

**City of Santa Cruz**  
**Addendum to Certified Environmental Impact Report**  
Newell Creek Dam Inlet/Outlet Replacement Project  
State Clearinghouse Number: 2018062071  
June 2021

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## **I. BACKGROUND**

**Project Title:** Newell Creek Dam Inlet/Outlet Replacement Project

**Lead Agency Name and Address:**

City of Santa Cruz Water Department  
212 Locust Street, Suite C  
Santa Cruz, CA 95060

**Contact Person and Phone Number:** Sarah Easley Perez, (831) 420-5327  
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**Project Applicant/Sponsor Name and Address:**

City of Santa Cruz  
212 Locust Street, Suite C  
Santa Cruz, CA 95060

**General Plan Designation:** Lake, Reservoir, Lagoon and Resource Conservation

**Zoning:** Timber Production (TP)

**Project Location:** Newell Creek Dam (NCD), which impounds Loch Lomond Reservoir (Reservoir), is located in unincorporated Santa Cruz County, approximately 10 miles north of the City of Santa Cruz and two miles east of the community of Ben Lomond (see Figure 1). NCD and the southern half of the Reservoir are located on an approximately 520-acre site owned by the City of Santa Cruz (Assessor's Parcel Number 076-251-24).

## II. PROJECT BACKGROUND

### Existing Newell Creek Dam Facilities

Completed in 1961, NCD is a zoned earthfill dam approximately 195 feet high with a crest length of about 750 feet. The City of Santa Cruz Water Department (City) operates the Reservoir as the primary surface water storage facility for the City's water supply system.

The existing NCD inlet/outlet works are used to convey raw water into and out of the Reservoir and were designed to deliver surface water diversions from the San Lorenzo River to the Reservoir, convey raw water from storage in the Reservoir to the City's Graham Hill Water Treatment Plant (GHWTP), provide beneficial releases to downstream Newell Creek, and implement operational and emergency flow releases from the Reservoir. It includes the following components, which are shown on Figure 2:

- **Intake Structure:** The existing NCD inlet/outlet structure (intake structure) consists of five 12-inch-diameter inlet/outlet gates (inlets) connected to a 24-inch-diameter cement mortar-lined steel pipe encased in reinforced concrete, which is located on the upstream face of the dam near the left/east abutment. Four of the original five sluice gates were replaced with new stainless steel knife gate assemblies in 2012, and the fifth and lowest inlet is currently inoperable because it is buried by sediment and surficial landslide material.
- **Conduit under the Dam:** The 24-inch-diameter sloping intake pipeline enlarges to a 30-inch-diameter conduit that is connected to a 36-inch-diameter inlet/outlet conduit. The 36-inch-diameter inlet/outlet conduit extends under the dam and terminates at a vault at the downstream toe of the dam.
- **Outlet Vault and Releases:** At the vault, the 36-inch-diameter conduit bifurcates to a 22-inch-diameter pipe connected to the Newell Creek Pipeline (NCP) and a 24-inch plug valve that is used for making emergency releases.

The NCP is a 22-inch-diameter cement mortar-lined steel pipe installed in 1960 in conjunction with construction of NCD. The NCP alignment runs south from the dam's existing outlet structure at the toe of the dam and extends approximately 9 miles to the GHWTP.

Appurtenant structures at NCD and the Reservoir include the spillway and spillway appurtenances (spillway bridge, spillway plunge pool, spillway plunge pool crossing), a seepage channel (a portion of Newell Creek's original alignment) at the toe of NCD, a control house on the crest of NCD, and the NCP. An existing pipe and meter at the toe of the dam deliver water to the seepage channel for Newell Creek beneficial fish flows.

### Approved Newell Creek Dam Inlet/Outlet Replacement Project

On May 14, 2019 the Santa Cruz City Council certified an Environmental Impact Report (EIR) for the Newell Creek Dam Inlet/Outlet Replacement Project (Project) and approved the Project. The

approved Project consists of replacement of the existing aging inlet/outlet works in new locations in Loch Lomond Reservoir and at the toe of the dam and other associated improvements. The Project was proposed and designed due to the fact that the existing NCD inlet/outlet works was approaching the end of its useful design life with three primary identified deficiencies: inlet/outlet conduit deterioration, an inoperable fifth inlet/outlet gate in the reservoir, and an inoperable and partially closed plug valve at the toe of the dam. The approved Project was deemed necessary to protect the City's ability to deliver drinking water to its customers as the Reservoir is the only asset that provides drinking water security in the City's water system in the form of raw water storage. Future failure of the existing inlet/outlet works may eliminate the City's ability to provide drinking water to its customers during two critical periods: dry summer months when other sources cannot meet demand and winter months when other water sources are too turbid due to storm runoff. Furthermore, the Project would improve the City's overall operational efficiency, improve system performance, and maintain long-term reliable storage for the City's drinking water supply. The Project was also necessary for the City to meet California Department of Safety of Dams (DSOD) requirements for Reservoir drawdown in an emergency.

The approved Project is comprised of the following primary components, which are illustrated on Figure 3.

- Three new inlets located within the Reservoir that function to control and convey flows in and out of the Reservoir,
- A new outlet structure with valves and controls at the toe of the dam to convey flows in and out of the inlet/outlet works; the structure would provide for energy dissipation of water released for beneficial and emergency drawdown purposes,
- A new dam seepage collection and monitoring system,
- A 14-foot maximum diameter tunnel containing 48-inch and 10-inch inlet/outlet pipelines through the right (west) abutment and under the dam,
- Replacement of an approximate 2,000 linear-foot segment of the Newell Creek Pipeline between the existing outlet structure and the first isolation valve,
- A new control house on the dam crest to house controls for the inlets,
- Improvements along the dam's access roads to improve access for construction, including a new culvert crossing at the spillway plunge pool, and
- Decommissioning the existing inlet/outlet works once the replacement inlet/outlet system is operational.

The approved Project's outlet structure is a point of control for flows to and from the Reservoir. The new outlet structure is a concrete, approximately 720-square-foot, structure that will be installed at the toe of the dam (see Figure 4). The 48-inch inlet/outlet conduit in the tunnel bifurcates into two main lines at the outlet structure, one that connects to the NCP and another that directs emergency release flows to a reinforced concrete energy dissipation chamber and ultimately to the spillway plunge pool. A third line is the 10-inch instream beneficial release line which continues from the tunnel into the energy dissipation chamber. The structure will house

valves and associated control and electrical equipment. From the outlet structure the City will be able to adjust instream beneficial flows, isolate the NCP from the inlet/outlet conduit, and make emergency releases.

Construction of the approved Project began in June 2020 and is expected to be completed in November 2022.

### **III. PROPOSED PROJECT MODIFICATIONS**

The proposed Project modifications consist of a change to the maximum discharge rate of the outlet structure with a control to be installed on the new outlet discharge sleeve valve to provide a revised maximum emergency release rate of 203 cubic feet per second (cfs). This represents an increase of approximately 39 cfs above the maximum emergency release rate of 164 cfs that was evaluated in the EIR. The change is necessary to allow the valve to initially facilitate releases greater than the required emergency release rate in order for the facility to continue to meet drawdown requirements even with some anticipated diminished capacity as the facility ages. Additionally, the velocity through the valve, which was modeled to have a theoretical maximum flow of 272 cfs, would be 38.5 feet/second (ft/s), however, the valve manufacturer does not recommend operating the valve at velocities higher than 30 ft/s for extended periods of time in order to minimize the potential for damage to the valve's internal parts.

The valve will be manufactured with a mechanical valve stop (clamp/bolts) that will limit the release to the 203 cfs maximum amount. This will ensure that the velocity through the sleeve valve will be less than the manufacturer's recommended maximum of 30 ft/s (AECOM 2021a). Operationally, the City may be required to fully open the valve during DSOD inspections/testing, but would only test the valve when the Reservoir is spilling or can make arrangements with DSOD to inspect and test the valve in the dry season without releasing water through the valve. In emergency conditions, the valve would be fully opened regardless of whether or not the Reservoir is spilling.

The new flow rate was determined by updated hydraulic modeling conducted by the Project design engineer (AECOM 2021a) to determine the hydraulic capacity of the outlet structure and maximum discharge rate if all three inlet valves and the outlet sleeve valve were fully open. As water is discharged from the sleeve valve in the outlet structure it flows over a weir separating the energy dissipation chamber from the downstream instream beneficial release chamber. From the downstream chamber, water flows into a 48-inch diameter reinforced concrete pipe and then discharges into the spillway plunge pool (see Figure 5). If the water level in the structure rises too high it could be discharged through the grating on the top of the structure. There is a 4-foot clearance above the weir and another 2 feet of freeboard before water would splash through the grating.

In order to meet the manufacturer's valve velocity recommendation, the proposed Project modifications include the addition of a physical stop to the sleeve valve to ensure that at maximum Reservoir head, with all inlet and outlet valves open, flows would not exceed 203 cfs, and any

potential adverse impacts on the design life of the facility caused by excessive flow velocity through the valve would be minimized.

The proposed Project modifications do not include changes to any other component of the approved Project, construction areas or construction methods.

#### **IV. ENVIRONMENTAL SETTING**

The Project site is located within the unincorporated area of Santa Cruz County. NCD and Loch Lomond Reservoir are located in the forested Santa Cruz Mountains. Elevations in the vicinity of the dam range from approximately 780 feet above mean sea level above the dam to 390 feet above mean sea level at the dam toe. Water levels in Loch Lomond Reservoir are generally maintained at an elevation between approximately 562.2 feet and 577.2 feet above mean sea level. Newell Creek feeds the Reservoir from the north, and continues south from the dam where it eventually joins the San Lorenzo River and flows into the Pacific Ocean. Access to NCD is provided by Newell Creek Road off Glen Arbor Road, approximately 0.8 miles south of the toe of the dam.

