



County of Santa Cruz

Department of Community Development and Infrastructure

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CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ENVIRONMENTAL CHECKLIST FOR DETERMINATION OF CEQA EXEMPTION

I. OVERVIEW

Date:	June 26, 2024	Application Number:	231069
Project Name:	Maciel Residential Community	Staff Planner:	Jonathan DiSalvo
Applicant:	Jeff Greenberg	APN(s):	029-391-09
Owner:	Maciel Development LP	Supervisory District:	1 st District

X

DocuSigned by:

Matt Johnston

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Environmental Coordinator

PROJECT LOCATION: The project site is located at 1960 Maciel Avenue on the east side of Maciel Avenue between Mattison Lane on the north and Encina Drive on the south within the community of Live Oak in unincorporated Santa Cruz County (see Figure 1). Santa Cruz County is bounded on the north by San Mateo County, on the south by Monterey and San Benito Counties, on the east by Santa Clara County, and on the south and west by the Monterey Bay and the Pacific Ocean.

SUMMARY PROJECT DESCRIPTION: The proposed project consists of demolition of one existing single-family home and outbuildings on the site, subdivision of the parcel into 21 lots, and construction of 21 detached, 3-bedroom residential units. To accommodate the affordable units, a density bonus request is included as part of the project. Three of the units are proposed to be below market rate; two would be affordable to moderate-income households and one would be affordable to low-income households. Figure 2 depicts the proposed site plan.

PLANNING POLICIES:

Zone District: SU-D

Special Designation: None

General Plan: R-UL

Urban Services Line:

☒ Inside

☐ Outside

Coastal Zone:

☐ Inside

☒ Outside

DISCRETIONARY APPROVAL(S) BEING CONSIDERED:

☐ General Plan Amendment

☐ Coastal Development Permit

☒ Land Division

☒ Grading Permit

☐ Rezoning

☐ Riparian Exception

☒ Development Permit

☐ LAFCO Annexation

☐ Sewer Connection Permit

☐ Other:

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED (e.g., permits, financing approval, or participation agreement):

Permit Type/Action

Agency

None have been identified.

CONSULTATION WITH NATIVE AMERICAN TRIBES: *Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?*

No California Native American tribes traditionally and culturally affiliated with the area of Santa Cruz County have requested consultation pursuant to Public Resources Code section 21080.3.1.





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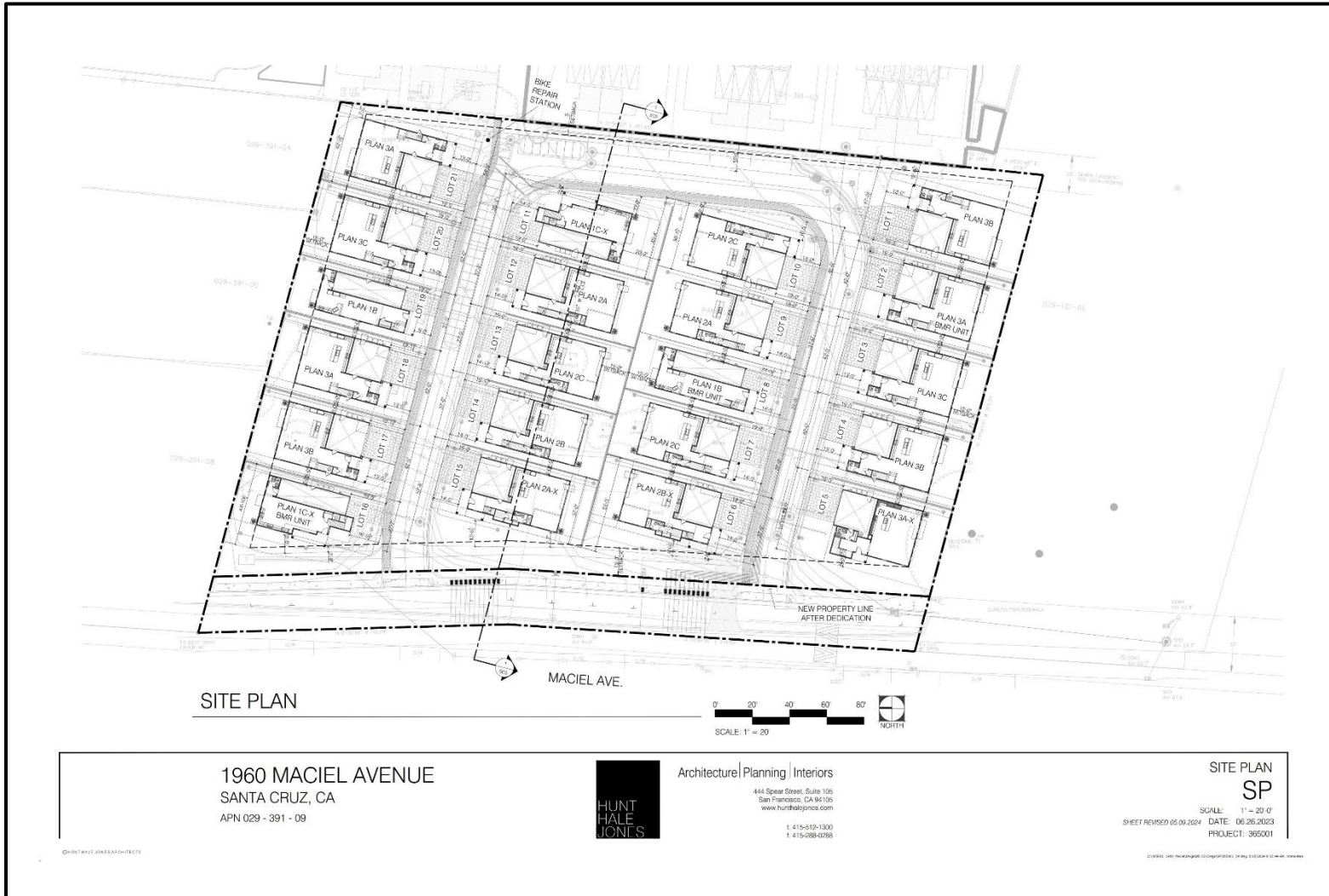


Figure 2



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II. BACKGROUND INFORMATION

EXISTING SITE CONDITIONS:

Parcel Size (acres): 2.37 acres
Existing Land Use: Residential
Vegetation: Non-native grassland
Slope in area affected by project: ☒ 0 - 30% ☐ 31 – 100% ☐ N/A
Nearby Watercourse: Rodeo Gulch
Distance To: Approximately 350 feet

ENVIRONMENTAL RESOURCES AND CONSTRAINTS:

Water Supply Watershed:	No	Fault Zone:	No
Groundwater Recharge:	No	Scenic Corridor:	No
Timber or Mineral:	No	Historic:	No
Agricultural Resource:	No	Archaeology:	Yes
Biologically Sensitive Habitat:	No	Noise Constraint:	No
Fire Hazard:	No	Electric Power Lines:	No
Floodplain:	No	Solar Access:	Available
Erosion:	No	Solar Orientation:	Southeast
Landslide:	No	Hazardous Materials:	No
Liquefaction:	Low Potential	Other:	None

SERVICES:

Fire Protection:	Central FPD	Drainage District:	Zone 5
School District:	Live Oak, Santa Cruz High	Project Access:	Maciel Avenue from Mattison Lane or Capitola Road
Sewage Disposal:	Santa Cruz Sanitation District	Water Supply:	City of Santa Cruz

III. PROJECT DESCRIPTION

Project Permits and Proposed Uses. The proposed project consists of a Tentative Map, Residential Development Permit with Density Bonus Request, Park Site Review, Roadway/Roadside Exception, and Preliminary Grading Review to subdivide the project parcel, demolish existing structures, and construct 21 detached single-family residences and associated improvements.

Proposed Improvements. The project consists of demolition of the existing residence and outbuildings, subdivision of the parcel into 21 lots, and construction of 21 detached, 3-bedroom residential units. With demolition of the existing residence, the project would result in a net increase of 20 single-family residential units. The proposed parcels range in size from approximately 3,100 to 3,500 square feet with one lot at approximately 4,800 square feet and two lots at slightly under 3,000 square feet in size. The proposed two-story single-family homes would range in size from 1,670 square feet to 2,330 square feet. Houses would include rooftop solar panels. Table 1 provides a summary of the proposed mix of unit types. A site plan showing the overall project footprint is included in Figure 2.

Table 1. Proposed Unit Types

Plan Type	Living Unit Square Feet	Total Unit Quantity	Plan Breakdown			
			Beds	Baths	Garage	Garage Type
Plan 1	1,670	2	3	2.5	2	Tandem
Plan 1X	1,799	2	3	2.5	2	Tandem
Plan 2	2,291	6	3	3	2	Side by side
Plan 2X	2,320	2	3	3	2	Side by side
Plan 3	2,330	8	3	3	2	Side by side
Plan 3X	2,276	1	3	3	2	Side by side
Unit Total	—	21	—	—	—	—

Density Bonus Request. The project includes a density bonus request pursuant to California Government Code sections 65915 – 65918, which was enacted in 1979 to encourage the provision of affordable housing units in the state by offering a combination of benefits to developers. For projects that include the requisite number of affordable housing units, and upon the request of an applicant, cities are required to (i) allow more market rate units to be built than otherwise allowed by the applicable zoning designation); (ii) provide “incentives or concessions,” such as reduced development standards that result in actual and identifiable cost savings for the project; (iii) provide “waivers or modifications” of development standards that would physically preclude the project from being constructed; and (iv) allow reduced parking requirements. Cities and counties are generally obligated to grant a density bonus and incentives, concessions, waivers, or reductions in development

standards to the applicant so long as the proposed development complies with the applicable affordability requirements and the waivers or incentives/concessions meet certain standards.

The amount of the density bonus is based on the number of affordable units at each income level that are included in a project. To determine whether a project qualifies for a density bonus, the percentage of affordable units is based on the maximum number of units that would be permitted under the County's zoning code (i.e., the "base density"). According to the project plans, the base density is 17 units based on the existing zoning. Three of the units are proposed to be below market rate; two would be affordable to moderate-income households and one would be affordable to low-income households. As proposed, the project is eligible for a Density Bonus of 40 percent pursuant to Density Bonus Law. The applicant is proposing to construct four of the seven bonus units earned, for a total of 21 units.

In addition to allowing more market rate units to offset the cost of providing affordable units, state law also provides a variety of tools that applicants can utilize to make projects physically or more economically feasible, including incentives/concessions and waivers that allow for modification of development standards if those standards would result in "actual and identifiable cost reductions" to the project or that "physically preclude" construction of the density bonus project. The project has requested 10 waivers from site standards including front and side yard setbacks, driveway length, lot coverage, minimum lot size and lot width, floor area ratio (FAR), street width, and walkway and curbs.

Site Access, On-Site Circulation, and Parking. Vehicle access to the new residences would be provided from two driveways connecting to Maciel Avenue on a new, U-shaped private street through the site. Each residence would have its own driveway and garage that connects to the new street.

The proposed project also includes a widening of Maciel Avenue and installation of curb and gutter along the easterly side of the road. Proposed off-site improvements include sidewalks, curbs, and gutters.

The project would provide a total of 92 parking spaces with 76 spaces provided in garages and driveways, and 6 parallel spaces provided along the new private street along the eastern site boundary for guest parking. In addition, 10 parking spaces would be provided along the project frontage on Maciel Avenue.

A bicycle repair station on a common area of the project site would be installed to encourage bicycling by residents. The bicycle repair station would provide repair tools and space to use them would support the continual use of bicycle for transportation in and out of the project site.

Other Site Improvement and Landscaping. Other project improvements include on- and off-site drainage and sewer infrastructure improvements. A buried stormwater retention system would be used for stormwater runoff collected from the residential development. Underground stormwater chambers would be installed beneath the private street in the northeast area of the site with a total capacity designed with adequate storage to both infiltrate the 2 year, 2 hour storm and store and restrict flows to the predevelopment 10 year, 15 minute storm flows. The project is designed to capture common pollutants by directing runoff from impervious surfaces into the underground chambers which are designed to provide treatment by infiltration in place.

New landscaping would be planted throughout the project site. Proposed landscape improvements would conform to the County's Water Efficiency Landscape Ordinance. Landscaping would include a mix of trees, including flowering accent trees and broadleaf canopy trees, shrubs, perennial grasses, and ground covers. Trees would be planted along the Maciel Avenue streetscape in accordance with County requirements. A row of evergreen screen planting would be provided along the portion of the new private street that would abut the eastern site boundary.

Construction. Construction would be expected to occur over a period of approximately 18 months. Construction would require approximate cut and fill volumes of 3,313 cubic yards and 4,960 cubic yards, respectively, with a net volume of 1,647 cubic yards of fill.

IV. ENVIRONMENTAL SETTING

The project site is located on the east side of Maciel Avenue between Mattison Lane and Encina Drive within the community of Live Oak in unincorporated Santa Cruz County (see Figure 1). Santa Cruz County is bounded on the north by San Mateo County, on the south by Monterey and San Benito counties, on the east by Santa Clara County, and on the south and west by the Monterey Bay and the Pacific Ocean.

The project site is located at 1960 Maciel Avenue about 300 feet south of Mattison Lane on an approximate 2.37-acre (103,123-square-foot) site. The site is bounded by single-family residential uses on the north and south, Maciel Avenue on the west, and rural residential properties on the east. The project site is located in a developed area, consisting primarily of low-density residential development with primarily single-family homes. The project and several adjacent properties to the east are underdeveloped. Rodeo Gulch is located further east of the project site.

The project site is developed with a 1,392-square-foot single-family residence, associated infrastructure, and outbuildings, including a 684-square-foot detached garage, 50-square-foot pump house with well, 100-square-foot wash house, and 1,800-square-foot chicken house. The primary house and outbuildings were constructed in 1921 and are dilapidated and in various stages of collapse. The existing impervious surface area on the site is 7,114 square feet (0.163 acres).

Vegetation on the site consists of annual non-native grassland, scattered residential landscaping including planted fruit/nut trees and groundcovers, and scattered coast live oak (*Quercus agrifolia*) trees. A total of 16 trees are located on the project site.

V. ENVIRONMENTAL CHECKLIST

A. Introduction and Background

In analyzing a proposed project, the County may consider whether existing environmental documents already provide an adequate analysis of potential environmental impacts. An earlier analysis may be used where, pursuant to tiering, a program environmental impact report (EIR), or other California Environmental Quality Act (CEQA) provisions, it can be determined that one or more effects have been adequately analyzed in an earlier EIR or negative declaration (State CEQA Guidelines section 15063(b)(1)(C)). If an earlier analysis is used, the Initial Study checklist discussion should identify: a) the earlier analyses and state where they are available for review; b) identify which effects were adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis; and c) describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

CEQA also allows a lead agency to avoid repeating analyses that were already provided in a certified General Plan EIR for a development project that is consistent with the General Plan. Public Resources Code section 21083.3 and its parallel CEQA Guidelines provision, section 15183, provide for streamlined environmental review or exemption for projects consistent with the General Plan for which an EIR was certified. Pursuant to section 21083.3, subdivision (b), if a development project is consistent with the General Plan for which an environmental impact report was certified, the application of CEQA shall be limited to effects on the environment which are “peculiar to the parcel or to the project” and which were not addressed as significant effects in the prior environmental impact report, or which substantial new information shows will be more significant than described in the prior environmental impact report. Subdivision (d) further indicates that an effect of a project upon the environment shall not be considered “peculiar to the parcel or to the project,” “if uniformly applied development policies or standards” have been previously adopted by the city or county, with a finding based upon substantial evidence, that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards would not substantially mitigate the environmental effect. CEQA Guidelines section 15183, subdivision (f), adds that “[w]here a city or county, in previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially

mitigate the effects of future projects, the decision-making body of the city or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project.” Under these provisions of CEQA, a project that is consistent with a General Plan that was adopted pursuant to a certified EIR, could be potentially partially or wholly exempt from further CEQA analyses.

Section 15183 provides more detailed guidance than can be found in Public Resources Code section 21083.3 itself. Section 15183, subdivision (b), states that if a project is consistent with an agency’s General Plan for which an EIR has been certified, the agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

- (1) Are peculiar to the project or the parcel on which the project would be located;
- (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent;
- (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan, or zoning action; or
- (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. (State CEQA Guidelines section 15183(b).)

Guidelines section 15183, subdivision (c), further provides that “if an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards...then an additional EIR need not be prepared for the project solely on the basis of that impact.” “[D]evelopment policies or standards need not apply throughout the entire city or county, but can apply only within the zoning district in which the project is located.... Moreover, such policies or standards need not be part of the general plan or any community plan, but can be found within another pertinent planning document such as a zoning ordinance.” (Guidelines, section 15183, subd. (f).)

B. Use of Earlier Analyses

On December 13, 2022, the Santa Cruz County Board of Supervisors adopted the Sustainability Policy and Regulatory Update (Sustainability Update) after certifying an EIR prepared for the Update. The Sustainability Update was a comprehensive update to the County’s General Plan/Local Coastal Program (LCP) and consists of amendments to the County’s existing General Plan/LCP, including four updated General Plan elements, amendments to sections of the Santa Cruz County Code (SCCC), adoption of County Design

Guidelines, and land use and/or zoning map amendments to implement map corrections and identify opportunity sites and vacant and underutilized properties. The General Plan/LCP amendments include four revised/updated elements: Built Environment (BE) (formerly Land Use), Mobility + Access (M+A) (formerly Circulation), Agriculture, Natural Resources + Conservation (ARC) (formerly Conservation and Open Space), and Parks, Recreation + and Public Facilities (PRP) Element. The Noise and Public Safety elements were not part of the Sustainability Update as they were updated in 2019 and 2020, respectively. The Sustainability Update also eliminated the former Community Design Element, which was incorporated into the BE Element. The Housing Element was updated in 2023 and adopted with an EIR Addendum to the Sustainability Update.

The Sustainability Update EIR includes the Draft EIR volume (April 2022) and the Final EIR volume (August 2022). The Sustainability Update EIR reviewed all of the topics included on the Appendix G environmental checklist in the State CEQA Guidelines as well as all sections required to be included in an EIR.

The Sustainability Update EIR is a “program” EIR prepared pursuant to State CEQA Guidelines section 15168, which reviewed environmental impacts associated with future development and buildout within the unincorporated county areas that would be accommodated by the General Plan/LCP. A program EIR can be used for subsequent projects implemented within the scope of the program/plan. Typically, site-specific or new significant impacts that weren’t addressed in the program EIR would be evaluated in an Initial Study, leading to preparation of a Negative Declaration, Mitigated Negative Declaration, or EIR. Mitigation measures adopted for the General Plan also would be a part of future development projects, as relevant, and supplemented, as may be necessary, with any site-specific mitigation measures identified in the project-specific environmental review process.

As indicated above, pursuant to Public Resources Code section 21083.3, certain (or potentially all) aspects of a development project that are consistent with a General Plan for which an EIR was certified may be exempt from additional CEQA analyses (i.e., negative declaration, mitigated negative declaration, or EIR) of issues that were adequately covered in the General Plan EIR. The project site is designated Urban Low Residential in the County’s General Plan/LCP with a density range of 4-10 units per acre. The proposed 21-unit project is a low-density residential project on a 2.37-acre site represents a density of 9 units per acre. Thus, the proposed project uses and density are consistent with the General Plan/LCP land use residential designation as amended by the Sustainability Update for which an EIR was prepared and certified in December 2022. Thus, the project meets the provisions of CEQA section 21083.3(b) with regards to project consistency with the County’s adopted General Plan/LCP.

While the Sustainability Update EIR considered the impacts of repurposing, intensifying, and redeveloping existing developed parcels in the unincorporated county as a whole, specific future development of the project site was not noted or specifically evaluated in the Sustainability Update EIR, and there were no site-specific impacts identified for the project site. However, the Sustainability Update considered construction of new housing units and non-residential uses throughout the unincorporated county. The EIR estimates that the Sustainability Update has the potential to accommodate approximately 4,500 housing units throughout the county over existing conditions with approximately 75% projected to occur within urban areas. The EIR also estimates the potential to accommodate approximately 6,210,000 square feet of non-residential uses, with approximately 60% expected to occur within urban areas (County of Santa Cruz 2022-Draft EIR volume). These forecasts provide an estimate of potential growth that could occur as a result of adoption and implementation of the Sustainability Update, for the purpose of evaluation in this EIR. This estimate of growth may or may not occur, and this estimate does not establish a limit to development. Annual limits for residential units are set annually by the County pursuant to Measure J and SCCC provisions as explained in Section 4.13.2.3 of the EIR. Additionally, some of this projected development and growth would occur under the existing General Plan/LCP without adoption of the Sustainability Update.

Since adoption of the Sustainability Update, approximately 142 residential units have been constructed or approved throughout the unincorporated area. The proposed project would result in 21 residential units with a net increase in 20 units with the demolition of the existing single-family residence on the site. The project and other constructed and approved residential units would result in a net increase in approximately 220 residential units, which would be well within the remaining residential buildout estimates of 4,500 residential units considered in the county-wide Sustainability Update EIR impact analyses. It is also noted that the project is within the development estimated for the Live Oak planning area neighborhood in which the project is located. The Sustainability Update EIR estimated 2,002 new residential units in this neighborhood.

C. Environmental Checklist Review

The purpose of the checklist presented on the following pages is to evaluate the impact categories covered in the County's certified Sustainability Update EIR to determine whether the project's impacts have been adequately analyzed in the EIR or whether any new significant impacts peculiar to the project or project site would result. Where an impact resulting from the project was adequately analyzed previously, the review provides a cross-reference to the pages in the Sustainability Update EIR where information and analysis may be found relative to the environmental issue listed under each topic. The checklist also identifies whether the project involves new significant impacts or substantially more severe impacts than analyzed in the Sustainability Update EIR or new significant impacts peculiar to the site or project. As indicated above, an impact would not

be considered “peculiar” to the site or project if uniformly applied development policies or standards would substantially mitigate an environmental effect. Therefore, the following review includes mitigation measures identified in the Sustainability Update EIR that would be applicable to the site or project and/or relevant applicable development policies or standards that would be applied to the project.

The Sustainability Update EIR is on file at the County’s Community Development and Infrastructure Department, 701 Ocean Street, Fourth Floor, Santa Cruz, California from 8:00 AM to 12:00 PM, Monday through Thursday. The document also is available for review on the County’s website at:

<https://www.sccoplanning.com/PlanningHome/Environmental/CEQAInitialStudiesEIRs/ArchivedCEQADocuments.aspx>.

D. Conclusion

Based on the following review, it has been determined that the County’s Sustainability Update EIR has adequately addressed the following issues, and no further environmental review is required pursuant to Public Resources Code section 21083.3: aesthetics (scenic views, scenic resources, light and glare); agricultural and forest resources; air quality (conflicts with Air Quality Management Plan, project emissions, sensitive receptors, odors); biological resources (sensitive habitat, wildlife movement, conflicts with local tree ordinance, conflicts with plans); cultural resources (historical resources); energy; geology and soils (fault rupture, non-seismic geologic hazards, soils, paleontological resources); greenhouse gas (GHG) emissions (GHG emissions, conflict with plans); hazards/hazardous materials (use/disposal of hazardous materials, exposure to hazardous materials, airport safety); hydrology-water quality (groundwater, flood risk, conflicts with plans); land use; mineral resources; noise (noise increase, vibration); population and housing; public services; recreation; transportation (conflicts with program or policy, hazardous design, emergency access); utilities; wildfire; and cumulative impacts.

The following site-specific impacts have been analyzed and determined to be less than significant due to substantial mitigation resulting from General Plan/LCP policies, zoning regulations and/or development standards that are uniformly applied to development projects by the County: aesthetics (visual character); biological resources (special status species, nesting birds); cultural resources (archaeological resources, human burials); geology and soils (seismic hazards, erosion); hazards/hazardous materials (accidental release of hazardous materials); hydrology-water quality (water quality, drainage); transportation (conflict with CEQA Guidelines regarding vehicle miles traveled); and tribal cultural resources. Thus, pursuant to Public Resources Code section 21083.3 and State CEQA Guidelines section 15183, no further environmental analysis is required.

E. Checklist and Discussion

1. AESTHETICS				
Except as provided in Public Resources Code Section 21099, would the project:	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update EIR Mitigation Measures or Other Uniformly Applicable Development Standards
a) Have a substantial adverse effect on a scenic vista?	DEIR pp. 4.1-1 to 4.1-2, 4.1-13 to 4.1-15	No	No	General Plan/LCP Policy ARC-5.1.2, 5.1.3, SCCC Chapter 13.11 site design regulations
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	DEIR pp. 4.1-2 to 4.1-3, 4.1-15 to 4.1-17	No	No	SCCC sections 13.11.072 & 13.20.130(C); SCCC Chapter 13.20 design criteria in coastal zone and scenic areas; SCCC Chapter 16.34-Significant Tree Protection
c) In non-urbanized areas, substantially degrade the existing visual character or quality public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	DEIR pp. 4.1-4 to 4.1-6, 4.1-17 to 4.1-22	No	No	Design Review pursuant to SCCC Chapter 13.11: Site, Architectural, and Landscape Design Review, SCCC Chapter 13.20 design criteria in coastal zone and scenic areas
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	DEIR pp. 4.1-5 to 4.1-6, 4.1-23 to 4.1-24	No	No	SCCC sections 13.10.324.1[F], 13.10.363, 13.10.554, 13.10.581, 13.10.637, 13.10.650, 13.10.685; SCCC section 13.11.070(C)(4) that requires light to be directed on site to prevent offsite lighting;

(a) Scenic Views. The Sustainability Update EIR indicates scenic view areas include: vistas from designated scenic roads, Coastal Special Scenic Areas, and unique hydrologic, geologic, and paleontological features. The ARC Element also indicates that ocean views, agricultural fields, wooded forests, open meadows, ridgetops, and mountain hillside views are also public scenic assets that should be identified and considered during development review permit processes (ARC-5.1.1). Development projects proposed in visual resource areas are required to be designed to protect these resources (ARC-5.1.2) and to protect scenic vistas (ARC-5.1.3). Protection of scenic ocean views and agricultural vistas also are required as part of future development projects (ARC-5.1.6 and ARC-5.1.5, respectively).

