coast Redwood stands are left in their current state. Each one of these proposed timber harvesting operations will create some form of activity fuel that must be treated according to the State Board of Forestry Timber Practices Rules. Activity fuels are the results (debris) from timber harvesting activities. I.e. road clearance (stumps and tree debris), treetops and limbs left on the ground, down and broken undergrowth brush and young trees (sapling and pole size trees).

Activity fuels created by the various recommended timber harvesting techniques tend to increase overall fuelloading and fire intensity. Even with the recommended lop and scatter fuel treatment option described in the NTMP and Fire Hazard Assessment, it is my opinion that fire spread, fire intensity and flame length will be much higher after timber harvest than if the coast redwood and Douglas fir stands within the watershed and left in their natural state.

What would be more appropriate for reducing and/or minimizing fire spread and intensity in the coast redwood and Douglas fir stands is to reduce ground fuel loading rather than crown removal. This can be accomplished by hand labor, mechanical means andlor the use of prescribed fire. Thinning out the understory ground fuels will do more to reduce fire spread and intensity than crown removal by timber harvesting.

Regardless of what decision is made in regard to the Upper Los Gatos Creek watershed, local citizens have a responsibility to maintain their property in a "fire *safe"* condition. Each property owner should maintain at least 100 feet of "defensible *space"* around their structure. This does not mean the homeowner must clear all vegetation and trees around their property. It only means that no tree crowns should be within 10 feet of their structure, the ground fuels are usually reduced to 50% percent of their original fuel loading, all dead and dying vegetation is removed and all grasses weed-whipped or mowed to a 4-inch stubble height. The local fire departments have excellent brochures explaining how to maintain a yard in a 'defensible *space"* condition.

Homeowners may want to work with their neighbors to provide a fuel treatment buffer around a cluster of residences by interlinking their various "defensible *space"* fuel treatments. In addition, access roads and long driveways should be treated a minimum of 20 feet on each side of the roadway. This provides a much safer ingress for emergency vehicles and egress by the residents.

It would be much more appropriate for the San Jose Water Company to implement and maintain a 100-foot wide fuel treatment buffer zone (shaded fuelbreak) along their boundaries that abut private development. This fuel treatment buffer zone would reduce the liability of a wildfire leaving the watershed and form an area in which homeowners can interlink their *"defensible space"* zones.

It is my opinion that he Fire Hazard Assessment by TSS Consultants should not be used in its present form as the sole basis of making fire protection management decisions in regard to the Upper Los Gatos Creek watershed. The data used does not appropriately reflect how coast redwoods andlor Douglas fir stands within the Bay Area react to wildfire. The larger wildfires in coast redwoods within the California coastal communities have spread due to increased fuel loading due to timber harvesting fuels and when ground fuels are abundant.

Respectively submitted by:

Richard E. Montague
FIREWISE 2000, Inc.

Environmental Review Inital Study
ATTACHMENT 6, 3 of 3
APPLICATION N/A Amendment to Co. Code. Sec. 13.10.375 re: TP

10/6/2006

From: Dr. Scott Stephens
Associate Professor of Fire Science
Department of Environmental Science, Policy, and Management
Division of Ecosystem Science
University of California
Berkeley, CA. 94720-3114
510-642-7304 stephens@nature.berkelev.edu

Subject: Review of Fire Hazard Assessment section of San Jose Water Company NTMP. Report prepared by TSS Consultants, Rancho Cordova, **CA.,** May 2006.

Dear Rick.

I have thoroughly reviewed this document and have visited the redwood forests that this plan applies to in the Santa Cruz Mountains. I have discussed the issues raised in this plan and my responses to them with Dr. Mark Finney at the USFS Missoula Montana Fire Lab. Mark did his PhD research on coast redwood fire ecology at UC Berkeley (Finney **1991)** and is an expert in this field. Mark was fully supportive of my assessment of this project.

The critical question that must first be answered in this analysis is 'Do the redwood forests in the proposed project area pose a fire hazard problem to the surrounding urban-wildland intermix communities?'