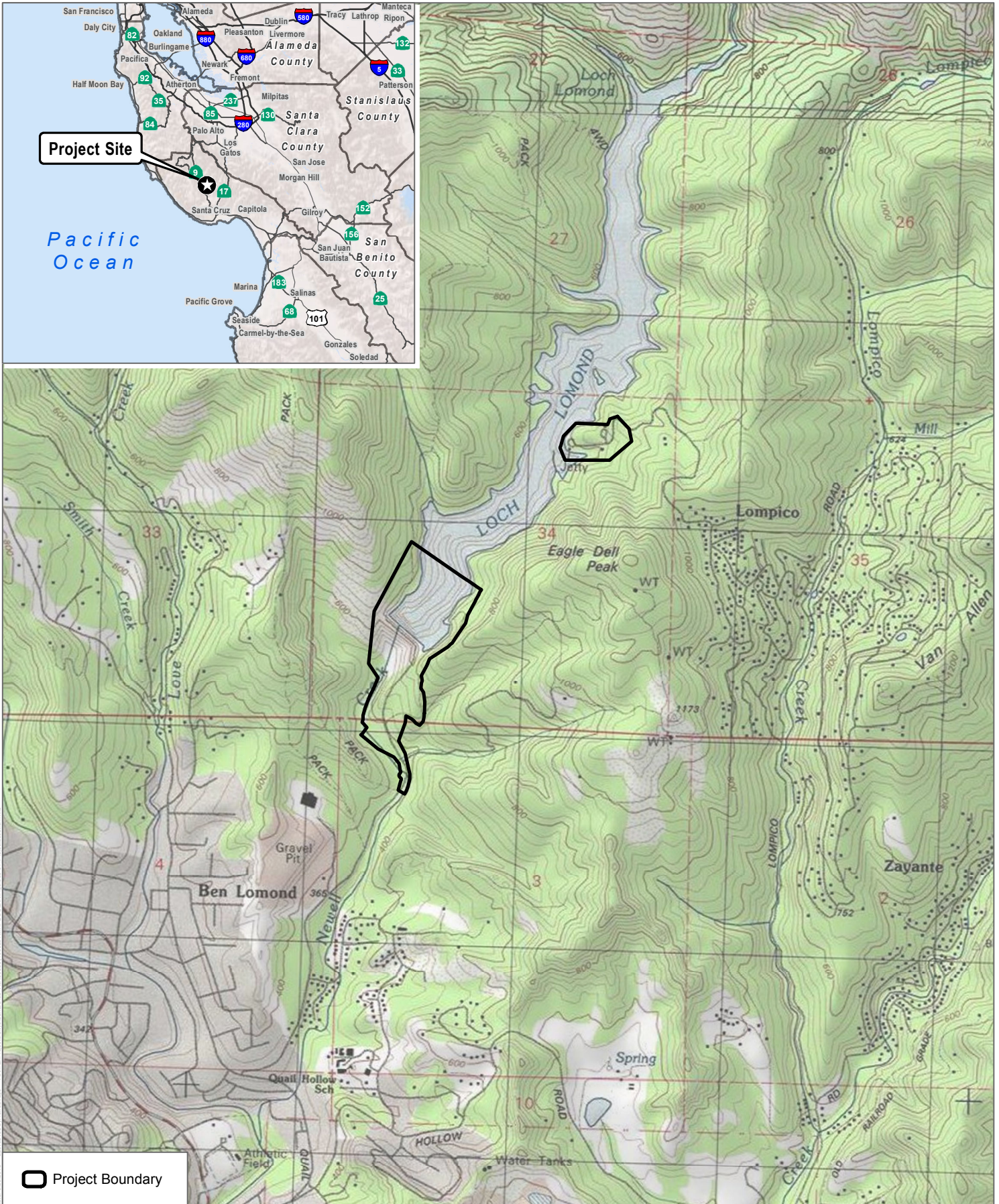
The surrounding area is characterized by steeply forested terrain with some residential homes on large lots. Rural residential subdivisions are located approximately 0.5 miles south and in the Ben Lomond area. The County's Ben Lomond Refuse Transfer Station, which accepts Class III non-hazardous residential, commercial and industrial waste that is trucked to the County's Buena Vista Landfill in southern Santa Cruz County, is located approximately 0.3 miles south of NCD.

#### **V. FIGURES**

These figures are presented on the following pages:

- Figure 1: Project Location
- Figure 2: Existing Newell Creek Dam Facilities
- Figure 3: Approved Project Overview
- Figure 4: Approved Outlet Structure Layout
- Figure 5: Outlet Structure Profile

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SOURCE: USGS 7.5-Minute Series Felton Quadrangle  
Township 9S, 10S; Range 2W; Sections 3, 34

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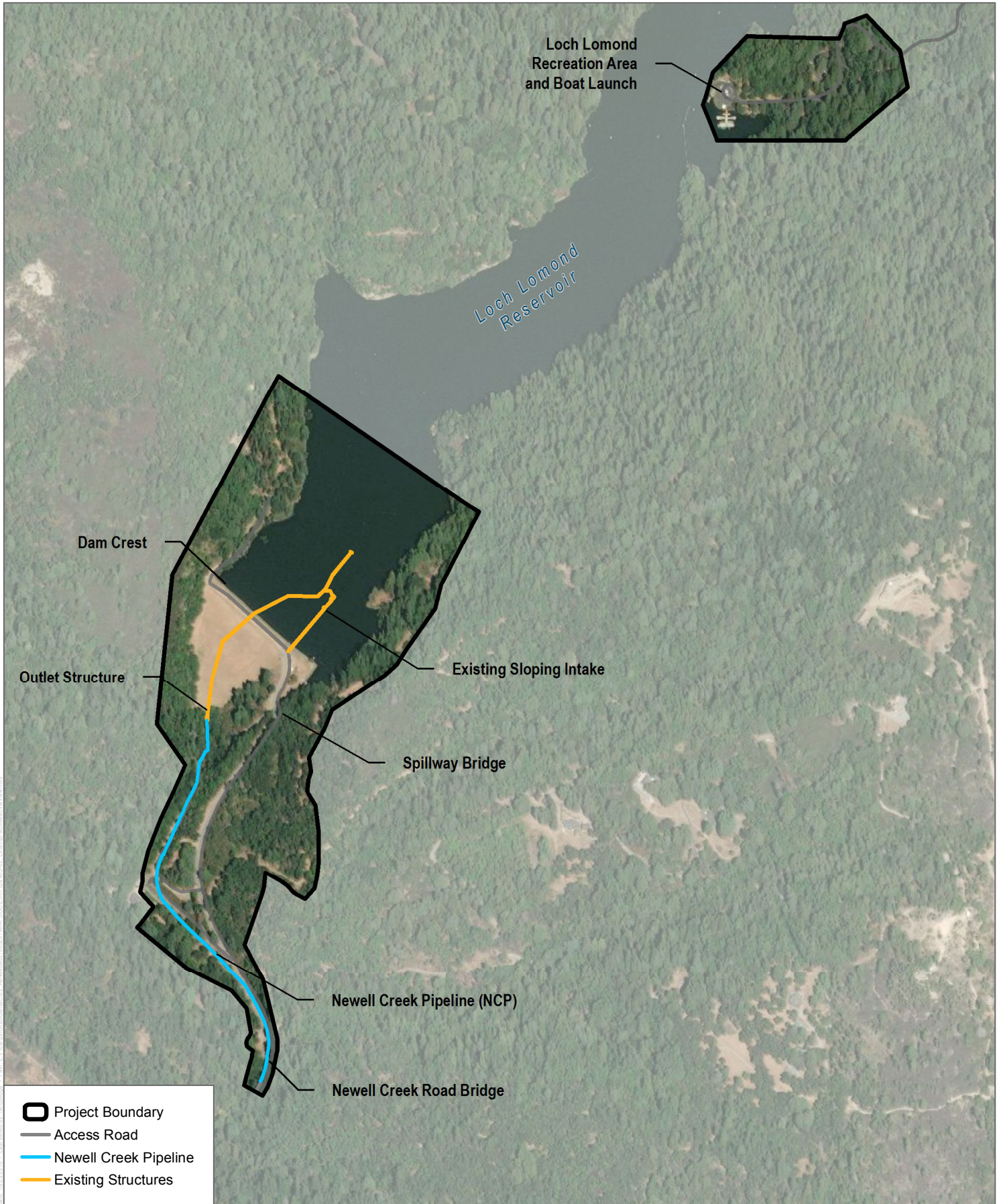