The Sustainability Update EIR, which comprehensively addressed impacts to scenic views associated with new development, concluded that most of the future development accommodated by the Sustainability Update would occur within the County's USL in areas that are already developed and generally located away from the coast or significant public scenic views. For development within the coastal zone, the EIR indicates that policies in the General Plan/LCP serve to protect significant public vistas. Table 4.1-1 in the Sustainability Update EIR (Draft EIR volume) summarizes policies that serve to avoid or minimize impacts related to substantially adversely affecting a scenic view, including review of proposed developments in Coastal Special Scenic Areas and Coastal Special Communities. The Sustainability Update EIR also indicates that County regulations in the SCCC require that development in the coastal zone be sited and designed to protect scenic coastal public views and significant trees, and site design regulations in SCCC Chapter 13.11 seek to protect scenic areas, hilltops and ridgelines, and the public viewshed throughout the county. Title 16 regulations for development in natural resource areas and hazardous areas also would protect scenic vistas. The Sustainability Update EIR concluded that with compliance with local regulations, implementation of the Sustainability Update policies and implementation strategies summarized on Table 4.1-1 in the EIR, and required future environmental review of specific development projects, future development would avoid adverse impacts to scenic views, resulting in a less-than-significant impact to scenic views.

The project site is located within an existing developed residential neighborhood within the County's designated Urban Services Line (USL). The site is not located within a scenic vista, such as views from designated scenic roads, Coastal Special Scenic Areas, sites with unique geological areas, or areas with ocean views, agricultural fields, wooded forests, open meadows, ridgetops, or mountain hillside views that are identified as public scenic assets in the Sustainability Update EIR. While the project site is underdeveloped, it is generally surrounded by urban development and not within areas of scenic views. Thus, the project is not located in a scenic area, and would not have an adverse effect on a scenic view as none have been identified, mapped or observed that include the project site. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding scenic views than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Scenic Resources. There are no designated state scenic highways that have been officially designated as State Scenic Highways¹. However, the Sustainability Update EIR indicated that there are six Eligible State Scenic Highways that have the potential to be officially designated in the future. These include:

¹ California Department of Transportation (Caltrans). 2023. Scenic Highways. Accessed January 26, 2024 at <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

- Highway 1 - Monterey to San Mateo county lines
- Highway 9 – Highway 1 near Santa Cruz to the Santa Clara county line
- Highway 17 – Highway 1 near Santa Cruz to the Santa Clara county line
- Highway 35 - Highway 17 to the Santa Clara county line
- Highway 152 – Highway 1 to the Santa Clara county line at Hecker Pass
- Highway 236 – Highway 9 near Boulder Creek to SR 9 northeast of Big Basin Redwoods State Park (AMBAG 2021).

The County's General Plan/LCP identifies seven state highway segments and 27 county roads that "are valued for their vistas," which include and generally coincide with state highways identified as potentially eligible for scenic highway status. Additionally, the General Plan/LCP ARC Element indicates that the county is highly scenic and supports scenic vistas and diverse scenic resources, including ocean vistas along the entire coastline, open agricultural lands along the northern coasts and in the southern part of the county, redwood forests, and the rolling hillsides and ridgetops of the Santa Cruz Mountains. Scenic resources also include redwood forests, coastal cliffs and estuaries, rivers, streams, watersheds, reservoirs, special geologic formations such as sandhill outcroppings, and selected vegetative communities. Steep slopes and high elevations are identified for their potential to provide scenic vistas. The General Plan/LCP designates "Coastal Special Scenic Areas" to include: a) Bonny Doon sandstone formations, generally found within the borders of Pine Flat Road, Laguna Creek, Ice Cream Grade, and Martin Road; b) the area enclosed by the Swanton Road and Highway 1; and (c) the Swanton Road Coastal Special scenic area north of Last Chance Road toward Highway 1. The General Plan/LCP

The Sustainability Update EIR concluded that new development could indirectly lead to future development and redevelopment throughout the county, primarily within urban areas within the USL, which could impact scenic resources. As indicated in the EIR, the General Plan/LCP includes policies that designate and define visual resource areas having regional public importance, which include: vistas from designated scenic roads, Coastal Special Scenic Areas, and unique hydrologic, geologic, paleontological features, as well as ocean views, agricultural fields, wooded forests, open meadows, ridgetops, and mountain hillside. Table 4.1-2 in the Sustainability Update EIR (Draft EIR volume) summarizes policies that serve to avoid or minimize impacts related to scenic resources. Title 16 regulations for development in natural resource areas and hazardous areas also serve to protect scenic vistas in these areas with project views, and provisions in Chapter 13.11 of the SCCC call for retention of significant natural vegetation on site, mature trees, rock outcroppings and other natural features. The EIR concluded that with implementation of the Sustainability Update policies and implementation strategies summarized on Table 4.1-2, existing and amended regulations in the SCCC for design review, zoning district development standards, compliance with regulations for development in natural resource areas, environmental review of specific development projects, future development would not result in an adverse impact to scenic resources, and impacts would be less than significant.

The Sustainability Update EIR evaluated the proposed removal of Highway 1 as a County-designated scenic road, but final County approvals retained the highway as a scenic road. Future development on any property located adjacent to County-designated scenic roads, including Highway 1, would be subject to review and compliance with County policies and design regulations that address siting and design of development adjacent to scenic roads. Specifically, as summarized in Table 4.3-2 of the EIR, ARC Policies 5.2.3 and 5.2.4 require that new development that is visible from urban scenic roads must be “respect, preserve or improve the visual quality through siting, architectural design, landscaping and appropriate signage.”

The project site is located within a developed area within the USL in the Live Oak planning area, and is not located adjacent to Highway 1, any other County-designated scenic road, any designated coastal special scenic area, or any other scenic area as discussed in the Sustainability Update EIR. In addition, the site is not located in a scenic area as designated in the County’s Geographic Information System (GIS). Thus, the project would not have an impact on scenic resources. For these reasons, the proposed project would not result in new significant impacts or substantially more severe related to scenic resources than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(c) Effects on Visual Character. The Sustainability Update EIR concluded that while future development could potentially result in impacts to the existing visual character of surrounding areas in non-urbanized locations, compliance with SCCC requirements to mitigate significant visual impacts of new development on coastal or other public scenic views through screening, landscaping, and other measures would prevent substantial degradation of the visual quality of these areas. In urbanized areas, future development would be required to comply with the County’s design review procedures and requirements, including adherence to the new County Design Guidelines and Site Development Permit requirements, and thus, would not conflict with applicable zoning and regulations governing scenic quality of urban areas. Therefore, with implementation of the General Plan/LCP policies as summarized in Table 4.1-3 of the Sustainability Update EIR (Draft EIR volume) and SCCC provisions related to project design and design review, including the Design Guidelines adopted as part of the Sustainability Update, the EIR concluded that future development would not adversely impact scenic resources or conflict with policies and regulations governing scenic quality, resulting in a less-than-significant impact.

The project site is located within a developed residential area. In the immediate vicinity of the project site, single-family homes and yards establish the visual character of the area, which also include trees along Maciel Road and some distant trees visible from Rodeo Gulch. Further north and south of the project site, the visual character is dominated by developed single-family homes townhomes.

The proposed project would result in development of 21 single-family homes on approximately 3,500-square foot lots, which is consistent with the mix of residential unit types and lots sizes within the general neighborhood. While parcels immediately adjacent to the project site are zoned R-1-6, many areas to the north, west, and south of the project site are zoned with RM designations that permit multi-family house. Thus, the project is within the range of housing types in the developed neighborhood, and the proposed 2-story height is consistent with heights in the neighborhood. The project design includes a subtle, neutral color palette, and materials would include a combination of stucco, horizontal siding, board and batten, and shingle siding depending on the floor plan. As indicated above and given its location in an urban area, the project is required to comply with the County's design review procedures and requirements, including adherence to the new County Design Guidelines and Site Development Permit requirements, either through proposed design or as may be conditioned by the County. Thus, the project would not conflict with applicable zoning and regulations governing scenic quality of urban areas. The Sustainability Update EIR concluded that future development accommodated by the Plan could result in adverse impacts to the visual quality, but could be mitigated with adherence to local regulations and design review requirements, including compliance with design and site review requirements set forth in the SCCC Chapter 13.11, which would be considered application of a uniformly applied development standard. County staff has reviewed the project and determined that the project complies with design review requirements as proposed or conditioned. Thus, the project would not result in new significant impacts or substantially more severe impacts related to visual quality than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(d) Light and Glare. The Sustainability Update EIR identifies potential sources of light and glare, and concluded that future development could result in exterior lighting and potential sources of glare, but new development would be subject to SCCC requirements, including section 13.11.074 (D)(1), which requires that all site, building, security, and landscape lighting be directed onto the site and away from adjacent properties and not be visible from adjacent properties. Light sources can be shielded by landscaping, structure, fixture design or other physical means. Building and security lighting shall be integrated into the building design. The regulations also specify that all lighted parking and circulation areas shall utilize low-rise light standards or light fixtures attached to the building. Light standards to a maximum height of 15 feet are allowed. The EIR concluded that future development projects would be required to comply with existing SCCC requirements regarding lighting, which would prevent creation of substantial new sources of light. Therefore, the Sustainability Update concluded that with compliance with County regulations, future development projects would avoid impacts related to generation of light and glare, resulting in no impact.

Exterior lighting would be included as part of the development, but would be typical of residential lighting in the area, and would not result in nighttime illumination levels beyond the property

line. Additionally, lighting along the new project street would be required comply with County standards on height and low-rise lighting.

A standard condition of approval requires all exterior lighting to be shielded to contain the light source in a downward direction and avoid glare and illumination of adjacent properties, which would be considered application of uniformly applied development standards that would substantially reduce light and glare impacts. Thus, the project would not result in new significant impacts or substantially more severe impacts related to light and glare than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards imposed as part of the project design review process. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

2. AGRICULTURE AND FOREST RESOURCES²	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	DEIR pp. 4.2-1 to 4.2-4, 4.2-18 to 4.2-25 FEIR pp 3-2	No	No	MM AGR-1; SCCC sections 13.10.313(E), 13.10.314, 13.10.632-13.10.644
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	DEIR pp. 4.2-4 to 4.2-5, 4.2-25 to 4.2-26	No	No	SCCC sections 13.10-312, 13.10.471-473
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code	DEIR pp. 4.2-7, 4.2-28 to 4.2-29	No	No	SCCC section 13.10.371-378; SCCC Chapter 16.52

² In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement Methodology provided in Forest Protocols adopted by the California Air Resources Board.

2. AGRICULTURE AND FOREST RESOURCES ²				
Would the project:	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	DEIR pp. 4.2-7, 4.2-28 to 4.2-29	No	No	SCCC section 13.10.371-378; SCCC Chapter 16.52
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	DEIR pp. 4.2-26 to 4.2-29	No	No	General Plan/LCP Policy ARC-1.4.4, ARC-1.4.5, ARC-1.4.13, ARC-1.4.14, SCCC section 13.10.313 for agricultural buffer requirements

(a) Conversion of Prime Agricultural Land. There are approximately 18,900 acres of land that are designated Prime Farmland, Farmland of Statewide Importance, and Unique Farmland in the California Farmland Mapping and Monitoring Program (FMMP) within unincorporated Santa Cruz County. The Sustainability Update EIR, which comprehensively addressed impacts to agricultural lands as a result of future development, concluded that future structural development as a result of the Sustainability Update could result in limited conversion of Important Farmlands as defined by the state's FMMP. The EIR found that the Sustainability Update retains policies to limit conversion, as well as inclusion of other controls that would serve to avoid or minimize impacts related to conversion of Important Farmland as summarized in Table 4.2-4 of the Sustainability Update EIR (Draft EIR volume) in addition to compliance with SCCC regulations. However, the EIR found that should a future residential, agricultural support facility, or public/quasi-public projects result in the conversion of Important Farmlands, the impact would be considered potentially significant. One of the Sustainability Update amendments clarifies "agriculturally oriented structures" to include these residential uses: one residence, one accessory unit, and farmworker housing. Section 13.10.631 addresses provisions for permitting farmworker housing on properties zoned CA (Commercial Agriculture).

The EIR found that the Sustainability Update amendments to SCCC regulations would require that any development exceeding 35,000 square feet in size to place an agricultural property of equal or greater size in a permanent agricultural easement, which would provide better protection to other existing agricultural lands, but would not fully mitigate the impacts. The EIR includes Mitigation

Measure AGR-1, which added public/quasi-public facilities to this requirement. The EIR also indicates that individual projects, including agricultural support uses for which discretionary review is required, would be subject to CEQA review and any loss of agricultural land could be evaluated using the Land Evaluation and Site Assessment (LESA) model to determine if impacts would be significant, which in some cases may determine that the impact is less than significant.

The EIR concluded that compliance with the County's policies and regulations to protect commercial agricultural lands, including prime lands, and compliance with other state requirements, such as project-specific application of LESA, would serve to generally avoid or minimize potential indirect impacts of the project related to conversion of Important Farmlands to non-agricultural uses. However, potential development on agricultural lands within the limits of SCCC zoning development standards, would also be subject to review, findings, and potential mitigation depending on the size of the project. The Sustainability Update included new requirements and findings for structures permitted on agricultural lands in order to limit and mitigate for the conversion of agricultural land. The EIR concluded that limited conversion of agricultural lands could occur with future structural development as could be permitted under County regulations (residential, agricultural support services, and wastewater treatment facilities), as well as other structural development that may result from implementation of the Sustainability Update, including other public facilities, breweries and distilleries. However, the EIR found that General Plan/LCP policies to limit conversion and avoid or minimize impacts related to conversion of Important Farmland as summarized in Table 4.2-4 of the Sustainability Update EIR (Draft EIR volume), and compliance with SCCC regulations would reduce the impact.

Nonetheless, the EIR found that there may be some limited situations where conversion of agricultural lands may occur, and conversion of prime agricultural lands to non-agricultural uses, even though the total amount likely would be minimal, would still be considered a significant and unavoidable impact. While Mitigation Measure AGR-1 would reduce the impact related to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, but not to a less-than-significant level, and the impact of conversion of these farmlands would be significant and unavoidable.

The project site is located within the Live Oak planning area within the County-designated USL. The project site does not contain prime farmland or other agricultural lands as mapped on the State Farmland Mapping and Monitoring Program (FMMP) (Sustainability Update EIR Figure 4.2-1). The project site is not designated for agricultural uses in the County's General Plan/LCP and is not located adjacent to agricultural lands that are in production or designated for such use. While portions of the project site were previously in production of row crops, agricultural production has not occurred on the site since approximately the mid-2000s (Harris and Lee Environmental Sciences 2021), and furthermore, the property is not designated as prime, important, or other agricultural land in the FMMP. Thus, the proposed project would not result in conversion of agricultural lands as designated in the FMMP, and the proposed project would not result in new

significant impacts or substantially more severe impacts related to conversion of agricultural land than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Conflict with Agricultural Zoning or Williamson Act Contracts. The Sustainability Update EIR concluded that the amendments to General Plan/LCP policies related to agricultural resources and accompanying changes to the SCCC would ensure that the zoning regulations are consistent with the General Plan/LCP. The Sustainability Update includes an implementing strategy to support and monitor compliance with Agricultural Preserve (Williamson Act) contracts and a covenants enforceable by the County to protect the use of the commercial agricultural land for agricultural uses (ARC-1.2b). The EIR concluded that the Sustainability Update would not result in conflicts with existing zoning for agricultural use or Williamson Act contract resulting in no impact.

The project site is not designated for agricultural uses in the County's General Plan/LCP or zoned for agricultural uses and is not located adjacent to agricultural lands. The project site is not subject to a Williamson act contract. Thus, the proposed project would not conflict with existing zoning for agricultural uses or a Williamson Act Contract, would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(c-d, e) Conflicts with Forest/Timberland Zoning and/or Conversion of Timberland. The Sustainability Update EIR found that the majority of the anticipated growth anticipated would occur within the existing USL and would not affect forest or timber lands and that County policies and regulations that seek to maintain and protect timberlands and limit residential development as summarized in Table 4.2-6, would serve to avoid or minimize potential impacts to forest and timber lands. The EIR concluded that with implementation of County General Plan/LCP policies and regulations, including SCCC Chapter 16.52 that regulates timber harvesting, the Sustainability Update would not conflict with or cause rezoning of forest or timber lands, resulting in no impact.

The project site is not zoned Timberland Preserve or Timber Production (TP) and is not located in or adjacent to timber resources. The proposed project would not result in conversion of timber lands or conflict with or lead to rezoning of lands zoning TP. Therefore, the proposed project would not result in impacts on forest resources, would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(e) Indirect Conversion of Agricultural Lands. The Sustainability Update EIR The Sustainability Update EIR reviewed the types of conflicts that are typically found with non-agricultural development adjacent to or in proximity to lands in agricultural production, which can then indirectly lead to conversion of agricultural lands. The EIR found that General Plan/LCP policies and SCCC regulations require agricultural buffers and other measures to reduce potential conflicts between agricultural and non-agricultural land uses. To protect agricultural land from potential conflicts with non-agricultural uses, there is a required 200-foot agricultural buffer setback between habitable uses (includes outdoor areas) and commercial agricultural land is retained. In addition to required agricultural buffers, the Sustainability Update EIR found that other policies serve to avoid or reduce conflicts between agricultural operations and non-agricultural uses as summarized in Table 4.2-5 of the Sustainability Update EIR (Draft EIR volume). These include requirements for windbreaks in buffers (ARC-1.4.4), siting of structures to minimize conflicts with adjacent agricultural operations (ARC-1.4.5), and recordation of agricultural notification for land divisions and properties adjacent to commercial agricultural lands (ARC-1.4.13 and 1.4.14). Additionally, the EIR found that the Sustainability Update would allow extension of sewer and water lines on commercial agricultural lands in the coastal zone, but only under specified circumstances that would require safeguards to ensure that such facilities would not result in the subsequent conversions of commercial agricultural lands to non-agricultural uses due to the utility extensions (ARC-1.1-14). Therefore, the EIR concluded that implementation of and compliance with County policies and regulations, the Sustainability Update, potential indirect conversion of agricultural lands due to potential conflicts and/or introduction of services would be considered a less-than-significant impact.

As indicated above, the project site is not located adjacent to agricultural lands, and, according to the County's GIS, the project site is not located within 200 feet of a property zoned for agriculture. Tthus, would not result potential conflicts with agricultural uses that could lead to conversion of prime agricultural lands. Therefore, the proposed project would not result in indirect impacts that could to conversion of agricultural lands, would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

3. AIR QUALITY ³	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	DEIR pp. 4.3-17 to 4.3-18, 4.3-22 to 4.3-23	No	No	None
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	DEIR pp. 4.3-23 to 4.3-27 to 4.3-30	No	No	None
c) Expose sensitive receptors to substantial pollutant concentrations?	DEIR pp. 4.3-27 to 4.3-30	No	No	None
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	DEIR pp. 4.3-30 to 4.3-31	No	No	SCCC section 13.10.313 for agricultural buffer requirements

(a) Conflict with Air Quality Management Plan. The Sustainability Update EIR reported that in 1991, the Monterey Bay Air Resources District (MBARD), formerly the Monterey Bay Unified Air Pollution Control District (MBUAPCD), adopted the Air Quality Management Plan (AQMP) for the Monterey Bay Region in response to the California Clean Air Act of 1988, which established specific planning requirements to meet the ozone standards. The California Clean Air Act requires that AQMPs be updated every three years. The MBARD has updated the AQMP seven times. The most recent update, the 2012-2015 Air Quality Management Plan (2016 AQMP), was adopted in 2017. The 2016 AQMP relies on a multilevel partnership of federal, state, regional, and local governmental agencies. The 2016 AQMP documents the MBARD's progress toward attaining the state 8-hour ozone standard, which is more stringent than the state 1-hour ozone standard.

The EIR further reported that MBARD's "CEQA Guidelines" consider inconsistency with the AQMP to be a significant cumulative adverse air quality impact. As indicated above, the AQMP is prepared to address attainment of the state AAQS and maintenance of the federal AAQS. The plan accommodates growth by projecting growth in emissions based on different indicators. For example, population forecasts adopted by the AMBAG are used to forecast population-related emissions. Through the planning process, emissions growth is offset by basin-wide controls on stationary, area, and transportation sources of air pollution. Thus, population-related emissions

³ Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

have been forecast in the AQMP using population forecasts adopted by AMBAG, and population-changing projects which are consistent with these forecasts are consistent with the AQMP. Projects that are not consistent with the AQMP's population projections have not been accommodated in the AQMP and would have a significant cumulative impact on regional air quality unless emissions are totally offset.

The Sustainability Update EIR concluded that potential development that could be accommodated by the Sustainability Update and which was evaluated in the EIR would not conflict with or obstruct implementation of the applicable air quality plan as dwelling unit estimates and population were within population estimates included in the AQMP. The current AQMP is based on AMBAG's 2014 Regional Growth Forecast (AMBAG 2014), which includes projections to year 2035.

The unincorporated county had 57,550 existing dwelling units as of January 1, 2023 (California Department of Finance 2023), and approximately 142 residential units have been constructed, are under construction, or have been approved throughout unincorporated county area since certification of the Sustainability Update EIR. With the addition of the proposed project units, the number of housing units constructed or approved since certification of the EIR would total approximately 220 dwelling units, which is within the 4,500 evaluated in the EIR. Future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to potential conflicts with the AQMP. Thus, the proposed project would not result in impacts related to conflicts with the AQMP, would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Project Criteria Pollutant Emissions. The U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards that are the maximum levels of ambient (background) air pollutants considered safe, with an adequate margin of safety to protect public health and welfare. Criteria pollutants include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), inhalable particulates (PM₁₀), fine particulates (PM_{2.5}), and lead. High O₃ levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO_x), which react under certain meteorological conditions to form O₃. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants. An area is designated as "in attainment" when it is in compliance with the federal and/or state standards, as further discussed below.

The project site is located within the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the MBARD and includes Santa Cruz, Monterey, and San Benito Counties. The NCCAB is designated attainment for the federal PM₁₀ and SO₂ standards, and is designated

attainment/unclassified for the other federal standards. The NCCAB is designated attainment for the state PM_{2.5}, NO₂, SO₂, and lead standards, and is designated unclassified for CO in Santa Cruz County. The NCCAB has nonattainment designations for state O₃ and PM₁₀ standards.

The Sustainability Update EIR concluded that future development by the Sustainability Update could result in air pollutant emissions, including ROG, NO_x, particulate matter, and CO from vehicular traffic, area sources, and energy sources (i.e., natural gas appliances, and space and water heating), as well as during construction of future development projects. The EIR indicated that the scale and timing of construction of development accommodated by the Sustainability Update is unknown, but that the MBARD CEQA Guidelines provide screening levels for potential significant impacts, and projects that are cover 2.2 or more acres may be required to implement dust suppression measures during construction unless future project-level construction-emissions modeling indicates that pollutant thresholds established by the MBARD would not be exceeded. Therefore, the Sustainability Update EIR concluded that with implementation and application of MBARD recommended measures, if required, potentially significant project-specific construction emissions would be to a less than significant.

With regards to operational emissions resulting from future development, the Sustainability Update EIR found that vehicular emission rates are anticipated to lessen in future years due to continuing improvements in automobile and fuel efficiency programs implemented by the State of California, and the MBARD's latest AQMP forecasts a substantial reduction in emissions through 2035. Regarding energy sources, the EIR indicated that new development would be required to comply with the applicable building codes (in effect at the time of construction, which include energy-efficient requirements that are anticipated to become more stringent. In addition, the EIR found that compliance with General Plan/LCP policies summarized in Table 4.3-4 in the Sustainability Update EIR (Draft EIR volume) would help reduce vehicle-related emissions. The Sustainability Update includes policies that set forth measures to avoid and minimize adverse impacts on air quality, including prioritizing connectivity of bicycle and pedestrian infrastructure, infrastructure for electric vehicles, siting new development to facilitate access to transit, and reduction of vehicle trips and emissions. Additionally, existing Public Safety Element policies identified in the EIR require future development projects to implement applicable MBARD control measures and/or air quality mitigations in the design of new projects as set forth in MBARD's CEQA Guidelines. Therefore, the Sustainability Update EIR concluded that construction and operational emissions impacts resulting from future development would be less than significant,

The proposed project would indirectly generate air pollutant emissions through new vehicle trips resulting from three new dwelling units on the three newly created lots, as well as emissions during construction. The proposed project would not result in stationary emissions. The proposed residential use of 21 residential units with a net increase of 20 residential units with proposed demolition of the existing residential unit is at a level that is substantially below the MBARD's screening level for the number of single-family residential units that could result in potentially significant ozone impacts (MBARD 2008).

