Staff Report to the Planning Commission

Application Number: 261042

Applicant: Stefan Slater, Blu Croix, Ltd.
Owner: Pacific Telephone & Telegraph Co. / AT&T
APN: 041-171-18
Site Address: 855 Polo Avenue, Aptos

Agenda Date: November 19, 2026
Agenda Item #: 8

Time: After 9:30 a.m.

Project Description: Proposal to divide an existing 67,549 square foot parcel, to create two commercial parcels. This proposal requires the approval of Minor Land Division with a Tentative Map as the proposed subdivision does not create more than four parcels, pursuant to Santa Cruz County Code (SCCC) 14.01.201.

Location: The project site is located near the northwest corner of the intersection of Monroe Avenue and Polo Avenue in Aptos (855 Polo Avenue).

Permits Required: Minor Land Division and approval of a Tentative Map

Supervisorial District: Second District (District Supervisor: Kim De Serpa)

Staff Recommendation:

- Determine that the proposal is exempt from further Environmental Review under the California Environmental Quality Act.
- Approval of Application 261042, based on the attached findings and conditions.

Project Description & Setting

The proposed Minor Land Division is to split an existing commercial parcel (APN 041-171-18) into two commercial parcels of 41,476 square feet (Parcel A) and 26,073 square feet (Parcel B). The larger of the two lots (Parcel A) will contain the existing commercial structure and the adjacent parking lot. The smaller lot (Parcel B) will remain undeveloped.

The subject parcel is located in a small commercial area to the south of the Aptos Village area, accessible by the Rio del Mar exit off Highway One. The parcel is bordered by commercial properties to the south and west, single-family residential parcels to the north, and the Aptos Junior High facility to the east across Polo Avenue.

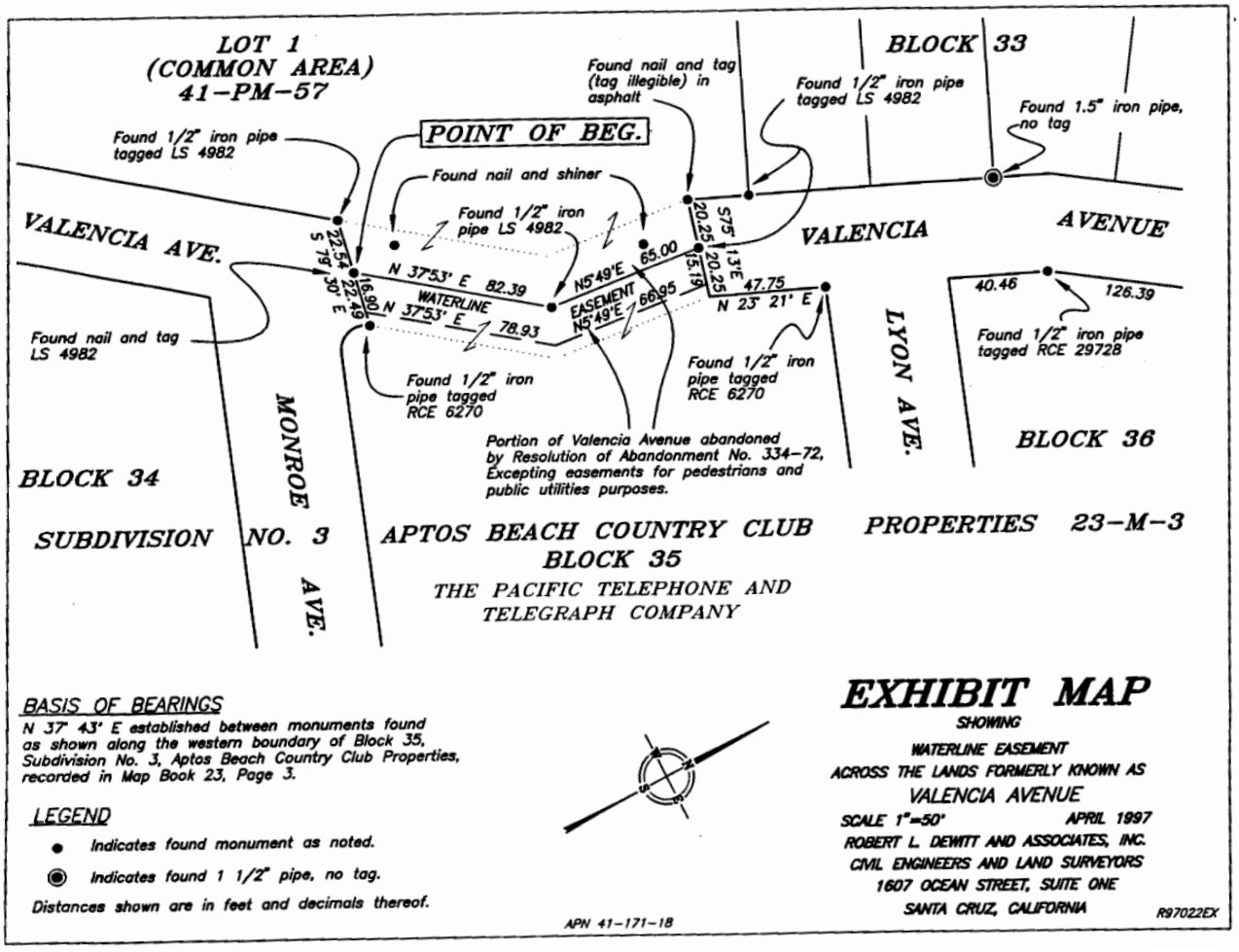
Project Background

The existing 67,549 square foot parcel is located within the Aptos Planning Area of the unincorporated County of Santa Cruz, north of Highway One. In 1972, the block, part of the Aptos

Beach Country Club, Subdivision 3 (Block 35 of Volume 23, Page 3), bordered by Polo Avenue, Lyon Avenue, Monroe Avenue and Valencia Avenue was surveyed and purchased by the Pacific Telephone and Telegraph Company (Document #2237-278), an entity now owned and operated by AT&T. The original use permit 4590-U allowed for the construction of an 8,800 square foot building, on the southeastern side of the parcel facing Polo Avenue, to be used as a telecommunications building with a staff of seven employees. The proposed facility on the site was never intended for staff to conduct business with the general public and therefore minimal traffic impacts were anticipated and only a small parking lot was planned and built; however, the original 4590-U project description included possible future expansion of the structure(s) to a total of 19,000 square feet.

The remaining 29,607 square feet of the northwestern side of the parcel, beyond the parking lot, was never developed. A portion of the Valencia Avenue right-of-way, the block between Lyon Avenue and Monroe Avenue, was abandoned (Document #334-72) to allow for a 20-foot-wide easement for pedestrians and public utility purposes; a 15-foot strip of this area was later granted as a waterline easement to the Soquel Creek Water District for the purpose of altering, repairing and maintaining the adjacent water mains (1997-0035765).

Figure 1: 1997-0035765 Easement granted to Soquel Creek Water District



To reduce overhead costs and allow for continued operation of the existing telecommunications facility at this site, AT&T is now seeking to split the parcel and sell the vacant portion.

Zoning & General Plan Consistency

The subject property is a 67,549 square foot lot, located in the C-1 (Neighborhood Commercial) zone district, a designation which allows commercial uses. The existing commercial development for a communications equipment (public utilities) building is a permitted use within the zone district, and the C-1 zoning is consistent with the site's C-N (Neighborhood Commercial) General Plan designation.

Minor Land Division

This application proposes to divide the subject property into two individual commercial lots. The division would result in the larger parcel (Parcel A) containing the existing commercial building and parking lot, while the currently undeveloped portion of the property would become a separate parcel (Parcel B).

Pursuant to SCCC 13.10.333(B), the division of the property into two separate commercial parcels within the C-1 zone district requires a minimum parcel area of 5,000 square feet per parcel. Both proposed parcels contain sufficient land area to comply with the minimum parcel size requirement. Parcel B would have a minimum frontage of approximately 80 feet along the street/right-of-way, which exceeds the C-1 zone district's minimum required frontage of 40 feet.

Project Access

The new parcel may be accessed by either Lyon Avenue off Polo Avenue or Monroe Avenue off Soquel Drive. No changes to the access or the parking lot of the existing telecommunications building are proposed as part of the Minor Land Division.

Both Lyon Avenue and Monroe Avenue were irrevocably offered to the County for dedication as streets for public use (per Parcel Map 023M03), but (to date) are not currently County maintained roads. Therefore, according to the definition found in SCCC 15.10.040, for "non-County maintained street", these streets must be maintained by a homeowners' association or common interest association and must meet local street design criteria.

Site Improvements & Utilities

No new site improvements are proposed as part of the Minor Land Division. Existing improvements and utilities will remain. The property is located within the Urban Services Line and the existing development is connected to utilities, with existing water service from the Soquel Creek Water District and existing sanitation service from the Santa Cruz County Sanitation District. The new parcel will not be developed with utilities.