0 1,000 2,000 Feet

**FIGURE 1**

**Project Location**

Newell Creek Dam Inlet/Outlet Replacement Project



SOURCE: Bing Maps 2018



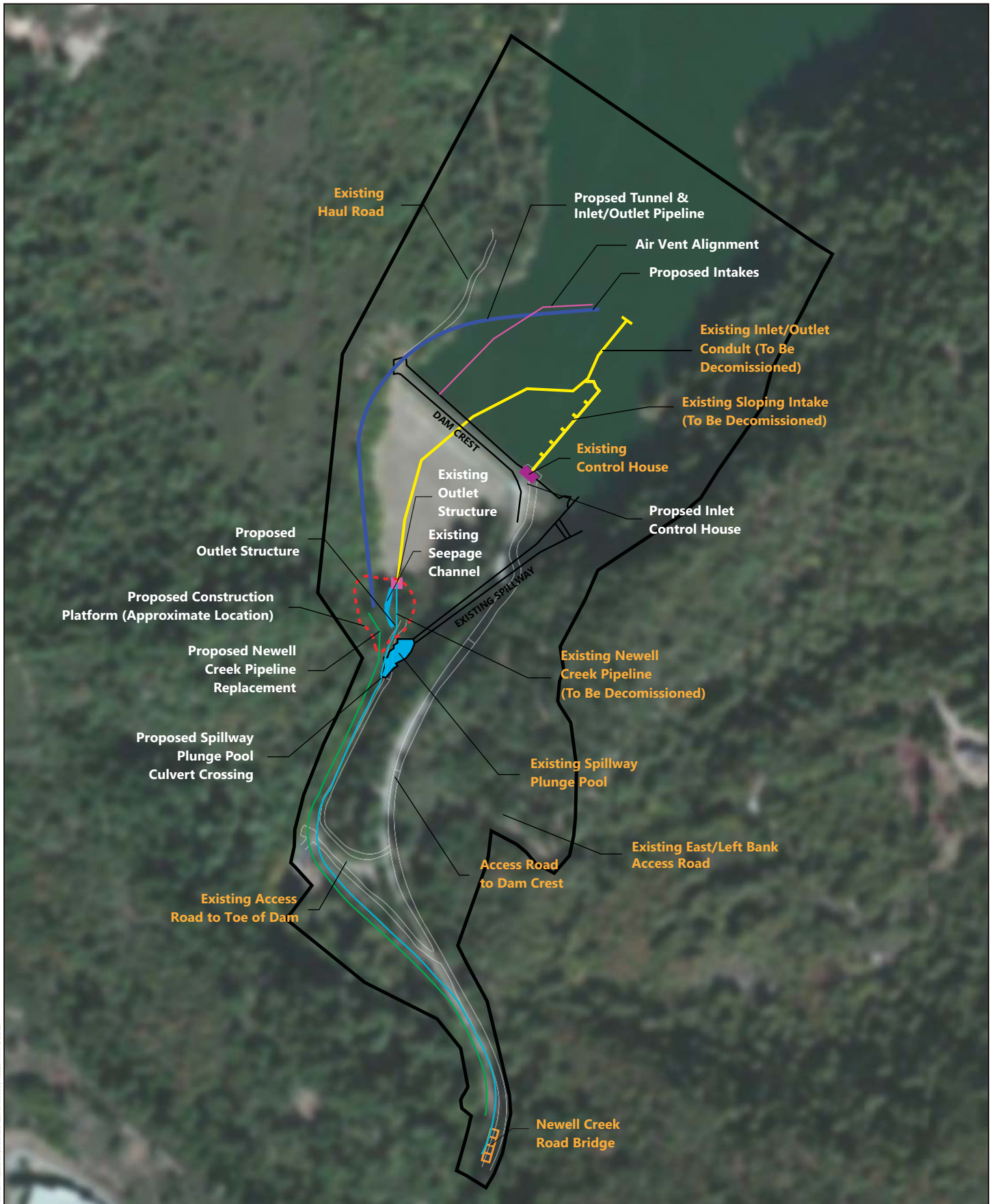
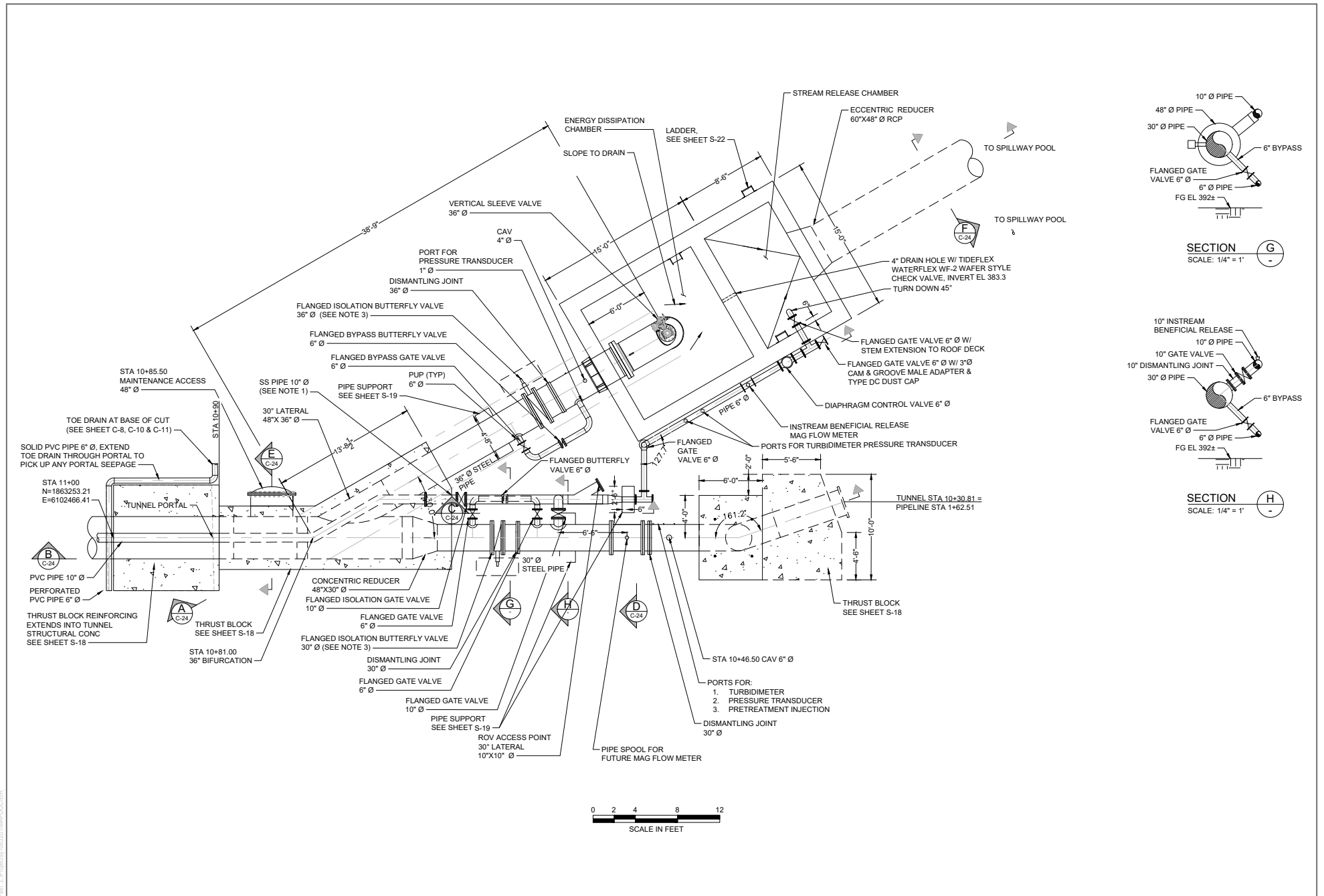


FIGURE 3

Project Overview

Newell Creek Dam Inlet/Outlet Replacement Project

Figure 3 Project Overview - Newell Creek Dam Inlet/Outlet Replacement Project

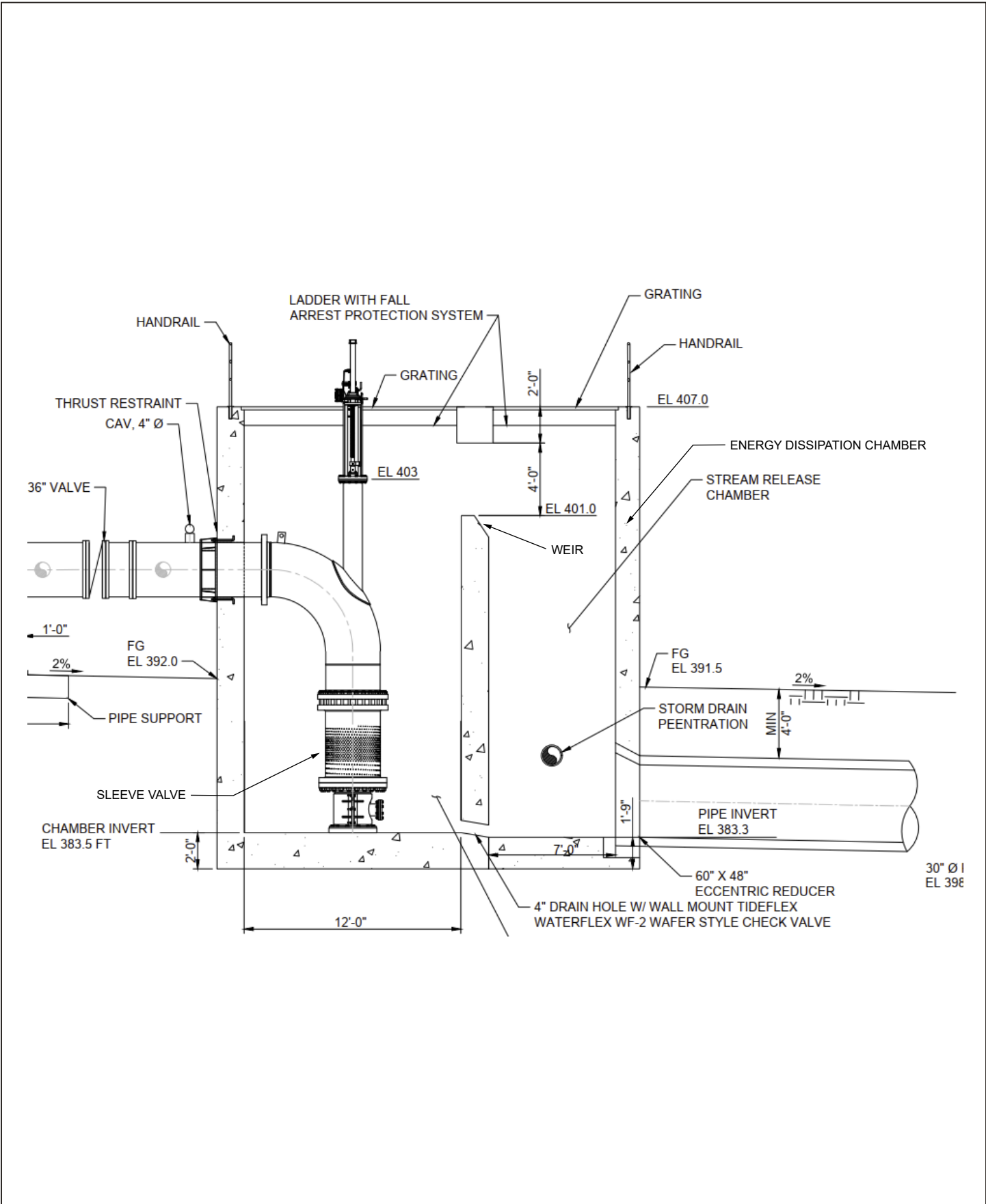


SOURCE: AECOM 2019

FIGURE 4

Approved Outlet Structure Layout

Newell Creek Dam Inlet/Outlet Replacement Project



SOURCE: AECOM 2019

FIGURE 5

Outlet Structure Profile

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## VI. USE OF AN ADDENDUM

Pursuant to Section 15164 of the State CEQA Guidelines, an addendum to a certified EIR may be prepared if only minor technical changes or additions are necessary and none of the conditions described in State CEQA Guidelines Section 15162 that call for preparation of a subsequent EIR or Negative Declaration have occurred. Under State CEQA Guidelines Section 15162, no subsequent EIR or negative declaration would need to be prepared unless the lead agency determines, on the basis of substantial evidence, one or more of the following:

- Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- New information of substantial importance, which was not known and could not have been known, at the time the previous EIR or Negative Declaration was prepared shows any of the following:
  - The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;
  - Significant effects previously discussed will be substantially more severe than shown in the previous EIR or Negative Declaration;
  - Mitigation measures or alternatives previously found not to be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or
  - Mitigation or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation or alternative.