Project construction could result in generation of dust and PM₁₀ emissions as a result of site excavation and grading. According to MBARD's CEQA Air Quality Guidelines (MBARD 2008), construction activity on 8.1 acres per day with minimal earthmoving or 2.2 acres per day with grading and excavation are assumed to be below the MBARD's PM₁₀ significance threshold of 82 pounds per day. The entire project site, which totals 2.37 acres, would be graded. Although, this slightly exceeds the MBARD's 2.2-acre significance threshold, the site is relatively flat, and there would be no substantial excavation. Furthermore, site grading would not occur in one day, and likely, would be less than 2.2 acres on any given day.

Therefore, the potential project PM₁₀ emissions would not exceed MBARD's adopted CEQA significance thresholds, and the project would not violate current air quality standards or expose sensitive receptors to substantial pollutant concentrations. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding air emissions than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required regarding these criteria pollutant air emissions pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

In addition, according to the MBARD CEQA Air Quality Guidelines, projects that are consistent with the AQMP would not result in cumulative impacts as regional emissions have been factored into the AQMP. The MBARD prepares air quality plans which address attainment of the state and federal emission standards and incorporate growth forecasts developed by AMBAG. As indicated in subsection 3(a) above, the proposed project would not conflict with or obstruct the implementation of the AQMP, which takes into account cumulative development within the county. Therefore, the proposed project would not result in a cumulatively considerable criteria pollutant increase.

(c) Sensitive Receptors. For CEQA purposes, a sensitive receptor is defined as any residence, including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade 12 schools; daycare centers; and healthcare facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long term care hospitals, hospices, prisons, and dormitories or similar live-in housing (MBARD 2008). The project site is located within a residential neighborhood, and existing residences, which are considered sensitive receptors, are located to the north, west, and south of the project site. The proposed residential project would not introduce a new source of stationary emissions, and thus, would not expose sensitive receptors to substantial pollutant concentrations.

The Sustainability Update EIR reviewed potential CO and toxic air contaminant (TAC) emissions that might affect sensitive receptors. This includes diesel particulate matter (DPM), which is a state-designated TAC. The EIR indicated that CARB adopted and has been implementing a diesel risk reduction plan to reduce the cancer risk associated with DPM, and that construction-related emissions are temporary. Concentrations of mobile-source DPM emissions are typically reduced

by 70% at a distance of approximately 500 feet. In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. In addition, operation of heavy-duty diesel construction equipment is subject to CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce DPM emissions, and any operation of diesel trucks are also subject to a CARB Airborne Toxics Control Measure. The EIR concluded that development accommodated by the Sustainability Update would not significantly contribute to a CO hotspot and would not indirectly generate construction-related TAC emissions and associated health risk, resulting in a less-than-significant impact. Furthermore, the EIR found that existing air quality protection policies and other policies amended as part of the Sustainability Update would reduce vehicle miles traveled (VMT) and/or air emissions as summarized in Table 4.3-4 of the Sustainability Update EIR (Draft EIR volume), which also are consistent with the goals of the MBARD's AQMP.

The Sustainability Update EIR concluded that compliance with existing General Plan/LCP Public Safety Element policies, which require future development projects to implement applicable MBARD control measures and/or air quality mitigations in the design of new projects as set forth in the MBARD's CEQA Guidelines, as well as project-specific environmental review required under CEQA, would ensure that TACs would be assessed and minimized, and sensitive receptors would be located away from sources of air pollution. Therefore, the EIR determined that the Sustainability Update would not expose sensitive receptors to substantial pollutant concentrations, and the impact would be less than significant.

As discussed above, the proposed project would not exceed MBARD emissions thresholds or result in a significant impact, and the project would not result in stationary sources of emissions. Construction equipment would result in temporary DPM emissions, but construction equipment would be subject to state emissions-control equipment requirements. Therefore, the project would not expose sensitive receptors to substantial pollution concentrations would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards contained in the MBARD's CEQA Guidelines. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(d) Odors. According to the Air District's CEQA Air Quality Guidelines (MBARD 2008), objectionable odors include sulfur compounds and methane, and land uses associated with odor complaints typically include landfills, rendering plants, agricultural uses, wastewater treatment plants, food processing plants, chemical plants, and refineries. As indicated in the Sustainability Update EIR, future development occurring as a result of the Sustainability Update would generate odors from vehicles and/or equipment exhaust emissions during construction. Odors would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse

rapidly and generally occur at magnitudes that would not affect substantial numbers of people, and the EIR concluded that these types of odors would result in a less-than-significant impact.

The proposed residential project does not include any uses associated with odors, and would not result in generation of substantial odors or result in impacts related to odors. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts related to odors than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required regarding impacts pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

4. BIOLOGICAL RESOURCES		Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:	Where Impact is Addressed in Sustainability Update EIR			
a) Have a substantial adverse effect, either directly or through habitat modifications, 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 Wildlife or U.S. Fish and Wildlife Service?	DEIR pp. 4.4-11 to 4.4-12, 4.4-29 to 4.4-31, DEIR Appendix E, FEIR pp 3-3 to 3-4	No	No	General Plan /LCP Policy ARC-3.1.10, SCCC Chapter 16.32
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	DEIR pp. 4.4-12 to 4.4-16, 4.4-32 to 4.4-37, FEIR pp. 3-4	No	No	MM BIO-2B, General Plan /LCP Policy ARC-3.1.10, SCCC Chapters 16.30 and 16.32
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	DEIR pp. 4.4-13 to 4.4-15, 4.4-32 to 4.4-35	No	No	General Plan/LCP Policy ARC-3.1.10, SCCC Chapters 16.30 and 16.32
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or	DEIR pp. 4.4-16 to 4.4-17, 4.4-29 to 4.4-31, 4.4-37 to 4.4-38	No	No	General Plan/LCP Policy ARC-1.1.13, SCCC Chapter 16.30

4. BIOLOGICAL RESOURCES	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:				
impede the use of native wildlife nursery sites?				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	DEIR pp. 4.4-39	No	No	SCCC Chapter 16.34
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	DEIR pp. 4.4-39 to 4.4-40, FEIR pp. 3-4 to 3-5	Not Applicable	Not Applicable	SCCC Chapter 16.32

(a) Special-Status Species, Sensitive Habitat. The Sustainability Update EIR reported that a total of 93 special-status plant and 55 special-status wildlife species have been documented within the county. Federally designated critical habitat is present in a number locations, including designated critical habitat for eight wildlife species and four plant species.

The Sustainability Update EIR indicated that future development accommodated by the Sustainability Update could potentially result in significant impacts, either directly, or through modifications to habitat that supports special status plant and/or wildlife species. However, the EIR found that the majority of the future development is expected to occur within the USL and community enclaves within the RSL where natural vegetation communities undisturbed by human activity are very limited or do not occur at all. However, the Sustainability Update includes policies to protect special status species as summarized in Table 4.4-3; Policy ARC-3.1.10 specifically requires protection of rare, endangered, and threatened species. Chapter 16.32 of the SCCC requires preparation of biotic assessments and biotic reports where potential rare, endangered or threatened species may occur, and requires development proposals to mitigate potentially significant impacts. Furthermore, other state and federal regulations require protection of special status species and nesting birds. The EIR concluded that with compliance with federal, state and local regulations, implementation of the Sustainability Update policies and implementation strategies summarized on Table 4.4-3, and potential impacts to special status species due to future development resulting from implementation of the Sustainability Update would be less than significant.

Vegetation on the project site consists of annual (nonnative) grassland (some areas previously disked), scattered landscape/fruit trees and groundcovers, and scattered oak trees (Biotic Resources

Group 2022). The SCCC requires preparation of a biotic assessment. In accordance with County requirements, a biotic assessment was prepared and determined that no special status plant species were found or expected to be found on the project site. The biotic assessment indicates that special status species were observed on this property; however, bats (including species considered to be State Species of Special Concern) may roost in the abandoned outbuildings, although no significant white-wash deposits were observed suggesting significant bat roosting activity, but all areas of the outbuildings were not visible (Biotic Resources Group 2022). The biotic assessment includes a recommendation to conduct surveys for bats prior to demolition of the existing outbuildings, and if roosting bats are found, recommendations for timing of demolition are provided for avoidance during the roosting period. This recommendation is included in the project Conditions of Approval. Chapter 16.32 of the SCCC requires mitigation of impacts identified in a biotic assessment, and the recommendations in the project biotic assessment are included in the Project Conditions of Approval. Thus, the project would not result in new significant impacts or substantially more severe impacts related to special status than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards contained in Chapter 16.32 of the SCCC, which requires preparation of biotic assessments and biotic reports where potential rare, endangered or threatened species may occur, and requires development projects to mitigate potentially significant impacts. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b-c) Sensitive Habitat. The Sustainability Update EIR indicated that sensitive habitats include the following: (1) vegetation communities designated as sensitive by the California Department of Fish and Wildlife (CDFW) (CDFW sensitive natural communities); (2) riparian communities and aquatic resources, including wetlands; and (3) County-designated sensitive habitats, many of which overlap with the other two categories. The General Plan/LCP and Chapter 16.32 of the SCCC also define “sensitive habitat,” and in addition to riparian and aquatic sensitive habitat, other specified unique biotic communities are identified.

The Sustainability Update EIR reported that aquatic resources include waters of the United States regulated under the federal Clean Water Act; waters of the State regulated under the Porter-Cologne Water Quality Act; and rivers, streams, and lakes regulated under section 1602 of the California Fish and Game Code. Because the EIR analysis was at the county level and programmatic, no jurisdictional delineations were conducted for the EIR; formal delineations of potentially jurisdictional aquatic resources would need to be conducted at a project-specific level for future development activities. In addition, portions of riparian communities may also be regulated as wetlands under the federal Clean Water Act.

The Sustainability Update EIR found that future development and redevelopment throughout the county, is primarily within urban areas and within the USL, which are already largely developed. However, there may be some areas where future developments is within or adjacent to riparian,

wetland, and/or other sensitive habitats. The EIR concluded that future development resulting from implementation of the Sustainability Update could impact sensitive habitats, including riparian and wetland habitats. However, in areas where parcels contain or are adjacent to sensitive habitats (e.g., riparian communities, streams, wetlands), the EIR found that future development of these parcels would be subject to federal and state regulations protecting sensitive habitats and County regulations in SCCC Chapters 16.30 and 16.32, which require protection of sensitive habitats.

In particular, Policy ARC-3.1.4 indicates that sensitive habitats are protected through implementation of SCCC Chapters 16.32, Sensitive Habitat Protection, and 16.30, Riparian Corridor and Wetlands Protection, and proposed implementation strategies require retention of these regulations (ARC-3.1f [Sensitive Habitat] and ARC-3-3a [Riparian and Wetland]). Policies ARC-3-1.6 and 3.1.7 protect sensitive habitats against disruption of habitat values through development siting and conditions. Chapter 16.30 establishes required riparian setbacks for new development based on stream characteristics, and Chapter 16.32 requires preparation of biotic assessments and biotic reports where impacts to sensitive habitats may occur, and requires development proposals to mitigate potentially significant impacts. General Plan/LCP policies and regulations in Chapter 16.32 require 100-foot wetland buffers to protect these sensitive habitat areas. Furthermore, policies to protect sensitive habitats, as summarized in Table 4.4-4 in the Sustainability Update EIR (Draft EIR volume), would protect sensitive habitats against disruption of habitat values through future review of development siting. Therefore, the EIR concluded that with adherence to local and state regulations, and implementation of General Plan/LCP policies and implementation strategies summarized on Table 4.4-4, as well as required future environmental review of specific development projects, potential impacts to sensitive habitats, including riparian and wetland, due to future development resulting from implementation of the Sustainability Update would be less than significant.

The Sustainability Update EIR concluded that new development accommodated by the plan would result in construction that could result in impacts to sensitive habitats. However, the EIR concluded that with compliance with federal, state and local regulations, implementation of the proposed Sustainability Update policies and implementation strategies summarized on Table 4.4-4, potential impacts to riparian, wetland, and other sensitive habitats due to future development would be less than significant.

The SCCC requires preparation of a biotic assessment. A biotic assessment prepared for the project found that the project site does not support any sensitive habitats, as identified by the County or CDFW. The annual (non-native) grassland supports common species and is not a sensitive resource, and the site does not support any drainages or other wetland-type features (Biotic Resources Group 2022). Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding sensitive habitat than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no

further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(d) Wildlife Movement/Breeding. The Sustainability Update EIR reported that generally, mountainous watersheds, creeks, streams, and other riparian areas serve as the primary wildlife corridors within the county and are generally more present or natural in the north coast and mountain areas of the county. In the urbanized and southern portions of the county, wildlife corridors are typically limited to rural areas toward the north and east, away from developed areas of the county. All streams and associated riparian vegetation in the county are also considered wildlife corridors for native fish and wildlife.

The Sustainability Update EIR found that future development as a result of the Sustainability Update would primarily occur on vacant infill sites or underutilized properties within the USL. The primary wildlife movement corridors are located along major watercourses and within undeveloped, open space lands in the Santa Cruz Mountains, where little or any new development other than potential single-family homes on large lots would be constructed. Projects adjacent to watercourses would be subject to setback requirements set forth in SCCC Chapter 16.30 and federal and state regulations protecting streams and riparian habitat and thus protecting wildlife movement habitat. In addition, the EIR found that General Plan/LCP policies intended to protect wildlife movement as summarized on Table 4.4-5 in the Sustainability Update EIR (Draft EIR volume), would avoid or minimize impacts related to wildlife movement or nesting birds.

The EIR also found that construction activities associated with future development could also affect nesting birds, if any are present during construction activities, including tree removal, which could disrupt nesting activities. This could lead to injury to individuals and/or abandonment of nests. However, the EIR found that with required compliance with existing federal, state, and local regulations, and implementation of General Plan/LCP policies and implementation strategies summarized on Table 4.4-5 of the Sustainability Update EIR (Draft EIR volume), potential impacts to wildlife movement and/or breeding or nesting, due to future development resulting from implementation of the Sustainability Update, would be less than significant.

The project site is located within a developed area, and is not located adjacent to or in proximity to a riparian corridor, and thus, would not result in impacts to wildlife movement as addressed in the Sustainability Update EIR. The project involves the removal of 14 trees. All trees on the project site could provide potential nesting habitat for migratory birds which are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGF). Tree removal during the breeding season (generally February 15 to August 31) has the potential to destroy bird nests, eggs or chicks if any are present during the removal. Compliance with the MBTA would require that either a pre-construction nesting survey be conducted to confirm that no nesting birds protected under the MBTA are present if trees are removed during the nesting season or to remove trees outside of the nesting season. Compliance with required regulations would not result in a significant impact.

The County typically requires as a standard condition of project approval that pre-construction nesting surveys be conducted for projects with tree removal, ground disturbance where ground nesting may occur, and/or where nesting birds may be indirectly impacted, in order to avoid and protect nesting birds. This would be considered application of a uniformly applied development standard. This condition is included in the Project Conditions of Approval. Thus, the project would not result in new significant impacts or substantially more severe impacts related to nesting birds than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(e) Conflicts with Local Policies and Ordinances. The County's General Plan/LCP ARC Element includes objectives and policies pertaining to biological resources. In addition, the SCCC has regulations to protect riparian corridors and wetlands (Chapter 16.30), to protect sensitive habitats (Chapter 16.32), and to protect significant trees (Chapter 16.34).

The Sustainability Update EIR found that potential future development could occur throughout the county, but primarily within urban areas and within the USL. The EIR reported that some parcels within the coastal zone may contain trees protected under SCCC Chapter 16.34, Significant Trees Protection, and that any future development proposing the removal of such trees within the coastal zone would need to apply for a tree removal permit and would be required to mitigate for loss of trees by replacing them with trees acceptable to the County Planning Department. Some parcels contain or abut "areas of biotic concern" as defined by SCCC Chapter 16.32, Sensitive Habitat Protection, including unincorporated areas of Aptos within the S-P zone for Santa Cruz long-toed salamander. Any future development activity within an area of biotic concern would be subject to biotic approval from the County and be required to mitigate for project-level impacts. Therefore, the EIR concluded that with implementation of General Plan/LCP policies and implementation strategies and adopted County Code regulations, conflicts with local regulations would be avoided, resulting in no impact.

The project would result in the removal of 14 trees due to the proposed construction footprint, none of which are considered significant trees under County regulations; five existing trees, include four oak trees would be retained as part of the project. The County's Significant Tree Protection Ordinance (16.34) addresses large trees occurring within the coastal zone; however, the subject property is not located in the coastal zone, so this ordinance is not applicable. Therefore, the project would not result in conflicts with County policies or regulations protecting trees and biological resources as explained above and in the preceding sections. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(f) Habitat Conservation Plans (HCP). The Sustainability Update EIR reported that approximately 20 approved HCPs have been issued within Santa Cruz County in the last 15+ years under the Federal Endangered Species Act to entities undertaking projects that might result in take of an endangered or threatened species, of which two are currently active in unincorporated county areas. There are no known NCCPs in the county.

The Sustainability Update EIR found that undeveloped parcels within the RSL in areas within approved HCPs would be required to comply with provisions of the applicable HCP. These areas would be considered an “area of biotic concern” under SCCC Chapter 16.32, and any future development would therefore be subject to its provisions. The County would not issue a permit for development on a site with an approved HCP until a biological assessment is performed by an applicant-funded and County-approved biologist. The County would typically not allow development of a site with an approved HCP if it would conflict with the HCP. Therefore, the EIR concluded that future development resulting from the Sustainability Update, which would primarily be within urban areas and within the USL, would result in no impact related to potential conflicts with an HCP or NCCP with implementation of General Plan/LCP policies and code sections in the SCCC.

The project site is not located within the boundaries of an adopted HCP. Thus, the proposed project would not conflict with an approved HCP, would not result in new significant impacts or substantially more severe impacts regarding recreation than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

5. CULTURAL RESOURCES		Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?		DEIR pp. 4.5-20 to 4.5-24	No	No	MM CUL-1 MM CUL-2 General Plan/LCP Policies ARC-8.2p, SCCC Chapter 16.42
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		DEIR pp. 4.5-24 to 4.5-25	No	No	General Plan/LCP Polices ARC-8.1.1, ARC-8.1.3, ARC-8.1.4, ARC-8.1.5, SCCC Chapter 16.40

5. CULTURAL RESOURCES				
Would the project:	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
c) Disturb any human remains, including those interred outside of formal cemeteries?	DEIR pp. 4.5-24 to 4.5-25	No	No	SCCC Chapter 16.40

(a) Historical Resources. The Sustainability Update EIR indicates that there are 17 federally and state-listed historical resources in the unincorporated county, as well as 266 parcels identified by the County as being local historical resources as designated by the Historic Landmark Combining District. The EIR indicated that future development accommodated by the Sustainability Update could be in areas with known historical sites or in areas where structures have not yet been evaluated for historical significance. Buildings that are over the age of 50 years old and are proposed for modification or alteration in the future would require evaluations to determine eligibility for listing in the California Register of Historical Resources (CRHR) and/or National Register of Historic Places (NRHP), and if found eligible, the building would be considered a historical resource under CEQA. The EIR found that future potential redevelopment of existing developed sites may result in alteration or removal of historical structures, affecting the significance of historical values if the structure is considered an historical resource under CEQA definitions.

The EIR indicated that the Sustainability Update's ARC Element of the County's General Plan/LCP includes policies that would serve to reduce potential future impacts to historical resources as summarized in Table 4.5-4 of the Sustainability Update EIR (Draft EIR volume). For development activities on properties containing historic resources, policies require protection, enhancement, and/or preservation of the resource, and plans for protection/preservation are required on properties with a designated historical resource. The Sustainability Update requires review of applications for demolition of any structure more than 50 years old to determine whether the structure is an historical resource under CEQA (ARC-8.2p). County policies also protect and preserve historical resources (ARC-3.2.3 and ARC-8.2.4). Additionally, compliance with local regulations provided in SCCC Chapter 16.42 regarding historic alteration or demolition would also serve as the mechanism for review of projects that may alter existing historical resources as designated by the Historic Landmark Combining District.

The Sustainability Update EIR determined that, through compliance with federal, state, and local regulations, and implementation of mitigation measures identified through project-level CEQA reviews and County-required historical evaluations for any structure over 50 years old, the potential for adverse effects to historical resources would be identified, and mitigation would be required if a significant impact were identified. Nonetheless, the EIR found that preservation, reuse, maintenance, and/or avoidance of historical resources may not always be feasible, especially

with potential redevelopment and intensification of uses in the USL, and recordation of a significant historical resource, alone, would not constitute adequate mitigation for a substantial adverse change to that resource. Therefore, because the potential for future development accommodated by the Sustainability Update to cause a substantial adverse change to an historical resource could not be precluded, the Sustainability Update EIR concluded that impacts to historical resources could be potentially significant.

The Sustainability Update EIR included Mitigation Measure CUL-1, which would require the review of listed, eligible, or unevaluated sites or structures over 50 years old to determine whether a historical resource exists, and if so, provide mitigation to reduce potentially significant impacts to a less-than-significant level. Mitigation would include compliance with the Secretary of the Interior Standards pursuant to CEQA guidelines 15064.5(b)(3). However, since the Sustainability Update EIR is a program-level analysis and no specific development projects were proposed, the EIR indicated that it is not possible to determine whether individual projects would be able to attain compliance with the Secretary of Interior's Standards.

The Sustainability Update EIR also included MM CUL-2, which provides on-site preservation guidance, and in the event that a structure or resource cannot be preserved, it ensures that actions would be taken to appropriately record and document an identified historical resource. While the potential for adverse effects on historical resources would be substantially reduced with MM CUL-2, the Sustainability Update EIR acknowledges that recordation of the resource would not constitute adequate mitigation for a substantial adverse change to that resource. Therefore, the Sustainability Update EIR analysis conservatively concluded that the potential impacts to historical resources due to future development resulting from implementation of the Sustainability Update would be potentially significant and unavoidable.

The project site contains a number of buildings, reported to be remaining buildings of a former poultry ranch (Past Consultants 2022), which include a highly-altered house, a small storage shed, a vehicle shed, and a poultry shed. A historical evaluation prepared for the project, concluded that the existing structures do not meet the criteria for listing on the National Register of Historic Places, the California Register of Historical Resources, or the Santa Cruz County Historic Resources Inventory, and is not considered a historical resource under the definitions of CEQA (Past Consultants 2022). Therefore, the project and proposed demolition of existing structures would not have an adverse effect on historical resources. <Thus, the proposed project would not result in new significant impacts or substantially more severe impacts related to historical resources than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b-c) Archaeological Resources. The Sustainability Update EIR indicates that sensitive archaeological areas are found throughout the county in all planning areas. The EIR found that grading, trenching, and other subsurface construction activities associated with future

development could damage or destroy known archaeological resources or potentially to encounter unknown archaeological resources during construction, especially in identified sensitive areas. The same development activities also have the potential to disturb or destroy Native American burial sites if known or encountered during future construction. As described in the EIR, future development proposals located within archaeologically sensitive areas defined by the County would be required to prepare archaeological investigations.

The EIR found that the Sustainability Update's ARC Element of the County's General Plan/LCP includes policies and implementation strategies, which would serve to reduce impacts related to archaeological resources and human burials as summarized in Table 4.5-3 of the Sustainability Update EIR (Draft EIR volume). The General Plan/LCP includes policies that require preparation of archaeological investigations for any project located within a sensitive archaeological area (ARC-8.1.1) as do requirements set forth in SCCC 16.40. Identified archaeological sites must be protected (ARC-8.1.3) and evaluated (ARC-8-1.4). Additionally, the County's accidental discovery policy (ARC-8.1.5) and procedures (SCCC Chapter 16.40) would also apply to properties in the study area in the event construction encounters unidentified archaeological deposits. Similarly, County policies and regulations, as well as state regulations, require construction to be stopped in the event that human remains are found, and state law requires that the County Coroner be notified in the event of this occurrence. If human remains are identified, state law sets forth the procedures for contacting the Native American Heritage Commission (NAHC) and Native American tribes. Therefore, the Sustainability Update EIR concluded that, with compliance with County policies and state and local regulations, potential impacts to archaeological resources and/or accidental human remains during construction of future development resulting from implementation of the Sustainability Update would be less than significant.