Because neither Lyon nor Monroe Avenues are not County maintained, the proposed lot split will not require road or sidewalk improvements. The original 4590-U permit included conditions of approval anticipating commercial growth on this site. Future plans for any expansion of the facilities shall provide for the widening of and the completion of Lyon Avenue, extending its frontage with concrete curb and gutter to Valencia Avenue.

Environmental Review

The subject parcel is mapped within the Archeologic Resources layers in the County Geographic Information System (GIS). An Archaeological Survey report (REV261126) was prepared by Alta Archeological Consulting which concluded that no cultural resources were identified on the site. The report was reviewed and accepted by County staff.

The site is neither located in the Coastal Zone nor mapped as Sensitive Habitat (as defined in SCCC 16.32.040), and therefore any significant trees (trunks measuring over five feet in circumference or sprout clumps of five or more stems each of which approximately three feet in circumference) are not protected. However, the site does contain a number of mature trees, including redwood trees in both the northwest corner (Figure 2) and in the southeast corner of the parcel. The redwoods are part of a broader grouping of mature trees that contribute to the surrounding landscape, as shown on the 2025 Base Layer of the County's publicly accessible GIS web service. Any future development shall comply with the County regulations and standards regarding the protection of biotic resources.

Figure 2: View of subject parcel from Lyon Avenue



Staff recommends that the project be exempted from the California Environmental Quality Act (CEQA) through the categorical exemption for a Minor Land Division (Class 15 Section 15315), as the proposed two-lot subdivision is in an area designated for commercial uses with all urban services available. The parcel complies with the exemption in that it has not been previously subdivided and does not have an average slope greater than 20 percent.

Design Review

The proposed Minor Land Division complies with the requirements of the County Design Review Ordinance, in that no physical changes are proposed to the existing commercial development, and no development is currently proposed for the undeveloped parcel. The applicant has not provided design guidelines with this application, and any future development must comply with the County regulations and development standards for the C-1 commercial zone district.

Public Outreach

An in-person and virtual (hybrid) neighborhood meeting was held at the Simpkins Swim Center in Santa Cruz on October 7, 2026, to solicit feedback from the community regarding the proposal. Approximately six neighbors attended this meeting, conducted by the applicant. The majority of questions were related to future commercial development and beyond the scope of this proposed land division.

The primary concern was over the current and proposed maintenance of the surrounding rights-of-way - specifically Lyon Avenue, as it is not a County maintained road but is currently used to access the parking lot for the existing communications building and could be a potential route to access the proposed parcel B.

Additionally, the property owners of the adjacent parcel to the northwest (APN 041-181-58) pointed to a discrepancy in the mapped boundaries of their parcel, which was confirmed by the Grant Deed and corrected with an updated map (Exhibit “D”).

Conclusion

As proposed and conditioned, the project is consistent with all applicable codes and policies of the Zoning Ordinance and General Plan/LCP. Please see Exhibit "B" ("Findings") for a complete listing of findings and evidence related to the above discussion.

Staff Recommendation

- Determine that the proposal is exempt from further Environmental Review under the California Environmental Quality Act.

- **APPROVAL** of Application Number **261042,** based on the attached findings and conditions.

Supplementary reports and information referred to in this report are on file and available for viewing at the Santa Cruz County Planning Division, and are hereby made a part of the administrative record for the proposed project.

The County Code and General Plan, as well as hearing agendas and additional information are available online at: www.sccoplanning.com.

Report Prepared By: _____

Rebecca Rockom
Santa Cruz County Planning
701 Ocean Street, 4th Floor
Santa Cruz CA 95060
Phone Number: (831) 454-3121
E-mail: rebecca.rockom@santacruzcountyca.gov

Report Reviewed By: _____

Jocelyn Jansen
Assistant Director, Planning Division
Development Review
Santa Cruz County Planning

Exhibits

A. Categorical Exemption (CEQA determination)
B. Findings
C. Conditions
D. Project plans
E. Assessor's, Location, Zoning and General Plan Maps
F. Parcel Information
G. Archeological Report review letter
H. Comments & Correspondence

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

The Santa Cruz County Planning Division has reviewed the project described below and has determined that it is exempt from the provisions of CEQA as specified in Sections 15061 - 15332 of CEQA for the reason(s) which have been specified in this document.

Application Number: 261042
Assessor Parcel Number: 041-171-18
Project Location: 855 Polo Avenue, Aptos

Project Description: Minor Land Division to divide an existing developed commerical property into two commercial parcels

Person or Agency Proposing Project: Stefan Slater, Blu Croix, Ltd.

Contact Phone Number: (818)281-2864

A. _____ The proposed activity is not a project under CEQA Guidelines Section 15378.
B. _____ The proposed activity is not subject to CEQA as specified under CEQA Guidelines Section 15060 (c).
C. _____ **Ministerial Project** involving only the use of fixed standards or objective measurements without personal judgment.
D. _____ **Statutory Exemption** other than a Ministerial Project (CEQA Guidelines Section 15260 to 15285).

E. X Categorical Exemption

Specify type: Class 15 - Minor Land Divisions (Section 15315)

F. Reasons why the project is exempt:

Minor Land Division in an area designated for commercial uses with all urban services available.

In addition, none of the conditions described in Section 15300.2 apply to this project.

Rebecca Rockom

_____ Date: _____
Rebecca Rockom, Project Planner

EXHIBIT A

Application #: 261042
APN: 041-171-18
Owner: Pacific Telephone & Telegraph Co. / AT&T

Subdivision Findings

1. That the proposed map is consistent with applicable general and specific plans.

This finding can be made, in that the proposed map meets the technical requirements of the Subdivision Ordinance and is consistent with the County General Plan as set forth in the findings below.

2. That the design or improvement of the proposed subdivision is consistent with applicable general and specific plans.

This finding can be made, in that the proposed division of land and its design, will be consistent with the General Plan. The project will result in two commercial parcels with existing commercial improvements on one-half of the parcel. The subject property is designated as Neighborhood Commercial (C-N) in the General Plan. The proposed land division complies with the minimum required 5,000 square foot lot size within the C-1 zone district and the zoning is consistent with the General Plan land use designation. The project is consistent with the General Plan in that all urban services are available, including public water and sewer service. Parcels may be accessed from either Lyon Avenue or Monroe Avenue. The property is currently developed with one existing commercial building and associated parking area. The newly created parcel would comprise the undeveloped portion. No additional improvements are proposed.

3. That the site of the proposed subdivision is physically suitable for the type of development.

This finding can be made, in that the subject property is currently developed with an existing commercial building and parking area, and no physical changes are proposed as part of the land division. The proposed parcels are arranged in a manner to allow future development of the created parcels without the need for site standard exceptions or variances.

4. That the site of the proposed subdivision is physically suitable for the density of development.

This finding can be made, in that the existing and proposed building envelopes are properly configured to allow the existing commercial development to be maintained in compliance with the required site standards. No environmental resources would be adversely impacted by the proposed development.

5. That the design of the proposed subdivision or type of improvements will not cause substantial environmental damage nor substantially and avoidably injure fish or wildlife or their habitat.

This finding can be made, in that no mapped or observed sensitive habitats or threatened species will be adversely impacted through the creation of two parcels on the existing developed commercial property. The proposed subdivision, with the redrawing of parcel boundaries on a map, does not have any associated improvements, ground disturbance, or other development that could cause any environmental damage.

6. That the proposed subdivision or type of improvements will not cause serious public health problems.

This finding can be made, in that municipal water and sewer services are available to serve the proposed parcels (see Exhibit "H"). The existing buildings are connected to water and sewer services.

7. That the design of the proposed subdivision or type of improvements will not conflict with easements, acquired by the public at large, for access through, or use of property within the proposed subdivision.

This finding can be made, in that no such easements are known to affect the project site.

Discretionary Permit Findings

(a) Health and Safety. The proposed location of the project and the conditions under which it would be developed, operated, or maintained will not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood or the general public and will not be materially injurious to properties or improvements in the vicinity.

This finding can be made, in that the project is located in an area designated for commercial uses. Construction will comply with prevailing building technology, the California Building Code, and the County Building ordinance to ensure that the project will not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood or the general public, and will not be materially injurious to properties or improvements in the vicinity.

(b) Zoning Conformance. The proposed location of the project and the conditions under which it would be developed, operated, or maintained will be in substantial conformance with the intent and requirements of all pertinent County ordinances and the purpose of the zone district in which the site is located.

This finding can be made, in that the proposed location of the Minor Land Division and the conditions under which it would be operated or maintained will in substantial conformance with all pertinent County ordinances and the purpose of the C-1 (Neighborhood Commercial) zone district as the primary use of the property will be a Minor Land Division that meets all current site standards for the zone district.

Pursuant to SCCC 13.10.333(B), the division of the property into two separate commercial parcels within the C-1 zone district requires a minimum parcel area of 5,000 square feet per parcel. Both proposed parcels contain sufficient land area to comply with the minimum parcel size requirement. Parcel B would have a minimum frontage of approximately 80 feet along the street/right-of-way, which exceeds the C-1 zone district's minimum required frontage of 40 feet.