After reading the literature applicable to this area, visiting the forest, and talking with Dr. Finney, I believe the answer is no. Redwood forests have the highest canopy cover, height, and densities for any vegetation type in the Santa Cruz Mountains and such characteristics influence their local microclimate (Dawson **1998).** Specific microclimate changes include increases in relative humidity, decreases in surface air temperatures, and reduction in ground level windspeeds. Surface and ground fuels would subsequently have higher moisture contents in coast redwood forests when compared to the surrounding grasslands and shrublands.

Removing forest canopy by thinning this forest would not effectively reduce potential fire behavior and effects, especially in areas where redwood is the dominant species. Redwood foliage is not particularly flammable and there are few records of crown fires in redwood forests. The 2003 Canoe Fire in Humboldt Redwood State Park is probably the fire that produced the highest seventy effects in the redwood region in the last 50 years. It was ignited by lightning and burned over 10,000 acres. In the late 1980s a large snowfall in this region preceded this fire and it resulted in many broken branches and tree-tops. These materials accumulated on the forest floor resulting in very **high** surface fuel loads. When these were burned during the Canoe Fire some areas of relatively high seventy

were produced. This was primarily a function of heavy surface fuels, not canopy fuels. Both Dr. Finney and I believe the most effective way to reduce potential fire behavior in redwood forests in by reducing woody surface fuels. The best method to reduce woody surface fuels in redwood forests is by prescribed fire.

Experiences in prescribed burning in redwood forests demonstrate the sensitivity of this forest type to changing weather conditions. A minimum relative humidity of *50* percent is needed to successfully bum redwood litter (Finney **1991,** Stephens and Fry 2005). It is possible to bum under higher humidities into the early evening for approximately 30 minutes, but once relative humidity increased to 60 percent, burning is no longer possible. Redwood responds very quickly to relative humidity changes. With heavy fog in the morning, it is possible to bum by 2 pm in the same afternoon if off-shore winds are present. It is possible to use prescribed fire in the redwood forests owned by the San Jose Water Co. Relatively small areas (20-100 acres) could he burned in one week with the right weather conditions. The biggest problem encountered in such burning operations would be smoke production. The area has many residents and the surrounding air-sheds would transport smoke into more populated areas. Still under-burning **is** probably the best method that could be used to reduce potential fire behavior and effects in this forest. Fire was once an important ecosystem process in redwood forests before fire suppression and Native American burning practices were eliminated (Stephens and Fry 2005).

If thinning occurred it would open up the canopy and this would probably result in a forest with higher fire hazards. Lop and scatter of activity fuels is the slash treatment proposed by this plan because burning is deemed infeasible. Given these constraints, trying to limit the height of the lop and scatter slash treatment is a good idea, but I don't believe that this would result in a forest with lower fire hazards. Forest openings could be filled in by tanoak or other more flammable species, this would increase fire hazards. If these forests were dominated by Douglas-fir my assessment would be different. Douglas-fir can sustain high intensity crown fires under severe fire weather conditions. My assessment of the proposed project area yielded few Douglas-fir trees, those that were found were normally in small clumps.

Fire history research in redwood forests has documented the ecological role of fire in these ecosystems (Jacobs et al. **1985,** Stuart **1987,** Finney and Martin **1989,** Brown and Swetnam **1994,** Brown and Baxter 2003, Stephens and Fry 2005). Fires perform many ecological functions in redwood forests including recycling woody and detritus fuels, preparing mineral seed beds, facilitating vegetative reproduction, and reducing understory vegetation. This would be another reason **to** use prescribed fire in managing these redwood forests.

Redwood trees produce thick bark at relatively young ages and they have the ability to resprout after being completely scorched by fire (Finney and Martin **1993).** The ability to resprout after all needles have been killed by thermal injury is rare in coniferous trees. I did visit the area of redwood forest that was burned by the **1985** Lexington Fire. Bark char was still present on most redwood ***trunks*** in this area. High bark char heights are easy to produce in redwood forests because fire will move up the trees fibrous bark very

easily, even under moderate weather conditions. I have seen this personally during prescribed fires in redwood forests. Bark char height on Douglas-fir trees would be a better estimate of flame heights during the 1985 Lexington Fire.