The project site is identified as being in an archaeologically sensitive area according to County GIS information, and an archaeological investigation was prepared in accordance with County requirements. The investigation reported that the records search and field survey did not reveal evidence of the existence of an archaeological site on the property. Although a small number of artifacts were documented, indicators of archaeological deposits or features were not seen during the on-site survey of the property, and no impacts to archaeological resources were identified (Patricia Paramoure Archaeological Consulting 2022). Therefore, the project would not result in impacts to archaeological resources. As indicated above, any unknown resources discovered during construction would be subject to County requirements to halt work and evaluate the find as set forth in SCCC Chapter 16.40, which would be considered application of a uniformly applied development standard. Thus, the project would not result in new significant impacts or substantially more severe impacts related to archaeological resources than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

6. ENERGY		Where Impact is Addressed in Sustainability EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:					
a	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	DEIR pp. 4.6-10 to 4.6-15	No	No	General Plan/LCP Policy BE-4.2
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	DEIR pp. 4.6-15 to 4.6-16	No	No	None

(a) Energy Use. The Sustainability Update EIR evaluated potential energy demand associated with future estimated residential and non-residential development potentially accommodated by the Sustainability Update and provided a quantified estimate of consumption of electricity, natural gas, and petroleum. The EIR found that energy demand would increase as a result of future development accommodated by the Sustainability Update. However, future development accommodated by the Sustainability Update would be required to comply with the efficiency standards of the California Building Code (CBC) (Title 24 Part 6 and Part 11), and the EIR concluded that additional energy demand as a result of development resulting from the Sustainability Update would not be unusual or wasteful as compared to overall local and regional demand for energy resources. In addition, the Sustainability Update included a number of amended policies in the County's General Plan/LCP that seek to improve energy efficiency and encourage alternative energy, as summarized in Table 4.6-2 of the Sustainability Update EIR (Draft EIR volume), which would also serve to reduce/minimize energy consumption. Furthermore, motor vehicles are expected to use decreasing amounts of petroleum over time, primarily due to advances in fuel economy and the increasing use of electric vehicles. Therefore, the Sustainability Update EIR concluded that electricity, natural gas, and petroleum consumption from future development as a result of the Sustainability Update would not be considered inefficient or wasteful, and impacts would be less than significant.

Construction of the project would require consumption of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment, and other resources including, but not limited to, lumber, sand, gravel, asphalt, metals, and water. It is expected that nonrenewable energy resources would be used efficiently during future construction of residential units accommodated by the project. Therefore, the amount and rate of consumption of such resources during construction and

maintenance activities would not result in the unnecessary, inefficient, or wasteful use of energy resources.

As indicated in Section V.B, the proposed residential project is within the development estimates considered in the Sustainability Update EIR, and thus, within the scope of the analysis in the EIR for which a less-than-significant impact was identified. Additionally, the proposed project avoids or reduces inefficient, wasteful, and unnecessary consumption of energy. The project would be subject to approval of building permits that meet the CBC and SCCC requirements, as well as compliance with County policies that promote energy conservation and alternative energy sources. Furthermore, the project includes solar panels on the proposed homes. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding energy use than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

b) Conflicts with Plans. The Sustainability Update EIR reported that Part 6 of Title 24 of the California Code of Regulations establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically (every 3 years) to incorporate and consider new energy efficiency technologies and methodologies. Title 24 also includes Part 11, the California Green Building Standards (CALGreen). CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial and state-owned buildings. The Sustainability Update EIR found that development facilitated by the Sustainability Update would meet any applicable Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency.

Additionally, as described in the Sustainability Update EIR, Central Coast Community Energy (3CE) started providing clean energy to the county as of 2018. 3CE is on a pathway to 60% clean and renewable energy by 2025 and 100% clean and renewable energy by 2030, as indicated in the EIR. The EIR determined that overall, the county's procurement of energy through 3CE and the projected 100% clean and renewable energy sourcing by 2030 would give customers the option of purchasing this clean energy 15 years ahead of California's SB 100 requirement of zero carbon energy by 2045. The County also adopted its Climate Action Strategy in 2013 and its Climate Action and Adaption Plan (CAAP) in 2022, which outline the County's course of action to reduce GHG emissions produced by governmental operations and community activities within unincorporated Santa Cruz County, and includes energy-consumption-reduction measures. The County has implemented a variety of strategies from the plan to achieve GHG reductions, efforts which will continue in the future.

The Sustainability Update EIR concluded that, because the land uses to be developed under the Sustainability Update would comply with all applicable energy standards and regulations, and that policies within the Sustainability Update's General Plan/LCP amendments also focus on compact

growth, efficient energy use, and renewable energy, the Sustainability Update, and future development would result in a less-than-significant impact associated with the potential to conflict or obstruct a state or local plan for renewable energy or energy efficiency.

As indicated above, the proposed residential project is within the scope of impact analyzed within the Sustainability Update EIR. The proposed project would not result in conflicts with or obstruct implementation of a state or local plan for renewable energy or energy efficiency. The proposed project would comply with building code requirements described above. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

7. GEOLOGY AND SOILS		Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:	Where Impact is Addressed in Sustainability Update EIR			
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) 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 based on other substantial evidence of a known fault?	DEIR pp. 4.7-18 to 4.7-20	No	No	General Plan/LCP Public Safety Policies 6.1.1, 6.1.2, 6.1.5, 6.1.9, 6.1.10, 6.1.11, 6.1.12 SCCC Chapters 12.10, 16.10
ii) Strong seismic ground shaking?	DEIR pp. 4.7-18 to 4.7-20	No	No	General Plan/LCP Public Safety Policies 6.1.1, 6.1.2, 6.1.3, 6.1.5, 6.1.8, 6.1.9, 6.1.10, 6.1.11, 6.1.12 SCCC Chapters 12.10, 16.10
iii) Seismic-related ground failure, including liquefaction?	DEIR pp. 4.7-18 to 4.7-20	No	No	General Plan/LCP Public Safety Policies 6.1.1, 6.1.2, 6.1.4 SCCC Chapters 12.10, 16.10
iv) Landslides?	DEIR pp. 4.7-18 to 4.7-20	No	No	General Plan/LCP Public Safety Policies

7. GEOLOGY AND SOILS		Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:	Where Impact is Addressed in Sustainability Update EIR			
				6.1.9, 6.2.1, 6.2.5, 6.2.7
b) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	DEIR pp. 4.7-21 to 4.7-23	No	No	General Plan/LCP Public Safety Policies 6.1.1, 6.1.2, 6.1.3, 6.1.5 SCCC Chapters 12.10, 16.10
c) Result in substantial soil erosion or the loss of topsoil?	DEIR pp. 4.7-24 to 4.7-25	No	No	General Plan/LCP Public Safety Policies 6.3.2, 6.3.3, 6.3.4, 6.3.5, 6.3.7, 6.3.8 SCCC Chapters 16.20 and 16.22
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	DEIR pp. 4.7-25 to 4.7-26	No	No	SCCC Chapter 12.10
e) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	DEIR pp. 4.7-18 to 4.7-20	No	No	General Plan/LCP Policy ARC-6.1.1, SCCC Chapter 16.44

(a) Seismic Hazards. The Sustainability Update EIR indicates that Santa Cruz County is located in a seismically active region of California, between two major Holocene-active faults, including the San Andreas Fault, located along the northeast county boundary, and the San Gregorio Fault, located along the northwest county coast. The EIR found that future development as a result of the Sustainability Update could occur on lands subject to seismic hazards, including active faulting, off-fault ground cracking, liquefaction, lateral spreading, seismically induced landslides, differential settlement, and collapsible soils. However, anticipated future development would not cause or exacerbate the potential for such seismic hazards to occur. Adherence to existing regulations and standards, including the CBC, the County's Building Regulations, and various policies and actions established in the Update and summarized in Table 4.7-2 of the Sustainability Update EIR (Draft EIR volume), would minimize seismic-related impacts.

Public Safety Element policies 6.1.1, 6.1.2, 6.1.3, and 6.1.6 require completion of geotechnical reports prior to construction of discretionary projects, projects within fault zones, and reservoirs.

Buildings would be required to be designed in accordance with the latest edition of the CBC, which sets forth structural design parameters for buildings to withstand seismic shaking without substantial structural damage. General Plan/LCP policies indicated that required geologic reviews shall examine all potential seismic hazards and may consist of a Geologic Hazards Assessment and a more complete investigation where required. Policies 6.1.8 and 6.1.11 require that projects be set back from active faults and be designed to withstand an earthquake on the San Andreas Fault. In addition, Policy 6.1.12 provides minimum lot sizes for new parcels located in State-designated active fault zones or County-designated seismic review zones. Each of these policies seek to reduce the potential for loss of life, injury, and property damage due to faulting, seismically induced ground shaking, and seismically induced ground failure.

Under existing county regulations, all related development, grading, and building permits would be reviewed by the County to ensure compliance with the County's Building Regulations, Geologic Hazards Ordinance, and Grading Ordinance (Chapters 12.10, 16.10, and 16.20 of the SCCC, respectively), and would be required to provide adequate engineering design to address or avoid unstable earth conditions. The County Building Code, adopted as Chapter 12.10 of the SCCC, implements the 2019 CBC and contains standards and regulations relating to seismic safety and construction standards for building foundations. Conformance with the CBC, as required by state law, and the County, would ensure the maximum practicable protection available for structures and their foundations. Therefore, the EIR concluded that potential impacts related to seismic hazards as a result of future development resulting from implementation of the Sustainability Update would be less than significant with adherence to existing regulations and policies. The Sustainability Update EIR concluded that with adherence to existing regulations and standards, including preparation of a project-specific geotechnical report and adherence to the CBC, as incorporated into the SCC, and various policies and actions established in the General Plan/LCP, harm to people and structures due to seismic events and potential fault would be minimized.

The project site is not located within a mapped fault zone or area subject to seismic hazards. The closest faults to the project site are the San Andreas Fault (approximately 9 miles northeast), Zayante-Vergeles Fault (approximately 6 miles northeast), Monterey Bay-Tularcitos Fault (approximately 9 miles southwest), and San Gregorio Fault (approximately 12 miles west-southwest). The updated geotechnical investigation prepared for the project in December 2022 (Dees & Associates 2022) determined that there is a potential for some thin soil layers in two of the borings near the southern end of the project site to liquefy during the design earthquake. The potentially liquefiable soil layers are more than 14 feet below the ground surface. Total seismic settlements are predicted to be on the order of 0.03 to 0.53 inches, however the settlements are deep and small, and no surface effects from liquefaction are anticipated (Dees & Associates 2022). The investigation provides seismic design and other recommendations. In accordance with County requirements, a project geotechnical investigation was performed, and implementation of recommendations would be considered application of a uniformly applied development standard. Thus, the project would not result in new significant impacts or substantially more severe impacts

related to seismic hazards than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards for required geological and geotechnical investigations and implementation of recommendations contained in these reports. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Non-Seismic Geologic Hazards. The Sustainability Update EIR indicates that some areas of the county are subject to other non-seismic geologic hazards including landslides and soil collapse in mountainous areas and coastal erosion including landslides, coastal bluff retreat, and unstable soils in coastal areas. As indicated in the EIR, the county is not in an area of regional ground subsidence and no subsidence-related impacts would occur. The EIR found that future development accommodated by the Sustainability Update could occur in areas subject to coastal erosion that could result in bluff retreat, landslides and unstable soils and in areas of steep slopes and potential slope instability. Impacts would be minimized through required adherence to the SCCC, including the County's Building Regulations, Geologic Hazard Code, Grading Ordinance, and Erosion Control Ordinance, as well as the General Plan/LCP policies summarized in Table 4.7-3 of the Sustainability Update EIR (Draft EIR volume).

Public Safety policies 6.2.1 and 6.2.2 would require completion of geologic hazards assessments for projects that may be affected by slope instability or other geologic hazards. Policies 6.2.5, 6.2.6, 6.2.10, and 6.3.1 would place restrictions on properties with steep slopes, potentially unstable slopes, or other geologic hazards. Policy 6.1.9 would require owners to record a Notice of Hazards disclosing geologic hazards on the property, and Policy 6.2.4 would allow the County to deny grading permits if it is found that geologic hazards cannot be satisfactorily mitigated. With respect to coastal erosion and slope instability, Policy 6.2.11 would require a geologic hazards assessment for development within coastal hazard areas, including all development within 100 feet of a coastal bluff.

Furthermore, the EIR found that project grading and construction would be required to adhere to SCCC requirements. Pursuant to the County's Building Code (SCCC Chapter 12.10), along with the County's Geologic Hazard Code (SCCC Chapter 16.10), Grading Ordinance (SCCC Chapter 16.20), and Erosion Control Ordinance (SCCC Chapter 16.22), development completed in association with the proposed project would be required to avoid exposure to unstable earth and unsuitable soil conditions. The County Planning Department and Building & Safety Division would enforce County development standards that require a geological study and/or soils engineering report, in addition to erosion control measures, which would substantially reduce landslide impacts. Therefore, the Sustainability Update EIR concluded that, with compliance with County policies and state and local regulations, future development would not result in new development on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potential impacts related non-seismic geologic hazards would be less than significant.

The project site is not located within an area subject to non-seismic geologic hazards. The project site is relatively level and is not near steep slopes; thus, the potential for landslides to affect the project site is low. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts related to non-seismic geologic hazards than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Erosion. The Sustainability Update EIR indicates that most of the soils in the county consist of loamy sands and sandy loams, which are susceptible to erosion. The EIR found that future development accommodated by the Sustainability Update would result in ground disturbance during clearing and grading, which could in turn result in soil erosion and loss of topsoil, particularly on steep slopes. Grading and construction activities occurring as a result of future development accommodated by the Sustainability Update would be required to adhere to General Plan/LCP policies and SCCC requirements, including best practices to manage grading, erosion, and stormwater runoff. General Plan/LCP policies that would serve to reduce soil erosion and loss of topsoil are summarized in Table 4.7-4 of the Sustainability Update EIR (Draft EIR volume). Specifically, Public Safety Element Policies 6.3.2 and 6.3.3 require mitigation measures to reduce and prevent soil impacts. Policies 6.3.7, 6.3.8, and 6.3.12 require minimization of grading and vegetation removal,

Development projects also would be subject to grading and erosion control requirements set forth in the SCCC. Under existing regulation, all related development, grading and building permits would be reviewed by the County to ensure compliance with the County's Building Regulations, Geologic Hazards Ordinance, Grading Ordinance, and Erosion Control Ordinance (Chapters 12.10, 16.10, 16.20, and 16.22 of the SCCC, respectively) and would be required to provide adequate engineering design to address or avoid unstable earth conditions. In addition, for development including ground disturbance of more than one acre, grading and construction would be completed in compliance with the State Water Resources Control Board (SWRCB) Construction General Permit, which would minimize soil erosion and off-site transport of soils through implementation of a Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practices (BMPs).

Therefore, the Sustainability Update EIR concluded that, with compliance with County policies and state and local regulations, future development resulting from implementation of the Sustainability Update would result in a less-than-significant impact related to soil erosion and loss of topsoil.

Soils on the project site are well drained and consist primarily of Elkhorn sandy loam (soil type 133), with Watsonville loam (soil type 177) on a small portion of the site adjacent to Maciel Avenue (C2G 2023). Project earthwork would include grading, trenching, and removal of trees and other vegetation. Construction would result in grading and excavation of approximately 3,313 cubic

yards (cy) of earth material and approximately 4,960 cy of earth material would be filled. Grading and construction activities would include ground disturbance, which would potentially result in short-term soil erosion. The project plans include an erosion control plan that would be implemented during construction of the subdivision improvements. Erosion control measures on the plan include, but are not limited to installation of a stabilized construction entrance/exist at the project's commencement; use of sediment control measures during the rainy season such as silt fencing, inlet sediment barriers, and sediment catchers (sand bags); covering stockpiled soils and materials with sheeting or tarps held in place with berms, fiber rolls, or wattles when not in use; and storage of particulate, granular, or powder materials indoors if possible, or if stored outside, covered or closed and kept within secondary containment.

Project grading and construction could lead to erosion, but implementation of a required erosion control plan would prevent excessive erosion during construction. In accordance with County requirements, a grading permit and erosion control plan are required pursuant to SCCC Chapters 16.20 and 16.22, would be considered application of a uniformly applied development standard. Thus, the project would not result in new significant impacts or substantially more severe impacts related to erosion than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards for required grading permit and erosion control plan. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183. See subsection 10(a) below regarding potential water quality impacts due to grading and earthwork.

(d) Expansive Soils. Expansive soils are clay-rich deposits that expand when wet and contract when dry. Alternating soil expansion and contraction can result in distress and damage to overlying structure foundations and/or infrastructure. The Sustainability Update EIR found that future development accommodated by the Sustainability Update could potentially be located on expansive soil but, with incorporation of standard geotechnical engineering, in compliance with the County Building Regulations and the CBC, would not create substantial direct or indirect risks to life or property. Structural designs and construction implementation in accordance with standard geotechnical/soils investigations can mitigate impacts posed by expansive soils. The County Building Code and CBC (Chapter 18) requires preparation of a geotechnical report for most new structures. Therefore, the EIR determined that the impact related to expansive soils due to future development resulting from the Sustainability Update would be less than significant.

The project geotechnical investigation did not indicate that the project site is located on expansive soils. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts related to expansive soils than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(e) Paleontological Resources. The Sustainability Update EIR indicates that four areas within the county are identified as being “Significant Hydrological, Geological, and Paleontological Features:” Majors Creek Canyon, Martin Road, Table Rock, and Wilder Creek. Seven areas within the county are likely to have rare or unique geological and paleontological resources related to their scarcity, scientific or educational value, aesthetic quality, or cultural significance. The largest of these areas is located between the Lompico and Glenwood areas in the Santa Cruz Mountains and Scotts Valley. Another area is located within the north coast and urban areas on the northwestern edge of the City of Santa Cruz. The remaining five areas are all located within the north coast area, with two occurring close together north of Bonny Doon, and three located on marine terraces along the coast between Davenport and the City of Santa Cruz.

The Sustainability Update EIR determined that potential development that could occur under the Sustainability Update could potentially damage or destroy unique geologic features or paleontological resources, if present. However, the EIR indicates that implementation of General Plan/LCP policies summarized in Table 4.7-5 of the Sustainability Update EIR (Draft EIR volume) would serve to avoid or reduce potential impacts to these features. Additionally, the SCCC Chapter 16.44 seeks to protect paleontological resources and provides methods and regulations for the identification and treatment of paleontological resources within the county, including preparation of a paleontological survey for specified developments in areas of known paleontological resources, and implementation of measures to protect resources during ground disturbing development activities. Therefore, the EIR concluded that that, with implementation of these policies and regulations, future development accommodated by the Sustainability Update would have a less-than-significant impact on unique geologic features and paleontological resources.

The project site is not located within an area identified as being sensitive for paleontological resources. < Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding paleontological resources than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

8. GREENHOUSE GAS EMISSIONS		Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:	Where Impact is Addressed in Sustainability Update EIR			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	DEIR pp. 4.8-29 to 4.8-32	No	No	CAS and CAAP GHG Reduction Measures General Plan/LCP Policies BE-4.1.3, BE-4.1.5, BE-4.2.6, BE-4.2.9, ARC-1.5.1, ARC-2.1.5, ARC-2.1.6, AM-1.1.8, AM-1.1.1g, AM-6.2.3, AM-1.2.1, AM-1.1.5, AM-1.1.4, AM-6.2.2, AM-1.1.10 Public Safety Policy 6.8.90
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	DEIR pp. 4.8-32 to 4.8-37	No	No	CAS and CAAP GHG Reduction Measures

(a) Greenhouse Gas Emissions. As reported in the Sustainability Update, climate change refers to any significant change in measures of climate—such as temperature, precipitation, or wind patterns—lasting for an extended period of time (decades or longer). Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. In California, climate change impacts have the potential to affect sea-level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, frequency of severe weather events, infrastructure, and electricity demand and supply. The primary effect of global climate change has been a rise in average global tropospheric temperature, which is fully explained in the Sustainability Update EIR.

A greenhouse gas (GHG) is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code section 38505(g), for purposes of administering many of the State’s primary GHG emissions reduction programs, GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (see also Cal. Code Regs. Title 14, § 15364.5).⁴ Some GHGs, such as CO₂, CH₄, and N₂O, occur naturally and are emitted into the atmosphere through natural processes and human activities. Of these gases, CO₂ and CH₄ are the predominant GHGs emitted from human activities. The Sustainability Update reported that the County of Santa Cruz developed GHG emissions

⁴ Climate-forcing substances include GHGs and other substances such as black carbon and aerosols.

inventories from government operations and from community activities in unincorporated areas of the county, originally prepared for 2005 and updated for 2009, the latest year in which a complete dataset for the county is available, and overall county GHG emissions decreased from 2005 to 2009.

The state has taken a number of actions to address climate change. The Legislature enacted AB 32, the California Global Warming Solutions Act of 2006 (California Health and Safety Code sections 38500-38599 et seq.) that provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions at 1990 levels by 2020, and initiate the transformations required to achieve the state's long-range climate objectives. SB 32 and AB 197 (enacted in 2016) are companion bills. SB 32 codified the 2030 emissions-reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030.

One specific requirement of AB 32 is for CARB to prepare a "scoping plan" for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (California Health and Safety Code section 38561[a]), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan: The Climate Change Proposed Scoping Plan: A Framework for Change (Scoping Plan). The Scoping Plan included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission-reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the state's long-range climate objectives.

In 2014, CARB approved the first update to the Scoping Plan, and in December 2017, CARB released the 2017 Climate Change Scoping Plan Update (Second Update) for public review and comment (CARB 2017a). The Second Update builds on the successful framework established in the initial Scoping Plan and First Update, while identifying new technologically feasible and cost-effective strategies that will serve as the framework to achieve the 2030 GHG target and define the state's climate change priorities to 2030 and beyond. The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32, SB 32, and the EOs; it also establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. A project is considered consistent with the statutes and EOs if it would meet the general policies in reducing GHG emissions in order to facilitate the achievement of the state's goals and would not impede attainment of those goals.

Subsequent to preparation of the Sustainability Update EIR, the Scoping Plan was updated. The current 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) was approved by CARB on December 15, 2022. The 2022 Scoping Plan lays out a path not just to carbon neutrality by 2045, but also to the 2030 GHG emissions reduction target. The 2022 Scoping Plan analyzed four scenarios, with the objective of informing the most viable path to remain on track to achieve the 2030 GHG reduction target. The scenario modeling indicates that, if the plan described in the

Proposed Scenario is fully implemented, and done so on schedule, the State would cut GHG emissions by 85 percent below 1990 levels, result in a 71 percent reduction in smog-forming air pollution, reduce fossil fuel consumption by 94 percent, and create 4 million new jobs, among other benefits (CARB 2022a).

The 2022 Scoping Plan details “Local Actions” in Appendix D, which includes recommendations intended to build momentum for local government actions that align with the State’s climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA. The recommendations provided in Appendix D are non-binding and should not be interpreted as a directive to local governments, but rather as evidence-based analytical tools to assist local governments with their role as essential partners in achieving California’s climate goals. Appendix D recognizes consistency with a CEQA-qualified GHG reduction plan such as a Climate Action Plan as a preferred option for evaluating potential GHG emission impacts under CEQA (CARB 2022b).

In February 2013, the County Board of Supervisors approved the County’s Climate Action Strategy (CAS) which includes targets for GHG reduction from the transportation, energy, and solid waste sectors, outlines strategies and implementing actions to achieve the targets, and provides a vulnerability assessment and eight climate adaptation goals intended to reduce vulnerability to climate change.

In 2022, subsequent to the certification of the Sustainability Update EIR, the County adopted an updated Climate Action and Adaption Plan (CAAP) that provides actionable steps towards reducing GHG emissions, adapting to climate hazards, and ensuring the safety and well-being of those most vulnerable to climate change. Regarding energy conservation, the CAAP includes strategies for the elimination of fossil fuel use in new and existing housing. Combined with the 100% renewable electrical energy provided by 3CE by 2030, implementation of these strategies would reduce or eliminate GHG emission in new and existing housing. The CAAP recognizes that providing housing to meet community needs, focusing on infill housing within urban areas, can help to mitigate climate change, by reducing driving times and utilizing existing infrastructure.

The Sustainability Update EIR indicates that future development accommodated by the Sustainability Update would result in the generation of GHG emissions from off-road equipment and vehicles during construction; however, because the scale and timing of future development was unknown, the EIR did not quantify construction GHG emissions. The EIR included an estimate of operational GHG emissions that would be generated by future development accommodated by the Sustainability Update from area, energy, mobile, waste, and water sources. While GHG emissions from area, energy, waste, and water sources would be higher under the Sustainability Update relative to existing (2019) conditions, GHG emissions from mobile sources would be lower under the Sustainability Update than existing conditions due to cleaner on-road mobile sources in the future. As a result of the reduction in mobile source emissions, the EIR found

that overall GHG emissions generated by the Sustainability Update in 2040 would be approximately 195,109 MT CO_{2e} per year less than existing (2019) conditions. In addition, as identified in Table 4.8-5 of the Sustainability Update EIR (Draft EIR volume), the Sustainability Update included several amended policies in the County's General Plan/LCP that seek to increase energy efficiency and reduce VMT and GHG emissions, such as through the support of zero-emission vehicles and charging infrastructure and alternative transportation options. Therefore, the EIR concluded that the Sustainability Update and resulting development would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, resulting in a less-than-significant impact related to the generation of GHG emissions.

The proposed project would result in construction and operation of 21 single-family residential homes with a net increase in 20 units with the demolition of the existing single-family residence on the site. The project site plans include solar panels on the proposed homes. This level of development would be within the overall amount of remaining residential development potential development analyzed in the Sustainability Update EIR as described in Section V.B. Because the project size is within the total amount of potential residential development and level of GHG emissions analyzed in the Sustainability Update EIR, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Conflicts with Applicable Plans. The Sustainability Update EIR included an analysis of the potential for the Sustainability Update to conflict with relevant plans that include GHG reduction strategies, including the County of Santa Cruz CAS, AMBAG's 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), and CARB's Scoping Plan. The analysis in the EIR determined that the Sustainability Update would not conflict with the goals and GHG reduction strategies contained in these plans, resulting in a less-than-significant impact. Subsequent to the certification of the EIR, updates were made to the AMBAG 2045 MTP/SCS (adopted in June 2022) and 2022 CARB Scoping Plan (approved in December 2022). The major goals of the AMBAG 2045 MTP/SCS are the same as those evaluated in the Sustainability Update EIR for the 2040 MTP/SCS, which found that the Sustainability Update would not inhibit AMBAG from achieving any of the goals.