(c) General Plan Conformance. The proposed project is in substantial conformance with the intent, goals, objectives, and policies of all elements of the County General Plan and any specific plan which has been adopted for the area.

This finding can be made, in that the proposed commercial use is in substantial conformance with the use and density requirements specified for the C-N (Neighborhood Commercial) land use designation in the County General Plan.

A specific plan has not been adopted for this portion of the County.

(d) CEQA Conformance. The proposed project complies with the requirements of the California Environmental Quality Act (CEQA) and any significant adverse impacts on the natural environment will be mitigated pursuant to CEQA.

This finding can be made, in that the project has been determined to be exempt from further review under the California Environmental Quality Act, as indicated in the Notice of Exemption for this project. The proposed two-lot subdivision is in an area designated for commercial use with all urban services available. The project complies with categorical exemption Section 15315 in that

the parcel has not been previously subdivided and does not have an average slope greater than 20 percent.

(e) Utilities and Traffic Impacts. The proposed use will not overload utilities, result in inefficient or wasteful use of energy, or generate more than the acceptable level of traffic on the streets in the vicinity.

This finding can be made, in that the proposed Minor Land Division will not add any residential or commercial units to an existing developed lot. The expected level of traffic generated by the proposed project is not expected to increase and therefore will not adversely impact existing roads or intersections in the surrounding area. In addition, all construction will comply with prevailing building technology, the California Building Code, and the County Building ordinance to ensure that the project will not overload utilities or otherwise result in an inefficient or wasteful use of energy.

(f) Neighborhood Compatibility. The proposed use will be compatible with the existing and proposed land uses, land use intensities, and dwelling unit densities of the neighborhood, as designated by the General Plan and Local Coastal Program and implementing ordinances.

This finding can be made, in that the proposed Minor Land Division is consistent with the land use intensity and density of the neighborhood as designated by the General Plan and implementing ordinances.

(g) Local Coastal Program Consistency. For proposed projects located within the coastal zone, the proposed project is consistent with the provisions of the certified Local Coastal Program.

This finding is not required, in that the project site is not located within the coastal zone.

Conditions of Approval

Minor Land Division 261042

Applicant: Blu Croix Ltd.

Property Owner: Pacific Telephone & Telegraph Co. / AT&T

Assessor's Parcel Number(s): 041-171-18

Property Address and Location: Property is located on the northwest corner of the intersection of Polo Avenue and Monroe Avenue in Aptos. (855 Polo Avenue)

Planning Area: Aptos

Exhibit D: Tentative Map - prepared by Polaris Land Surveying, revised October 26, 2026.

All correspondence and maps relating to this land division shall carry the land division number noted above.

I. This permit authorizes the Minor Land Division as indicated on the approved Exhibit "D" for this permit. Prior to exercising any rights granted by this approval, the applicant/owner shall:

   A. Sign, date, and return to Santa Cruz County Planning one copy of the approval to indicate acceptance and agreement with the conditions thereof.

II. A Parcel Map for the land division shall be recorded prior to the expiration date of the tentative map and prior to sale, lease or financing of any new lots. The Parcel Map shall be submitted to the County Surveyor (Department of Public Works) for review and approval prior to recordation. No improvements, including, without limitation, grading and vegetation removal, shall be done prior to recording the Parcel Map unless such improvements are allowable on the parcel as a whole (prior to approval of the land division). The Parcel Map shall meet the following requirements:

   A. The Parcel Map shall be in general conformance with the approved Tentative Map and shall conform to the conditions contained herein. All other State and County laws relating to improvement of the property or affecting public health and safety shall remain fully applicable.

   B. This land division shall result in no more than two (2) commercial parcels as indicated on the approved Exhibit "D" for this permit.

   C. The minimum parcel area shall be no less than 5,000 square feet of land area per parcel.

D. The following items shall be shown on the Parcel Map:

1. Building setback lines located according to the approved Tentative Map boundaries. The standard setbacks for the C-1 commercial zone district are 10 feet for the front yard (note that the proposed Parcel B has double frontage), and zero feet for front and side yards.

2. Show the gross area of each lot to nearest square foot.

3. All easements and dedications to be recorded prior to recordation of the Parcel Map.

4. Include the Minor Land Division number "261042" on all sheets of the Parcel Map.

E. The following requirements shall be noted on the Parcel Map as items to be completed prior to obtaining a building permit on lots created by this land division:

1. New parcel numbers for all of the parcels must be assigned by the Assessor's Office prior to application for a Building Permit on any parcel created by this land division, unless waived by the Building Official.

2. Lots shall be connected for water service to the Soquel Creek Water District. All regulations and conditions of the water district shall be met.

3. Lots shall be connected for sewer service to Santa Cruz County Sanitation District. All regulations and conditions of the sanitation district shall be met.

4. All new utilities shall be underground. All preliminary engineering for such utility improvements is the responsibility of the owner/applicant. Pad-mounted transformers shall not be located in the front setback or in any area visible from public view unless they are completely screened by walls and/or landscaping (underground vaults may be located in the front setback). Utility equipment such as gas meters and electrical panels shall not be visible from public streets or building entries. Backflow prevention devices must be located in the least visually obtrusive location.

5. Any changes from the approved Exhibit "D", including but not limited to the Tentative Map, must be submitted for review and approval by the Planning Department. Changes may be forwarded to the decision-making body to consider if they are sufficiently material to warrant consideration at a public hearing noticed in accordance with Section 18.10.223 of the County Code. Any changes that are on the final plans which do not conform to the project conditions of approval shall be specifically illustrated on a separate sheet and highlighted in yellow on any set of plans submitted to the County for review.

III. Prior to recordation of the Parcel Map, the following requirements shall be met:

A. Submit a letter of certification from the Tax Collector's Office that there are no outstanding tax liabilities affecting the subject parcels.

B. Meet all drainage requirements of the Division of Public Works, Stormwater Management Services section.

C. All requirements specified by the Environmental Planning Section of the Planning Department shall be met.

D. Meet all requirements of the Santa Cruz County Sanitation District including, without limitation, the following standard conditions:

1. Submit and secure approval of an engineered sewer improvement plan providing sanitary sewer service to each parcel.

2. Pay all necessary bonding, deposits, and connections fees, and furnish a copy of any CC&R's or shared maintenance agreement to the district.

E. Engineered improvement plans for all water line extensions required by the Water District shall be submitted for the review and approval of the water agency.

F. All requirements of the Central Fire Protection District shall be met.

IV. Prior to issuance of Building Permit, all development impact fees shall be paid as applicable.

V. All future construction shall meet the following conditions:

A. All work adjacent to or within a County road shall be subject to the provisions of Chapter 9.70 of the County Code, including obtaining an encroachment permit where required. Where feasible, all improvements adjacent to or affecting a County road shall be coordinated with any planned County-sponsored construction on that road. Obtain an Encroachment Permit from the Department of Public Works for any work performed in the public right of way. All work shall be consistent with the Department of Public Works Design Criteria unless otherwise specifically excepted by these conditions of approval.

B. Future development of proposed new parcel shall require a separate sewer connection to the public sewer main. A public sewer main exists in Monroe Avenue, accessible by the new vacant parcel.

1. The project sewer design and connection of the project to the Santa Cruz County Sanitation District system will be required to conform to the County of Santa Cruz Design Criteria (CDC) Part 4, Sanitary Sewer Design, latest edition.

https://cdi.santacruzcountyca.gov/Portals/35/CDI/PublicWorks/Transportation/2024DesignCriteria.pdf

C. A driveway providing access to Parcel B shall be designed and permitted in conformance with the applicable County requirements prior to, or concurrently with, the submittal of a development permit for any development on Parcel B, or prior to the issuance of any building permit, whichever comes first. The design of the driveway shall meet all design requirements of the Public Works Division.

D. No land clearing, grading or excavating shall take place between October 15 and April 15 unless the Planning Director approves a separate winter erosion-control plan that may or may not be granted.

E. No land disturbance including grading shall take place prior to issuance of building permits (except the minimum required to install required improvements, provide access for County required tests or to carry out work required by another of these conditions).

F. Prior to any site disturbance on the subject property, the following conditions shall be met:

1. A preconstruction meeting shall be scheduled 1-4 days prior to commencement of earthwork. Attendees shall include Environmental Planning staff, the grading contractor, the soils engineer and the civil engineer.

G. Pursuant to Sections 16.40.040 and 16.42.080 of the County Code, if at any time during site preparation, excavation, or other ground disturbance associated with this development, any artifact or other evidence of an historic archaeological resource or a Native American cultural site is discovered, the responsible persons shall immediately cease and desist from all further site excavation and notify the Sheriff-Coroner if the discovery contains human remains, or the Planning Director if the discovery contains no human remains. The procedures established in Sections 16.40.040 and 16.42.080, shall be observed.

