

4 Environmental Setting, Impacts, and Mitigation Measures

4.0 Introduction to Analysis

This chapter provides a project-level analysis of the physical environmental effects of implementing the Newell Creek Pipeline (NCP) Improvement Project (Proposed Project). The following sections within this chapter evaluate the environmental impacts of the Proposed Project:

- 4.1 – Impacts Not Found to Be Significant
- 4.2 – Air Quality
- 4.3 – Biological Resources
- 4.4 – Cultural Resources and Tribal Cultural Resources
- 4.5 – Energy
- 4.6 – Geology and Soils
- 4.7 – Greenhouse Gas Emissions
- 4.8 – Hazards and Hazardous Materials
- 4.9 – Hydrology and Water Quality
- 4.10 – Noise
- 4.11 – Transportation
- 4.12 – Wildfire

4.0.1 Section Organization

Each environmental resource section listed above generally has a similar format as described below.

- **Existing Conditions.** This section provides a general overview of the existing physical environmental setting and conditions related to the topic being addressed, based on the conditions present at the time that the Notice of Preparation for the EIR was released (January 2021).
- **Regulatory Framework.** This section describes applicable federal, state, and local, laws and regulations relevant to the environmental resource topic and the Proposed Project.
- **Impacts and Mitigation Measures.** This section identifies thresholds of significance used to evaluate whether an impact is considered significant, based on standards derived from Appendix G of the California Environmental Quality Act (CEQA) Guidelines and from the City of Santa Cruz CEQA Guidelines. In some cases, agency policies and regulations or professional judgment are used to further define CEQA standards of significance.

This section first presents a discussion of the standards of significance for which no impacts have been identified, if any. The section then evaluates and analyzes project impacts, states the level of significance prior to mitigation, and proposes mitigation measures for significant impacts that would

reduce such impacts, if feasible. A statement regarding the level of significance of each impact after mitigation precedes the mitigation measures for that impact.

Cumulative impacts are discussed in each environmental resource section following the description of the project-specific impacts. The cumulative impact analysis considers the effects of the Proposed Project together with, and against the backdrop of, other past, present, or reasonably foreseeable future projects proposed in the project vicinity and region. The cumulative impact analysis is based on the same setting, regulatory framework, and significance thresholds presented for each respective resource topic. Additional mitigation measures may be identified if the analysis determines that the Proposed Project's incremental contribution to a significant cumulative impact would be cumulatively considerable and, therefore, significant in and of itself. Section 4.0.2 below describes the assumptions and methodology for assessing cumulative impacts.

4.0.2 Significance Determinations

In accordance with CEQA, specifically Public Resources Code Section 21068, a “significant effect on the environment” means a substantial or potentially substantial adverse change in the environment. The significance thresholds used for each environmental resource topic are presented in each section of this chapter immediately before the discussion of impacts. For each impact described, one of the following significance determinations is made:

- **No Impact.** This determination is made if there is no potential that the Proposed Project could affect the resource at issue.
- **Less than Significant.** This determination applies if there is a potential for some limited impact on a resource, but the impact is not significant in accordance with the significance standard.
- **Less than Significant with Mitigation.** This determination applies if there is the potential for a substantial adverse effect in accordance with the significance standard, but mitigation is available to reduce the impact to a less-than-significant level.
- **Significant and Unavoidable.** This determination applies to impacts that are significant, and for which there appears to be no feasible mitigation available to substantially reduce the impact.