The 2022 Scoping Plan identifies measures for cutting GHG emissions and reducing the utilization of fossil fuels within California, transitioning to zero-emission transportation, and phasing out the use of petroleum and natural gas used for heating homes and buildings. It also sets a more aggressive goal to reduce carbon emissions by 48% below 1990 levels in 2030, which represents an 8% increase from the current SB 32 target of a 40% reduction. The Plan identifies three priority areas for local governments including electrification of transportation, reducing VMT, and

decarbonization of buildings. As described in the Sustainability Update EIR, development accommodated by the Sustainability Update would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable. Therefore, the EIR concluded that the Sustainability Update would result in a less-than-significant impact related to potential conflicts with GHG reduction plans.

As described above, the County also adopted its first CAS in 2013, which identifies specific strategies to reduce GHG emissions and energy consumption. In 2022, subsequent to the certification of the Sustainability Update EIR, the County adopted an updated CAAP that provides actionable steps towards reducing GHG emissions, adapting to climate hazards, and ensuring the safety and well-being of those most vulnerable to climate change. Regarding energy conservation, the CAAP includes strategies for the elimination of fossil fuel use in new and existing housing. Combined with the 100% renewable electrical energy provided by SCE by 2030, implementation of these strategies would reduce or eliminate GHG emission in new and existing housing. The CAAP recognizes that providing housing to meet community needs, focusing on infill housing within urban areas, can help to mitigate climate change, by reducing driving times and utilizing existing infrastructure.

The proposed project includes solar panels on the proposed homes. Given the foregoing, the project would not result in impacts related to conflicts with plans related to GHG emissions and reduction strategies. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

9. HAZARDS AND HAZARDOUS MATERIALS	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update EIR Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	DEIR pp. 4.9-17 to 4.9-19	No	No	SCCC Chapter 7.100 (Hazardous Materials–Hazardous Waste–Underground Storage Tanks)
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the	DEIR pp. 4.9-19 to 4.9-20	No	No	SCCC Chapter 7.100 (Hazardous Materials–Hazardous Waste–Underground Storage Tanks)

9. HAZARDS AND HAZARDOUS MATERIALS	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update EIR Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:				
release of hazardous materials into the environment?				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ miles of an existing or proposed school?	DEIR pp. 4.9-20 to 4.9-21	No	No	SCCC Chapter 7.100 (Hazardous Materials–Hazardous Waste–Underground Storage Tanks)
d) 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?	DEIR p. 4.9-21	No	No	SCCC Chapter 7.100 (Hazardous Materials–Hazardous Waste–Underground Storage Tanks)
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	DEIR pp. 4.9-21 to 4.9-22	Not Applicable	Not Applicable	SCCC Chapter 13.12, Airport Combining District
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	DEIR pp. 4.15-32, 4.17-18 to 4.17-19	No	No	SCCC Chapter 7.9 (Fire Code)

(a) Use of Hazardous Materials. The Sustainability Update EIR indicates that a variety of commercial, industrial, and other land uses (i.e., agricultural uses) that involve the handling, storage, and disposal of potentially hazardous materials. Commercial manufacturing, petroleum exploration, industrial fabrication, biotechnology, gas stations and other automotive-service-related businesses, and utilities may use potentially hazardous materials, including petroleum-based fuels, chlorinated solvents, acrylic coatings, corrosive or caustic additives, as well as chemical fertilizers, pesticides, and herbicides. The type of industry and business that currently exist within the county and which are supported in the Sustainability Update are generally not the type that would be significant sources of hazardous material use or generators of substantial amounts of hazardous waste such as manufacturing and heavy commercial uses. Non-retail, commercial service and light industrial land uses such as auto services, storage, landscape/timber businesses,

research and development, manufacturing, and processing uses are concentrated in the vicinity of 41st Avenue, Highway 1, and Soquel Drive, as well as pockets in Live Oak. The county does not currently have heavy industrial land use aside from quarries in the San Lorenzo Valley, Carbonera, and the North Coast, four of which are still active.

The Sustainability Update EIR addressed impacts associated with the routine transport, use, or disposal of hazardous materials, and concluded that potential future development accommodated by the Sustainability Update could result in land uses that involve the routine use, transport, and disposal of hazardous materials, including pesticide use in agricultural operations, biological or other hazardous waste in medical facilities, and common hazardous household products in residential uses. In particular, new industrial development, expected to be primarily within the USL in the South County area with smaller areas in the San Lorenzo Valley and North Coast, would be expected to use some hazardous materials and generate hazardous waste. The Sustainability Update EIR found that the type of industry and business that currently exist within the county and which are supported in the Sustainability Update are not the type that would be significant sources of hazardous material use or generators of substantial amounts of hazardous waste.

The EIR notes that strict federal and state regulations are in place for the transport of hazardous materials and wastes, and state and local regulations for the storage and handling of hazardous materials, including SCCC 7.100 which requires Hazardous Materials Business Plans (HMBPs) for quantities of hazardous materials that are less than the state thresholds. Table 4.9-3 of the Sustainability Update EIR summarizes policies and actions in the Public Safety Element of the County's General Plan/LCP that would serve to reduce impacts related to the transport, use, or disposal of hazardous materials. The Sustainability Update EIR concluded that, with adherence to applicable regulations, as well as implementation of existing General Plan/LCP policies, the impact related to routine transport, use, and disposal of hazardous materials would be less than significant.

The proposed project consists of a residential project, which would not involve the routine transport, use, or disposal of hazardous materials or wastes, and would not result in the creation of a public health hazard. The proposed project would not result in industrial or other types of uses that would use and/or dispose of hazardous materials other than routine household cleaning supplies. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required regarding pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Upset or Accidental Release of Hazardous Materials. The Sustainability Update EIR indicates that the county contains current and former land uses involving hazardous materials, resulting in the potential for past and/or ongoing site contamination. Hazardous materials may be found in the materials of older buildings (e.g., asbestos-containing materials [ACMs], lead-based paint [LBP], or polychlorinated biphenyls [PCBs]), or may have been used routinely in the operation of land uses

such as auto repair shops, agricultural fields, medical offices, dry cleaners, and photo processing centers. In addition, the county contains numerous sites where known releases of hazardous materials have occurred in the past (e.g., leaking underground storage tank [LUST] sites), which are primarily concentrated in urban areas and documented in databases of the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).

The Sustainability Update EIR addressed impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials, and concluded that potential future development accommodated by the Sustainability Update could expose the public to hazardous materials due to sting near contaminated soils or groundwater, airborne releases, or accidental releases. Remediation of contaminated sites occurring through new development accommodated by the Sustainability Update would ultimately reduce the future risk of hazardous materials releases in remediated areas, but site cleanup could entail transport of hazardous materials off site, which could result in accidental release. Businesses that generate airborne toxic emissions would be subject to the Monterey Bay Air Resources District's (MBARD's) Rule 1000, requirements for regulating sources of toxic air contaminants (TACs). This includes preparation of a health risk assessment in situations where TACs may exceed regulatory thresholds.

Demolition or renovation of existing buildings which may contain hazardous materials, such as asbestos or lead-based paint, that would also be subject to regulations, including Occupational Safety and Health Administration (OSHA) standards to protect workers, MBARD's Rule 306 for reporting and investigation of certain buildings with asbestos as established under federal law, and the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) set forth in 40 CFR Part 61 to prevent "visible emissions" of asbestos when buildings are demolished or retrofitted. Under federal law, a building must be inspected for asbestos prior to demolition or renovation, and federal and state agencies must be notified prior to demolition. According to the California Air Resources Control Board, removal and disposal of asbestos procedures and controls must be specified in the notification form. Therefore, the Sustainability Update EIR concluded that, with adherence to applicable regulations, the impact related to upset or accident conditions leading to release of hazardous materials would be less than significant.

The proposed project is not located on a site with potential hazardous materials or waste that could be released, except that the residential building that may contain asbestos and lead-based paint, which could expose workers to a hazardous material release. However, the Sustainability Update EIR found that all demolition activities would be required to be undertaken according to OSHA standards to protect workers from asbestos and lead based paint. Any demolition of buildings containing asbestos also would be required to comply with the MBARD's Rule 306 that requires reporting and investigation of certain buildings with asbestos as established under federal law. The project would be conditioned to meet requirements of local and state regulations for testing and removal of asbestos and lead-based paint, which would be considered application of uniformly applied development standards. Thus, the project would not result in new significant impacts or

substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(c) Hazardous Materials Use or Emissions Near Schools. The Sustainability Update EIR indicates that the county contains 10 public school districts with several public schools, as well as a number of private schools, charter schools, alternative education schools, and the University of California and Cabrillo College campuses.

The Sustainability Update EIR, which comprehensively addressed impacts associated with hazardous materials use or emissions near schools, concluded that potential future development accommodated by the Sustainability Update that uses hazardous materials or emits TACs within 0.25 miles of school facilities could expose students to these materials. However, as discussed above, hazardous material use is regulated by a number of state and local agencies providing for proper storage, use, and disposal of these materials, and TACs are regulated by the MBARD to prevent exceedances of regulatory thresholds which could result in public health impacts. Therefore, the Sustainability Update EIR concluded that, with adherence to applicable regulations, the impact related to hazardous emissions or handling of hazardous materials with 0.25 miles of schools would be less than significant.

The nearest school to the project site is Live Oak Elementary School, which is approximately 0.3 miles to the southwest. The project site is not within ¼ mile of an existing or proposed school and would not result in stationary emission sources or hazardous emissions. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(d) Hazardous Materials Sites. The Sustainability Update EIR indicates that there are numerous sites within the county that are included on the list of hazardous material sites compiled pursuant to Government Code section 65962.5 (i.e., the Cortese List). At the time of the publication of the Sustainability Update EIR, the county contained 150 sites on the Cortese List, most of which were LUST sites.

The Sustainability Update EIR, which comprehensively addressed impacts associated with Cortese List sites, concluded that any future development project that may occur as a result of the Sustainability Update would be required to identify whether a proposed site is on the Cortese List as part of the CEQA environmental review process, and if so, would be required to complete site remediation measures in accordance with state and/or federal laws. Therefore, the Sustainability Update EIR concluded that, with adherence to applicable regulations, the impact related to development on a site that is included on the Cortese List would be less than significant.

The proposed project is not located on a site listed on the state Cortese List. Furthermore, a Phase I Environmental Site Assessment (ESA) was conducted for the project site, but did not find evidence of or identify “Recognized Environmental Conditions” on the site that would warrant further site investigation. The ESA report “de minimis” conditions to agricultural cultivation on the site may have involved application of agricultural chemicals such as pesticides, although former agricultural operations were reported as being organic, and residual metals and/or herbicides/pesticides may be found around the structure perimeters attributable to flaking of lead-based paint and residential application of pesticides/herbicides (Harris and Lee Environmental Sciences 2021). The Phase I ESA concluded that the assessment revealed no evidence of Recognized Environmental Conditions in connection with the property. However, recommendations were made to appropriate destroy the onsite water production well, if no longer planned for use, and to provide asbestos and lead-based paint surveys and abatement prior to demolition activities in accordance with local and status regulations (Harris and Lee Environmental Sciences 2021) as explained above. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(e) Airport Safety. The Sustainability Update EIR indicates that the county contains one public airport and three private airports: the public Watsonville Municipal Airport at 100 Aviation Way, the private Monterey Bay Academy airport at 681 Beach Drive, the private Las Trancas Airport at 3564 SR 1, and the private Bonny Doon Village Airport at 8647 Empire Grade. SCCC Chapter 13.12, Airport Combining Zone District, regulates land uses and development standards within six safety zones surrounding the Watsonville Municipal Airport.

The Sustainability Update EIR addressed impacts associated with airport hazards and concluded that the Sustainability Update included a number of policies in the Built Environment Element that would serve to protect residents from public safety hazards from aircraft, as summarized in Table 4.9-4 of the EIR. In particular, Policy BE-5.4.2 requires all development within the AIA must comply with the height, use, noise, safety, and density criteria that are compatible with airport operations as established by the latest version of the California Department of Transportation Division of Aeronautics Airport Land Use Planning Handbook and applicable federal aviation regulations. Under current state law, development near the Watsonville Municipal Airport is required to be in conformance with the California Airport Land Use Planning Handbook. SCCC Chapter 13.12, Airport Combining District, regulates land use and development within the Airport Influence Area (AIA), which is defined as the area within two miles of the boundary of the Watsonville Municipal Airport. These regulations incorporate the requirements of the California Airport Land Use Planning Handbook published by the California Department of Transportation, Division of Aeronautics (Handbook) and applicable Federal aviation regulations, including, but not limited to, The Sustainability Update EIR concluded that, with compliance with County policies

and with other federal and state regulations regarding airports, the impact related to airport hazards as a result of future development would be less than significant.

The proposed project is not located near an airport and is not within an airport land use plan. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding recreation than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(f) Emergency Response Plan. See discussion in Sections V.E. 17 and 20 below.

10. HYDROLOGY AND WATER QUALITY	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	DEIR pp. 4.10-33 to 4.10-38, FEIR pp. 3-10 to 3-11	No	No	General Plan/LCP Policy ARC-4.1.14, SCCC Chapters 7.79, 16.20, 16.22
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	DEIR pp. 4.10-38 to 4.10-43, FEIR pp. 3-11	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	DEIR pp. 4.10-43 to 4.10-47	No	No	General Plan/LCP Policy PPF-4.4.1, ARC-4.2.12, SCCC Chapter 7.79
(i) Result in substantial erosion or siltation on- or off-site;	DEIR pp. 4.10-45	No	No	SCCC Chapter 7.79
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	DEIR pp. 4.10-45	No	No	SCCC Chapters 7.79, 16.10, 16.13
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned storm water	DEIR pp. 4.10-43-4.10-47	No	No	SCCC Chapter 7.79

10. HYDROLOGY AND WATER QUALITY				
Would the project:	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows?	DEIR pp. 4.10-45	No	No	None
d) In flood hazard, tsunami or seiche zones, risk release of pollutants due to project inundation?	DEIR pp. 4.10-47 to 4.10-48	No	No	SCCC Chapters 16.10 and 16.13
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	DEIR pp. 4.10-47 to 4.10-49	No	No	None
f) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	DEIR pp. 4.10-49 to 4.10-51	No	No	General Plan/LCP Policy PPF-4.2.4, PPF-4.2.9, SCCC Chapter 7.38

(a) Water Quality/Discharges. The Sustainability Update EIR reported that there are numerous streams throughout the county, which total over 850 miles; the San Lorenzo River and Pajaro River are the two rivers in the county. The mountainous topography of the county encompasses 15 principal watersheds. The Sustainability Update EIR describes existing surface and groundwater quality issues in the county, including impaired surface waters designated under the Clean Water Act. Surface water quality can be affected by pollution from point sources, such as discharge from industrial facilities, or from nonpoint sources, such as pollutants or contaminants that are carried by stormwater runoff. Within the county, water quality degradation also can result from erosion, which leads to sedimentation, as well as from urban contaminants in urban stormwater runoff, pesticides and fertilizers in runoff from agricultural lands, and infiltration from faulty septic systems. Stormwater pollutants present in the watersheds of the county include metals, solvents, paint, concrete, masonry products, detergents, vehicle fuels and fluids, oil and grease, pesticides and herbicides (organic compounds and nutrients), debris and litter, bacteria, pathogens and oxygen demanding compounds, and sediment and silt. Groundwater quality can be adversely affected by a range of constituents, including minerals, pathogens, nitrates, and toxic materials as explained in the Sustainability EIR.

The Sustainability Update EIR found that future development that could be accommodated by the Sustainability Update could result in potential water quality degradation due to increased stormwater runoff with associated urban contaminants and potential erosion due to grading and construction disturbances. However, the EIR concluded that all future development projects would be required to adhere to the Central Coast Regional Water Quality Control Board (RWQCB) requirements as enforced by the County. Future development projects would be required to prepare and submit stormwater management plans that show compliance with the County's stormwater and water quality control requirements established in Chapter 7.79 of the SCCC, which also requires all new development to implement BMPs to prevent, control, and reduce stormwater volume, runoff rate and pollutant load and to minimize contribution to pollution or contamination of the storm drain system, receiving waters, groundwater or a body of standing water. All new development also would be required to comply with County grading and erosion control regulations in the SCCC. SCCC section 7.79.110 also states that all new development and redevelopment shall mitigate impacts due to development and implement BMPs per the County of Santa Cruz Design Criteria and SCCC Chapters 16.20 and 16.22 to control the volume, runoff rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects to minimize the generation, transport, and discharge of pollutants, prevent runoff in excess of predevelopment conditions, and maintain predevelopment groundwater recharge.

In addition, implementation of existing and proposed General Plan/LCP policies summarized in Table 4.10-5 of the Sustainability Update EIR (Draft EIR volume), also would serve to avoid and/or minimize potential impacts of future development related to water quality degradation, including potential impacts to waters of the Monterey Bay. In particular, the ARC Element includes a policy that requires development to be designed to minimize water pollution from urban runoff (ARC-4.1.14).

Therefore, the Sustainability Update EIR concluded, that with implementation of County policies and compliance with state regulations and local regulations, including the post-construction requirements of Central Coast RWQCB and County stormwater regulations, future development accommodated by the Sustainability Update would avoid or minimize adverse water quality effects associated with stormwater runoff, erosion, and discharges, resulting in a less-than-significant impact. It is noted that EIR concluded that potential water quality degradation due to runoff from agricultural lands and faulty or leaking septic systems were not anticipated due to existing regulations.

The proposed project does not involve any discharges that would violate any water quality standards or waste discharge requirements. The project site is currently partially developed, and the site's impervious surface area would increase from approximately 7,114 square feet (0.163 acres) to 53,940 square feet (1.238 acres) with the proposed project. New impervious surfaces could increase the delivery of urban pollutants to vicinity storm drains or water courses, although there are no watercourses on or adjacent to the project site. Pollutants in runoff could include oils from existing and proposed asphaltic concrete, as well as any material eroded from

roofing treatments or concrete surfaces, as well as pavement and vehicle parking areas (potential for leaks, cleaning compounds, etc.), off-site run-on areas (miscellaneous pollutants), and landscaped areas (fertilizers, pesticides, etc.).

A stormwater control plan has been prepared for the project that details drainage features to collect and treat stormwater runoff in compliance with County regulations. Site design measures to minimize the potential for stormwater pollution include minimizing impervious areas in particular areas, clustering structures and pavement, and provision of landscaped areas. A runoff mitigation system has been designed, including underground storage chambers, runoff rate restriction structures, and connections to existing facilities designed in accordance with County Design Criteria. Runoff from impervious surfaces would be directed into the underground chambers which would provide treatment by infiltration in place.

Construction activity on projects that disturb one or more acres of soil must obtain coverage under the State's General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 99-08-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must list best management practices (BMPs) that the discharger will use to protect stormwater runoff and the placement of those BMPs. A Notice of Intent (NOI) and SWPPP must be prepared prior to commencement of construction.

Project construction would include grading, trenching, and removing trees and other vegetation that exceeds one acre and could result in short-term soil erosion. As indicated in subsection 7(b) above, project plans include an erosion control plan that would be implemented during construction, in accordance with County regulations.

In accordance with County requirements, a stormwater plan is required pursuant to SCCC Chapter 7.79, which would be considered application of a uniformly applied development standard. The project stormwater management plan would avoid or minimize potential water quality degradation impacts. Thus, the project would not result in new significant impacts or substantially more severe impacts regarding water quality than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards for required stormwater management and water quality controls. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Groundwater. The Sustainability Update EIR reported that Santa Cruz County overlies three different groundwater basins including the Santa Margarita Groundwater Basin, the Santa Cruz Mid-County Groundwater Basin (Mid-County Basin), and the Pajaro Valley Groundwater Subbasin, which are all used as a primary source of water for urban and agricultural land uses within the county. According to the basin prioritization in accordance with the Sustainable

Groundwater Management Act (SGMA), Santa Cruz Mid-County Basin and Pajaro Valley Subbasin are considered high priority basins, and Santa Margarita is a medium priority basin. Both high and medium priority basins are required to adhere to the requirements of SGMA by preparing and implementing a groundwater sustainability plan (GSP). None of these three groundwater basins, however, are adjudicated but all three are in some level of overdraft where more water has been extracted from the aquifers than is naturally recharged. The Santa Cruz Mid-County Basin and Pajaro Valley Subbasin are both designated as “critically overdrafted,” resulting in an accelerated timeline for SGMA implementation. The Groundwater Sustainability Agency set up for each basin pursuant to state law are implementing plans to reach sustainable groundwater levels in the next 20 years and have made progress in meeting sustainable groundwater management goals as summarized below for each basin.

The County designates the areas where major groundwater recharge or infiltration is known to occur as Primary Groundwater Recharge areas on General Plan/LCP Resource Constraints Maps and County GIS system. These areas are locations where local soil conditions and underlying geologic formations allow for infiltration and percolation of rainfall and runoff into groundwater basins. Land divisions and density are regulated by County policy in primary groundwater recharge areas.

The Sustainability Update EIR found that future development and redevelopment resulting from the Update would result in additional demands for potable water supplies that are provided by groundwater resources in three groundwater basins in the county, two of which are experiencing seawater intrusion (Mid-County Basin and Pajaro Valley Subbasin), and the Pajaro Valley Subbasin also is in an overdraft condition. Development potentially accommodated by the Sustainability Update would primarily occur within the county’s urbanized areas. The net increase in residential growth associated with the Sustainability Update by 2040 was estimated to be approximately 4,450 housing units and a total of 6,209,500 square feet in non-residential growth, although the EIR indicated that some of this potential development would occur under the existing General Plan/LCP without the proposed project.

As indicated above, the three different groundwater basins/subbasins are all subject to implementation of sustainable groundwater management requirements of SGMA and either have completed or are in the midst of completing GSPs (or alternative). The Sustainability Update EIR reported that current trends have shown that improvements have been made in management of the basins even during extended drought periods. The estimated increased demands on groundwater indirectly resulting from the Sustainability Update due to future development were determined to be relatively modest. The Sustainability Update included revised goals and policies in the ARC Element of the General Plan/LCP, which include long-term sustainable management and conservation of water and groundwater resources. In addition, implementation of General Plan/LCP policies summarized in Table 4.10-6 in the Sustainability Update EIR (Draft EIR volume) also would serve to avoid and/or minimize potential impacts related to groundwater supplies or recharge. Considering the long-term planning measures that are required by SGMA and

implementation of the GSPs, combined with the sustainable policies of the proposed project, the EIR concluded that increased demands from future development would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin, resulting in a less-than-significant impact.

The proposed project site is located within the area of the Mid-County Basin. The project would result in construction and operation of 21 single-family residences, resulting in a net increase of 20 new residential units with demolition of the one existing unit, with an associated water demand that relies on groundwater from impacted groundwater basins. However, the level of proposed development would be within the overall amount of remaining residential development potential analyzed in the Sustainability Update EIR as described in Section V.B. Because the project size is within the total amount of potential development related to groundwater impacts analyzed in the Sustainability Update EIR, which identified less-than-significant groundwater impacts, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(c[i-iii]) Drainage. Stormwater runoff in the county is conveyed in a number of man-made and natural runoff conveyance systems discharging to various drainages. Stormwater runoff flows overland via sheet flow and channels and in developed areas via streets, gutters and storm drain pipes. In some locations, runoff travels relatively long distances before reaching an inlet or receiving water and can form small ponds that either infiltrate, transpire evaporate over time. The storm drain inlet types range from older inlets to more modern gutter grates.

The Sustainability Update EIR found that future development that could be accommodated by the Sustainability Update could result in increased stormwater runoff associated with new impervious surfaces, but would not result in a substantial alteration of existing drainage patterns, either through alteration of a stream or through introduction of impervious surfaces that would lead to erosion, flooding or drainage issues. County regulations require preparation and implementation of a stormwater management plan for any new developments larger than 5,000 square feet in size. Per the County's requirements, the plan must show how stormwater overflow will be conveyed and controlled and that runoff shall not negatively impact neighboring properties or stormwater (drainage) pathways. Thus, all future development projects would be subject to the County's stormwater regulations that require preparation of stormwater management plans to meet County standards.

Furthermore, the EIR found that General Plan/LCP policies summarized in Table 4.10-7 in the Sustainability Update EIR (Draft EIR volume) would serve to avoid or minimize impacts related to stormwater drainage resulting from future development. In particular, In particular, Parks, Recreation + Public Facilities (PPF) Policy PPF-4.4.1 requires that runoff levels with new

development or redevelopment be maintained at predevelopment rates for a minimum design storm as determined by County Design Criteria by requiring projects to provide both on- and off-site improvements, including on-site percolation methods. Policy ARC-4.2.12 requires retention of stormwater runoff from impervious surfaces for all new development and redevelopment. Therefore, the Sustainability Update EIR concluded that compliance with existing regulatory requirements would ensure that stormwater generated by construction and operation of future development projects accommodated by the Sustainability Update would not substantially change existing drainage patterns or result in adverse erosion/siltation, flooding, or storm drain capacity issues, resulting in a less-than-significant impact.