**Conclusion and Findings.** The City has determined that the proposed modifications represent a minor design change in order to allow a slightly increased flow rate during emergency releases and during testing/maintenance operations. Other than this modified release flow and addition of a stop on the outlet sleeve valve, no other Project components would be changed. The modifications do not change the approved Project's site plan, overall area of construction disturbance or construction methods. Similarly, there are no substantial changes with respect to the circumstances under which the project is undertaken or new information of substantial importance that would result in new significant impacts or a substantial increase in significance of previously identified impacts, as explained below in Section VII. Based on the level of previous environmental review and degree of proposed project changes, the City has determined that the proposed Project modifications are minor changes that would not result in new significant impacts

or substantially more severe significant impacts than analyzed in the 2019 certified EIR, and no other substantial changes in the Project or environmental conditions have occurred since certification of the project EIR in 2019. Thus, the City has determined that an Addendum to the certified Newell Creek Dam Inlet/Outlet Replacement Project EIR is the appropriate environmental review document for the proposed project modifications.

## **VII. REVIEW OF IMPACTS**

### **Environmental Checklist for Supplemental Environmental Review**

The purpose of the checklist presented on the following pages is to evaluate the impact categories in terms of any “changed condition” (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a changed environmental effect. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigations in prior environmental documents.

#### **Explanation of Checklist Evaluation Categories**

Where Impact Was Analyzed? This column provides a cross-reference to the pages of the certified Final EIR (FEIR) where information and analysis may be found relative to the environmental issue listed under each topic.

Do Proposed Changes Involve New Significant Impacts? Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this column indicates whether the changes represented by the current project will result in new significant impacts that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact.

Any New Circumstances Involving New Impacts? Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in the current project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

Any New Information Requiring New Analysis or Verification? Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that: (A) the project will have one or more

significant effects not discussed in the prior environmental documents; or (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects or the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, then the question would be answered 'Yes' requiring the preparation of a subsequent or supplemental EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain the same and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or additional mitigation is not necessary, then the question would be answered 'No' and no additional environmental documentation (supplemental or subsequent EIR) is required.

Mitigations Implemented or Address Impacts. Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this column indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the mitigations have already been implemented. A "yes" response will be provided if mitigation measures were included in the prior environmental document or have already been implemented for the respective impact category. If "NA" is indicated, this Environmental Review concludes that the impact does not occur with this project and therefore no mitigations are needed.

Discussion. A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue and the status of any mitigation that may be required or that has already been implemented.

Mitigation Measures. Applicable mitigation measures from the prior environmental review that apply to the project are listed under each environmental category.

Conclusions. A discussion of the conclusion relating to the analysis contained in each section.

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Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts?
<b>1. Aesthetics. Except as provided in Public Resources Code Section 21009, would the project:</b>					
a) Have a substantial adverse effect on a scenic vista?	FEIR page 4.1-1	No	No	No	NA
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	FEIR page 4.1-1	No	No	No	NA
c) In non-urbanized areas, substantially degrade the existing visual character or quality of 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?	FEIR page 4.1-1	No	No	No	NA
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	FEIR page 4.1-2	No	No	No	NA
<p><b>Discussion:</b> The 2019 certified project EIR concluded that the approved Project would have no impact on scenic vistas or resources, would not degrade existing visual character or quality of the site, and would not result in creation of light and glare. The proposed Project modifications would change the emergency release flow rate of the outlet valve with the addition of a stop on the sleeve valve to limit the maximum release flow. The modified outlet valve is located within the outlet structure and would not be visible. Therefore, the proposed project modifications would not result in new significant impacts or substantially more severe impacts related to aesthetics.</p> <p>It is also noted that subsequent to the release of the public review Draft EIR, amendments to the State CEQA Guidelines were approved in December 2018 and went into effect in April 2019, just prior to the certification of the EIR. The amendments changed some of the recommended questions on the Environmental Checklist (Appendix G) regarding aesthetics. The revisions qualify the inquiry into potential degradation of existing visual character to whether a project in a non-urbanized area would substantially degrade the existing visual character or quality of public views of the site and its surroundings. The project site is located within a non-urbanized area of the county, but is not visible from any public viewpoints. The Project component proposed for modification is a valve that is located within the enclosed project outlet. Therefore, the proposed project modifications would not result in a significant impact under the amended State CEQA Guidelines.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts?
<p><b>Mitigation Measures:</b> None were identified in the EIR, and no new mitigation measures are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to aesthetics than the impacts evaluated in the certified EIR.</p>					
<p><b>2. Agriculture and Forestry Resources. 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. Would the project:</b></p>					
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?	FEIR page 4.1-2	No	No	No	NA
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	FEIR page 4.1-2	No	No	No	NA
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 section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	FEIR pages 4.5-5 and 4.5-6	No	No	No	NA
d) Result in the loss of forest land or conversion of forest land to non-forest use?	FEIR pages 4.5-3 through -5 and 4.5-6 through 4.5-9	No	No	No	Yes Mitigation Measures FOR-1, FOR-2, FOR-3, FOR-4

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts?
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?	FEIR pages 4.1-2, 4.5-6	No	No	No	NA
<p><b>Discussion:</b> <i>(a-b, e) Agricultural Land Conversion.</i> The 2019 certified project EIR concluded that the approved Project would have no direct or indirect impacts on agricultural resources as none exist on or near the project site, and this conclusion remains unchanged with the proposed Project modifications.</p> <p><i>(c,e) Conflict with Timberland Zoning.</i> The certified EIR determined that the City is not subject to County zoning regulations, but that the Project would be considered an Allowed Use (Utilities) under Santa Cruz County Code Section 13.10.372 and would not conflict with existing County Timber Production (TP) District zoning. The Project does not include rezoning of forestland or timberland. Therefore, the EIR concluded that the Project would not conflict with existing zoning or result in rezoning related to forest lands. The EIR also concluded that the project would not result in indirect conversion of timberland. The proposed Project modifications do not change the location of project components or the conclusion of the EIR regarding potential conflicts with timberland zoning.</p> <p><i>(d) Forest Land Conversion.</i> The certified EIR concluded that the project would result in a potentially significant impact due to removal of 15 acres of forest land as result of project construction areas, although none of the trees were identified as virgin, old-growth or initial stage old-growth trees. Additionally, construction activities could result in physical damage to residual trees where they are located adjacent to construction activity, as well as increase the potential for pathogen spread through the use of tools and equipment. The proposed Project modifications would not expand the project construction footprint evaluated in the EIR and would not result in tree removal. Thus, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to forest resources or forest land conversion.</p> <p><b>Mitigation Measures:</b> The certified EIR’s Mitigation Measures FOR-1, FOR-2, FOR-3 and FOR-4 require tree replanting, implementation of forest management measures, implementation of best management practices (BMPs) to minimize the potential for pathogen spread, and forest land management actions intended to promote forest land health through invasive species treatment, tree planting and/or fuel management and support late seral stage management objectives. These mitigation measures would continue to be required with the proposed Project modifications. No new mitigation measures are required as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to agricultural and forestry resources than the impacts evaluated in the certified EIR.</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts?
<b>3. Air Quality. 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. Would the project:</b>					
a) Conflict with or obstruct implementation of the applicable air quality plan?	FEIR pages 4.2-8, 4.2-17	No	No	No	NA
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?	FEIR pages 4.2-19 through 4.2-21, 8-7	No	No	No	NA
c) Expose sensitive receptors to substantial pollutant concentrations?	FEIR page 4.2-22	No	No	No	NA
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	FEIR Pages 4.2-22 through 4.2-23	No	No	No	NA
<p><b>Discussion:</b> (a) <i>Conflicts with Air Quality Management Plan.</i> The 2019 certified project EIR concluded that the approved Project would not result in conflicts with or obstruction of implementation of the Monterey Bay Area Air Quality Management Plan (AQMP). The proposed Project modifications would not change the project construction schedule or duration and would not change project operations, which are expected to be similar to existing operations. Therefore, there would be no change in approved Project uses or size from what was analyzed in the EIR, and the proposed modifications would not result in new significant impacts or substantially more severe impacts related to conflicts with the AQMP.</p> <p>(b-c) <i>Air Pollutant Emissions.</i> The certified EIR included air pollutant emissions calculations that found that the criteria pollutant emissions resulting from Project construction and operations would not exceed Monterey Bay Air Resources District (MBARD) emissions significance standards, violate any air quality standard or contribute substantially to an existing or projected air quality violation, contribute substantially to an existing or projected air quality violation, result in cumulatively considerable net increase of any criteria air pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard or expose sensitive receptors to substantial pollutant concentrations. The EIR concluded impacts related to emissions during construction and operations would be less than significant. The proposed Project modifications would not include changes to the Project uses and would not change the nature of construction activities or associated emissions. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to air emissions or air quality.</p> <p>(d) <i>Odors.</i> Given the type of land uses envisioned within the Project, the certified EIR concluded that the Project would not result in introduction of new sources of substantial odors, and potential odors from equipment would be limited and temporary. The proposed Project modifications would not result</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts?
<p>in changes to land uses or result in activities that would result in substantial odors, and therefore would not result in new significant impacts or substantially more severe impacts related to odors.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR, and no new mitigation measures are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to air quality than the impacts evaluated in the certified EIR.</p>					
<p><b>4. Biological Resources. Would the project:</b></p>					
<p>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?</p>	<p>FEIR pages 4.3-12 to 4.3-19, 4.3-24 to 4.3-34, 8-13</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>Yes Mitigation Measures BIO-1A-1, BIO-1A-2, BIO-1B-1, BIO-1C-1, BIO-1C-2, BIO-1C-3, BIO-1C-4, BIO-1C-5, BIO-1C-6, BIO-1D-1</p>
<p>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 US Fish and Wildlife Service?</p>	<p>FEIR pages 4.3-19 to 4.3-20, 4.3-34 to 4.3-35</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>Yes Mitigation Measures BIO-2-1, BIO-2-2</p>
<p>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?</p>	<p>FEIR pages 4.3-19 to 4.3-20, 4.3-34 to 4.3-35</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>Yes Mitigation Measures BIO-3-1, BIO-3-2, BIO-3-3</p>
<p>d) Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p>	<p>FEIR pages 4.3-20 through 4.3-21, 4.3-23, 4.3-37 to 4.3-39</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>Yes Mitigation Measures BIO-4-1, BIO-4-2</p>