VI. Indemnification

The applicant/owner shall indemnify, defend with counsel approved by the COUNTY, and hold harmless the COUNTY, its officers, employees, and agents from and against any claim (including reasonable attorney's fees, expert fees, and all other costs and fees of litigation), against the COUNTY, its officers, employees, and agents arising out of or in connection to this development approval or any subsequent amendment of this development approval which is requested by the applicant/owner, regardless of the COUNTY's passive negligence, but excepting such loss or damage which is caused by the sole active negligence or willful misconduct of the COUNTY. Should the COUNTY in its sole discretion find the applicant's/owner's legal counsel unacceptable, then the applicant/owner shall reimburse the COUNTY its costs of defense, including without limitation reasonable attorney's fees, expert fees, and all other costs and fees of litigation. The applicant/owner shall promptly pay any final judgment rendered against the COUNTY (and its officers, employees, and agents) covered by this indemnity obligation. It is

expressly understood and agreed that the foregoing provisions are intended to be as broad and inclusive as is permitted by the law of the State of California and will survive termination of this development approval.

A. The COUNTY shall promptly notify the applicant/owner of any claim, action, or proceeding against which the COUNTY seeks to be defended, indemnified, or held harmless. The COUNTY shall cooperate fully in such defense.

B. Nothing contained herein shall prohibit the COUNTY from participating in the defense of any claim, action, or proceeding if both of the following occur:

1. COUNTY bears its own attorney's fees and costs; and

2. COUNTY defends the action in good faith.

C. Settlement. The applicant/owner shall not be required to pay or perform any settlement unless such applicant/owner has approved the settlement. When representing the COUNTY, the applicant/owner shall not enter into any stipulation or settlement modifying or affecting the interpretation or validity of any of the terms or conditions of the development approval without the prior written consent of the COUNTY.

D. Successors Bound. The "applicant/owner" shall include the applicant and/or the owner and the successor'(s) in interest, transferee(s), and assign(s) of the applicant and/or the owner.

AMENDMENTS TO THIS LAND DIVISION APPROVAL SHALL BE PROCESSED IN ACCORDANCE WITH CHAPTER 18.10 OF THE COUNTY CODE.

This Tentative Map is approved subject to the above conditions and the attached map and expires 24 months after the 10-day appeal period. The Parcel Map for this division, including improvement plans if required, should be submitted to the County Surveyor for checking at least 90 days prior to the expiration date and in no event later than 3 weeks prior to the expiration date.

Approval Date: _____

Effective Date: _____

Expiration Date: _____

Appeals: Any property owner, or other person aggrieved, or any other person whose interests are adversely affected by any act or determination of the Planning Commission, may appeal the act or determination to the Board of Supervisors in accordance with chapter 18.10 of the Santa Cruz County Code.

Application Plan Set

Application Number 261042

EXHIBIT D



EXISTING LOT CONFIGURATION

Scale: 1" = 40'



PROPOSED LOT CONFIGURATION

Scale: 1" = 40'

NOTES

1. DISTANCES ARE EXPRESSED IN FEET AND DECIMALS THEREOF.
2. CONTOUR INTERVAL 1'.
3. THE PROJECT DESCRIPTION IS TO DIVIDE AN EXISTING 67,549 SQUARE FOOT AT&T PARCEL (APN 041-171-18) INTO TWO PARCELS. PARCEL A (41,476 SQUARE FEET), WHICH WILL FEATURE THE AT&T CENTRAL OFFICE AT THIS SITE AND ITS REQUIRED PARKING, AND PARCEL B (26,073 SQUARE FEET), WHICH FEATURES UNDEVELOPED, VACANT LAND. REGARDING THE PURPOSE OF THE PROPOSED PARCEL B: THERE ARE NO PLANS FOR CONSTRUCTION OR CHANGE OF USE OR ANY DEVELOPMENTS AT THIS TIME BY AT&T FOR PARCEL B.
4. THIS PROPERTY DOES NOT FALL WITHIN A SPECIAL FLOOD HAZARD AREA AS SHOWN ON FIRM PANEL NUMBER 06087C0357F, EFFECTIVE ON 9/29/2017.
5. THIS PROPERTY DOES NOT FALL WITHIN THE COAST ZONE IN SANTA CRUZ COUNTY.
6. ARCHAEOLOGICAL SURVEY REPORT PREPARED BY ALTA ARCHAEOLOGICAL CONSULTING DATED JUNE 30, 2026 WAS PREPARED FOR THIS PROPERTY AS PART OF APPLICATION NO. REV261126 (RELATED TO 261042).

0 40 80 120

SCALE IN FEET

OWNERS

PACIFIC BELL TELEPHONE COMPANY
APN: 041-171-18
855 POLO DRIVE
APTOS, CA 95003

REPRESENTATIVE

STEFAN SLATER
BLU CROIX LTD
3961 BLACKBIRD WAY
CALABASAS, CA 91302

PREPARED FOR: Blu Croix

SURVEYED BY: *POLARIS LAND SURVEYING*
P. O. BOX 1378
CARMEL VALLEY, CA 93924
831-659-9564

SCALE: 1" = 40' VIEW: TM DATE: October 26, 2026
FILE NAME: Polo Dr SITE.dwg JOB #25-107 Sheet 1 of 1

SURVEYOR'S STATEMENT

THIS MAP CORRECTLY REPRESENTS A SURVEY MADE BY ME OR UNDER MY DIRECTION, IN CONFORMANCE WITH THE REQUIREMENTS OF THE PROFESSIONAL LAND SURVEYORS' ACT AT THE REQUEST OF BLU CROIX LTD, IN MAY, 2025.

DATED 10/26/26

LYNN A. KOVACH
P.L.S. 5321

PROFESSIONAL LAND SURVEYOR · LYNN A. KOVACH · P.L.S. 5321 · STATE OF CALIFORNIA

SUMMARY TABLE

Subject Property	Existing Square Feet	Land Use	Zoning
Parcel 1	67,549	Commercial	C-1

Proposed Property Designation	Proposed Square Feet	Land Use	Zoning
Parcel A	41,476	Commercial	C-1
Parcel B	26,073	Vacant	C-1

LEGEND

- SEWER MANHOLE
- WATER METER
- ELECTRIC METER
- TREE, TYPE AND DIAMETER SPECIFIED
- PROPERTY LINE
- LOT LINE
- EASEMENT LINE
- REDWOOD DRIP LINE
- BUILDING

TENTATIVE MAP

FOR
MINOR SUBDIVISION
LANDS OF PACIFIC BELL TELEPHONE COMPANY
PARCEL 1, 57 MAPS 46 &
A PORTION OF 2237-278
APN: 041-171-18
855 POLO DRIVE, APTOS

SANTA CRUZ COUNTY, CALIFORNIA

EXHIBIT D

OWNER'S STATEMENT

WE HEREBY STATE THAT WE ARE THE OWNERS OF THE REAL PROPERTY INCLUDED WITHIN THE SUBDIVISION AS SHOWN ON THIS MAP AND THAT WE ARE THE ONLY PARTIES NECESSARY TO SIGN SAID MAP PURSUANT TO SECTION 66445(e) OF THE SUBDIVISION MAP ACT OF THE STATE OF CALIFORNIA, AND THAT WE HEREBY CONSENT TO THE PREPARATION AND RECORDATION OF SAID MAP AND SUBDIVISION AS SHOWN WITHIN THE DISTINCTIVE BORDER LINES.

BY: PACIFIC BELL TELEPHONE COMPANY

_____ _____
DATE

OWNER'S ACKNOWLEDGEMENT

A NOTARY PUBLIC OR OTHER OFFICER COMPLETING THIS CERTIFICATE VERIFIES ONLY THE IDENTITY OF THE INDIVIDUAL WHO SIGNED THE DOCUMENT TO WHICH THIS CERTIFICATE IS ATTACHED, AND NOT TO THE TRUTHFULNESS, ACCURACY, OR VALIDITY OF THAT DOCUMENT.

STATE OF CALIFORNIA

COUNTY OF _____, ON _____,

BEFORE ME, _____, A NOTARY PUBLIC, PERSONALLY APPEARED

_____ , WHO PROVED TO ME ON THE BASIS OF SATISFACTORY EVIDENCE TO BE THE PERSON(S) WHOSE NAME(S) IS/ARE SUBSCRIBED TO THE WITHIN INSTRUMENT AND ACKNOWLEDGED TO ME THAT HE/SHE/THEY EXECUTED THE SAME IN HIS/HER/THEIR AUTHORIZED CAPACITY(IES), AND THAT BY HIS/HER/THEIR SIGNATURE(S) ON THE INSTRUMENT THE PERSON(S), OR THE ENTITY UPON BEHALF OF WHICH THE PERSON(S) ACTED, EXECUTED THE INSTRUMENT.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING PARAGRAPH IS TRUE AND CORRECT.