The Fire Hazard Assessment correctly points out that no fuel treatment will eliminate fire. Fuel treatments will only modify potential fire behavior and effects. It is also true that another severe wildfire in the adjacent chaparral could pose a threat to the homes in the adjacent redwood forest. If homes were constructed with materials that were not combustion resistant (such as wood shake roofs, etc.), they could easily be ignited by embers produced by a chaparral fire. Residents living in areas adjacent to the redwood forests owned by the San Jose Water Co should take steps to reduce the flammability of their homes. Removing flammable vegetation away from structures should also be done.

If the forests in the study area were relatively young (1-30 years) and regeneration was produced by clear-cutting, targeted thinning treatments could be effective in reducing potential fire behavior and effects. Such treatments have been done in dense, shrub like-redwood forests at Redwood National Park in northern California. The redwood forests in this study area are over 100 years old and don't have the characteristics of recently clear-cut forests.

Technically the Fire Hazard Assessment (FHA) document is basically sound. Most of the methods used to assess potential fire behavior and effects are similar to what Jason Moghaddas and I did in two studies on mixed conifer forests in the Sierra Nevada (Stephens and Moghaddas 2005a; b). The R I A used a combination of field data, remotely sensed data, and archived data on weather and fuel moisture. The computer program FlamMap was used to assess fire behavior. The authors note that there are no alometric equations available to allow an objective estimate of crown fuels from the redwood forests analyzed in this work. This is true and the report proposes some intense field sampling to remedy this problem. Even if this data were obtained it would not change my opinion of this proposed project.

In summary, I believe the forest treatments outlined in the FHA would not result in a reduction of potential fire behavior and effects in these redwood forests.

Sincerely,
Scott Stephens

Environmental Review Inital Study
ATTACHMENT 7, 3 of 4
APPLICATION N/A Amendment to Co. Code Sec. 13.10.375 re: TP

References

Brown, P.M., and T.W. Swetnam. 1994. **A** cross-dated fire history from coast redwood near Redwood National Park, California. Canadian Journal of Forest Research 24:21-31.

Brown, P.M., and W.T. Baxter. 2003. Fire history in coast redwood forests on the Mendocino Coast, California. Northwest Science 77:147-158.

Dawson, T.E. 1998. Fog in the California redwood forest: Ecosystem inputs and use by plants. Oecologia 117:476-485.

Finney, **M.A.,** and R.E. Martin. 1989. Fire history in a ***Sequoia*** *sempervirens* forest at Salt Point State Park, California. Canadian Journal of Forest Research 19:1451-1457.

Finney, **M.A.** 1991. Ecological effects of prescribed and simulated fire on the Coast Redwood (Sequoia sempervirens (D.Don) Endl.). Thesis (Ph.D. in Wildland Resources Science), University of California, Berkeley. 179 pp.

Finney, **M.A.,** and R.E. Martin. 1993. Modeling effects of prescribed fire on young-growth redwood trees. Canadian Journal of Forest Research 23:1125-1135.

Jacobs, D.F., D.W. Cole, and J.R. McBride. 1985. Fire history and perpetuation of natural coast redwood ecosystems. Journal of Forestry 83:494-497.

Stephens, S.L., and D.L. Fry. 2005. Fire history in coast redwood stands in the Northeastern Santa Cruz Mountains, California. Fire Ecology 1: 2-19

Stephens, **S.L.** and J.J. Moghaddas. 2005a. Experimental fuel treatment impacts on forest structure, potential fire behavior, and predicted tree mortality in a mixed conifer forest. Forest Ecology and Management 215:21-36.

Stephens, **S.L.** and J.J Moghaddas. 2005b. Silvicultural and reserve impacts on potential fire behavior and forest conservation: 25 years **of** experience **from** Sierra Nevada mixed conifer forests. Biological Conservation 25:369-379.

Stuart, J.D. 1987. Fire history of an old-growth forest of ***Sequoia*** *sempervirens* (Taxodiaceae) in Humboldt Redwoods State Park, California. Madroño 34:128-141.