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e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	FEIR page 4.1-2	No	No	No	NA
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?	FEIR pages 4.1-3 and 4.3-23	No	No	No	NA
<p><b>Discussion:</b> (a-d) <i>Special Status Species, Sensitive Habitat, Nesting Birds.</i> The 2019 certified project EIR identified potentially significant impacts to special status plant and wildlife species, sensitive habitats, and nesting birds due to construction, all of which could be mitigated to a less-than-significant level. The proposed Project modification would change the emergency release flow rate of the outlet valve, which is located within the outlet structure, but would not change the footprint of construction disturbance. As discussed in section VII.10 below, the modified emergency flow rate would be slightly higher than analyzed in the EIR, but would be well within recorded peak storm flows. As such, the proposed Project modifications would not result in new significant impacts or substantially more severe impacts to biological resources.</p> <p>(e-f) <i>Conflicts with Adopted Plans.</i> Although the Project is located within the unincorporated area of Santa Cruz County, the Project is not subject to County policies and regulations pursuant to state law as a water supply project; see FEIR page 4.1-2. At the time of certification of the EIR, there were no Habitat Conservation or Natural Community Conservation Plans that included the Project area, although the EIR indicated that the City was in the process of developing HCPs for City operations.</p> <p>Subsequent to certification of the EIR in May 2019, in January 2021 the U.S. Fish and Wildlife Service (USFWS) approved an incidental take permit (ITP) to the City of Santa Cruz pursuant to section 10(a)(1)(B) of the Endangered Species Act of 1973 (ESA) as amended (16 U.S.C. 1531 et seq.) for incidental take of six wildlife species and four plant species as a result of operation and maintenance of specified City facilities. The authorization covers a 30-year period from 2021 to 2051. A Habitat Conservation Plan (HCP) was prepared that refers to the plant and wildlife species included for coverage; “Covered Activities” include operation, maintenance and rehabilitation of the City’s water supply and water system facilities; operation and maintenance of the City’s municipal facilities; and management of City lands. The area covered by the HCP (Plan Area) is located in Santa Cruz County. The approved NCD Inlet/Outlet Project is not a covered activity in the HCP, and thus, the HCP is not applicable to the approved Project or proposed Project modifications.</p> <p><b>Mitigation Measures:</b> As indicated above, with implementation of identified mitigation measures potentially significant impacts related to biological resources would be reduced to a less-than-significant level. All mitigation measures as identified in the table above would continue to be required with the proposed Project modifications. No new mitigation measures are required with the proposed project modifications as no new significant impacts have been identified.</p>					

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<p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to biological resources than the impacts evaluated in the certified EIR.</p>					
<p><b>5. Cultural Resources. Would the project:</b></p>					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	FIER pages 4.4-10 through 4.4-13; pages 16 through 4.4-17	No	No	No	NA
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	FEIR pages 4.4-9, 4.4-17 to 4.4-18	No	No	No	NA
c) Disturb any human remains, including those interred outside of formal cemeteries?	FEIR pages 4.4-9, 4.4-17 to 4.4-18	No	No	No	NA
<p><b>Discussion:</b> (a) <i>Historical Resources.</i> The 2019 certified project EIR found that the Newell Creek Dam property is considered a historical resource under CEQA due to its eligibility for listing at the local level of significance under NRHP/CRHP Criterion A/1 due to association with important events that have made a significant contribution to the broad patterns of water infrastructure development in Santa Cruz. However, the EIR concluded that none of the Project improvements would demolish, destroy, or relocate the NCD or result in physical alterations that would adversely impact the physical characteristics that convey the historical significance of the NCD as none of the improvements would alter the overall historic integrity of the resource, resulting in a less-than-significant impact. The proposed Project modifications include a change in the outlet valve in order to release increased flows during emergency and testing/maintenance situations, but this would not result in construction in new areas and would not impact historical resources. Therefore, the proposed Project modifications would not result in new or substantially more severe impacts related to historical resources.</p> <p>(b-d) <i>Archaeological Resources.</i> The 2019 certified project EIR did not identify archaeological resources in the project area and concluded that the approved Project would result in a less-than-significant impact to archaeological resources. No mitigation measures were required as a significant impact had not been identified, but the Project includes Best Management Practices (BMPs) that address procedures to be followed in the event that unknown archaeological resources or human burials are discovered during construction. The proposed Project modifications do not change areas of construction, and construction activities would adhere all Project BMPs. Therefore, the proposed project modifications would not result in new significant impacts or substantially more severe impacts related to archaeological resources.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR, and no new or modified mitigation measures would be required with the proposed Project modifications as no new significant impacts have been identified.</p>					

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<p><b>Conclusion:</b> The proposed project modifications would not result in new significant impacts or substantially more severe impacts related to cultural resources than the impacts identified in the certified EIR.</p>					
<p><b>6. Energy. Would the project:</b></p>					
<p>a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</p>	<p>FEIR pages 6-4 through 6-9</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>NA</p>
<p>b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</p>	<p>FEIR pages 6-4 through 6-9</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>NA</p>
<p><b>Discussion:</b> Subsequent to the release of the public review Draft EIR in November 2018, amendments to the State CEQA Guidelines were approved in December 2018 and went into effect in April 2019, just prior to the certification of the EIR. The amended Guidelines include a new section in Appendix G related to wasteful or inefficient energy use. However, the 2019 certified project EIR did analyze potential energy use during project construction in Chapter 6 of the EIR and concluded that the Project would not result in wasteful or inefficient energy use. The proposed Project modifications would not result in changes to construction methods or schedule. Thus, neither the Project nor the proposed modifications would result in wasteful or inefficient energy consumption or conflicts with plans for renewable energy or energy efficiency, and the proposed modifications would not result in new significant impacts or substantially more severe impacts related to energy.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR, and no new mitigation measures are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to energy than the impacts evaluated in the certified EIR.</p>					



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<b>7. Geology and Soils. Would the project:</b>					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> <li>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? Refer to Division of Mines and Geology Special Publication 42.</li> <li>ii. Strong seismic ground shaking?</li> <li>iii. Seismic-related ground failure, including liquefaction?</li> <li>iv. Landslides?</li> </ul>	FEIR pages 4.6-4 to 4.6-6, 4.6-10 through 4.6-12	No	No	No	NA
b) Result in substantial soil erosion or the loss of topsoil?	FEIR pages 4.8-4 to 4.8-6, 4.8-11 to 4.8-16	No	No	No	Yes Mitigation Measures HYDRO-4-1, HYDRO-4-2
c) 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?	FEIR pages 4.6-6, 4.6-12 through 4.6-15	No	No	No	NA
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	FEIR pages 4.6-7, 4.6-15 through 4.6-16	No	No	No	NA
e) 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?	FEIR page 4.6-9	No	No	No	NA

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f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	FEIR pages 4.4-14, 4.4-18 through 4.4-19	No	No	No	Yes Mitigation Measure CUL-5-1
<p><b>Discussion:</b> (a,c) <i>Seismic and Geologic Hazards.</i> The 2019 certified project EIR concluded that although the nearby Zayante-Vergeles fault is considered active by the California Geological Survey, Project facilities would not increase the potential for fault rupture and associated earthquakes to occur. The EIR identified less-than-significant impacts related to seismic hazards, slope instability or landsliding with implementation of recommendations in the Project geotechnical report. The proposed Project modifications involve a minor change to the outlet emergency release rate and would not result in new structures or directly or indirectly cause potential substantial adverse effects related to fault rupture and seismic hazards. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to seismic and geologic hazards.</p> <p>(b) <i>Erosion.</i> The certified EIR concluded that, with implementation of the Project-proposed Best Management Practices (BMPs) and measures implemented as part of the required Stormwater Pollution Prevention Plan (SWPPP), potential erosion impacts during construction would be less than significant. The EIR did identify a potentially significant erosion impact resulting from creation or improvement of construction access roads, which could be mitigated to a less-than-significant level with the mitigation measures included in the EIR to maintain access roads in accordance with specified performance standards and wintering monitoring to prevent erosion and stormwater runoff-induced erosion. The proposed Project modifications would not result in increased on-site grading or off-site disturbance, and therefore, would not result in new significant impacts or substantially more severe impacts related to erosion.</p> <p>(d) <i>Expansive Soils.</i> The EIR concluded that the potential for expansive soils to occur on the Project site was low, and the Project would result in a less-than-significant impact. The proposed Project modifications would not result in changes to location of Project construction activities and would not result in new significant impacts or substantially more severe impacts related to expansive soils.</p> <p>(e) <i>Septic System Suitability.</i> The EIR found no impacts related to septic system suitability because the project will not utilize a septic system. No changes in site conditions have occurred; therefore, the proposed project modification would not result in new significant impacts or substantially more severe impacts related to septic systems.</p> <p>(f) <i>Paleontological Resources.</i> It is noted that that subsequent to the release of the public review Draft EIR in November 2018, amendments to the State CEQA Guidelines were approved in December 2018 and went into effect in April 2019, just prior to the certification of the EIR. The amendments moved the question regarding paleontological resources in Appendix G from the Cultural Resources section to the Geology and Soils section. The 2019 certified project EIR concluded that no paleontological resources were identified within the Project site, but there are records of paleontological resources discoveries either nearby or within the Project area within the same geological formation that is present on the Project site. While the Project area has been heavily disturbed by development for the existing dam and related facilities, intact paleontological resources may be present below the original</p>					