The project site is currently partially developed with impervious surface area associated with the existing residence and outbuildings. Under the existing drainage patterns on the project site, stormwater runoff flows from the northwest to the southern portion of the site, away from Maciel Avenue. There is an existing storm drain centered along the southerly property line where stormwater is conveyed through an existing 6-inch pipe that is directed through the property to the south and sent to the existing ravine which flows to Rodeo Gulch Creek. The project site currently receives upstream stormwater runoff from approximately half the width of Maciel Avenue (C2G/Civil Consultants Group 2023).

In accordance with County requirements, a stormwater control plan was prepared pursuant to SCCC Chapter 7.79, which would be considered application of a uniformly applied development standard. The project is requesting a waiver from the County Design Criteria to alter the drainage patterns as water leaves the project site. Rather than runoff flowing to the existing low point centered along the southerly property line, runoff would be directed to the southwestern corner of the project site, where it would travel down Maciel Avenue before discharging to the ravine. A proposed overland release area would be located at the southeastern corner of the project site. Proposed drainage conditions consist of one drainage management area that would collect the stormwater runoff by means of curb and gutter and an underground drainage system, which would drain to an underground storage chamber system that would treat the stormwater through groundwater infiltration, retain the 2-year storm, and detain the 10-year storm, mimicking the 10-year predevelopment release rate. The underground storage chamber system would include an outlet/restrictor structure with an overflow bypass that discharges into the existing storm drain system within Maciel Avenue. The new curb and gutter would block run-on from Maciel Avenue onto the site. The project has been designed in accordance with County requirements. The project would not result in new significant impacts or substantially more severe impacts regarding drainage than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with the application of uniformly applied development standards for required grading permits and erosion control plans. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(c)[iv], d) Flood Hazard Areas and Risk of Release of Pollutants. Flooding can occur when stormwater runoff exceeds the conveyance capacity of existing drainages or control systems, dam or levee failures, high tides/storm surges, tsunamis, sea level rise, or other causes. Floods usually occur in relation to precipitation. Within Santa Cruz County, there are numerous areas subject to flooding due to rivers, creeks, or coastal storms. The two main rivers in the county that are subject to flooding are the Pajaro River and the San Lorenzo River.

The Sustainability Update EIR found that some future development that could be accommodated by the Sustainability Update Some of these projects could be located within flood prone, tsunami, or seiche hazard areas. However, the EIR concluded that future development and redevelopment projects would be required to adhere to SCCC chapters 16.10 and 16.13, which include requirements to avoid inappropriate land uses in flood zones. In addition, construction in a flood-prone area would also require flood protection measures incorporated into the project design to avoid inundation. Future development also could include industrial uses that could require the use and storage of hazardous materials or otherwise involve sources of pollutants that adversely affect waters in the event of inundation due to flooding. Any commercial or industrial land uses would be required to adhere to existing regulatory requirements for storage of hazardous materials, as discussed in Section 4.9, Hazards and Hazardous Materials, of the Draft EIR. State and local regulations require all businesses that store or handle specified quantities of hazardous materials to prepare and implement a HMBP and obtain a Hazardous Materials Permit. Therefore, the Sustainability Update EIR concluded that required compliance to existing regulatory requirements related to development in a flood zone and related to the storage and handling of hazardous materials and wastes would reduce the potential impact of potential release of pollutants from inundation due to future development to a less-than-significant level.

According to County GIS information, the project site is not located within a flood hazard area. The project site also is not within a mapped tsunami inundation zone. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts related to flood hazards than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(e) Conflict with Plans. The Sustainability Update EIR reported that future development projects potentially accommodated by the Sustainability Update would be required to adhere to any applicable waste discharge and other regulatory requirements. The EIR concluded that the Sustainability Update includes policies that would be applied to future development to protect water quality, and thus, these policies would be consistent with goals of the Central Coast Basin Plan for water quality and would not conflict or obstruct implementation of the water quality control plan for the region.

The Sustainability Update EIR concluded that potential future development and redevelopment projects indirectly resulting from the proposed project would represent an increase in water

demands, but projected water demand increases alone would not necessarily result in a conflict with the three different groundwater sustainability plans that are or will be implemented within the three underlying groundwater basins/subbasins. SGMA requires that the GSPs identify mechanisms to achieve a sustainable yield by 2040. Future development would occur in accordance with the proposed policies of the General Plan/LCP ARC Element, which have long-term sustainable management and water conservation policies that would be consistent with the groundwater sustainability plans in the county, as well as existing SCCC regulations. Therefore, the EIR concluded that the Sustainability Update's policies regarding protection of groundwater resources, which would be consistent with directives in the GSPs, and would not conflict with or obstruct implementation of a GSP, resulting in no impact.

The project site is not located adjacent to a stream that is included in the Central Coast Basin Water Plan; however, Rodeo Creek Gulch runs adjacent to the property directly to the east of the project site, approximately 320 feet (0.06 miles) from the project site's eastern boundary, ultimately emptying into Corcoran Lagoon. As discussed above, the project would result in an increase in impervious surface area that could result in potential water quality degradation due to increased stormwater runoff with associated urban contaminants and potential erosion due to grading and construction disturbances. However, the stormwater control plan prepared for the project demonstrates compliance with the County's stormwater and water quality control requirements established in Chapter 7.79 of the SCCC, implementation of BMPs to prevent, control, and reduce stormwater volume, runoff rate, and pollutant load to receiving waters. The project would comply with County grading and erosion control regulations in the SCCC. As indicated above in subsection 10.b, the proposed is within the range of development analyzed in the Sustainability Update EIR in which potential impacts related to implementation of groundwater management plans were found to be less than significant. Thus, the proposed project would not conflict with or obstruct implementation of water quality control or sustainable groundwater management plans, would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(f) Inadequate Soils for Septic or Alternative Wastewater Systems. The Sustainability Update EIR indicates that areas not served by wastewater disposal service providers outside of the USL typically have septic systems, also referred to as onsite wastewater treatment systems (OWTS). The EIR found that future development accommodated by the Sustainability Update is expected to primarily occur within the County's USL, and potential future development in planning areas outside of the USL is not expected to increase beyond what could occur under the existing General Plan/LCP. New residential and non-residential uses in rural areas would utilize OWTS for wastewater treatment and disposal. Some areas of the county may have geologic features or soils that are incapable of adequately supporting, or are incompatible with, the installation of OWTS, thereby potentially leading to adverse groundwater quality impacts if OWTS are not properly sited, designed, or maintained. Constraints include areas with noted high groundwater conditions,

areas with clay soil conditions, areas with sandy soils or areas in proximity to streams or water supply sources.

The Sustainability Update EIR found that future development and redevelopment projects accommodated by the Sustainability Update would be required to adhere to County regulations set forth in Chapter 7.38 of the SCCC, which regulate OWTS. The regulations require a permit for the construction, reconstruction, repair, addition, or upgrade of any individual sewage disposal system or any portion thereof on any property within the unincorporated area of the county. The regulations set forth certain prohibitions and lot size requirements for OWTS, as well as specific requirements for system design. . Future development also would be subject to requirements of the Local Area Management Plan, which was prepared by the County to meet requirements set forth in the State OWTS Policy. In addition, the General Plan/LCP PPF Element includes policies that require adequate provision of OWTS as summarized in Table 4.10-8 of the Sustainability Update EIR (Draft EIR volume). In particular, Policy PPF-4.2.4 requires minimum parcel sizes and maximum densities with individual sewage disposal systems, and Policy PPF-4.2.9 allows alternative treatment disposal systems, where environmentally acceptable, as approved by the County and the RWQCB. With required compliance with these regulations and policies, the Sustainability Update EIR found that potential impacts related to adequate disposal capabilities of OWTS that are installed to support future development would be less than significant.

The proposed project would be served by a public sanitary sewer system and would not use an OWTS. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding use of an OWTS than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

11. LAND USE		Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:	Where Impact is Addressed in Sustainability Update EIR			
a) Physically divide an established community?	DEIR pp. 4.11 15 to 4.11 16	No	No	None
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	DEIR pp. 4.11 16 to 4.11 33 FEIR pp. 3-11 to 3-12	No	No	None

(a) Physically Divide an Established Community. The Sustainability Update EIR indicates that existing communities, neighborhoods, and village centers that are developed at urban densities are located along the coast in the Live Oak, Soquel, and Aptos planning areas, as well as in the vicinity of the City of Watsonville and in towns and villages in the San Lorenzo Valley. Much of the county's urban coastal development is organized around existing corridors. If adopted, the Sustainability Update would continue to guide the location, form, and intensity of all development within unincorporated Santa Cruz County for the next 20 years. The Sustainability Update EIR found that future development resulting from the Sustainability Update would have the potential to divide an established community if infrastructure (e.g., roadways, utilities) or other incompatible land uses were developed within an established community. However, the EIR determined that the Sustainability Update would primarily promote future development within established communities where public infrastructure and services already exist, and numerous policies in the General Plan/LCP, summarized in Table 4.11-4 of the Sustainability Update EIR (Draft EIR volume), would provide for land use compatibility to ensure that established communities remain intact while accommodating future development. Therefore, the EIR found that future development resulting from the Sustainability Update would result in no impact related to physical division of an established community.

The project site is located in the Live Oak planning area within a developed residential neighborhood. The project does not include linear elements that could serve as barriers that could physically divide an established community. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Conflict with Policies and Regulations. The Sustainability Update EIR reviewed the Sustainability Update to identify potential conflicts with policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect, including the General Plan/LCP, Coastal Act, AMBAG's 2040 MTP/SCS, and Watsonville Airport Land Use Compatibility Plan, and found no apparent conflicts between the Sustainability Update and such land use plans, policies, or regulations. The EIR determined that because the Sustainability Update includes objectives and policies consistent with these adopted plans, and requires coordination with regional plans and programs, adoption and implementation of the Sustainability Update would not cause a significant environmental impact due to a conflict with a regional plan, policy, or program, and the impact would be less than significant.

As indicated in Section V.B., the proposed project is consistent with the General Plan/LCP land use designation as discussed in section V.B and C. Based on the analyses contained in this Environmental Checklist and County staff review of the project, the proposed project would not result in a conflict with any policies or regulations adopted for the purpose of avoiding or mitigating an environmental impact. Thus, the proposed project is consistent with the General

Plan/LCP, and would not result in new significant impacts or substantially more severe impacts regarding recreation than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

While the proposed project would not conflict with plans, policies or regulation adopted for the purpose of avoiding or mitigating an environmental effect, it is noted that the project site is zoned SU with a D combining zone designation. The D combining zone district designates land as a potential County park site. However, the General Plan/LCP designates the site for residential uses. The PPF Element includes Policy PPF-1.2.3, which establishes overlay districts to designate specific parcels proposed to be acquired in whole or in part for future public park sites and references Appendix M. PPF-2.2c further directs the County to review new development applications for consistency with Appendix M of the General Plan/LCP to ensure that designated park sites remain available for recreation opportunities. The project site is not included in Appendix M. Furthermore, the County Department of Parks, Open Space, and Cultural Services has determined that the County is not interested in acquiring the project site for future park or open space purposes due to two existing parks that are in proximity to the project site and lack of County resources to acquire the property (County of Santa Cruz Department of Parks, Open Space, and Cultural Services 2022). The proposed residential use would be consistent with the existing General Plan/LCP designation for the project site and would not conflict with policies or regulations to protect designated parks. County review has concluded that the project would not result in conflicts with policies regarding parks and recreational facilities.

12. MINERAL RESOURCES		Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:	Where Impact is Addressed in Sustainability Update EIR			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	DEIR p. 4.2-30	No	No	General Plan/LCP Policies ARC-7.2.2, Public Safety 6.7.7
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	DEIR p. 4.2-30	No	No	General Plan/LCP Policies ARC-7.2.2, Public Safety 6.7.7

(a-b) Loss of Mineral Resources. The State Geologist classifies mineral resource zones (MRZs) solely on the basis of geologic factors. Classification of an area as a MRZ-2 indicates the existence of a deposit that meets certain criteria for value and marketability. The General Plan/LCP recognizes the State classification and designation process by showing these lands as Mineral Resource areas on the General Plan/LCP Resources and Constraints Maps. The Mineral Extraction (M-3) Zone District is used to implement the Mineral Resource protection policies. The Sustainability Update EIR indicates that the county has approximately 3,300 acres of land in quarry/mineral processing uses, including four active quarries and four closed quarries. A large area extends from the coast up through San Lorenzo Valley and south to Aptos with lands mostly classified as MRZ-3 (areas containing known or inferred mineral resources of undetermined significance) and MRZ-4 (areas where geologic information is inadequate to assign to any other MRZ category) with some locations designated MRZ-1 (areas where little likelihood exists for the presence of significant mineral resources). MRZ-1 and MRZ-3 lands are found in the southern portion of the county from Watsonville to the coast.

The EIR found that the Sustainability Update would not lead to development that would result in impacts on mineral resources. The General Plan/LCP contains policies that would serve to avoid or minimize impacts on mineral resources as summarized in Table 4.2-7 of the Sustainability Update EIR (Draft EIR volume). In particular, Policy ARC-7.2.2 requires that uses on Mineral Resource lands be limited to mining and mining-related uses, and Public Safety Policy 6.7.7 allows facilities to be sited only where they will not preclude extraction of minerals necessary to sustain the economy of the state. The Sustainability Update did not include any proposed changes to properties designated Mineral Resources or zoned for mineral extraction and did not propose development near existing quarry operations in the county. Therefore, the EIR concluded that the Sustainability Update would have no impact on mineral resources.

The project site is not located near existing quarry operations or on parcels that are designated Mineral Resources or zoned for mineral extraction. Thus, the project would not result in the loss of availability of a known mineral resource and would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to mineral resources. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

13. NOISE				
Would the project result in:	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?	DEIR pp. 4.12 22 to 4.12 25	No	No	General Plan/LCP Noise Policies 9.1.2, 9.2.1, 9.2.2, 9.2.3, 9.2.4, 9.2.5, 9.2.6, 9.6.2 SCCC Chapter 8.30 and Chapter 13.15
b) Generation of excessive ground borne vibration or ground borne noise levels?	DEIR pp. 4.12 25 to 4.12 26	No	No	SCCC Chapter 8.30 and Chapter 13.15
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	DEIR pp. 4.12 26 to 4.12 27	No	No	General Plan/LCP Policy 9.5.1, 9.5.2 SCCC Chapter 13.12

(a) Noise Increases. The Sustainability Update EIR indicates that new development accommodated by the Sustainability Update would have the potential to increase ambient noise levels. However, the General Plan/LCP Noise Element includes policies to protect sensitive receptors from permanent noise effects of new development with requirements for preparation of acoustical studies and implementation of mitigation or sound-reducing measures if needed as summarized in Table 4.12-9 of the Sustainability Update EIR (Draft EIR volume). The General Plan/LCP includes policies that set forth measures to avoid and minimize adverse impacts of increased noise resulting from construction or operation of development projects (Noise Policies 9.1.2, 9.1.3, 9.2.1, 9.2.2, 9.2.3, 9.2.4, 9.2.5, 9.2.6, 9.6.2). Development projects are reviewed on a case-by-case basis, and typical conditions of approval include limiting the day and times of day during which construction and/or heavy construction can be conducted, provision of notification to neighbors regarding construction schedules, and implementation of a process to receive and respond to noise complaints.

These requirements are largely incorporated into the SCCC (Chapter 13.15), which would ensure that noise-generating land uses would not result in noise levels that would exceed County standards. Where the expected noise increase from a proposed development would be substantial, appropriate noise mitigation measures would need to be developed, as feasible. Also, if a proposed

use or development includes fixed noise sources that are subject to noise limits in the SCCC, then noise impacts and appropriate mitigation would be identified and incorporated into project design to reduce noise to meet those limits and reduce noise as perceived by nearby sensitive receptors.

In addition, Chapter 8.30 of the SCCC enumerates general standards, limitations and exemptions pertaining to noise within the county. SCCC Chapter 13.15 implements the Noise Element by applying noise policies and standards in the land use permitting process. These regulations are intended to prevent increases in ambient noise levels and would be considered uniformly applied regulations to which the proposed project would be subject to compliance.

The Sustainability Update EIR found that new development or redevelopment accommodated by the Update could also result in increased ambient noise levels from vehicular traffic, special events, and construction of individual projects. The EIR found that traffic-related noise would not exceed thresholds of significance, and special events that could generate noise would be controlled through a permit process with restrictions on amplified noise if needed—in particular, a community event or fundraiser with 100 or more guests would be allowed only once per year without amplified music at a given property and up to two events per year with approval of a Minor Use Permit. The Sustainability Update included standards for events including notification to owners and occupants of properties within 500 feet, restrictions on hours of amplified music, and establishment of maximum number of guests based on site size, access, and other physical characteristics. Similarly, SCCC regulations would limit the use of property for commercial weddings and could include restrictions or limitations on amplified music. Thus, the EIR concluded that these types of events would not be expected to result in generation of substantial permanent or temporary noise increases with the limits and restrictions that would be imposed by permit.

The EIR indicated that construction of individual projects would result in temporary noise increases which would fluctuate throughout the day, depending on the nature of construction activities and equipment in use. However, regulations in the SCCC set decibel limits for sounds levels during the day, evening, and night, which would be applicable to future development projects, and provide an exemption for construction activities during daytime hours. Additionally, Policy 9.2.6 of the Noise Element requires the use of mitigation or best management practices to reduce construction noise as a condition of approval. Therefore, with compliance with County policies and regulations, future temporary increases in noise levels due to construction of individual development projects would not be considered substantial. Therefore, the Sustainability Update EIR concluded that future development resulting from the Update would result in a less-than-significant impact related to permanent or temporary increases in ambient noise levels.

The primary existing noise source within the project area is vehicle traffic on Maciel Avenue. The proposed project would include residential development that would be enclosed. This use is not typically associated with activities that would generate substantial permanent increases in ambient noise levels. Construction of residential projects would generate temporary noise, but daytime

construction activities are exempt from SCCC noise regulations as described in the Sustainability Update EIR. The project would be required to comply with applicable General Plan/LCP policies and SCCC regulations related to the reduction of construction noise. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding permanent or temporary increases in noise than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Vibration. The Sustainability Update EIR indicates that development accommodated by the Sustainability Update could result in the generation of groundborne noise or vibration from construction of projects allowed under the General Plan/LCP, certain commercial and industrial operations, and roadway traffic. The Sustainability Update did not directly include elements that would generate long-term/permanent operational groundborne noise and vibration.

Groundborne vibration attenuates rapidly, even over short distances. Using standard Federal Transit Administration vibration attenuation formulas, non-pile driving construction activities would exceed the Caltrans recommended threshold of significance of 0.3 in/sec PPV at a distance of approximately 11 feet. The Sustainability Update EIR determined that it would be unlikely that the center of operations for heavy construction equipment would operate within 11 feet of sensitive receptors based on the mandatory buffers required by the SCCC (e.g., setbacks, buffers, easements, rights-of-way, etc.), which would result in structures typically separated by at least 12 feet. Therefore, the EIR concluded that construction activities would not be anticipated to generate groundborne noise and vibrations levels in excess of the Caltrans guideline threshold criteria of 0.3 in/sec PPV. The Sustainability Update EIR concluded that with implementation of General Plan/LCP policies and adherence to City regulations, noise impacts from construction of future development projects would be less than significant.

The proposed project would include residential development and would not result in construction methods or operations that would generate excessive vibration. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding generation of vibration than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(e-f) Airport Noise. Watsonville Municipal Airport is located adjacent to the boundary of the county unincorporated areas within the City of Watsonville. The Sustainability Update EIR indicates that there is potential for future development to be located within 2 miles of the airport. The Noise Element policies limit the adverse effects of airport-related noise through land use planning and the establishment of noise level thresholds for residential and non-residential land uses within the 60-decibel (dBA) CNEL/L_{dn} noise contour. Additionally, SCCC Chapter 13.12, Airport (AIA) Combining District, identifies allowed and prohibited uses, densities, and other

development standards within six airport safety zones in the 2 miles surrounding the airport. The purpose of the district is to prevent any exposure to safety issues with the airport and prevent any incompatible land uses from being developed adjacent to the airport. The Sustainability Update did not include any proposed land use changes in the AIA Combining District. Furthermore, the General Plan/LCP Noise Element includes Policies 9.5.1 and 9.5.2 to ensure that future development is sited and designed to avoid exposure to excessive aircraft noise, as summarized in Table 4.12-10 of the Sustainability Update EIR (Draft EIR volume). Therefore, the Sustainability Update EIR concluded that, with compliance with existing policies and other local, state and federal airport regulations, the Sustainability Update would result in a less-than-significant impact related to excessive airport noise.

The project site is not located near an airport or private airstrip, and, thus, the project would not expose people to excessive noise. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

14. POPULATION AND HOUSING	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	DEIR pp. 4.13-13 to 4.13-15	Not Applicable	Not Applicable	SCCC Chapter 17.04 (Annual Population Growth Goal for Santa Cruz County)
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	DEIR pp. 4.13-15 to 4.13-16	Not Applicable	Not Applicable	None

(a) Inducement of Substantial Unplanned Population Growth. The Sustainability Update EIR indicates that the population growth rate in Santa Cruz County, which has been declining since the 1960s, slowed considerably in the 1990s and 2000s, and has remained low since then. In 2020, the county's unincorporated population of 133,153 comprised approximately half of the county's

total population. From 2010 to 2020, the unincorporated population grew by 3,414, comprising an average annual growth rate of 0.3%.

Every four years, the Association of Monterey Bay Area Governments (AMBAG) updates its Regional Growth Forecast for population, housing, and employment to support the development of the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), Regional Travel Demand Model and other planning efforts. The 2018 Regional Growth Forecast was adopted at the time that the Sustainability Update EIR was published, and the 2022 Regional Growth Forecast was subsequently adopted in June 2022. Based on AMBAG's 2018 Regional Growth Forecast, the 2040 population forecast estimated an increase of 4,754 persons in the county's unincorporated area (an average annual growth rate of 0.2%); however, based on the actual 2020 population reported in the U.S. Census which was lower than AMBAG forecasted, the population increase by 2040 would be 8,492 persons (an average annual growth rate of 0.3%). The 2018 Regional Growth Forecast projected a total of 60,841 housing units in the county's unincorporated area by 2040 (an increase of 3,514 housing units relative to the existing number of housing units in 2020).

The Sustainability Update EIR found that the Sustainability Update could indirectly result in future residential development and population increase that would exceed current forecasts by approximately 2,895 to 6,630 residents in the year 2040 based on potential future development of 4,500 residential dwelling units with an associated population increase of 11,385 residents. The resulting population increase represents an annual average growth rate of approximately 0.4%, which the EIR indicated is slightly higher than the AMBAG forecast annual average rate of 0.2%, as well as an average annual rate of 0.3% based on existing 2020 population. The annual average growth potentially induced by the Sustainability Update also was found to be slightly higher than the 2021 and 2022 annual Measure J growth rate established by the County (0.25%), but less than the 2020 established annual growth rate of 0.5%. It is noted that the 2023 annual Measure J growth rate established by the County was 0.5%.

The Sustainability Update EIR found that the population increases potentially resulting from the Update were a conservative estimate for the purposes of analyses included in this EIR, and that residential development within the unincorporated area is subject to annual growth rates and residential building permit limits established by the County of Santa Cruz Board of Supervisors. However, the EIR concluded that even as a conservative estimate, the average annual growth rate of 0.4% resulting from potential development accommodated by the Sustainability Update, was not substantially higher than forecasted rates (0.2%) and the historical average annual growth rates of 0.3% experienced between 2010 and 2020 and 0.4% experienced between 1990 and 2000.

The Sustainability Update EIR found that General Plan/LCP policies, as summarized in Table 4.13-8 of the Sustainability Update EIR (Draft EIR volume), would serve to avoid and minimize impacts related to population growth, and that compliance with General Plan/LCP policies, Measure J, and the SCCC would result in establishment of annual growth rates that are

relatively consistent with regional and state projections. Thus, the EIR concluded that the Sustainability Update and resulting residential development would not induce substantial unplanned population growth in the unincorporated area of Santa Cruz County. The EIR also indicated that the regional population projections prepared by AMBAG are routinely updated to reflect population trends, and forecasts are adjusted if needed to reflect actual population growth trends. As AMBAG projections are developed in part based on locally adopted land use plans, the local basis for AMBAG's successive projections would shift if the County were to adopt the proposed project. Therefore, the EIR concluded that future residential development would not induce substantial unplanned population growth in the unincorporated area of Santa Cruz County, and the impact would be less than significant because the average annual growth rate would not be substantially higher than projected, and compliance with Measure J, proposed policies, and the SCCC would result in establishment of annual growth rates that are relatively consistent with regional and state projections.

The proposed 21-unit residential project would result in construction of a net increase of 20 residential units with an associated estimated population of approximately 51 people based on an average household size of 2.53 persons per household as reported in the Sustainability Update EIR. This level of development would be within the overall amount of remaining residential development potential analyzed in the Sustainability Update EIR as described in Section V.B. Because the project size is within the total amount of potential residential development and population increases analyzed in the Sustainability Update EIR, the proposed project would not result in new significant impacts or substantially more severe impacts regarding population growth than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required regarding population pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183. In addition, it is noted that when the project population is added to the existing unincorporated population of 127,467 (estimated by the California Department of Finance as of January 1, 2023), the County's population would not exceed the current AMBAG 2022 Regional Growth Forecast for the year 2025 (134,675) or 2030 (135,027).