Environmental Review Inital Study
ATTACHMENT 7, 4 of 4
APPLICATION N/A Amendment to Co. Code Sec. 13.10.375
re: TP

-Review **and** Critique-

Report on San Jose Water Company Fire Hazard Assessment

Philip N. Omi, Ph.D.
Professor Emeritus, **Forest** Fire Science
Colorado State University

Omi Associates
P.O. Box **854**
Sebastopol, CA 95473
10/1/2006

Environmental Review Inital Study
ATTACHMENT 8 1 of 9
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

EXECUTIVE SUMMARY

The "Report on San **Jose** Water Company Fire Hazard Assessment" by TSS Consultants (dated May 2006) presents a systematic analysis of fire hazard in forested stands in **the** upper Los Gatos Creek watershed. The significant omission from consideration of chaparral-covered lands in the upper Los Gatos Creek watershed limits the usefulness of the report. A more meaningful analysis would consider all lands within the upper watershed (including lands managed by San Jose Water Company and Sierra Azul Open Space Preserve).

Specific shortcomings in the report include omission of ignition likelihood, incorrect application of fuel inventory information to represent treatment impacts, and incorrect interpretation of fire behavior outputs used in the FlamMap analysis. The composite hazard index presented in the report is poorly explained and may not be meaningful in terms of justifying the need for hazard reduction treatments within the NTMP. Further the report overlooks the possible increases to fire spread rates resulting from lop/scatter treatments, and apparently equates logging practices with wildfire hazard mitigation.

The fire behavior analysis in the **TSS** report is best viewed as a simulation exercise based in part on incomplete or uncertain information. Sole reliance on the report for making management decisions within the NTMP would not be prudent.

Environmental Review Inital Study
ATTACHMENT 8, 2 of 9
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

PURPOSE AND OVERVIEW TO THIS REPORT

The purpose of this report is to provide an overall review and critique of the "Report on San Jose Water Company Fire Hazard Assessment," by TSS Consultants (hereafter referred to as "the report." The report synopsis provides an overall summary of the TSS report. The critique considers two features: 1) overall report scope; and **2)** analysis and inferences. Discussion and Conclusions provide an overall summary of this review and critique.

REPORT SYNOPSIS

The report by TSS Consultants (dated May **2006)** presents synthetic results from fuel assessments, canopy cover estimates using LiDAR, and fire behavior simulations for the Upper Los Gatos Creek watershed. The report uses fire behavior estimates (rate of spread, flame length, fireline intensity, heat per unit area, etc.) from the FlamMap mapping and analysis program to evaluate treatments (various harvest alternatives) versus an untreated baseline within the NTMP (Non-Industrial Timber Management Plan) area. **A** composite hazard index is computed for treated and untreated areas, based on simulated heat per unit area, spread rate, and crowning estimates. Customized fuel models are developed to provide input to simulations for the NTMP area. Wildfire hazards outside the NTMP are simulated using fuel models incorporated in the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program (FRAP). Treatment impacts on NTMP fuel profiles are represented by field measurements sampled from harvest sites in Santa Cruz, Santa Clara, and San Mateo counties.

Three mitigation measures (paraphrased) result from the **TSS** Consultants analysis:

1. augmentation of lopping standards within the NTMF' to restrict logging slash depth in all areas of operation to a maximum 12" residual standard;
2. augmentation of road safety zones so that all downed woody material 1-12 in will **be** removed/masticated and spread to a 1' **fuel** depth (within 100' of road edge);
3. augmentation of defensible space around habitable structures so that flammable materials 1-8 in dbh are removed or masticated (within 200 ft of permanent habitable structures in the NTMP).

The composite hazard index shows a net benefit of **18%** across the NTMP resulting from adoption of these mitigation measures.

Environmental Review Inital Study
ATTACHMENT 8, 3 of 9
APPLICATION NH Amendment to
Co. Code Sec. 13.10.373
re: TP

CRITIQUE

General assumptions

The report is correct in noting (52.0) that fuel treatments do not stop fires and that proposed fuel treatments do not guarantee against wildfire damages. The assertion that reductions in fire behavior, growth, or severity are best achieved by fragmenting a

landscape repeatedly, provides intuitive appeal but has not been demonstrated empirically for actual landscapes. Theoretical justifications, i.e., such as Finney (1999), rely solely on computer simulations for hypothetical landscapes and also provide impetus for widespread interest in analyses (or similar variants) using FlamMap (or FARSITE). However, empirical evidence for reductions in fire growth or burned area at the landscape scale have not been demonstrated *to* date. Thus analyses such as the **TSS** report represent at best hypotheses yet to be tested or proven.