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<p>layer of fill material and discovered during construction, resulting in a potentially significant impact. Implementation of a Paleontological Resources Impact Mitigation Program (PRIMP) as identified in the EIR mitigation measures would ensure protection of any identified resources inadvertently discovered during construction and would reduce the impact to a less-than-significant level.</p> <p><b>Mitigation Measures:</b> With implementation of Mitigation Measures HYDRO-1, HYDRO-2 and CUL-5-1, potentially significant impacts related to erosion and paleontological resources would be reduced to a less-than-significant level, and these mitigation measures would continue to be required.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to geology and soils than the impacts evaluated in the certified EIR.</p>					
<p><b>8. Greenhouse Gas Emissions. Would the project:</b></p>					
<p>a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</p>	<p>FEIR pages 4.2-10 to 4.2-14, 4.2-24 through 4.2-26</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>NA</p>
<p>b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</p>	<p>FEIR page 4.2-18 through 4.2-19</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>NA</p>
<p><b>Discussion:</b> (a) <i>Greenhouse Gas (GHG) Emissions.</i> The 2019 certified project EIR concluded that Project construction and operation would result in GHG emissions, which would be below applicable thresholds. The proposed project modifications would not change Project construction methods or schedule or result in changes to post-construction operations. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to GHG emissions.</p> <p>(b) <i>Conflicts with Adopted Plans.</i> The 2019 certified project EIR found that the project would not conflict with or interfere with implementation of any of the GHG reduction goals for 2030 or 2050 because the Project would not exceed the recommended thresholds established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020; Project construction was initiated in 2020. The EIR concluded that the Project would not impede the state’s trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050 and also found that there are no measures in the City’s Climate Action Plan (CAP) that are applicable to the Project. The proposed project modification would change the emergency release flow rate, but would not result in emissions or otherwise result in conflicts with adopted plans, including the City’s CAP. Therefore, the proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to conflicts with plans, policies, or regulations adopted for the purpose of reducing GHG emissions.</p>					

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<p><b>Mitigation Measures:</b> None were identified in the EIR, and no new mitigation measures are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed project modifications would not result in new significant impacts or substantially more severe impacts related to GHG emissions than the impacts evaluated in the certified EIR.</p>					
<p><b>9. Hazards and Hazardous Materials. Would the project:</b></p>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	FEIR pages 4.7-8 through 4.7-11	No	No	No	Yes Mitigation Measures HAZ-1B-1, HAZ-1B-2
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	FEIR pages 4.7-10 through 4.7-13	No	No	No	Yes Mitigation Measures HAZ-2A-1, HAZ-2A-2, HAZ-2A-3, HAZ-2B-1
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	FEIR page 4.7-8	No	No	No	NA
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?	FEIR page 4.7-8	No	No	No	NA
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?	FEIR page 4.7-7	No	No	No	NA

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f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	FEIR page 4.10-10	No	No	No	NA
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	FEIR page 4.7-7	No	No	No	NA
<p><b>Discussion:</b> (a) <i>Use/Disposal of Hazardous Materials.</i> The 2019 certified project EIR concluded that the Project would result in potentially significant impacts with disposal of excavated soils that are known to contain naturally-occurring concentrations of metals. With implementation of mitigation measures that require testing of spoils and disposal in accordance with regulatory requirements, the impact would be less than significant. The proposed Project modifications would not change the area of construction, and thus, would not result in in new significant impacts.</p> <p>(b) <i>Release of Hazardous Materials.</i> The certified EIR concluded that project construction could result in a release of hazardous materials, including accidental release of petroleum products used for equipment and potential release of contaminated soils in the Reservoir, both of which could be mitigated to a less-than-significant level. The proposed Project modifications do not include new construction disturbance areas and would not be located in the Reservoir, and therefore, would not result in new significant impacts.</p> <p>(c-g) <i>Other.</i> The certified EIR found that the Project site is not located within one-quarter mile of a school or result hazardous emissions (c) and is not on a hazardous materials site identified by the state (d). The Project site is not within proximity to an airport (e) and would not impede emergency access or response (f). The Project would not result in development of habitable structures and would not exposure people or structures to wildland fire risks. These conditions are not changed with the proposed Project modifications, which would not result in new significant impacts or substantially more severe impacts related to hazards and hazardous materials.</p> <p><b>Mitigation Measures:</b> Mitigation measures identified in the EIR related to hazardous materials would continue to be required, but no new mitigation measures are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to hazards and hazardous materials than the impacts evaluated in the certified EIR.</p>					

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<b>10. Hydrology and Water Quality. Would the project:</b>					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	FEIR pages 4.8-4 to 4.8-6, 4.8-11 to 4.8-16	No	No	No	NA
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	FEIR page 4.8-8	No	No	No	NA
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: <ul style="list-style-type: none"> <li>i. result in substantial erosion or siltation on- or off-site;</li> <li>ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;</li> <li>iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or</li> <li>iv. impede or redirect flood flows?</li> </ul>	FEIR pages 4.8-9 to 4.8-16	No	No	No	Yes Mitigation Measures HYDRO-4-1, HYDRO-4-2
	FEIR page 4.8-10	No	No	Yes	NA
	FEIR pages 4.8-9 through 4.8-10	No	No	No	NA
	FEIR pages 4.8-16 to 4.8-17				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	FEIR pages 4.8-16 to 4.8-18	No	No	No	NA
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	FEIR pages 4.8-5, 4.8-11 to 4.8-16	No	No	No	NA

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<p><b>Discussion:</b> (a, c-i) <i>Water Quality and Erosion.</i> The 2019 certified project EIR identified a potentially significant impact related to erosion and potential water quality degradation as a result of construction activities, which could be mitigated to a less-than-significant level with implementation of Project-proposed BMPs, measures in the required SWPPP and mitigation measures regarding creation or improvement of construction access roads. The proposed Project modifications would change the emergency release flow rate of the outlet valve and would include the addition of a stop on the sleeve valve to limit the maximum release flow. Construction activities would not be changed with the modified valve. Additionally, as discussed below, the increased flow rate of 203 cfs, which is greater than the required drawdown rate of 164 cfs that was analyzed in the EIR, would be well within recorded peak storm flows of Newell Creek downstream of the dam. The increase would not be considered a substantial increase beyond what was analyzed and would not substantially increase the potential for erosion or water quality impacts. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts than previously evaluated related to water quality.</p> <p>(b) <i>Groundwater.</i> The certified EIR indicated that the Project does not propose use of groundwater and does not propose structural development in an area of groundwater recharge, and therefore, the Project would not result in impacts to groundwater resources. This is not changed with the proposed Project modifications.</p> <p>(c-ii, iii) <i>Alteration of Drainage and Increased Surface Runoff Flows.</i> The 2019 certified project EIR concluded that the approved project would result in a less-than-significant impact related to drainage because the project would not alter the existing drainage pattern of the site in a manner that would potentially result in substantial off-site erosion or siltation. Structural development would result in minor increases of impervious surfaces and runoff. The proposed Project modifications do not include new impervious surfaces.</p> <p>The EIR concluded that increased surface flows associated with 10 percent Reservoir drawdown requirements, from 10 days to 7 days, would increase the rate or amount of surface runoff, but would not exceed capacity of existing or planned storm drain facilities, cause downstream or off-site drainage problems, or increase the risk or severity of flooding in downstream areas, resulting in a less-than-significant impact. In accordance with DSOD emergency drawdown requirements, the EIR indicates that lowering the Reservoir from the spillway water surface elevation by 10 percent of the hydraulic head, to elevation 563 feet in 7 days, would require an average flow rate of 106 million gallons per day (mgd) or 164 cfs, which would be a slightly higher flow than lowering within 10 days. The EIR concluded that increased flow rates required to reduce the drawdown time from 10 days to 7 days would be regulated through the drawdown period such that drawdown would occur uniformly over the 7 days. Drawdown quantities would not fluctuate erratically over the drawdown period and would be less than peak flows within the creek.</p> <p>The proposed Project modifications would increase the emergency release flow. To ensure the facility meets drawdown requirements with diminished capacity as the facility ages, the release valve needs to be capable of facilitating releases greater than the required drawdown rate.</p> <p>As indicated in a technical memo regarding flood flows at the dam (AECOM 2018), stream gage data for Newell Creek is available from 2004 to 2018, from locations upstream and downstream of the reservoir. The highest calculated flow for the Lower Newell Creek gage was 680 cfs, with a return period of approximately 5 years. Based on a 2012 FEMA Flood Insurance Study for Santa Cruz County, the 500-year flow rate over the spillway was estimated to be 3,310</p>					