4.0.3 Scope of Analyses

4.0.3.1 Study Area

As described in the Project Description, the Proposed Project is located in the Santa Cruz Mountains, primarily in the unincorporated San Lorenzo Valley area of Santa Cruz County, except for the portion of the NCP that extends onto the City's Graham Hill Water Treatment Plant (GHWTP) property, which is located within the City of Santa Cruz, but is surrounded by unincorporated lands. The Proposed Project consists of replacement of 8.75 miles of the existing NCP. The proposed NCP northern segment extends from the Newell Creek Access Road Bridge just south of Newell Creek Dam, to the Felton Booster Pump Station (FBPS) and generally follows the existing NCP alignment through residential neighborhoods. The proposed southern segment extends from the FBPS to the GHWTP. The pipeline generally would be installed within existing road pavement, road right-of-way (ROW), which includes the paved roadway and unpaved shoulders adjacent to the paved road, and/or existing and new City easements, except for the proposed Brackney North section that would be installed using

a trenchless method as described in Section 3.6.2.2, Construction Methods in Brackney North Section. Trenchless methods would also be used for a railroad crossing in the northern portion of the Graham Hill Road North section and in the Brackney South section.

For most impact topics, the study area includes the area within and adjacent to the pipeline construction corridor identified in Tables 3-2 and 3-3 in Chapter 3, Project Description. However, for some topics, such as air quality and greenhouse gas emissions, the study area includes the Monterey Bay region.

4.0.3.2 Analysis Approach

The impact analyses include both direct and indirect impacts resulting from project construction and operation. However, the project does not include new pump stations or other facilities that would result in new operations, and periodic maintenance of the new pipeline would be the same as currently exists. Therefore, the impact analyses primarily address impacts related to construction and installation of the Proposed Project. In accordance with Section 15125 of the State CEQA Guidelines, the EIR examines impacts based on physical environmental conditions as they exist at the time the EIR Notice of Preparation (NOP), which is considered the baseline conditions. For this project the NOP was released in January 2021, which is the baseline for analyses in this EIR.

Three pipeline sections have been identified for replacement at this time: the Brackney North, Graham Hill Road North and Graham Hill South sections. In a new alignment in Graham Hill Road, the Graham Hill North section would replace the existing NCP through Henry Cowell Redwoods State Park. The engineering design for these sections have been completed through the 30% design plan phase. For the remainder of the pipeline sections in the northern segment, the analyses consider impacts of installation of the new pipeline within specified construction disturbance corridors as identified in Table 3-2 in Section 3.5.2.1.

The Proposed Project is scheduled to be constructed in phases over multiple years from approximately late 2022/early 2023 to 2032. The Graham Hill Road and Brackney North pipe sections would be constructed generally between late 2022/early 2023 and 2024, and the remaining pipe sections in the northern segment are estimated to be constructed in 2030 and 2031. The estimated construction schedule, construction workers, and construction equipment for each pipeline section are summarized in Table 3-4 in Section 3, Project Description. Construction would be scheduled on weekdays generally between 8 AM and 5 PM, except construction along Graham Hill Road would be scheduled on weekdays between the hours of 8 AM and 4 PM with road lane closures only permitted between 9 AM and 3 PM.

4.0.4 Cumulative Impacts Overview

The section below presents the CEQA requirements pertaining to the cumulative projects and cumulative analysis that have been considered for each environmental resource topic at the end of each section in this chapter.

4.0.4.1 CEQA Guidelines Requirements

CEQA Guidelines Section 15130(a) requires that an environmental impact report (EIR) discuss cumulative impacts of a project “when the project’s incremental effect is cumulatively considerable.” As defined in CEQA Guidelines Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. Pursuant to CEQA Guidelines Section 15065(a)(3), “cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. Where a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” the lead agency need not consider the effect significant.

CEQA requires an evaluation of cumulative impacts when they are significant. When the combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. Furthermore, according to CEQA Guidelines Section 15130 (a)(1), there is no need to evaluate cumulative impacts to which the project does not contribute.

An EIR may determine that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus not significant when, for example, a project implements or funds its fair share of a mitigation measure designed to alleviate the cumulative impact if the lead agency identifies facts and analysis to support the conclusion that the contribution will be rendered less than cumulatively considerable (CEQA Guidelines Section 15130(a)(3)). An EIR shall examine reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative effects.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide detail as great as that provided for the impacts that are attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified project contributes.