Additional commentary on the TSS report is provided below, by report section.

§2.2.4 Fire & Ignition History

The pre-settlement fire return interval information cited provides little insight to fire recurrence in the chaparral zones within the Los Gatos Creek Watershed. In fact, the fire potential and likelihood for watershed damages in the chaparral zones may be higher than in the forested areas of the NTMP.

No details are provided on how information on fire weather, ignition points, and bum footprints from the Lexington (1985) and Austrian Gulch (1951) fires was used to customize the fire behavior model to the site-specific conditions of the Upper Los Gatos Creek Watershed.

63.1 FlamMap

The absence of fire probability calculations (though problematic) is a significant omission, especially for areas that don't bum often, e.g., coast Redwood stands. The low proportion of area burned by decade since the 1930s **($2.4)** is further evidence that the redwood stands may comprise a low fire risk, irrespective of pre-settlement fire history. In redwood stands, wildfire risks and hazards are mitigated in part by characteristic fog belts and marine influences in the vicinity.

§3.3.1 Reauired Model Inputs

The field measurements in Brown (1974) were developed to develop biomass estimates for coarse woody debris in wilderness areas--not for providing inputs to fire behavior models as employed in the report. The estimators developed by Brown (1974) will likely lead to overestimates for loading and depth as employed in the fire behavior model. It is unclear how these field measurements allow for customization (and testing) of the fire model, **as** asserted in the report. It is also unclear how fuel models are customized to the NTMP area. Even the ***95"*** percentile depth measurement will likely overestimate the required fuelbed depth input for fire modeling (Albini and Brown 1978).

Environmental Review Inital Stud
ATTACHMENT 3, 4 of 9
APPLICATION N/A Amendment to
GP Code Sec 13, 10,375
re: TP

§3.3.2 **Other** Reauired Inputs

A crown bulk density estimate of **.30** kg/m^3 used by other fi[illegible] scientists may be at least 3 times too high, based on actual destructive field sampling of dense conifers elsewhere (as

yet unpublished). TSS plans to carry out this research for dominant tree species in Upper Los Gatos Creek Watershed (see footnote 4) may take longer than anticipated, and should not be relied upon if uninitiated at this time. Even if initiated, years could pass before study results would be available and verified (i.e., peer-reviewed). Further, the reliability of the .30 kg/m^3 crown bulk density estimate is questionable, even if "conservative" based on the extant literature cited.

§3.4.1 Standard Model Outputs

The discussion of outputs from fire behavior models is flawed and inaccurate. English units on fireline intensity should be Btu/ft-sec. The discussion on flame length overlooks its direct relationship to fireline intensity and suggests a non-existent relationship between flame length and risk. The asserted relationship between heat per unit area and amount of fuels burned is unjustified and not documented in the literature. The report over-generalizes the relationships between rate of spread, perimeter and area growth.

§3.4.2 Fire Hazard Index

Inclusion of "active" crown fire as the third component in the fire hazard index is misleading and confusing. It seems to presume that a fire actually will move into the canopy stratum and spread as an active crown fire. The ensuing discussion regarding "all five fire behavior outputs" and of weighting in the fire hazard index is confusing and raises doubts about the meaningfulness of the index.

§4.0 Treatment Design

The report acknowledges that additional analysis for the entire Upper Los Gatos Creek Watershed is needed. In fact, as noted previously with respect to §2.2.4, the chaparral zones probably represent a far greater fire hazard than the NTMP areas.

§4.2 Fuel Modification Recommendations

The aversion to pile and burning by San Jose Water Company is understandable yet unfortunate. Lopping and distributing fuels may increase fuelbed continuity and spread rate, depending on extent and quality of execution.

64.3 Modeling Assumptions

The assumptions about crown bulk density reduction due to harvesting is questionable as noted above with reference to §3.3.2.