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<p>cfs. In addition, based on daily reservoir elevation data, from 1961 to 2018, the maximum spillway discharge rate that occurred over the spillway during this period was 1,185 cfs, which occurred in February 1980. This flow rate was estimated to have a return period of 50 years. AECOM recommends utilizing this computed discharge rate of 1,185 cfs for Project design flows, as this discharge rate is based on a larger dataset than the creek gage data (57 years versus 14 years) (AECOM 2018). Therefore, an increased flow rate of 203 cfs, which is greater than the required drawdown rate of 164 cfs over 7 days that was analyzed in the EIR, would be well within recorded peak storm flows of Newell Creek downstream of the dam. A 7-day emergency drawdown with this release rate, therefore, would not be expected to exceed the capacity of downstream Newell Creek or result in increased risk or severity of flooding in downstream areas.</p> <p>The City also would periodically test the valves for maintenance. Valve testing can be completed either while the reservoir is spilling, in which case water could be released through the valve under maximum outflow conditions (i.e., 203 cfs), or during dry periods in which case no water would be released through the valve. The latter can be accomplished by closing an upstream valve. Either way, valve testing would result in a maximum flow of 203 cfs. As described above, this maximum flow rate during valve testing would not be expected to exceed the capacity of downstream Newell Creek or result in increased risk or severity of flooding in downstream areas. However, the valve testing would involve one cycle of fully opening and closing the valves, and thus, the flow would not be extended over time as with emergency drawdown.</p> <p><i>(c-iv, d) Flood Hazards.</i> The 2019 certified project EIR indicated that the 100-year flood would flow over the southeast portion of the dam in the vicinity of the existing control house and dam access road, but concluded that replacement of the small control house would not substantially impede or redirect flood flows. Other Project improvements, including the outlet structure, construction platform and culvert bridge across the spillway pool are designed to be above the 100-year flood flow elevation. The platform and culvert bridge are designed such that access is maintained for the 100-year event. The proposed Project modifications would not result in new structural development, but includes a modification of the outlet valve and maximum emergency release flow rate, which would not result in significant impacts. It is also noted that subsequent to release of the public review Draft EIR in November 2018, amendments to the State CEQA Guidelines were approved in December 2018 and went into effect in 2019, which changed some of the recommended questions on the Environmental Checklist (Appendix G) regarding flooding. The revised questions focus on whether a project would impede or redirect flood flows or release pollutants due to project inundation from a flood hazard, tsunami or seiche. The proposed project modifications would have no effect on flood flows.</p> <p><i>(e) Conflicts with Plan.</i> Subsequent to the release of the public review Draft EIR, amendments to the State CEQA Guidelines were approved in December 2018 and went into effect in 2019, which include a new question regarding whether a project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. There are no applicable groundwater management plans that include the Project site. The approved project would not change or affect beneficial uses identified for Newell Creek in the Central Coast Basin Plan, and with implementation of project BMPs and measures in the required SWPPP, the project would not result in erosion, sedimentation or water quality degradation, resulting in a less-than-significant impact. The proposed project modification would not result in new or expanded construction disturbance zones as the minor valve change is located within the outlet structure that was evaluated in the EIR. Therefore, the proposed modification would not result in new significant impacts related to potential conflicts with water quality or ground water management plans.</p>					



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<p><b>Mitigation Measures:</b> Mitigation measures identified for potential erosion and water quality impacts would continue to be required with the proposed Project modifications. No other mitigation measures are required with the proposed modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed project modifications would not result in new significant impacts or substantially more severe impacts related to hydrology and water quality than the impacts evaluated in the certified EIR.</p>					
<p><b>11. Land Use and Planning. Would the project:</b></p>					
a) Physically divide an established community?	FEIR page 4.1-2	No	No	No	NA
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?	FEIR pages 4.1-2 to 4.1-3	No	No	No	NA
<p><b>Discussion:</b> The 2019 certified project EIR found no impacts related to potential physical division of an established community or conflicts with policies or regulations adopted for the purpose of avoiding or mitigating an environmental impact. The Project consists of infrastructure improvements to an existing dam in an unincorporated area of Santa Cruz County. The City is exempt from County zoning ordinance and building code requirements pursuant to state law. California Government Code section 53091(d) and (e), which provides that facilities for the production, generation, storage, treatment, or transmission of water supplies are exempt from local zoning and building ordinances. Furthermore, the Project would not result in a change or expansion of the existing use. Implementation of the project would support the City’s continued ability to deliver drinking water to its customers from the existing Loch Lomond Reservoir. There are no policies in the City’s General Plan applicable to the Project. Therefore, the Project would not result in conflicts with existing policies or regulations. The proposed Project modification would not change Project construction methods or operations. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to land use and planning.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR and none are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to land use and planning than the impacts evaluated in the certified EIR.</p>					

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<b>12. Mineral Resources. Would the project:</b>					
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?	FEIR page 4.1-3	No	No	No	NA
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?	FEIR page 4.1-3	No	No	No	NA
<p><b>Discussion:</b> The 2019 certified project EIR concluded that there are no known available mineral resources or locally important mineral resource recovery sites delineated in the Project area, and the Project would have no impact on known or locally important mineral resources. There have been no changes to these conditions. Therefore, the proposed Project modification would not result in new significant impacts or substantially more severe impacts related to mineral resources.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR and none are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to mineral resources than the impacts identified in the certified EIR.</p>					
<b>13. Noise. Would the project result in:</b>					
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?	FEIR pages 4.9-10 to 4.9-17	No	No	No	NA
b) Generation of excessive groundborne vibration or groundborne noise levels?	FEIR page 4.9-10, 4.9-17 to 4.9-18	No	No	No	NA
c) For a project located within the vicinity of a private airstrip or an airport land use plan or,	FEIR page 4.9-10	No	No	No	NA

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<p>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?</p>					
<p><b>Discussion:</b> (a) <i>Generation of temporary or Permanent Noise Increases.</i> The 2019 certified project EIR concluded that the Project would result in less-than-significant impacts regarding generation of permanent and temporary noise increases. Operational requirements are not expected to change from existing conditions, and no significant change in existing operational noise levels was identified. Based on sound measurements and modeling, the EIR concluded that construction noise could increase over ambient noise levels at the nearest residential (sensitive) receptors, but sound levels would be consistent with noise levels established in the County of Santa Cruz noise regulations for construction noise, resulting in a less-than-significant impact. The proposed Project modifications would not result in new construction equipment or methods that would result in noise, and therefore, would not result in new significant impacts or substantially more severe impacts related to generation of substantial increases in noise.</p> <p>(b) <i>Temporary Construction Vibration.</i> The certified EIR concluded that the approved Project could generate groundborne vibration during periods of controlled detonation that may be needed for the tunnel construction, but resulting vibration levels would not expose residents to excessive groundborne vibration, resulting in a less-than-significant impact. The proposed Project modifications would not result in use of new equipment or construction techniques as the modified outlet valve is located in the outlet valve and outlet structure evaluated in the EIR. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to generation of vibration.</p> <p>c) <i>Airport or Airstrip Noise.</i> The certified EIR concluded that there would be no impacts related to airports or private air strips as the Project site is not located near an airport or private air strip. The proposed Project modifications would not change the project location. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to airport noise.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR and none are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed project modifications would not result in new significant impacts or substantially more severe impacts related to noise than the impacts evaluated in the certified project EIR related to noise.</p>					

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<b>14. Population and Housing. Would the Project:</b>					
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)?	FEIR page 4.1-3	No	No	No	NA
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	FEIR page 4.1-3	No	No	No	NA
<p><b>Discussion:</b> The 2019 certified project EIR concluded that the Project would result in replacement of existing infrastructure and associated improvements at the existing Newell Creek Dam and would not result in development of new residential uses or displace existing housing or people. The Project would not generate new employment, extend roads or other infrastructure, or procure additional water supplies which could result in indirect population growth. As such, the Project would have no impact on population and housing. The proposed Project modifications involve a minor design change to the outlet valve and emergency release flow rate, and would not result in new significant impacts or substantially more severe impacts related to population growth.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR, and no new mitigation measures are required as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to population and housing than the impacts evaluated in the certified EIR.</p>					

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<b>15. Public Services.</b>					
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically 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?	FEIR page 4.1-3 to 4.1-4	No	No	No	NA
Police protection?	FEIR page 4.1-3 to 4.1-4	No	No	No	NA
Schools?	FEIR page 4.1-3 to 4.1-4	No	No	No	NA
Parks?	FEIR page 4.1-4	No	No	No	NA
Other public facilities?	FEIR page 4.1-3 to 4.1-4	No	No	No	NA
<p><b>Discussion:</b> The 2019 certified project EIR found that the Project would not include any new land uses that would generate new demand for public services as no new residences or businesses were proposed; therefore, the Project would not result in an increase in population or employees on site and would have no impact on public services. The proposed Project modifications involve a minor design change to the outlet valve and emergency release flow rate, and would not change the intensity or type of improvements that were analyzed in the EIR. Therefore, the proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to public services.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR and none are required as a result of the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to public services than the impacts identified in the certified EIR.</p>					

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<b>16. Recreation. Would the project:</b>					
a) Would the project 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?	FEIR page 4.1-4	No	No	No	NA
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	FEIR page 4.1-4	No	No	No	NA
<p><b>Discussion:</b> The 2019 certified project EIR found that the Project would not involve the construction of parks or recreational facilities and would not create a need for the expansion or addition of recreational facilities. The project would not include any new residences or businesses; therefore, no increase in population that would generate increased demand for or use of parks and recreational facilities would occur as a result of the Project. The EIR concluded that the Project would have no impact on parks and recreational facilities. The proposed Project modifications would not result in a change in the planned improvements, other than the minor outlet design change, or construction schedule and would have no effect on recreational facilities. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to recreation.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR and none are required for the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to recreation than the impacts identified in the certified EIR.</p>					