_____
WITNESS MY HAND AND SIGNATURE

_____
PRINTED NAME

_____
PRINCIPAL COUNTY OF BUSINESS

_____
COMMISSION EXPIRATION DATE

_____
COMMISSION NUMBER

AUDITOR CONTROLLER'S STATEMENT

I HEREBY STATE THAT THERE ARE NO LIENS FOR UNPAID STATE, COUNTY, MUNICIPAL OR LOCAL TAXES OR SPECIAL ASSESSMENTS COLLECTED AS TAXES AGAINST THE LAND INCLUDED IN THE WITHIN SUBDIVISION OR AGAINST ANY PART THEREOF, EXCEPT TAXES AND SPECIAL ASSESSMENTS COLLECTED AS TAXES WHICH ARE NOT YET PAYABLE, AND WHICH IT IS HEREBY ESTIMATED WILL NOT EXCEED THE SUM OF $_____ FOR THE YEAR _____ - _____, AND THAT SAID LAND OR PORTION THEREOF IS NOT, NOT IS ANY PART THEREOF. SUBJECT TO SPECIAL ASSESSMENTS WHICH HAVE NOT BEEN PAID IN FULL AND THAT THIS STATEMENT DOES NOT INCLUDE ANY ASSESSMENTS OF ANY ASSESSMENT DISTRICT , THE BONDS OF WHICH HAVE NOT YET BECOME A LIEN AGAINST SAID LAND OR ANY PART THEREOF.

_____ _____
AUDITOR-CONTROLLER OF DATE
THE COUNTY OF SANTA CRUZ

_____
BY DEPUTY

CLERK OF THE BOARD'S CERTIFICATE

THE CLERK OF THE BOARD OF SUPERVISORS OF THE COUNTY OF SANTA CRUZ DOES HEREBY CERTIFY THAT ALL CERTIFICATES AND SECURITIES REQUIRED UNDER THE PROVISIONS OF SECTIONS 66492 AND 66493 OF THE GOVERNMENT CODE HAVE BEEN DULY FILED AND DEPOSITS HAVE BEEN DULY MADE. PURSUANT TO THE AUTHORITY DELEGATED TO ME BY SAID BOARD, I HEREBY APPROVE SAID CERTIFICATES AND SECURITIES ON BEHALF OF THE COUNTY OF SANTA CRUZ.

_____
EX-OFFICIO CLERK OF THE BOARD OF
SUPERVISIONS OF SANTA CRUZ COUNTY,
STATE OF CALIFORNIA

_____ _____
BY DEPUTY DATE

COUNTY RECORDER'S STATEMENT

FILED THIS _____ DAY OF _____, 20__,

AT _____ .M. IN VOLUME _____ OF PARCEL MAPS, AT PAGE

_____, AT THE REQUEST OF _____.

_____
COUNTY RECORDER

_____
BY DEPUTY

SURVEYOR'S STATEMENT

THIS MAP WAS PREPARED BY ME OF UNDER MY DIRECTION AND IS BASED UPON A FIELD SURVEY MADE IN CONFORMANCE WITH THE REQUIREMENTS OF THE SUBDIVISION MAP ACT AND LOCAL ORDINANCES AT THE REQUEST OF BLU CROIX IN MAY, 2025. I HEREBY STATE THAT ALL MONUMENTS ARE OF THE CHARACTER AND OCCUPY THE POSITIONS INDICATED, AND THAT THE MONUMENTS ARE SUFFICIENT TO ENABLE THE SURVEY TO BE RETRACED. I FURTHER STATE THAT THIS PARCEL MAP SUBSTANTIALLY CONFORMS TO THE APPROVED OR CONDITIONALLY APPROVED TENTATIVE MAP, IF ANY.

DRAFT

_____ _____
LYNN A. KOVACH, L.S. 5321 DATE



COUNTY SURVEYOR'S STATEMENT

I HEREBY STATE THAT I HAVE EXAMINED THE HEREIN MAP. THE SUBDIVISION AS SHOWN IS SUBSTANTIALLY THE SAME AS IT APPEARED ON THE TENTATIVE MAP, AND ANY APPROVED ALTERATIONS THEREOF. ALL PROVISIONS OF THE SUBDIVISION MAP ACT AND OF ANY LOCAL ORDINANCES APPLICABLE AT THE TIME OF APPROVAL OF THE TENTATIVE MAP, HAVE BEEN COMPLIED WITH. I AM SATISFIED THAT THIS MAP IS TECHNICALLY CORRECT.

_____ _____
GREG JONES DATE
SANTA CRUZ COUNTY SURVEYOR

PARCEL MAP

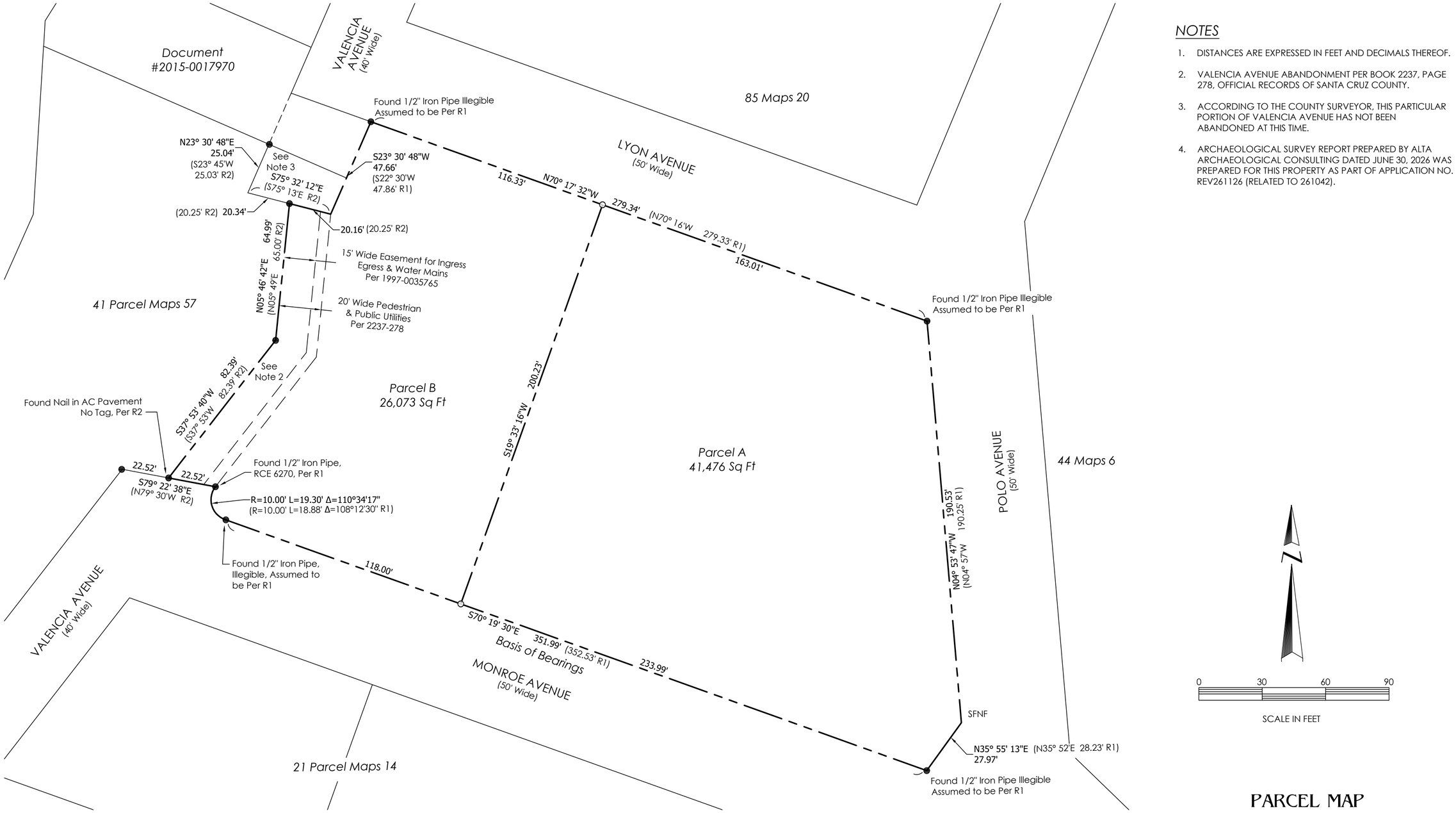
BEING A MINOR SUBDIVISION OF
PARCEL 1, VOLUME 57 MAPS PAGE 46
& A PORTION OF 2237-278,
SANTA CRUZ COUNTY, CALIFORNIA

PREPARED FOR: Blu Croix

SURVEYED BY: POLARIS LAND SURVEYING
P. O. BOX 1378
CARMEL VALLEY, CA 93924
831-659-9564

SCALE: 1" = NONE VIEW: NONE DATE: October 26, 2026
FILE NAME: Polo Dr PM.dwg JOB #25-107 Sheet 1 of 2

EXHIBIT D



NOTES

1. DISTANCES ARE EXPRESSED IN FEET AND DECIMALS THEREOF.
2. VALENCIA AVENUE ABANDONMENT PER BOOK 2237, PAGE 278, OFFICIAL RECORDS OF SANTA CRUZ COUNTY.
3. ACCORDING TO THE COUNTY SURVEYOR, THIS PARTICULAR PORTION OF VALENCIA AVENUE HAS NOT BEEN ABANDONED AT THIS TIME.
4. ARCHAEOLOGICAL SURVEY REPORT PREPARED BY ALTA ARCHAEOLOGICAL CONSULTING DATED JUNE 30, 2026 WAS PREPARED FOR THIS PROPERTY AS PART OF APPLICATION NO. REV261126 (RELATED TO 261042).