4.0.4.2 Cumulative Projects and Scope of Analysis

The analysis of cumulative impacts may consider either 1) a list of past, present, and probable future projects producing cumulative impacts or 2) a summary of growth projections contained in an adopted plan that evaluates conditions contributing to cumulative impacts, such as those contained in a General Plan. Projects that are relevant to the cumulative analysis include projects that could:

- Contribute incremental environmental effects on the same resources as, and would have similar impacts to, those discussed in the EIR applicable to the Proposed Project.
- Be located within the defined geographic scope for the cumulative effect. The defined geographic scope is dependent on the environmental resource affected.
- Contribute impacts that coincide with the Proposed Project’s impacts during either construction (short-term) or operation (long-term).

This EIR uses a list-based approach for the development of the cumulative projects. Based on the above factors, cumulative projects considered for the analysis include other capital improvement projects planned by the Santa Cruz Water Department (City) that would be located in proximity to the project site or whose

impacts would otherwise combine with the impacts of the Proposed Project. Santa Cruz County Planning Department staff were also contacted to determine if other proposed or pending projects are located in proximity to the project site; staff indicated that there are not any major proposed or pending development projects in the vicinity of the Proposed Project sites or within two miles of the Proposed Project (Williams 2021). The City of Scotts Valley’s website was checked for cumulative projects in Scotts Valley. Cumulative projects are discussed below and summarized in Table 4.0-1 at the end of this section.

Santa Cruz Water Department Projects

Capital Improvement Program Projects

The City’s Capital Improvement Program (CIP), also referred to as the Santa Cruz Water Program, includes plans and funding for numerous capital improvements projects, including rehabilitation or replacement projects, upgrades and improvement projects, water supply augmentation projects, and water main replacements (City of Santa Cruz 2020a, 2020b). The City is implementing the City Council-adopted recommendations of the Water Supply Advisory Committee for supplemental water supply, which are incorporated in the 2015 Urban Water Management Plan (UWMP) (City of Santa Cruz 2016), to which some of these projects relate. It is noted that the 2020 UWMP is expected to be approved in November 2021. Table 4.0-1 identifies the comprehensive list of capital projects that were reviewed for this EIR.

Santa Cruz Water Rights Project

The City is proposing changes to its existing water rights through the Santa Cruz Water Rights Project (SCWRP) to address key issues needed to improve flexibility in operation of the City’s water system to better use limited water resources, while enhancing stream flows for local anadromous fisheries. The SCWRP also includes water supply augmentation components and surface water diversion improvements that could be implemented after the water rights modifications are approved. The underlying purpose of the SCWRP is to improve flexibility in operation of the City’s water system while enhancing stream flows for local anadromous fisheries. During the development of the City’s pending Anadromous Fisheries Habitat Conservation Plan (ASHCP), the City negotiated with the California Department of Fish and Wildlife (CDFW) and the National Marine Fisheries Service (NMFS) to develop levels of stream flows that would better protect federally listed Central California Coast coho salmon (coho) and Central California Coast steelhead (steelhead) in all watersheds from which the City diverts water (Agreed Flows). Incorporating these Agreed Flows into all City water rights is necessary to benefit local fisheries, specifically for coho and steelhead, but would further constrain the City’s limited surface water supply. Consequently, the City needs to improve operational flexibility of the water system within existing rights, permits, and licenses to allow better use of limited water resources. To do this, the City is proposing water rights modifications to its existing rights, permits, and licenses to expand the authorized place of use (POU), to better utilize existing diversions, and to extend the City’s time to put water to full beneficial use.

The SCWRP includes both “project” and “programmatic” components that are summarized below.

- **Water rights modifications** include modifications related to place of use, method of diversion, points of diversion and re-diversion, underground storage and purpose of use, extension of time and stream bypass requirements for fish habitat (referred to as Agreed Flows);
- **Water supply augmentation components**, which include:
 - Aquifer storage and recovery (ASR):

- New ASR facilities at unidentified locations (referred to as “new ASR facilities”), which are program components.
- Beltz ASR facilities at the existing Beltz well facilities (referred to as “Beltz ASR facilities”), which are project components.
- Water transfers and exchanges and associated intertie improvements, which are program components.
- **Surface water diversion improvements**, which include the Felton Diversion fish passage improvements and the Tait Diversion and Coast Pump Station improvements.