Environmental Review Inital Study
ATTACHMENT 8, 5 of 9
APPLICATION N/A Amendment to
Co. Code Sec. 13.10.375
re: TP

54.4 Description of Surrogate Post-Harvesting Sites

It is questionable if surrogate sites were harvested with the objective of reducing wildfire severity. Thus the fuel profiles at surrogate sites may not be representative of NTMP sites after harvest, and any resemblance may be coincidental

§4.6 Fuel Modification Treatment Modeling

The wording in the paragraph above Figure 11 implies that fire behavior would be "severe" in untreated NTMP sites and that the treatments carried out at surrogate sites (and proposed for the NTMP) would be successful in "reducing severe fire behavior." Notwithstanding the simulations described in the report, these are both untested hypotheses.

Reduction of canopy coverage (i.e., by 20%) may be a questionable strategy for reducing fire hazard. Arguably, thinning and removal of smaller diameter trees, removal of fuel ladders, and retention of large trees may be more effective in reducing wildfire hazard and ensuring the sustainability of the NTMP stands.

64.7 Effectiveness of Treatments

The finding of net benefit in six measures of fire behavior is not especially meaningful, since flame length and fireline intensity are essentially duplicative measures. Also, fireline intensity depends on rate of spread and heat per unit area.

The use of heat per unit area to "scale the threat posed by crown fire" is unprecedented in the literature. Heat per unit area is unaffected by wind speed, so its correspondence to "areas that carry crown fire at low wind speeds" is probably coincidental. Tables **9** and 10 are either mislabeled or indecipherable if fire line intensity is cumulated (similar to Tables 6-7 in Appendix D).

The report omits mention that Table 11 indicates that most of the threat of active crown fire behavior is supported in areas that cannot be treated due to policy considerations ("Out", WLPZs, and other sensitive areas). Apparently, about **9%** of the NTMP is susceptible to crown fire, approximately **2/3** of which is off-limits to management activities. Reducing the supposed crown **fire** threat on less than **3%** of the total land area within the NTMP may not be meaningful or cost-effective.

The explanation relating heat per unit area increases and crown fuels does not make sense—heat **per** unit area is unaffected by crown fuels. Further, heat per unit area as a fire characteristic is descriptive of surface **fires** only.

The **18%** net benefit across the NTMP attributable to reduction in fire hazard index may not be meaningful inasmuch as it is apparently calculated as a simple arithmetic average across the treatment types (Appendix D Table **7).** Further, the focus on percent reduction in fire hazard index says nothing about whether the pre-treatment hazard is tolerable or not. Moreover, the interpretation of Table **12** mistakenly equates flame length with identifying the minimum height to live crown.

Environmental Review Inital Study
ATTACHMENT 8, 6 of 9
APPLICATION N/A Amendment to Co. Code Sec. 13.10.375 re: TP.

§5.0 Analysis and Conclusions

The report seems to lump harvesting with thinning treatments. While some overlap may exist in terms of tree cutting, harvest tends to focus on removal of larger trees while thinning removes the smaller and less commercially-sized trees. Thinning with slash disposal is more cost-effective in terms of reducing wildfire hazards and ensuring the sustainability of redwood stands.

Fuel loadings in Table 13 are not necessarily indicative of high fire hazard. In fact, the report acknowledges under ***Modeling*** *Discussion* that the "NTMP area appears to have a low hazard index." If so, then the changes due to treatment (i.e., **18%)** may reduce hazards even lower but also may not be necessary. Further, the acknowledgement of low hazard index raises questions about study focus and the need for timber harvest.

The collaborative effort called for in conclusion makes good sense. Creation of community wildfire protection programs and fire-wise communities may provide the largest payoffs in terms of living with fire hazards in wildland areas. Public/private collaboration is especially important since socio-political concerns may override technological solutions to wildfire management problems.

DISCUSSION **AND** CONCLUSIONS

The limited scope of the report (i.e., forested stands within the NTMP versus all lands managed by San Jose Water Company and Sierra Azul Open Space Preserve) restricts its overall usefulness. The report relies on fire behavior predictions incorporated within the FlamMap simulation processor. Inferences are limited by the assumptions and limitations inherent to the underlying fire behavior prediction process.