BASIS OF BEARINGS

THE BEARING OF S 70°19'30" E ALONG THE NORTHERLY RIGHT OF WAY OF MONROE AVENUE AS SHOWN ON THE MAP RECORDED IN VOLUME 57 OF MAPS AT PAGE 46 AS FOUND MONUMENTED, WAS TAKEN AS BASIS OF BEARINGS SHOWN UPON THIS MAP.

LEGEND

○	SET 1" IRON PIPE TAGGED L.S. 5321, UNLESS NOTED OTHERWISE
●	FOUND 1/2" IRON PIPE, LS 4982, PER R2, UNLESS NOTED OTHERWISE
R1	RECORD DATA PER VOLUME 57 MAPS PAGE 46
R2	RECORD DATA PER VOLUME 41 PARCEL MAPS PAGE 57
SFNF	SEARCHED FOR NOT FOUND
— — —	PROPERTY LINE
———	LOT LINE
– – – –	OLD LOT LINE
— — —	EASEMENT LINE

PARCEL MAP

BEING A MINOR SUBDIVISION OF
PARCEL 1, VOLUME 57 MAPS PAGE 46
& A PORTION OF 2237-278,
SANTA CRUZ, CALIFORNIA

PREPARED FOR: Blu Croix

SURVEYED BY: POLARIS LAND SURVEYING
P. O. BOX 1378
CARMEL VALLEY, CA 93924
831-659-9564

SCALE: 1" = 30' VIEW: PM DATE: October 26, 2026
FILE NAME: Polo Dr PM.dwg JOB #25-107 Sheet 2 of 2

EXHIBIT D

Parcel Maps
Assessor / Location / Zoning / General Plan

Application Number 261042

EXHIBIT E

FOR TAX PURPOSES ONLY

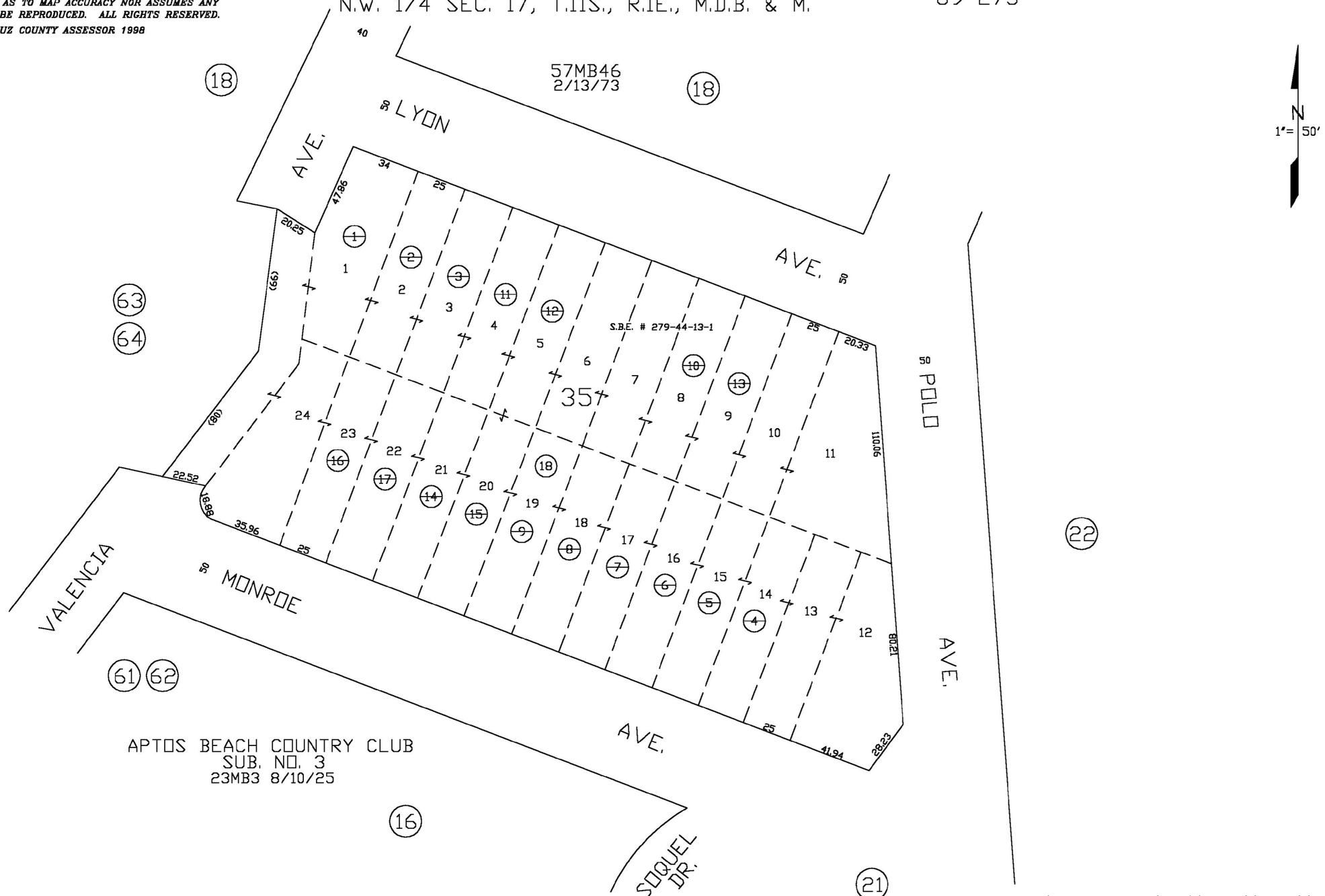
THE ASSESSOR MAKES NO GUARANTEE AS TO MAP ACCURACY NOR ASSUMES ANY LIABILITY FOR OTHER USES. NOT TO BE REPRODUCED. ALL RIGHTS RESERVED.
© COPYRIGHT SANTA CRUZ COUNTY ASSESSOR 1998

POR. APTOS RANCHO

N.W. 1/4 SEC. 17, T.11S., R.1E., M.D.B. & M.

Tax Area Code
69-273

41-17



Note - Assessor's Parcel & Block Numbers Shown in Circles.

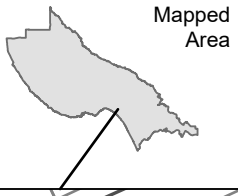
Assessor's Map No. 41-17
County of Santa Cruz, Calif.
December, 1998