The City is in the process of completing a Final EIR for the SCWRP. The following proposed SCWRP components are located in proximity to the Proposed Project: 1) new ASR facilities with potential location in the Santa Margarita aquifer, but specific locations have not yet been identified; 2) City/Scotts Valley Water District intertie, potentially located between Scotts Valley and Sims Road along La Madrona Drive; 3) Felton Diversion Fish Passage Improvements; and 4) Tait Diversion and Coast Pump Station Improvements.

Habitat Conservation Plans

Since 2001, the City has been developing two Habitat Conservation Plans (HCPs)¹, one pertaining to anadromous salmonids² with the National Marine Fisheries Service and one pertaining to other listed species³ with the U.S. Fish and Wildlife Service (USFWS). The HCPs will provide for California Endangered Species Act and Federal Endangered Species Act compliance for the City’s ongoing operations that may affect special-status species.

The Operations and Maintenance HCP (OMHCP) developed with the USFWS and associated incidental take permit was completed, and the incidental take permit for listed species other than anadromous salmonids was issued in January 2021 (City of Santa Cruz 2021a). The OMHCP does not include construction projects that improve habitat conditions. The biological goals and objectives and conservation measures include restoring habitat temporarily disturbed by activities covered by the permit, contributing to protected and managed lands that support covered species populations, implementing bypass flows consistent with the Anadromous Salmonid HCP (ASHCP), pursuing other conservation actions that will result in conservation benefits to covered species, and implementing general and species-specific minimization and best management practices.

¹ A HCP is prepared under Section 10 of the Federal Endangered Species Act by nonfederal parties seeking to obtain a permit for incidental take of federally listed fish and wildlife species. A HCP can also form the basis for an application for incidental take of state-listed species under Section 2081 of the California Endangered Species Act. A HCP includes descriptions of likely impacts to the subject species and the steps an applicant will take to avoid, minimize, and mitigate such impacts.

² The anadromous salmonids covered by the Anadromous Salmonid (ASHCP) include Central California Coast coho salmon (coho) (*Oncorhynchus kisutch*), a state- and federally listed endangered species, and the Central California Coastal steelhead (steelhead) (*Oncorhynchus mykiss*), a federally listed threatened species.

³ Listed species covered by the other HCP include Ohlone tiger beetle (*Cicindela ohlone*), a federally listed endangered species; Mount Hermon June beetle (*Polyphylla barbata*), a federally listed endangered species; tidewater goby (*Eucyclogobius newberryi*), a federally listed endangered species; Pacific lamprey (*Lampetra tridentata*), a species not currently listed under the Endangered Species Act; California red-legged frog (*Rana draytonii*), a federally listed threatened species; western pond turtle (*Actinemys marmorata*), a federal species of concern; Ben Lomond spineflower (*Chorizanthe pungens* var. *hartwegiana*), a federally listed endangered species; Robust spineflower (*Chorizanthe robusta* var. *robusta*), a federally listed endangered species; Santa Cruz tarplant (*Holocarpha macradenia*), a federally listed threatened species; and San Francisco popcornflower (*Plagiobothrys diffuses*), a state-listed endangered species.