(b) Displacement of Existing Housing or People. The Sustainability Update EIR indicates that future development may be constructed on properties with existing development, particularly on underutilized properties that may be developed at higher densities and/or land use intensities. Of the 23 parcels proposed for a General Plan/LCP land use designation and/or zoning map change, 12 of these properties contain an existing residence on a parcel. Four of these parcels are located along Portola Drive and could be redeveloped with high-density residential uses as a result of the Sustainability Update's General Plan/LCP Land Use and zone map changes.

The Sustainability Update EIR, which comprehensively addressed impacts associated with displacement of existing housing or people, concluded that the Sustainability Update would result in a net increase in housing units, resulting in a less-than-significant impact related to displacement of existing housing or people. In the event that existing residential units are found

on a site proposed for development, these units likely would be vacated prior to demolition in accordance with state and local law to avoid displacement of people, and they are required to be replaced if the existing units are affordable units. Furthermore, state streamlining laws include protections for preservation or reconstruction of rental housing.

The proposed project would result in removal of one existing housing unit and construction of 21 housing units, resulting in a net increase of 20 housing units. Thus, the existing residential unit that would be demolished would be replaced with the project. The existing unit is owner-occupied, and there are no rental units on the project site. The existing residents would be relocated prior to demolition. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding displacement of housing or people than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

15. PUBLIC SERVICES		Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical altered governmental 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:					
Fire protection?		DEIR pp. 4.14-15 to 4.14-17	No	No	None
Police protection?		DEIR pp. 4.14-17 to 4.14-18	No	No	None
Schools?		DEIR pp. 4.14-19 to 4.14-20	No	No	Payment of School Impact Fees
Parks?		DEIR pp. 4.14-20 to 4.14-22	No	No	None
Other public facilities?		DEIR p. 4.14-22	No	No	None

a) Fire Protection, Police Protection, Schools, Parks, and Other Public Facilities

Summary of Sustainability Update Conclusions

Fire Protection. As described in the Sustainability Update EIR, fire protection in Santa Cruz County is provided by 13 entities, including nine fire protection districts (FPDs), two community

service areas (CSAs), and two city fire departments. The Sustainability Update EIR, which evaluated impacts associated with fire protection services, concluded that the population growth and new development resulting from the Sustainability Update would result in increased demand for fire protection services throughout the county, primarily within the Central Fire District, which serves most of the properties within the USL where new development would be concentrated. The EIR found that future growth would not result in the need for additional fire protection facilities in order to maintain acceptable service ratios and response times in the future. Furthermore, with compliance with federal, state, and local regulations in addition to implementation of the proposed Sustainability Update policies and implementation strategies summarized in Table 4.14-5 of the EIR which would avoid and minimize impacts related to fire protection services, the EIR determined that the Sustainability Update's potential indirect impact on fire protection facilities would be considered less than significant.

Police Protection. As described in the Sustainability Update EIR, the Santa Cruz County Sheriff's Office provides police protection services in the unincorporated areas of the county. The California Highway Patrol (CHP) maintains a mutual aid agreement with the Santa Cruz County Sheriff's Office and assists local governments during emergencies when requested. The Sustainability Update EIR, which evaluated impacts associated with police protection services, concluded that the County Sheriff's Office has adequate facilities to serve the projected growth increases associated with implementation of the Sustainability Update, and no additional facilities would be needed to maintain response times; however, staffing is currently at minimal levels. New development and growth accommodated by the Sustainability Update would not substantially reduce response times or require new or physically altered police protection facilities that could result in significant physical impacts. Table 4.14-7 of the EIR lists proposed and retained General Plan/LCP policies that would serve to avoid and minimize impacts related to police protection services. The EIR determined that, with compliance with federal, state, and local regulations in addition to implementation of the policies and implementation strategies summarized in Table 4.14-7, the Sustainability Update's potential indirect impact on police protection services would be considered less than significant.

Schools. As described in the Sustainability Update EIR, there are 10 public school districts located within the county with a total enrollment of nearly 40,000 students at the kindergarten to high school levels, as well as one community college district (Cabrillo) and one state university (University of California, Santa Cruz). Two additional school districts are located outside of the county but serve some residents in within the county. The County and individual jurisdictions provide the procedures for project applicants to pay school impact fees as part of local development approvals to ensure that adequate school facilities continue to be provided in the county. Development impact fees are collected for the following districts: Aromas-San Juan Unified School District, Bonny Doon Union Elementary School District, Happy Valley Elementary School District, Live Oak School District, Loma Prieta Joint Union School District, Mountain Elementary School District, Pacific Elementary School District, Pajaro Valley Unified School District, San Lorenzo Valley Unified School District, Santa Cruz City Schools, Scotts Valley Unified School

District, and Soquel Union Elementary School District. All fees are collected at the time of issuance of a building permit.

The Sustainability Update EIR, which evaluated impacts associated with school services, concluded that some schools particularly in urban areas could experience exceedances in enrollment capacity in some years, but with payment of required school impact fees to fund necessary facility expansion and/or additions if needed, the impact of the Sustainability Update on schools would be less than significant. Table 4.18-8 of the EIR summarizes proposed and retained General Plan/LCP policies that would serve to avoid and minimize impacts related to school enrollments. The EIR determined that because the County and its individual jurisdictions will be required to conduct environmental review prior to any significant expansion of school facilities or the development of new school facilities, as well as current state law requirements that the environmental impact of other new development on school facilities is considered fully mitigated through the payment of required development impact fees, this impact would be considered less than significant.

Parks. As described in the Sustainability Update EIR, Santa Cruz County Parks, Open Space, and Cultural Services Department (County Parks) manages 43 parks and open space properties totaling nearly 1,600 acres and 29 miles of coastline. The County parks system serves the county in two ways: regional facilities that serve the entire county's population and local parks (e.g., neighborhood, rural, and community parks) that serve unincorporated neighborhoods that are outside an independent recreation and park district boundary. Along with parkland belonging to the County, there are a number of state lands, including 1,500 acres managed by the California Department of Fish and Wildlife, and 42,120 acres managed by California State Parks. In addition, the county contains federal lands administered by the Bureau of Land Management, consisting of the approximately 5,800-acre Cotoni-Coast Dairies property, a California Coastal National Monument.

The Sustainability Update EIR, which comprehensively addressed impacts associated with park services, concluded that the Sustainability Update would have a less-than-significant impact related to parks. The Parks Strategic Plan determined that the County provides sufficient parklands for its residents. Table 4.15-9 of the EIR describes existing and proposed policies that avoid and minimize impacts related to parks and recreational facilities. These policies include guidance standards for 2-3 net acres of usable classifications of parkland and 5-6 acres of recreational facilities per 1,000 residents in order to maintain acceptable levels of service. Proposed policies also set forth guidelines for development of new parks and placement near compatible uses. Because existing countywide parklands are sufficient to serve its population and the County continues to plan for additional parks, the increase in population accommodated by the Sustainability Update would not substantially increase usage of park facilities such that provision of new facilities would be required.

Other Public Facilities. As described in the Sustainability Update EIR, library services are provided by the Santa Cruz Public Libraries District and are governed by a Joint Powers Authority (JPA)

that includes all jurisdictions in Santa Cruz County, except for Watsonville, which manages its own public library system. The City of Watsonville operates two facilities—the Main Library and the Freedom Branch Library. The Sustainability Update includes policies to ensure adequate provision of public services (Objective PPF-3.1 and its supporting policies and implementation strategies), provide libraries within community centers, adjacent to major commercial centers, or in other areas convenient for public use (PPF 3.3.1), and to support adequate library service in all parts of the county. and continue to improve and expand services (PPF-3.3.2). The Sustainability Update EIR concluded that with implementation of the General Plan/LCP policies and implementation strategies, the Sustainability Update EIR concluded that impacts related to libraries and other public facilities would be less than significant.

Project Review

Police and fire protection services to project site are provided by the Santa Cruz County Sheriff's Office and the Central Fire District, respectively. The project site is within the boundaries of the Live Oak School District. The project site is near several public parks and recreational facilities, including Coffee Lane County Park (approximately 0.1 miles to the east), Chanticleer Avenue County Park (approximately 0.25 miles to the west), Brommer Street County Park (approximately 0.4 miles to the south), Jose Avenue County Park (approximately 0.8 miles to the west), Felt Street County Park (approximately 0.85 miles to the southwest), and Simpkins Family Swim Center (approximately 0.9 miles to the southwest. The project would result in an incremental increased demand for public services within the County's urban area. However, the proposed residential project, which consists of 21 dwelling units with a net increase of 20 dwelling units, would be within the overall amount of remaining residential development analyzed in the Sustainability Update EIR as described in Section V.B. Because the project size is within the total amount of potential residential development analyzed in the Sustainability Update EIR regarding public services impacts, the proposed project would not result in new significant impacts or substantially more severe impacts analyzed regarding public services than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

16. RECREATION		Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:	Where Impact is Addressed in Sustainability Update EIR			
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of	DEIR pp. 4.14-20 to 4.14-22	No	No	Parks and Recreation Facilities Tax

16. RECREATION				
Would the project:	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
the facility would occur or be accelerated?				
b) Include recreational facilities or require the construction or expansion of recreational facilities?	DEIR pp. 4.14-20 to 4.14-22	No	No	None

(a) Use of Existing Parks and Recreational Facilities. As described in the Sustainability Update EIR, and in Section 15, Public Services, above, County Parks manages 43 parks and open space properties totaling nearly 1,600 acres and 29 miles of coastline. The County parks system serves the county in two ways: regional facilities that serve the entire county's population and local parks (e.g., neighborhood, rural, and community parks) that serve unincorporated neighborhoods that are outside an independent recreation and park district boundary. Along with parkland belonging to the County, there are a number of state lands, including 1,500 acres managed by the California Department of Fish and Wildlife, and 42,120 acres managed by California State Parks. In addition, the county contains federal lands administered by the Bureau of Land Management, consisting of the approximately 5,800-acre Cotoni-Coast Dairies property, a California Coastal National Monument.

The Sustainability Update EIR, which evaluated impacts associated with use of parks and recreational facilities as a result of potential future development concluded that the Sustainability Update would have a less-than-significant impact related to increased use of recreational facilities. The EIR found that potential increased population accommodated by the Sustainability Update could result in an increased use of existing parks and recreational facilities, especially in areas within the County's USL and RSL. The potential increased use of parks and recreational facilities would be distributed throughout existing neighborhood and community parks throughout the USL and specific parks and recreational facilities, including school playgrounds and joint use facilities. Furthermore, the EIR found that with implementation of policies summarized in Table 4.14-9 of the Sustainability Update EIR (Draft EIR volume), potential impacts related to parks and recreational facilities. Therefore, the EIR concluded that the Sustainability Update and subsequent development would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, resulting in a less-than-significant impact.

As indicated above in Section V.E.15a, the project site is located within 0.5 to 1.0 miles of six existing parks and recreational facilities. The project would result in an incremental increased use

of public parks in the project area and within the greater region. However, the proposed residential project, which consists of 21 dwelling units, with a net increase of 20 units would be within the overall amount of remaining residential development potential development analyzed in the Sustainability Update EIR as described in Section V.B. Because the project size is within the total amount of potential residential development analyzed in the Sustainability Update EIR regarding public services impacts, the proposed project would not result in new significant impacts or substantially more severe impacts regarding recreation than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) New Recreational Facilities. As described in the Sustainability Update EIR, implementation of the Sustainability Update would support future development of recreational facilities but does not directly propose the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. The Sustainability Update EIR, which evaluated impacts associated with construction or expansion of recreational facilities, concluded that the Sustainability Update would have a less-than-significant impact related to construction or expansion of recreational facilities, with implementation of the General Plan/LCP policies and implementation strategies, in combination with existing regulations and park impact fees for new development.

The proposed project consists of construction of 21 single-family residential units with a net increase of 20 residential units, and does not include recreational facilities. The project would not require expansion of recreational facilities because as explained above, the project is within the level of development evaluated in the Sustainability EIR for which a less-than-significant impact was identified. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

17. TRANSPORTATION AND TRAFFIC	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:				
a) Conflict with a program, ordinance or policy addressing the circulation	DEIR pp. 4.15-26 to 4.15-31	No	No	None

17. TRANSPORTATION AND TRAFFIC	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project: system, including transit, roadway, bicycle and pedestrian facilities?				
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	DEIR pp. 4.15-19 to 4.15-26	No	No	MM TRA-1, MM TRA-2
c) Substantially increase hazards due to a geometric design feature (for example, sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?	DEIR pp. 4.15-31 to 4.15-32	No	No	None
d) Result in inadequate emergency access?	DEIR pp. 4.15-32	No	No	General Plan/LCP Policy AM-6.1a

(a) Conflict with Circulation Plan, Policy or Ordinance. The Sustainability Update EIR reports that the circulation system within the county consists of nearly 1,135 miles of freeways, arterials, collectors, and local roads with connectivity within and between communities and regions. The County maintains a roadway network of over 600 miles including all of the associated bridges, ramps, bicycle facilities, stop signs, signals and other traffic controls. In the urban areas of the county arterial roads and major state highways make up 14% of the roadway miles but carry over 70% of the VMT.

The county has approximately 100 miles of bicycle facilities, which account for 8 percent of the county's roadway system, although there are few Class I bikeways (bike paths) in the unincorporated county. Pedestrian facilities include sidewalks, walkways, curb ramps, crosswalks, furnishings, traffic control devices, and other amenities. Public transit in Santa Cruz County is primarily provided by the Santa Cruz Metro Transit District (METRO). There is currently no year-round passenger rail service in Santa Cruz County. The Santa Cruz Branch Rail Line, which was acquired by the SCCRTC in 2012, formerly provided freight rail service. The Santa Cruz County Regional Transportation Commission (SCCRTC) purchased the rail corridor to preserve the corridor for existing and future transportation uses, including freight rail, passenger rail service/transit, and bicycle and pedestrian facilities.

The Sustainability Update provided an updated Circulation Element to the General Plan/LCP in the new Access + Mobility (AM) Element. The AM Element generally provides a greater focus on an enhanced multi-modal transportation system, and includes policies that support transit, bicycle,

and pedestrian travel modes, as well as policies for operations. The element continues support for use of the Santa Cruz Branch Line and the Santa Cruz Big Trees rail corridors for recreational travel, freight and high-quality transit service, as determined by the SCCRTC and other rail corridor owners. The new AM Element includes an objective and supporting policies and implementing strategies to increase shuttle, transit, and active transportation travel within the tourism sector to the county's beaches, parks, and other recreational areas. The proposed element includes policies that support development of facilities addressing the overall circulation system, including roads, bicycle, pedestrian, and transit facilities as summarized in Table 4.15-7 of the Sustainability Update Draft EIR. In addition, several new connector road segments are proposed in the USL, primarily in Live Oak and Soquel, including pedestrian and bicycle connections, which would improve circulation.

The Sustainability Update EIR concluded that the amendments to the General Plan/LCP and SCCC would not result in conflicts with existing local or regional programs, plans, ordinances or policies addressing the county's circulation system. The EIR also concluded that the Sustainability Update is consistent with regional plans: AMBAG's Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and SCCRTC's RTP. Specifically, the AM policies summarized in Table 4.15-7 are consistent with the 2040 MTP/SCS goal and policy objectives to "Provide convenient, accessible, and reliable travel options while maximizing productivity for all people and goods in the region." Therefore, the EIR concluded that adoption and implementation of the proposed Sustainability Update would not result in conflicts with existing plans, programs, policies, or ordinances that address the circulation system in the unincorporated county, including road, transit, bicycle, and pedestrian facilities, resulting in a less-than-significant impact.

The proposed project consists of a net increase of 20 residential units. As indicated in Section V.B, the project size would be within the potential buildout evaluated in the Sustainability Update EIR transportation analyses. Based on County review, the project would not conflict with a program, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Thus, the proposed project would not result in new significant impacts or substantially more severe regarding conflicts with transportation policies than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

It is also noted that the project also would be subject to payment of traffic impact fees that are applied uniformly to new development within the County's USL. While the project would result in increase vehicle trips, automobile delay, as described by level of service [LOS] or similar measures of vehicular capacity or traffic congestion may no longer be considered a significant impact on the environment pursuant to CEQA.

(b) Conflicts with State CEQA Guidelines. CEQA Guidelines Section 15064.3(b) focuses on VMT for determining the significance of transportation impacts and sets forth the criteria for analyzing

transportation impacts related to VMT. It is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The County adopted a VMT threshold in 2020 pursuant to state law and consistent with the criteria in section 15064.3(b). The County's adopted VMT thresholds follow the guidance provided by the state (Governor's Office of Planning and Research [OPR] 2018), which generally recommend a threshold that is 15% below the existing county-wide average VMT per capita for residential uses and 15% below the county-wide average VMT per employee, except for retail uses, which would be measured by a net increase in total VMT. The County of Santa Cruz also has published guidelines for the implementation of VMT reviews and thresholds along with screening criteria that uses the guidance published within the OPR technical advisory as a reference point.

The Sustainability Update EIR concluded that adoption and implementation of the proposed Sustainability Update and future development that could result from the Update would result in residential and employee VMT that does not meet the County's VMT threshold, although VMT resulting from development evaluated in the Sustainability Update EIR would be below the County's existing VMT. However, the VMT associated with the Sustainability Update would not meet the County's VMT threshold (15% below existing countywide average) for residential per capita and employee VMT (except for retail employee VMT), resulting in a significant impact. The EIR indicated that there are a number of transit, bicycle, and pedestrian improvements that are planned or proposed that could help reduce VMT by providing enhanced alternative modes of transportation other than automobile travel. However, because many of these projects are not funded, and the traffic model cannot forecast reductions due to new and improved active transportation facilities or employer-required transportation demand management (TDM) programs. Therefore, reductions related to increases in bicycle and pedestrian mode share, carpooling, and new TDM programs are not accounted for in the Sustainability Update VMT results, and therefore the results were considered conservative.

The EIR indicates that the Sustainability Update includes policies that support transportation improvements and other measures that would serve to reduce VMT as summarized in Table 4.15-6 of the Sustainability Update EIR. These include policies that support multiple transportation modes (AM-2.1.1, AM-2.1.2, AM-2.1.3), coordinated land use and transportation planning (BE-1.2.1), and multi-modal improvements as part of future development projects (AM-6.2.2). Policies support the implementation of high-quality transit facilities in the county, as well as bicycle and pedestrian improvements, the implementation of which would serve to help reduce total VMT by providing additional and/or enhanced opportunities for alternative transportation modes. In addition, the proposed Sustainability Update encourages infill, mixed-use, and intensified development within the USL, which would serve to locate higher density development in proximity to transit, bicycle, and pedestrian facilities that would encourage and promote use of transportation modes other than automobiles. The County's VMT Guidelines also include TDM strategies that can be implemented as project design features and/or mitigation measures to offset a project's VMT.

The Sustainability Update EIR concluded that development and growth evaluated as part of the Update would result in VMT that is higher than the County's threshold for residential and non-residential uses (except retail uses), and thus, even with full implementation of TDM measures, there likely would not be a sufficient reduction to meet the County's VMT threshold. Therefore, while the proposed project reduces VMT from existing conditions and contains policies that focus new development in the USL and seek to coordinate land use and transportation improvements, encourage the development and use of non-motorized transportation facilities, as well as several transportation improvements to facilitate an efficient circulation system, the project would result in a significant impact related to VMT.

The Sustainability Update EIR noted that future development projects would be subject to review under the County's VMT Guidelines, which identify projects that require VMT analysis and others that would be automatically considered within significance thresholds due to size, proximity to high quality transit, and other screening criteria. The County's significance thresholds are based on land use type, broadly categorized as efficiency and net change metrics. Efficiency metrics include VMT per capita and VMT per employee and are used for residential and non-residential uses, respectively. Therefore, some types of future projects, such as small projects, projects near high quality transit, local-serving retail projects, and affordable housing projects could be found to meet the County's VMT threshold, while others will require mitigation to meet the threshold.

The EIR also found that implementation of Mitigation Measure TRA-1 would require development and implementation of a funding mechanism to support regional VMT-reducing projects, and Mitigation Measure TRA-2 recommends a General Plan/LCP implementing strategy to further review parking requirements as another means to reduce vehicle travel and VMT. However, because of the uncertainty as to whether such a VMT program under Mitigation Measure TRA-1 could fully fund VMT-reduction measures to the level needed to meet the County's VMT threshold, the EIR concluded that impacts may not be fully mitigated to a less-than-significant level, resulting in a significant and unavoidable impact.

The proposed project consists of a net increase of 20 single-family residential units. A transportation study prepared for the project indicates that based on the County residential screening map, the project site is located in an area where the VMT is between 10 to 14.9 percent below the per capita average VMT, but not 15 below the County average. Therefore, the study indicates that the project would have a potential VMT impact if the project VMT exceeds 85% of existing County-wide average VMT per capita. The VMT threshold for Santa Cruz County is 8.9 daily VMT per capita, which is 15% below the existing County-wide average VMT (Hexagon Transportation Consultants 2023). However as indicated in section V.B, the project size would be within the potential buildout evaluated in the Sustainability Update EIR transportation analyses, which evaluated VMT impacts and found that overall future VMT would decrease, but the countywide may be above the County's VMT threshold. Furthermore, the project would be required to pay the County's road improvement fee, which is considered a uniformly applied development standard. In the Live Oak area, the County's Capital Improvement Plan includes

project to improve pedestrian and bicycle access as well as traffic flow and efficiency, which would result in a reduction in VMT in the area. In addition, implementation of the proposed sidewalks within and along Maciel Avenue and inclusion of the bike repair station within the project site would reduce VMT (Hexagon Transportation Consultants 2023). Thus, the proposed project would not result in new significant impacts or substantially more severe VMT impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project with application of uniformly applied development standards. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(c-d) Road Design Hazards and Emergency Access. The Sustainability Update EIR indicates that the Update includes several proposed new roadways in the USL, but roadway geometrics have yet to be designed. Future roadways would be designed to meet all applicable road design and sight distance standards that would avoid creation of hazardous conditions including fire department requirements. In addition, new roadways, as well as new access driveways would be required to meet the County of Santa Cruz Design Criteria, which provides standards for safe roadway design. Furthermore, Sustainability Update included several policies and goals in the AM Element to avoid or minimize impacts related to hazardous conditions within road and transportation system designs that are summarized in Table 4.15-8 of the Sustainability Update EIR (Draft EIR volume). These proposed policies provide for safe access and improvements to the roadway system within the county, as well as prevent incompatible land uses to avoid transportation conflict and potential roadway safety hazards. Therefore, the Sustainability Update EIR concluded that future development of would not substantially increase hazards due to a geometric design feature or incompatible uses, resulting in a less-than-significant impact.

The Sustainability Update EIR concluded that the Update would not directly result in new development that would result in inadequate emergency access. Additionally, the proposed AM Element includes policies that would minimize the impacts related to provision of inadequate emergency access. Specifically, proposed Policy AM-6.1.1 calls for adequate roads for fire and emergency response access, which would be reviewed as part of future development project applications. In addition, County staff would work in conjunction with the Fire Department, and other emergency access providers to continue to coordinate development review and review of new roads with Fire District and Sheriff's Office staff (AM-6-1a). Therefore, the Sustainability Update concluded that the Update would not directly result in inadequate emergency access, and the project would result in a less-than-significant impact.

The proposed project has been designed in accordance with standard County requirements, and there are no access designs that would substantially increase hazards. Furthermore, the project would be designed in accordance with recommendations of the Fire District requirements and would provide for adequate emergency access. Thus, the proposed project would not result in increased hazards related to project design, would not provide inadequate emergency access, would

not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

18. TRIBAL CULTURAL RESOURCES		Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:	Where Impact is Addressed in Sustainability Update EIR			
Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	DEIR pp. 4.5 25 to 4.5 26	No	No	General Plan/LCP Policy ARC-8.1.5 SCCC Chapter 16.40
c) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	DEIR pp. 4.5 25 to 4.5 26	No	No	General Plan/LCP Policy ARC-8.1.5 SCCC Chapter 16.40

State Assembly Bill (AB) 52, effective July 1, 2015 recognizes that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities. The law establishes a new category of resources in the California Environmental Quality Act called “tribal cultural resources” that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation. Public Resources Code section 21074 defines a “tribal cultural resource” as either:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

- (a) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - (b) Included in a local register of historical resources as defined in subdivision (k) of section 5020.1.
- (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of section 5024.1.

(a-b) Tribal Cultural Resources and Consultation. The archaeological records search and the County's outreach to Native American tribes that was conducted for the Sustainability Update EIR did not result in the identification of any specific tribal cultural resources. The Indian Canyon Band of Costanoan Ohlone People responded that the Sustainability Update area overlaps a potentially eligible cultural site. However, three follow-up attempts from the County failed reach the respondent for further information. The Sustainability Update EIR found that the ARC Element of the County's General Plan/LCP includes policies and implementation strategies that would serve to protect tribal cultural resources and reduce impacts related to tribal cultural resources as summarized in Table 4.5-4 of the Sustainability Update EIR (Draft EIR volume). The General Plan/LCP policies includes a policy that prohibits disturbance of Native American sites cultural sites or tribal cultural resources without an appropriate permit. Additionally, the County's accidental discovery policy (ARC-8.1.5) and procedures (SCCC Chapter 16.40) would also apply to properties in the event future construction encounters unidentified tribal cultural resources. This regulation requires that construction be stopped if archaeological resources are encountered during construction, and that the Planning Director be notified and the discovery analyzed. Therefore, the Sustainability Update EIR concluded that with compliance with General Plan/LCP policies and County regulations, future development would result in less-than-significant impacts related to tribal cultural resources.