The TSS report is reasonably-written but misguided and potentially misleading. It is misguided because it focuses on fire hazard in the redwood stands in the NTMP instead of the more flammable chaparral within the San Jose Creek watershed. The potential for long-term damage to watershed values is arguably much greater in the chaparral zones **than** in the redwood stands within the NTMP. Notwithstanding the commercial value of redwood stumpage, the fire risk analysis should focus instead on the vegetation types comprising the entire upper watershed rather than the trees within the NTMP. The report is misleading insofar as it builds an apparent rationale for timber harvest under the guise of wildfire hazard reduction.

The report creates the impression of high fire hazard in uncut redwood stands comprising the NTMP, relying on the FlamMap simulation processor. Yet the reliability of FlamMap estimates is questionable in timber/litter environments generally. The theoretical basis for the FlamMap processor (i.e., Rothermel's 1972 spread model) is most challenged in timber/litter fuel complexes, such as redwood stands, where the complexity of fuel and environmental influences presents a greater modeling challenge than in more uniform grass and shrub fuel beds. The analysis incorporates fuel measurements (i.e., loading and

ATTACHMENT 6, 7 of 9
APPLICATION N/A Amendment to Co. Code Sec. 13.10.375
re: TPD

depth) from field inventory techniques that are not intended for direct input to fire behavior calculations. Further, custom fuel modeling efforts within the report are likely to neglect site fuel characteristics such as surface area to volume ratio, heat content, and canopy base height. among others. As a result, fire characteristics are likely over-predicted for stands within the NTMP. Further, the fire hazard index (even though standardized) is poorly explained and may not be reliable or meaningful in terms of eventual fire behavior that will be experienced within treated and untreated stands of the NTMP. Lastly, anticipated reductions in wildfire hazard (i.e., by 18%), are purely speculative and not confirmed empirically nor in the literature.

The fuel models developed or relied upon for the analysis may be incapable of representing changes in fire behavior resulting from treatment alternatives. Thus, the fuel models developed may not represent the effects of lopping/scattering fuels uniformly, which, in fact, may increase rate of spread even if changes in fuelbed depth reduce fire spread predictions.

Fires can and will bum in stands dominated by coast redwood and associated forest types within the NTMP, and fuel hazard reduction is needed to create defensible spaces around structures. But the wisdom of logging to reduce fuel hazards needs to be balanced against environmental impacts (e.g., water quality) and the relatively-low probabilities **of** ignition in coast redwood stands due to inherent moisture regimes. Logging of merchantable timber may not reduce wildfire hazards and is counter-productive from a long-term, sustainability perspective. Strategically, removal of small-diameter trees that provide fuel ladders into tree crowns may make more sense, especially from a sustainability perspective. **Also,** removal of tree cover from steep slopes in the name of wildfire hazard reduction may produce unacceptable siltation and erosion especially near creeks and riparian zones.

The fire behavior analysis in the **TSS** report needs to be viewed as an exercise based on incomplete or uncertain information, using a simulation processor underlain with assumptions and limitations that accompany **any** computer-based analysis. Thus the report should not be relied upon as the sole basis for making management decisions affecting the **NTMP.** Further, a broader perspective that incorporates the chaparral zones in the upper watershed would provide a more meaningful assessment of overall fire hazard in the area.

Literature Cited

Albini, F.A. and **J.K.** Brown. **1978.** Predicting slash depth for fire modeling. Ogden: **USDA** For. Serv., Res. Pap. INT-206, 28 p.

Brown, **J.K.1974.** Handbook for inventorying downed woody material. **USDA** For. Serv. **Gen.** Tech. **Rep. INT-16.**

Finney, **M.A. 1999. Design** of regular landscape fuel treatment patterns for modifying fire growth and behavior. For. Sci. 47(2):219-228.

Rothermel, R.C. 1972. **A mathematical model** for **predicting fire spread in wildland fuels USDA For Serv. Res. Pap.** INT-I **15.**

Environmental Review Inital Study
ATTACHMENT 8, 9 of 9
APPLICATION NA Amendment to
Co. Code Sec. 13.10.375
re: TP