The ASHCP was submitted for agency review in spring 2021 (City of Santa Cruz 2021b). Initiation of environmental review for the ASHCP and associated permit applications is expected to commence in fiscal year 2022 with the goal of completing the permit process by late 2022 or early 2023. The ASHCP would commit the City to maintaining minimum bypass flows for anadromous fisheries at all City diversions as with the SCWRP. The conservation strategies of the ASHCP are designed to avoid, minimize, and fully mitigate the effects of the City's activities covered by the ASHCP on species and their habitat in support of the long-term viability of these populations within streams and habitats affected by the activities.⁴

The City has one other low-effect HCP and related Incidental Take Permit covering the Mount Hermon June beetle, Zayante band-winged grasshopper, and the Ben Lomond spineflower at the GHWTP (City of Santa Cruz 2013). This HCP has been implemented since 2013 at the GHWTP and it also includes establishment of a permanent 17-acre preserve in the Laguna Watershed, which serves as off-site mitigation for Mount Hermon June beetle. This preserve is in place and is being managed by the City under a Habitat Management and Monitoring Plan for the Laguna Sandhills Preserve (City of Santa Cruz 2014). Ongoing management activities are intended to protect and preserve habitat at the preserve and would not contribute to cumulative impacts. Therefore, this preserve and its Habitat Management and Monitoring Plan are not further evaluated in the cumulative analysis.

Other Cumulative Infrastructure and Development Projects

There are several infrastructure and other development projects that are proposed in the vicinity of the Proposed Project. These include County of Santa Cruz bridge replacement projects and development projects in the cities of Santa Cruz and Scotts Valley as identified on Table 4.0-1. Additionally, the University of California, Santa Cruz 2021 Long Range Development Plan is also included because it constitutes a project of regional significance, even though it is not located in proximity to the Proposed Project. Some of these cumulative projects could have construction periods that overlap with the Proposed Project, depending on the ultimate timing of construction, that could result in cumulative effects within a specific geographic area.

⁴ The activities covered by the ASHCP include water diversion and operation, rehabilitation, replacement, repair, and maintenance of conveyance facilities and other existing infrastructure. Activities also include municipal facility operations and maintenance including flood control channel operation and maintenance), land management, monitoring, and habitat restoration.

Table 4.0-1. Cumulative Projects

	Project Name	Project Location	Project Description	Estimated Construction Schedule
1	Santa Cruz Water Rights Project (includes Felton Diversion and Tait Diversion and Coast Pump Station upgrades, and aquifer storage and recovery (ASR) in Mid-County and Santa Margarita Groundwater Basins)	Various Locations in unincorporated Santa Cruz County. Components in proximity to the Proposed Project include: <ul style="list-style-type: none"> • East of Proposed Project – Intertie with city of Scotts Valley • West/South of Proposed Project - Felton Diversion and Coast Pump Station Upgrades 	The SCWD is proposing changes to its existing water rights through the SCWRP to address key issues needed to improve the City's water system flexibility while enhancing stream flows for local anadromous fisheries as described above. This project also includes infrastructure upgrades at the Felton and Tait Diversions and Coast Pump Station, ASR in Mid-County and Santa Margarita Groundwater Basins, and water transfers and exchanges with neighboring water agencies and associated intertie facilities.	2021-2030
City of Santa Cruz Water Projects in Capital Improvement Program (CIP)Bra				
2	Felton Diversion Pump Station Assessment	West of Proposed Project Unincorporated Santa Cruz County, near community of Felton and Proposed Project	Evaluation of the existing dam and pump station with recommendations to rehabilitate or replace existing facilities. A hydraulic assessment of the existing facility will be conducted to determine what, if any, improvements or operational changes are needed to pump from the diversion directly to the GHWTP. To improve energy efficiency, new pumps and drives at the diversion are also anticipated.	2027-2028
3	Newell Creek Dam Inlet/Outlet Replacement Project	North of Proposed Project Unincorporated Santa Cruz County, near the community of Ben Lomond	Replacement of the existing aging inlet/outlet works at the Newell Creek Dam (NCD), which impounds Loch Lomond Reservoir (Reservoir), and replacement of the northern segment of the Newell Creek Pipeline (NCP) that transports water to the Reservoir from Felton Diversion and from the Reservoir to the GHWTP. Construction commenced in Spring 2020.	2020-2023
4	Habitat Conservation Plans	Unincorporated and incorporated locations in Santa Cruz County	Anadromous Salmonid HCP under development (National Marine Fisheries Service) and Operations and Maintenance HCP recently completed (U.S. Fish and Wildlife Service).	Not applicable
5	GHWTP Concrete Tanks Project	Near southern end of Proposed Project City of Santa Cruz	Infrastructure improvements to the GHWTP are necessary to meet regulatory requirements, improve operations and increase overall reliability. The design phase of this project is nearly complete for the replacement of the Filtered Water Tank, Wash Water Reclamation Tank (Reclaim Tank), and Sludge Storage Tank.	2020-2024