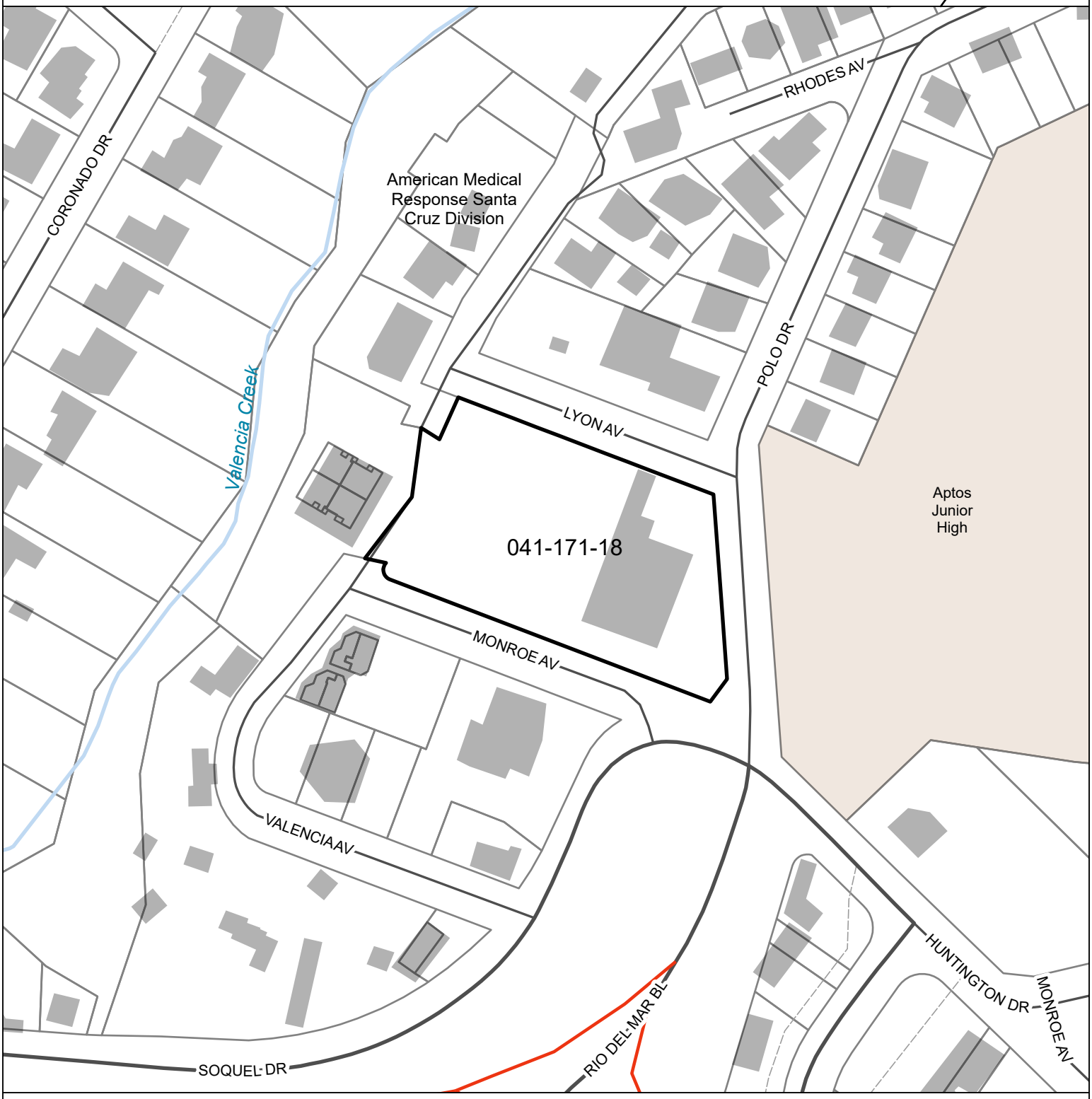
Electronically Redrawn 12/29/98 rw
Rev. 5/10/01 mvm (changed page refs.)

EXHIBIT E

Santa Cruz County Planning Department

Parcel Location Map





Parcel: 04117118

Subject Parcel

Map printed: 6 Nov. 2026

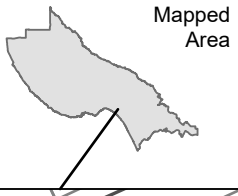
0 80 160

Feet

EXHIBIT E

Santa Cruz County Planning Department

Parcel General Plan Map





Subject Parcel

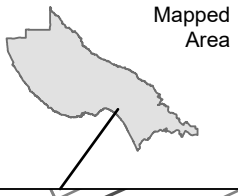
0 80 160

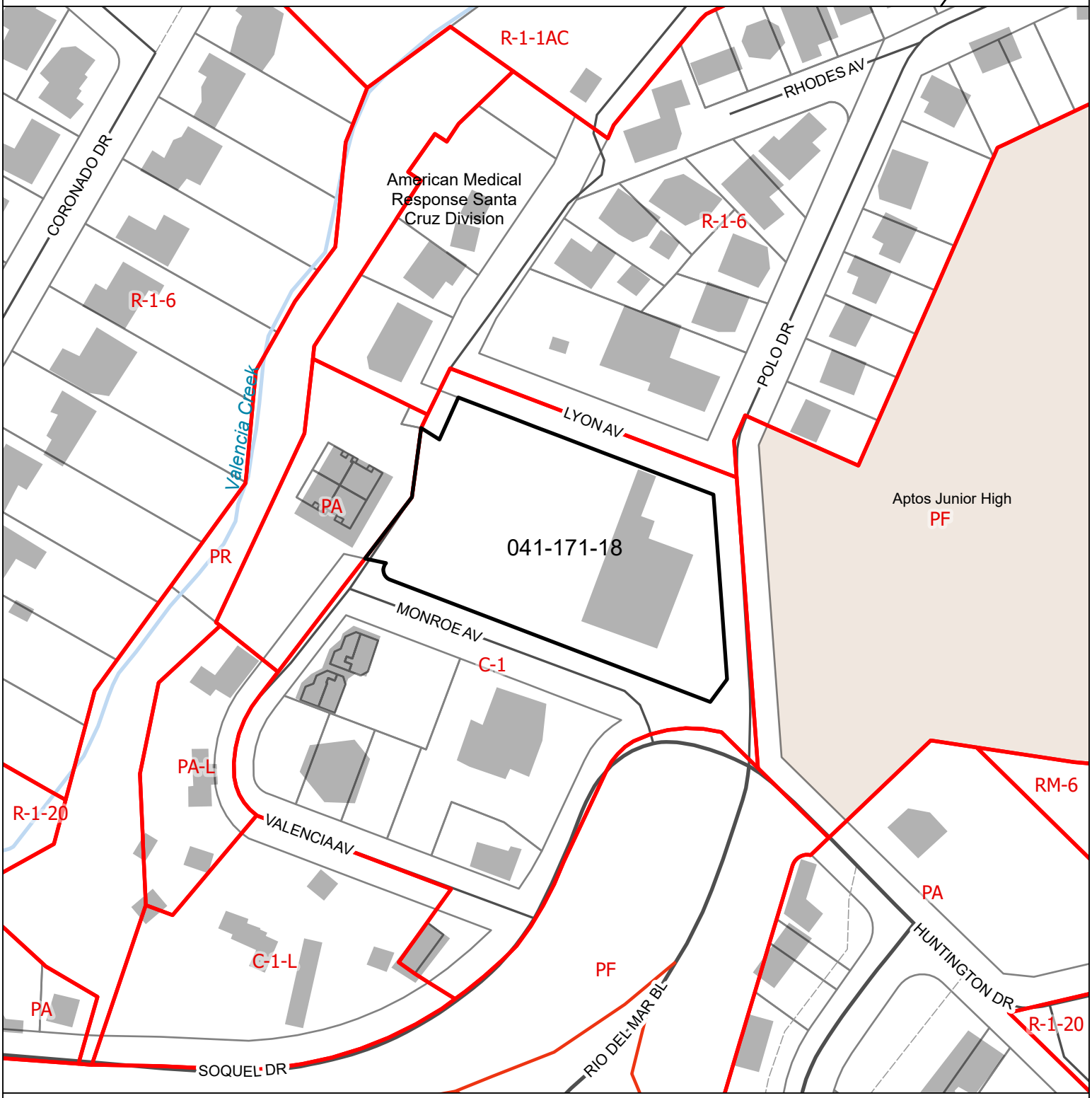
Feet

EXHIBIT E

Santa Cruz County Planning Department

Parcel Zoning Map





Subject Parcel

0 80 160

Feet

EXHIBIT E

Application #: 261042
APN: 041-171-18
Owner: Pacific Telephone & Telegraph Co. / AT&T

Parcel Information

Services Information

Urban/Rural Services Line:	_X_ Inside __ Outside
Water Supply:	Soquel Creek Water District
Sewage Disposal:	Santa Cruz Sanitation District
Fire District:	Central Fire Protection District
Drainage District:	Flood Control Zone 6

Parcel Information

Parcel Size:	67,549 square feet
Existing Land Use - Parcel:	Commercial
Existing Land Use - Surrounding:	Commercial / Residential / Public Facilities
Project Access:	Monroe Avenue and Lyon Avenue
Planning Area:	Aptos
Land Use Designation:	C-N (Neighborhood Commercial)
Zone District:	C-1 (Neighborhood Commercial)
Coastal Zone:	__ Inside _X_ Outside
Appealable to Calif. Coastal Comm.	__ Yes _X_ No

Technical Reports:

REV261126 Archaeological Report

Environmental Information

Geologic Hazards:	Not mapped/no physical evidence on site
Fire Hazard:	Not a mapped constraint
Slopes:	N/A
Env. Sen. Habitat:	Not mapped/no physical evidence on site
Grading:	No grading proposed
Tree Removal:	No trees proposed to be removed
Scenic:	Not a mapped resource
Archeology:	Mapped/no physical evidence on site; Report reviewed and accepted

EXHIBIT F

Archeological Report Review Letter

Application Number 261042

EXHIBIT G

County of Santa Cruz

Department of Community Development and Infrastructure

701 Ocean Street, Fourth Floor, Santa Cruz, CA 95060
Planning (831) 454-2580 Public Works (831) 454-2160
cdi.santacruzcountyca.gov

July 9, 2026

Stefan Slater < stefan@blucroix.com>
3961 Black Bird Way, Calabasas, CA 91302

Subject: Review of the **Archaeological Survey Report dated June 30, 2026 by Alta Archaeological Consulting**

Project Site: **855 Polo Drive, Aptos**
APN 041-171-18
Application No. REV261126 (related to 261042)

Dear Applicant(s):

The purpose of this letter is to inform you that the Planning Division has accepted the subject report, and the following items shall be required:

Final plans shall reference the subject report by titles, authors, and dates.