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<b>17. Transportation. Would the project:</b>					
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	FEIR pages 4.10-2 to 4.10-5, 4.10-8 through 4.10-15	No	No	No	NA
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	FEIR page 4.10-9	No	No	No	NA
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	FEIR page 4.10-10	No	No	No	NA
d) Result in inadequate emergency access?	FEIR page 4.10-10	No	No	No	NA
<p><b>Discussion:</b> (a-b) <i>Conflicts with Programs, Plans, or Regulations.</i> The 2019 certified project EIR concluded that Project construction would result in temporary increases in vehicular traffic on area roads, but would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the transportation circulation system, resulting in a less-than-significant impact. The EIR also concluded that Project would not result in conflicts with policies and regulations regarding the performance of the circulation system and would not result in changes to air traffic patterns as there are no airports or air strips within or near the city of Santa Cruz. The proposed Project modifications would not result in a change in construction methods or construction-related trips, and therefore, would not result in new significant impacts or substantially more severe impacts related to transportation and traffic.</p> <p>Subsequent to the release of the public review Draft EIR in November 2018, amendments to the State CEQA Guidelines were approved in December 2018 and went into effect in 2019 that changed the method of review of transportation impacts. CEQA Guidelines section 15064.3, subdivision (b) codifies the switch from level of service (LOS) to vehicle miles traveled (VMT) as the metric for transportation analysis pursuant to state legislation adopted in 2013. The State CEQA Guidelines amendments gave all agencies until July 2020 to adopt their own VMT standards. The City of Santa Cruz adopted a VMT threshold in June 2020. The threshold and accompanying guidelines do not address construction-related trips, but address land use-development project types. However, as indicated in the EIR, per capita VMT within Santa Cruz County is estimated to decrease by approximately 11% between 2005 and 2040. Therefore, the proposed Project modifications, which involve minor design changes to the outlet valve, would not result in changes to Project-generated constructions trips, would not affect VMT and would not conflict with provisions in the amended CEQA Guidelines.</p> <p>(c-d) <i>Design Hazards.</i> The 2019 certified project EIR concluded that the Project does not include new road designs or alterations of existing features (e.g., road realignment) that could substantially increase hazards. Access roads on the Project site would be re-graded and improved to accommodate</p>					

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<p>construction vehicles, but no improvements or new access is proposed to other existing roads. Therefore, the Project would not result in hazards caused by a design feature or use that is incompatible with roadway designs. The proposed Project modifications would not affect road designs or result in a new significant impact.</p> <p>(d) <i>Emergency Access</i>. The certified EIR concluded that the approved Project would not result in development of new uses that would require emergency access. As indicated above, access roads on the Project site would be re-graded and improved to accommodate construction vehicles, which would also improve access for emergency vehicles. Therefore, the Project would not result in inadequate emergency access to the site, and this condition would not change with the proposed Project modifications.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR, and no mitigation is required as a result of the proposed Project modifications as new significant impacts have not been identified..</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to transportation and traffic than the impacts evaluated in the certified EIR.</p>					
<p><b>18. Tribal Cultural Resources.</b></p>					
<p>Would the project 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 or scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p>					
<p>a) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</p>	<p>FEIR page 4.4-9 to page 4.4-10, page 4.4-18</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>NA</p>
<p>b) 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</p>	<p>FEIR page 4.4-9 to page 4.4-10, page 4.4-18</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>NA</p>



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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.					
<p><b>Discussion:</b> (a-b) <i>Tribal Cultural Resources.</i> The 2019 certified project EIR concluded that no tribal cultural resources meeting the definition in the Public Resources Code were identified in the Project study area, and there are no known resources on the site that would be considered a tribal cultural resource. No California Native American tribe that is traditionally and culturally affiliated with this geographic area has contacted the City and requested notification of projects. No responses have been made to letters sent to Native American tribes to solicit input on information on known resources in the area. Therefore, the Project would not result in an adverse impact to or cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074. No changes in site conditions have occurred, and the proposed Project modifications do not change the planned construction area. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to tribal cultural resources.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR, and no new mitigation measures are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to tribal cultural resources than the impacts evaluated in the certified EIR.</p>					
<p><b>19. Utilities and Service Systems. Would the project:</b></p>					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	FEIR pages 1-3 through 1-15	No	No	No	NA
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	FEIR page 4.1-4	No	No	No	NA

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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?	FEIR page 4.1-4	No	No	No	NA
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?	FEIR page 4.1-4	No	No	No	NA
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	FEIR page 4.1-4	No	No	No	NA

**Discussion:** (a) *New or Relocated Infrastructure.* Subsequent to the release of the public review Draft EIR in November 2018, amendments to the State CEQA Guidelines were approved in December 2018 and went into effect in 2019, just prior to the certification of the EIR. The amendments include a new question on the Environmental Checklist in Appendix G that asks whether a project would require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The approved Project is water supply infrastructure improvement, the impacts of which are analyzed in the certified EIR. The EIR did not identify any significant unavoidable impacts resulting from Project construction and operation. The EIR identified 14 significant impacts related to biological resources, paleontological resources, forest conversion, hazardous materials and waste, and water quality, all of which can be mitigated to a less-than-significant level with mitigation measures identified in the EIR. The proposed Project modifications consist of minor design changes to the outlet valve and emergency release flow rate. However, as explained in this Addendum, the proposed modifications would not result in new significant or substantially more severe significant impacts than were evaluated in the EIR.

(b-e) *Water, Wastewater, and solid Waste.* The 2019 certified project EIR concluded that the approved Project, which involves replacement and improvements to existing water supply facilities and infrastructure, would not increase demand for utilities and service systems, including potable water and wastewater treatment utilities. Therefore, the EIR concluded that the Project would not result in impacts related to water and wastewater utilities. The EIR concluded that construction spoils could be disposed at the City’s Resource Recovery Facility (landfill) and would be well within existing remaining landfill capacity. The proposed Project modifications would not change the construction disturbance area or generate additional solid waste. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to wastewater.

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<p><b>Mitigation Measures:</b> None were identified in the EIR, and no new mitigation measures are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to utilities than the impacts identified in the certified EIR.</p>					
<p><b>20. Wildfire. If located near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b></p>					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	FEIR page 4.10-10	No	No	No	NA
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 uncontrollable spread of wildfire?	FEIR page 4.7-7	No	No	No	NA
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?	FEIR page 4.7-7	No	No	No	NA
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?	FEIR page 4.7-7	No	No	No	NA
<p><b>Discussion:</b> Subsequent to release of the public review Draft EIR in November 2018, the State CEQA Guidelines were amended in December 2018 and became effective in 2019, and changes include a new section on wildfire in the Environmental Checklist in Appendix G. As indicated in the certified EIR, the approved project does not result in development of habitable structures or introduction of residents or employees to the project area, and therefore, would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. The Project would not impair implementation of emergency plans (see section VI.17 above). As a water infrastructure improvement, neither construction nor operation of the Project would result in</p>					

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts?
<p>any activities that would exacerbate wildfire risks. The proposed Project modifications consist of a modification of the outlet valve and emergency release flow rate, but would not expand the construction disturbance area evaluated in the EIR.</p> <p><b>Mitigation Measures:</b> None were identified in the EIR, and no new mitigation measures are required with the proposed Project modifications as no new significant impacts have been identified.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts related to wildfire than addressed in the certified EIR.</p>					
<p><b>21. Mandatory Findings of Significance:</b></p>					
<p>a) Does the project 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, substantially 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?</p>	<p>FEIR pages 4.3-23 to 4.3-24, 4.3-39 to 4.3-39, 4.4-16 to 4.4-17</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>Yes Mitigation Measure BIO-8-1</p>
<p>b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</p>	<p>FEIR pages 4.2-26, 4.3-41 to 4.3-22,4.4-20, 4.5-9, 4.6-16, 4.7-13 to 4.7-14, 4.8-18 to 4.8-19, 4.9-18, 4.10-15</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>NA</p>
<p>c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>	<p>FEIR pages 4.9-10 to 4.9-18</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>NA</p>

Environmental Issue Area	Where Impact Was Analyzed in Prior Environmental Documents	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Documents Mitigations Implemented or Address Impacts?
<p><b>Discussion:</b> (a) <i>Biological Habitats and California History.</i> As discussed above in subsections VII.4-Biological Resources and 5-Cultural Resources, no new significant impacts or substantially more severe impacts were identified as a result of the proposed Project modifications, and no significant impacts were identified related to historical resources. The certified EIR also concluded that the project would not substantially reduce fish or wildlife species habitat or threaten to eliminate a plant or animal community. The EIR identified a potential significant impact to non-native game fish in Loch Lomond Reservoir due to potential adverse effects on water quality from in-reservoir construction activities, which could be mitigated to a less-than-significant level. The proposed Project modifications do not change the construction impact area and do not involve work in the Reservoir. Therefore, the proposed modifications would not result in new significant impacts or substantially more severe impacts related to the quality of the environment, wildlife habitat, listed species, or important examples of California history or prehistory.</p> <p>(b) <i>Cumulative Impacts.</i> The 2019 certified project EIR analyzed cumulative impacts of the approved project and other known cumulative projects within potential project areas of impact. No significant cumulative impacts were identified, except for potential water quality impacts, but the project’s contribution was found to not be cumulatively considerable with implementation of project BMPs and mitigation measures and compliance with existing regulations, all of which would prevent violation of water quality standards and minimize the potential for contributing to water quality degradation. The proposed Project modifications do not change the area of construction or impacts and would not affect cumulative projects.</p> <p>(c) <i>Effects on Human Beings.</i> The EIR did not identify any environmental effects that would have direct or indirect substantial adverse effects on human beings, including potential effects of noise as discussed in section VII.13. The proposed modifications would not result in additional environmental effects than those identified in the certified EIR; therefore, no new significant or substantially more severe effects on human beings would occur.</p> <p><b>Mitigation Measures:</b> The certified EIR includes mitigation measures related to biological resources, as described in this Addendum. These measures would continue to be applicable with the proposed Project modifications and would mitigate the project’s contribution to identified significant impacts. No additional mitigation measures are required.</p> <p><b>Conclusion:</b> The proposed Project modifications would not result in new significant impacts or substantially more severe impacts than the impacts evaluated in the certified EIR.</p>					

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## **VIII. REFERENCES**

### **AECOM.**

- a. May 27, 2021. Letter to Isidro Rivera, P.E., City of Santa Cruz Water Department regarding hydraulic capacity of the outlet works at Newell Creek Dam.
- b. March 10, 2021. Letter to Isidro Rivera, P.E., City of Santa Cruz Water Department regarding hydraulic capacity of the outlet works at Newell Creek Dam.
- c. May 6, 2020. Letter to Leah VanDerMaaten, P.E., City of Santa Cruz Water Department regarding hydraulic capacity of the outlet works at Newell Creek Dam.
- d. September 18, 2018. Technical Memorandum: Flood Levels at the toe of Newell Creek Dam.

City of Santa Cruz. April 2019. Final Environmental Impact Report, Newell Creek Dam Inlet/Outlet Replacement Project (SCH No. 2018062071). Certified by Santa Cruz City Council on May 14, 2019.

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