As described above in Section IV.E.5, Cultural Resources, no potential archaeological resources were identified on the project site Furthermore, General Plan/LCP Policy ARC-8.1.5 and SCCC Chapter 16.40 set forth the procedure to follow in the event that unknown archaeological materials, which could include tribal cultural resources, are unearthed during construction, as described in Section IV.E.5 above, and implementation of these standards would be a standard condition of approval. Thus, the project would not result in new significant impacts or substantially more severe impacts to tribal cultural resources than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site with application of uniformly applied development standards. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

19. UTILITIES AND SERVICE SYSTEMS	Where Impact is Addressed in Sustainability Update EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment facilities, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or which could cause significant environmental effects?	DEIR pp. 4.16-33	No	No	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	DEIR pp. 4.16-34 to 4.16-37	No	No	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	DEIR pp. 4.16-37 to 4.16-38	No	No	None
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	DEIR pp. 4.16-38 to 4.16-40	No	No	None
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	DEIR pp. 4.16-38 to 4.16-40	No	No	None

(a) Relocation or Construction of Utilities. The unincorporated area of the county is served a variety of public and private agencies and entities. The Sustainability Update EIR found that the future development and growth accommodated by the Sustainability Update would not induce substantial unplanned population growth in the unincorporated area of Santa Cruz County. The EIR concluded that there were no known new or relocated public utility facilities that would be required as a result of future development accommodated by the Sustainability Update based on discussions with service providers. The EIR found that compliance with County General Plan/LCP policies would ensure future development projects could be adequately served by water and sewer

infrastructure as part of the development approval process as summarized in Tables 4-16-5 and 4-16-6 of the Sustainability EIR (Draft EIR volume). In particular, compliance with County General Plan/LCP policies would ensure development projects can be adequately served by water and sewer infrastructure as part of the approval process (BE-2.1.8, PPF-4.2.1). Therefore, the EIR concluded that the project would not result in the need for relocated or new public utility facilities related to water or wastewater treatment facilities.

The EIR also concluded that no new or expanded storm drainage or energy utility infrastructure were identified, except for some low to moderate priority storm drain improvements and one high priority improvement in urban areas that have been identified in County's Storm Drain Master Plan and are being addressed by Master Plan updates as described in the EIR. Therefore, the future development accommodated by the Sustainability Update would result in a less-than-significant impact related to the need for new or expanded utilities. (See Section 4.3.10(c) regarding stormwater drainage.)

The proposed project, which is in the County's USL, would be served by existing public utilities, including the County of Santa Cruz for wastewater collection and stormwater drainage, and the City of Santa Cruz for water service and wastewater treatment. Based on review of existing and required utility service for the proposed project, the project can be served by existing utilities, and would not result in the need for relocated or new public utility facilities. The County has a planned sewer line improvement project, the Upper Rodeo Gulch Sewer Rehabilitation Project, which is planned for construction this year and will improve sewer line capacity in the project vicinity. Upon completion, an existing moratorium for new service connections will be lifted, which requires Board of Supervisors action. The project will include a standard condition of approval that the Final Map and associated Improvement Plans shall not be recorded until after a will-serve letter from the Sanitation Dept. has been issued for the entire development. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts regarding the need for new or relocated utilities than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Water Supply. The Sustainability Update EIR reported that nearly all of Santa Cruz County's water supply is derived from local surface water (streams and reservoirs - 20% of supply) and groundwater (80% of supply), which are fed entirely by precipitation and do not receive any imported water. A small amount of recycled water is produced for irrigation (4%). Domestic supply within the region is provided by five large public agencies, four medium water systems, 115 small water systems, and some 8,000 individual wells. Potable water supplies within the County's USL and RSL are provided by six agencies. Unincorporated areas of the county not serviced by the larger water purveyors rely on private wells and stream diversions for their water supply.

The Sustainability Update EIR found that future development as a result of the Update would occur primarily within the County's USL and would result in additional demand for domestic potable water. The EIR found that future potential development and growth appeared to be within growth projections developed for each of the six major public water districts serving the unincorporated county area, although potential development may approach or exceed estimates in the City of Santa Cruz and Soquel Creek Water District (SqCWD) forecasts in their respective 2020 Urban Water Management Plans (UWMPs). However, the EIR further found that implementation of the Sustainability Update policies summarized in Table 4.16-5 of the Sustainability Update EIR (Draft EIR volume) and compliance with SCCC water conservation requirements would serve to reduce water demand. Furthermore, General Plan/LCP policies require that development be allowed only where adequate water supplies are available, and all public water purveyors would have to approve new connections as part of future development project reviews.

The Sustainability Update EIR concluded that implementation of County policies and compliance with water conservation regulations and requirements of the water purveyors would serve to reduce demand and ensure availability of adequate water supplies prior to approval of future developments. Therefore, the Sustainability update EIR concluded that the Update's potential indirect impact on water supplies would be considered less than significant, except conservatively concluded that the impact could be potentially significant for the Santa Cruz Water Department and SqCWD. The EIR indicated that General Plan/LCP policies and regulations would require incorporation of water-conserving fixtures, measures and landscaping as part of new development in the county, which would serve to minimize water demands. The Sustainability Update includes policies that serve to avoid or minimize impacts related to provision of adequate water supplies as summarized in Table 4.16-5 of the EIR (Draft EIR volume). In addition, the policies require that new development or intensification of land use only be allowed where public service levels are adequate to serve a project, including water supply (PPF-3.1.1 and PPF-4.1). Implementation of these policies also would be required for developments served by small mutual water companies or water systems. Requirements for water conserving-fixtures and water-efficient landscaping are also included in the SCCC and building codes and would be required for new development. However, no other mitigation measures were identified in the Sustainability Update EIR that would reduce potential impacts on water supply of the City of Santa Cruz and SqCWD to a less-than-significant level. Therefore, the EIR concluded that the impact for these two water suppliers would remain potentially significant and unavoidable.

The proposed project would result in an increased water demand. Water service to the project would be provided by City of Santa Cruz. The County's Sustainability Update and General Plan/LCP requires that all development proposals be reviewed to assess whether adequate service is available (PPF-4.1.3) and that a commitment letter from a water agency that verifies the capability of the system to serve proposed development (PPF-4.1.2). The City of Santa Cruz Water Department has indicated that the project can be served (via email to the applicant dated August 21, 2023). Therefore, sufficient water supplies are available to serve the project. Furthermore, the proposed residential project, which consists of 21 single-family residential units with a net increase

of 20 units, which is within the overall amount of remaining residential development potential analyzed in the Sustainability Update EIR as described in Section V.B. Because the project size is within the total amount of potential residential development analyzed in the Sustainability Update EIR regarding water supply impacts, and the Santa Cruz Water Department has indicated that water service can be provided to the project, the proposed project would not result in new significant impacts or substantially more severe impacts regarding water supplies than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b) Wastewater Treatment Capacity. The collection, conveyance, and treatment of wastewater within the unincorporated areas of the county are managed by a number of agencies. Wastewater services within Santa Cruz County are provided by three cities, four special districts, and six County Service Areas (CSAs). Facilities range from individual or small community onsite wastewater treatment systems (OWTS, also known as septic systems) to local wastewater collection systems and regional treatment plants. Wastewater infrastructure includes septic systems, collection and sewer main lines, lift stations, treatment plants and recycled water treatment systems. Wastewater systems are closely regulated both for health and environmental concerns. The RWQCB regulates operations and discharges from sewage systems, while the County regulates individual and small OWTS with flows up to 10,000 gallons per day.

The Sanitation Division of the County Community Development & Infrastructure Department staffs three County sanitation districts, which include the Davenport County Sanitation District, the Santa Cruz County Sanitation District (SCCSD), and the Freedom County Sanitation District, as well as five County Service Areas (CSAs): 2 (Place de Mer), 5 (Sand Dollar), 7 (Boulder Creek), 10 (Rolling Woods), and 20 (Trestle Beach). These agencies provide sanitary sewer collection services. Collected wastewater is treated at the City of Santa Cruz wastewater treatment facility (WWTF) for the Santa Cruz County Sanitation District and CSA 10, and at the City of Watsonville wastewater treatment facility for the Freedom County Sanitation District.

The Sustainability Update EIR concluded wastewater flows resulting from future development accommodated by the Sustainability Update EIR could be accommodated within the remaining capacity of the existing regional wastewater treatment providers. Furthermore, implementation of the Sustainability Update policies and implementation strategies summarized in Table 4.16-6 of the Sustainability Update EIR (Draft EIR volume) would ensure that adequate sewer services are available as part of future development project reviews. In particular, Sustainability Update and General Plan/LCP policies requires the adequacy of sewer service be considered in determining the number of units to be permitted for projects (BE-2.1.8) and that a written commitment from sewer service that it can support a new development (PPF-4.2.1). Therefore, the Sustainability Update EIR concluded that impacts of future development on wastewater treatment capacity would be considered less than significant.

The project would result in increased wastewater generation and need for wastewater treatment. Wastewater treatment for the proposed project would be provided by City of Santa Cruz WWTF. The County's Sustainability Update and General Plan/LCP requires that all development proposals be reviewed to assess whether adequate sewer service is available (BE-2.1.8) and that a commitment letter from a water agency that verifies the capability of the system to serve proposed development (PPF-4.2.1). The Sustainability Update EIR found that adequate wastewater treatment capacity exists to serve potential development analyzed in the EIR. Therefore, there is sufficient wastewater treatment capacity are available to serve the project, Furthermore, the proposed residential project, which consists of 21 dwelling units and a resulting net increase of 20 single-family dwellings, which would be within the overall amount of remaining residential development potential development analyzed in the Sustainability Update EIR as described in Section V.B. Because the project size is within the total amount of potential residential development analyzed in the Sustainability Update EIR regarding wastewater treatment impacts, the proposed project would not result in new significant impacts or substantially more severe impacts regarding wastewater treatment capacity than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(d-e) Solid Waste Disposal. As described in the Sustainability Update EIR, Santa Cruz County Recycling and Solid Waste Services (Recycling & Trash) is responsible for the operation and administration of solid waste diversion and disposal in the unincorporated areas of the county. Recycling & Trash operates the County's two solid waste facilities, the Buena Vista Landfill located west of the City of Watsonville at 1231 Buena Vista Drive and the Ben Lomond Transfer Station located east of Ben Lomond in the San Lorenzo Valley at 9835 Newell Creek Road. The Sustainability Update EIR indicates that the Buena Vista Landfill has 26% remaining capacity (1,947,631 cubic yards) and is expected to close in 2030, after which refuse from the unincorporated county will be transferred to the Monterey Regional Waste Management District (MRWMD) Monterey Peninsula Landfill, and the County is currently in the process of studying a transfer station to be located at the current Buena Vista Landfill site to facilitate the transition. The Monterey Peninsula Landfill has 98% remaining capacity (over 48.5 million cubic yards) and is expected to have capacity for approximately at least 90 more years.

The Sustainability Update EIR, which evaluated impacts regarding with solid waste disposal, concluded that adequate landfill capacity is available to serve development accommodated by the Sustainability Update and beyond. Table 4.16-7 of the Sustainability Update EIR (Draft EIR volume) lists proposed and retained General Plan/LCP policies that would serve to avoid and minimize impacts related to solid waste disposal. Furthermore, the Sustainability Update EIR indicates that the County is working to implement its Zero Waste Plan, which would ultimately result in no net increase in solid waste generation. Additionally, future development accommodated by the project would be required to comply with all applicable federal, state, and local regulations related to solid waste. Solid waste generated during construction and operation

of development projects would be expected to be recycled to the maximum extent possible, and unsalvageable materials generated from development projects would be disposed of at authorized sites in accordance with all applicable federal, state, and local statutes and regulations. The EIR concluded that impacts related to generation of solid waste as a result of future development would be less than significant.

As described in the Sustainability Update EIR, future development accommodated by the Sustainability Update would be required to comply with all applicable regulations associated with the reduction of solid waste entering landfills, as well as plans, policies, and programs related to recycling/diversion and disposal of solid waste. Solid waste generated during construction and operation of development projects would be expected to be recycled to the maximum extent possible, and unsalvageable materials generated from development projects would be disposed of at authorized sites in accordance with all applicable federal, state, and local statutes and regulations. Thus, the Sustainability Update's impact related to generation of solid waste and compliance with applicable solid waste regulations would be less than significant.

The project would result in solid waste generation, which would be disposed of at the Buena Vista Landfill. The proposed residential project, which consists of 21 dwelling units (with a net increase of 20 dwelling units), would be within the overall amount of remaining residential development potential analyzed in the Sustainability Update EIR as described in Section V.B, and future solid waste generation and disposal was identified as a less-than-significant impact in the Sustainability Update EIR. Because the project size is within the total amount of potential residential development analyzed in the Sustainability Update EIR regarding generation and disposal of solid waste, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

20. WILDFIRE		Does Project Involve New Significant Impacts or Substantially More Severe Impacts?		Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Where Impact is Addressed in Sustainability Update EIR		Any New Impacts Peculiar to Project or Site?	
a) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	DEIR pp. 4.17-14 to 4.17-18	No	No	SCCC Chapter 7.92 (Fire Code) and SCCC Title 12 (Building Regulations), Standard Fire Department Conditions of Approval

20. WILDFIRE		Does Project Involve New Significant Impacts or Substantially More Severe Impacts?		Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Where Impact is Addressed in Sustainability Update EIR		Any New Impacts Peculiar to Project or Site?	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	DEIR pp. 4.17-14 to 4.17-18	No	No	SCCC Chapter 7.92 (Fire Code)
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	DEIR pp. 4.17-14 to 4.17-18	No	No	SCCC Chapter 7.92 (Fire Code)
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	DEIR pp. 4.17-14 to 4.17-18	No	No	SCCC Chapter 7.92 (Fire Code)
e) Substantially impair an adopted emergency response plan or emergency evacuation?	DEIR pp. 4.17-18 to 4.17-19	No	No	SCCC Chapter 7.92 (Fire Code)

(a) Wildfire Fire Hazards. The Sustainability Update EIR indicates that the risk of significant wildfire exists in the county due to topography, fuels, and weather conditions. The county experiences annual cycles of elevated fire danger, with the wildfire season typically extending from roughly May into late October or early November. The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire hazard severity zones (FHSZs) throughout the county. According to CAL FIRE's currently adopted (2007) FHSZ maps, most of the county is designated as moderate to high FHSZs, while a small area of Bonny Doon and areas along the eastern boundary of the county are designated as being very high FHSZs. Large areas of the county have also been mapped and designated in the County's General Plan/LCP as Critical Wildfire Hazard Areas due to accumulations of wildfire prone vegetation, steep and dry slopes, and the presence of structures vulnerable to wildland fires. These areas are generally situated in the steeper higher elevations of the county. Most of these areas are along the border of Santa Clara County or in the Coastal ridges between Highway 9 and Highway 1. At the local level, the County is responsible for managing emergency preparedness, response, and evacuation through its Local Hazard Mitigation Plan

(LHMP), which includes mitigation strategies for reducing wildland fire risks, creating defensible space around structures, improving access, and inter-agency coordination of efforts.

The Sustainability Update EIR, which evaluated impacts associated with wildfire hazards, found that the Sustainability Update could lead to some development in areas that are located within designated FHSZs; however, all development would be required to comply with local regulations regarding building and fire codes, including requirements for provision of adequate access and water supply, fire sprinkler systems in new buildings, and exterior defensible space. As noted in Table 4.17-1 of the EIR, policies in the Parks, Recreation + Public Facilities Element and the Public Safety Element would serve to avoid or minimize impacts related to exposure to wildfires. While some future development could be located in fire hazard zones, compliance with state and local regulations, as well as implementation of the existing and proposed General Plan/LCP policies, future development would be designed to minimize risks resulting from exposure to wildland fire hazards. Therefore, the Sustainability Update EIR concluded that, with compliance with state and local regulations and implementation of the County's General Plan/LCP policies and LHMP mitigation strategies, the impact related to wildfire would be less than significant.

The proposed project is within a local responsibility area (LRA) and is not located within a fire hazard area. Thus, the project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(b-d) Exacerbation of Wildfire Risks. The Sustainability Update EIR indicates that the risk of significant wildfire exists in Santa Cruz County, due to the local climate and topography as well as existing development patterns where over 50% of the County's population lives in the WUI. As described in the EIR, the California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire hazard severity zones throughout the county's state responsibility area (SRA), including moderate, high, and very high FHSZs. In addition, large areas of the county have been mapped and designated in the County's General Plan/LCP as Critical Wildfire Hazard Areas due to accumulations of wildfire prone vegetation, steep and dry slopes, and the presence of structures vulnerable to wildland fires. According to CAL FIRE's currently adopted (2007)⁵ FHSZ mapping, most of the county is designated as moderate to high fire hazard severity, while a small area of Bonny Doon and areas along the eastern boundary of the county are designated as being very high FHSZs. Critical wildfire hazard areas identified by the County are primarily located along the border of Santa Clara County in the South County region and in the coastal ridges of the Mountain and North Coast regions.

⁵ As of December 2022, CAL FIRE has begun the regulatory adoption process to update its 2007 FHSZ maps, however updated maps are not yet adopted and were not in effect at the time the Notice of Preparation was published.

The Sustainability Update EIR, which evaluated impacts associated with wildfire hazards, concluded that development accommodated by the Sustainability Update would primarily be located in urban areas with the County's USL, where wildfire hazards are relatively lower than in WUI areas. Future development in WUI areas would be required to comply with state and local regulations and local policies regarding siting and design of structures to avoid/minimize risks of exposure to fires. Requirements for adequate access, water supply, building design, and defensible space would also minimize conditions that would lead to exacerbation of a wildfire hazard or result in an adverse secondary effect as a result of development, such as grading of steep slopes or inadequate drainage. Additionally, the Sustainability Update did not forecast an increase in new residential units in rural planning areas over what could have occurred under the existing General Plan/LCP, although there could be some increased non-residential development in these areas. However, as described in the EIR, all development would be required to be designed in accordance with fire and building code requirements. Therefore, the EIR determined that the Sustainability Update would not directly or indirectly result in activities that would exacerbate the existing risk of wildland fires or result in secondary impacts related to flooding, slope instability, or discharge of pollutants, and the impact would be less than significant.

The proposed project is within a LRA and is not located within a fire hazard area. Thus, the project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the project or site. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

(e) Emergency Response and Evacuation. The Sustainability Update EIR indicates that the Santa Cruz County Office of Response, Recovery & Resilience (OR3) serves as the emergency management office for responding to ongoing disasters. Evacuations are frequently a response to natural disasters to protect people from potential harm. The County uses a variety of methods to notify residents when an evacuation is necessary, including reverse 911 calls, text or phone messages through Code Red (for those who have signed up), and/or door-to-door notifications. Evacuation areas are determined by the incident command team, who are in charge of responding to the disaster.

The Sustainability Update EIR, which evaluated impacts associated with emergency response and evacuation, concluded that the Sustainability Update would not impair implementation of or interfere with an emergency response or evacuation plan. As described in the EIR, development under the Sustainability Update would be concentrated in urban areas within the County's USL where fire hazards are lower than in wildland-urban interface (WUI) areas. Nonetheless, all development would be required to comply with adopted local, regional, and state plans and regulations addressing emergency access and exposure to wildfire hazards. The Sustainability Update Access + Mobility Element includes policies that would minimize the impacts related to provision of inadequate emergency access. Specifically, Policy AM-6.1 calls for adequate roads for fire and emergency response access, which would be reviewed as part of future development

project applications. In addition, County staff would work in conjunction with the fire departments, and other emergency access providers to continue to coordinate development review and review of new roads with Fire District and Sheriff's Department staff (AM-6-1a). Therefore, the EIR determined that the Sustainability Update would not directly or indirectly result in provision of inadequate emergency access or substantially impair implementation of an emergency response or evacuation plan, and the impact would be less than significant.

The proposed project would not include any changes to existing public roadways that provide emergency access to the site, except for access private improvements into the site and widening of Maciel Avenue as described above. Therefore, the project would not impair implementation of or physically interfere with an emergency response or evaluation plan and would not result in an impact. Thus, the proposed project would not result in new significant impacts or substantially more severe impacts than evaluated in the Sustainability Update EIR, and would not result in impacts peculiar to the site or the project. Therefore, no further environmental analysis or review is required pursuant to Public Resources Code section 21083.3 and the State CEQA Guidelines section 15183.

21. MANDATORY FINDINGS OF SIGNIFICANCE				
Would the project:	Where Impact is Addressed in Sustainability Update 2030 EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
a) Have the potential to substantially 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Draft EIR pp. 4.4-29 to 4.4-40, 4.5-10 to 4.5-26	No	No	MM Bio-2B, CUL-1, and CUL-2, See Sections IV.B.4 and IV.B.5 for list of other uniformly applicable development standards
b) 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 the	Draft EIR pp. 4.1-24, 4.2-30 to 4.2-31, 4.3-31, 4.4-40, 4.5-26 to 4.5-27, 4.6-16, 4.7-27, 4.8-37, 4.9-23,	No	No	MM CUL-1, and CUL-2, TRA-1, and TRA-2 See Sections IV.B.5, IV.B.8, IV.B.10, and IV.B.17 for list of other uniformly

21. MANDATORY FINDINGS OF SIGNIFICANCE				
Would the project:	Where Impact is Addressed in Sustainability Update 2030 EIR	Does Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Impacts Peculiar to Project or Site?	Relevant Sustainability Update Mitigation Measures or Other Uniformly Applicable Development Standards
past projects, the effects of other current projects, and the effects of probable future projects.)	4.10-50 to 4.10-51, 4.11-33, 4.12-27 to 4.12-28, 4.13-16 to 4.13-17, 4.14-23, 4.15-33, 4.16-41 to 4.16-42, 4.17-19			applicable development standards
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Draft EIR Sections 4.3, 4.9, 4.12	No	No	No

(a) Substantially Degrade Environmental Quality. The project would not degrade the quality of the environment or otherwise affect fish and wildlife habitat as discussed in Section IV.E.4 (Biological Resources) of this Environmental Checklist review. As explained in Section IV.E.4, biological resource impacts are not peculiar to the parcel or the project because they were either adequately addressed in the Sustainability Update EIR or can be substantially mitigated by the application of uniformly applied development policies or standards. As discussed in Section IV.E.5 (Cultural Resources) and Section IV.E.18 (Tribal Cultural Resources), cultural resources are not peculiar to the parcel or the project because they were either adequately addressed in the Sustainability Update EIR or can be substantially mitigated by the application of uniformly applied development policies or standards. The project would not result in elimination of important examples of a major period of California history or prehistory. Therefore, the proposed project would not result in new or substantially more severe impacts related to environmental quality, fish or wildlife habitat or populations, plant or animal communities including special-status species, or examples of California history or prehistory than previously identified and analyzed in the Sustainability Update EIR.

(b) Cumulative Impacts. The Sustainability Update EIR evaluated cumulative impacts for each environmental resource topic based on future and cumulative projects identified on Table 4.0-1 in the Sustainability Update EIR. Potentially significant cumulative impacts were identified for cultural resources (historical resources), GHG emissions, hydrology (groundwater supplies in the Pajaro Valley), transportation (VMT), and utilities (water supply for two water agencies). However, the Sustainability Update's incremental contribution was not found to be cumulatively

considerable, except for cultural resources (historical resources), transportation (VMT), and utilities (water supply). As discussed in this Checklist, the proposed project development would be within the amount of development analyzed in the Sustainability Update EIR and would not result in new or substantially more severe impacts that would lead to new significant or more severe impacts related to cumulative impacts than previously identified in the Sustainability Update EIR.

(c) Substantial Adverse Effects on Human Beings. The Sustainability Update EIR did not identify significant impacts related to impacts that could have a substantial adverse effect on human beings, such as air emissions, noise, or hazards due to location near an airport. construction noise and vibration. Thus, no environmental effects have been identified that would have direct or indirect adverse effects on human beings, and the project would not result in new significant impacts peculiar to the project or site that would result in substantial adverse effects on humans.

VI. REFERENCES AND DATA SOURCE LIST

Agency Plans and Studies

1. County of Santa Cruz *Sustainability Policy and Regulatory Update* and EIR
 - a. Adopted December 13, 2022. *Sustainability Policy and Regulatory Update*. Available online at: <https://sustainability-update-sccgis.opendata.arcgis.com/pages/documents>.
 - b. April 2022. Environmental Impact Report, County of Santa Cruz Sustainability Policy and Regulation Update (SCH# 2020079005), which consists of the Draft EIR volume (April 2022) and the Final EIR volume (August 2022). Prepared by County of Santa Cruz Community Development and Infrastructure Department with assistance of Dudek. Available online at: <https://www.sccoplanning.com/PlanningHome/Environmental/CEQAInitialStudiesEIRs/ArchivedCEQADocuments.aspx>.
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