Our acceptance of the report is limited to its technical content only. Compliance with other resource protection requirements set forth in Chapter 16 of the Santa Cruz County Code, as well as other planning related regulations governing zoning, fire safety, septic or sewer are subject to approval by other agencies.

Please contact Kathleen McLaughlin at (831) 454-2530/email: Kathleen.McLaughlin@santacruzcountyca.gov if I can be of any further assistance.

Sincerely, DocuSigned by: Kathleen McLaughlin AD51E927D72B4A2... 7/9/2026

Kathleen McLaughlin
Resource Planner
County of Santa Cruz
CDI - Planning Division

Cc: Denise Hardesty
Rebecca Rockom

EXHIBIT G

Comments & Correspondence

Application Number 261042

EXHIBIT H

Outlook

Re: AT&T Neighborhood Meeting, Aptos, 855 Polo Drive

From Zach Meschi <zmeschi@gmail.com>
Date Mon 10/12/2026 3:42 PM
To Stefan Slater <stefan@blucroix.com>
Cc Lisa Nealon <nealon_lisa@icloud.com>; Rebecca Rockom <Rebecca.Rockom@santacruzcountyca.gov>; kandersongrey@yahoo.com <kandersongrey@yahoo.com>; sloke@sbcglobal.net <sloke@sbcglobal.net>; ththeocha@gmail.com <ththeocha@gmail.com>; Jeff <jsnealon@gmail.com>

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hi Stefan,

Could you also please follow up with AT&T regarding its plans to help maintain Lyon Avenue, which it uses to access its properties? Our understanding is that Lyon Avenue is a county road that is privately maintained. Given the road's current condition and the significant repairs needed to keep it safe and serviceable for the long term, we would appreciate clarification on AT&T's plans and its commitment to contributing to both immediate repairs and ongoing maintenance.

Additionally, Aptos Junior High School frequently uses the end of Lyon Avenue. Given this regular use, it would be reasonable to contact the school to discuss its commitment to addressing the immediate maintenance needs.

We would appreciate having both parties engaged in these discussions to help identify a coordinated approach to the necessary repairs and establish a sustainable plan for maintaining Lyon Avenue going forward.

Cheers,

Zach Meschi
Meschi Construction, Inc.
831.345.1390 Mobile
831.464.8759 Office
www.meschiconstructioninc.com



EXHIBIT H

On Mon, Oct 12, 2026 at 2:55 PM Stefan Slater <stefan@blucroix.com> wrote:

Hi Lisa,

No problem. Let me check in with our surveyor about the property line. I have also reached out to AT&T regarding the follow up items. I will be in touch.

Stefan

Sincerely,

Stefan Slater, Project Manager

Based in Los Angeles, CA

Office Address:
Blu Croix Ltd.
3961 Blackbird Way
Calabasas, Ca. 91302

stefan@blucroix.com

818-281-2864

Blucroix.com

From: Lisa Nealon <nealon_lisa@icloud.com>
Sent: Friday, October 9, 2026 10:58 AM
To: Stefan Slater <stefan@blucroix.com>; rebecca.rockom@santacruzcountyca.gov <rebecca.rockom@santacruzcountyca.gov>
Cc: kandersongrey@yahoo.com <kandersongrey@yahoo.com>; sloke@sbcglobal.net <sloke@sbcglobal.net>; ththeocha@gmail.com <ththeocha@gmail.com>; Jeff <jsnealon@gmail.com>; Zach Meschi <zmeschi@gmail.com>
Subject: Fwd: AT&T Neighborhood Meeting, Aptos, 855 Polo Drive

Hi Stefan & Rebecca,

Thank you for the follow up and information you both shared at the neighborhood meeting on Wednesday. Per your request, I have added Zach Meschi to this email thread.

We would appreciate your follow up regarding the timeline. AT&T currently uses Lyon Ave to access their property and Lyon Ave is the only road for all the neighbors to access their homes. The proposed Parcel B could have access from Monroe Ave.

Jeff and I have two questions for you and Rebecca:

1. The attached pdf you shared with the map (pg 1 & 3) depicts the Nealon property (APN 04118158) ending at the fence line and Valencia Ave running in between our property and the proposed Parcel B site. Our property line extends into Valencia Ave and butts up against Parcel B (see below image). We want to ensure there is no confusion for any future development and access and would appreciate all future mapping to reflect the correct property lines.

2. Rebecca, you mentioned that we can follow the development process and review the staff notes online at CDI. Can you please share the applicable link to access this information?

Thank you,

Lisa

Begin forwarded message:

From: Stefan Slater <stefan@blucroix.com>
Subject: AT&T Neighborhood Meeting, Aptos, 855 Polo Drive
Date: October 8, 2026 at 11:35:46 AM PDT
To: Lisa Nealon <nealon_lisa@icloud.com>, "kandersongrey@yahoo.com" <kandersongrey@yahoo.com>, "sloke@sbcglobal.net" <sloke@sbcglobal.net>, "ththeocha@gmail.com" <ththeocha@gmail.com>
Cc: Steve Slater <s.slater@blucroix.com>

Hello,

This is Stefan Slater with Blu Croix, and I just wanted to reach out and say thank you for attending the neighborhood meeting last night regarding the parcel map split at the AT&T 855 Polo Drive site.

I have a couple of items that I will be following up on concerning a timeline regarding the potential sale for this new parcel, and also regarding the maintenance of the private road which AT&T uses to access the property. The private roads are Lyon and Valencia, yes?

Attached please find the parcel map that I shared last night. Also, you had a question on whether or not the property is part of the Coastal Zone/Costal Encroachment Zone, and looking at the attached screenshot, the property is not a part of that zone.

Lastly, Zach Meschi was on the call last night via zoom, but I do not have his email. If possible, could this group share this information with him or connect me via email? Thank you.

If you have any question, please don't hesitate to reach out. Thank you.

Stefan

Sincerely,

Stefan Slater, Project Manager

Based in Los Angeles, CA

Office Address:
Blu Croix Ltd.
3961 Blackbird Way
Calabasas, Ca. 91302

stefan@blucroix.com

818-281-2864

Blucroix.com

EXHIBIT H

Outlook

Applic. 261042 - Polo Drive, Aptos - APN 041-171-18

From Kim Tschantz <kimt@cruzio.com>
Date Tue 11/3/2026 3:10 PM
To Rebecca Rockom <Rebecca.Rockom@santacruzcountyca.gov>

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Rebecca,

It was good speaking with you last Friday. If it is possible for you to share the site map of the proposed MLD via email attachment, that would be appreciated.

As I expressed on the phone Friday, the larger concern is protection of the two mature redwood groves on the site. (See photos at end of this email.) It would be a travesty to see these two groves removed as a result of future development generated by the proposed MLD. The two groves are clearly significant environmental and aesthetic resources that can be protected by designating building/development envelopes beyond the two groves on the two proposed parcels as a condition of MLD approval.

The two redwood groves quality as significant environmental resources due to their size, age and location. They are not merely a few trees within a larger forest as one would encounter in the Forest of Nisene Marks or Henry Cowell State Park, but rather two isolated groves that are probably the remnants of an old forested habitat before the homes and the polo field (now the Polo Grounds Park) were constructed during past decades. As such, the two groves provide shelter and sustenance for a variety of wildlife species that inhabit the immediate suburban environment. They are also visually significant. Loss of these two redwood groves would significantly deplete wildlife habitat in the area and substantially impact the viewshed for people living and using the area. For these reasons, the normal CEQA exemption for minor land divisions specified by CEQA Guidelines Section 15315 does not apply to this project.* In this case, the exemption is superseded by Guidelines Section 15300.2** which recognize a project may significantly impact a sensitive resource on a site that otherwise would have been exempted from CEQA.

The best way to cure this issue is to remove the Class 15 exemption wrongly issued for this project by the County and specify a mitigation measure to preserve the two groves by requiring a building/development envelope on the two proposed parcels on the tentative map and final parcel map for the project. Please keep me informed of any public hearings or oher opportunities for public comment on this project.

Regards,

Kim Carlos Tschantz

831-428-5483

EXHIBIT H

*Section 15315. Minor Land Divisions.

Class 15 consists of the division of property in urbanized areas zoned for residential, commercial, or industrial use into four or fewer parcels when the division is in conformance with the General Plan and zoning, no variances or exceptions are required, all services and access to the proposed parcels to local standards are available, the parcel was not involved in a division of a larger parcel within the previous 2 years, and the parcel does not have an average slope greater than 20 percent.

**Section 15300.2. Exceptions to Categorical Exemptions

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located--a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

(c) *Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.



EXHIBIT H



Grove at the rear of the site.
of Soquel Drive and Polo Drive

Grove at the intersection

EXHIBIT H