Table 4.0-1. Cumulative Projects

	Project Name	Project Location	Project Description	Estimated Construction Schedule
6	GHWTP Facility Improvement Project	Near southern end of Proposed Project City of Santa Cruz City of Santa Cruz	Treatment process and structural improvements are planned for the Graham Hill Water Treatment Plant (GHWTP) to improve reliability of meeting water quality goals, to support the City's Water Supply and Augmentation Strategy (i.e. aquifer storage and recovery and water transfers), to assure supply and treatment resiliency given future climate change impacts to hydrology and water quality, and to address existing deficiencies related to the age of the infrastructure. A design-build team has been procured to execute the design phase from 2021 through 2024 with the subsequent construction duration, pending CEQA review, anticipated from 2024 through 2028	2023-2028
Other Infrastructure and Public Projects				
7	Rancho Rio Avenue at Newell Creek Bridge Replacement	West of Proposed Project. Unincorporated Santa Cruz County	Replace existing 38-foot long, one-lane bridge over Newell Creek with a two-lane bridge and improved roadway approaches.	2025
8	Quail Hollow Road at Zayante Creek Bridge Replacement	West of Proposed Project. Unincorporated Santa Cruz County	Replace the 84-foot-long Quail Hollow Road Bridge over Zayante Creek with a two-lane, single-span concrete box girder with improved roadway approaches.	2024
9	San Lorenzo Way at San Lorenzo River Bridge Replacement	West of Proposed Project. Unincorporated Santa Cruz County	Replace existing bridge over San Lorenzo Valley due to substandard load capacity and structural deficiencies. Project will replace the existing one-lane structure with a two-lane clear span concrete box girder bridge and standard bridge approaches.	2021
10	Quail Hollow Ranch County Park Master Plan Amendment	East of Proposed Project northern segment - Master Plan amendment for new trails, habitat restoration and signage	Master Plan amendment for new trails, habitat restoration and signage.	Unknown
Residential, Commercial, and Mixed-Use Projects				
11	1930 Ocean View Extension Project	South of Proposed Project City of Santa Cruz, Ocean Street Extension	32-unit condominium project	Unknown; approved in September 2018
12	La Madrona Mixed-Use Project	East of Proposed Project southern segment - City of Scotts Valley	80-room hotel with a 6,600 square foot (sf) restaurant and 184 residential units (110 senior/74 family) in two, four-story buildings on La Madrona Drive.	Unknown; project under CEQA review

Table 4.0-1. Cumulative Projects

	Project Name	Project Location	Project Description	Estimated Construction Schedule
13	Oak Creek Park Mixed- Use Development	<i>East of Proposed Project southern segment</i> - City of Scotts Valley	Mixed-use commercial (25,000 sf) and residential (52 units) development at Mt. Hermon Road and Glen Canyon.	Unknown; project under CEQA review
14	Bay Photo Apartments	<i>East of Proposed Project southern segment</i> - City of Scotts Valley	Conversion of an existing 92-space parking lot into a 19-unit apartment project, at 4627 Scotts Valley Drive.	Unknown
15	Encore Condominium Project	<i>East of Proposed Project southern segment</i> - City of Scotts Valley	16-unit condominium project	Unknown; Approved
16	Bay Village-Erba Lane	<i>East of Proposed Project southern segment</i> - City of Scotts Valley	10-unit single-family home project	Unknown; Approved
17	Valley Gardens, 263 Mountain Hermon Road	<i>East of Proposed Project southern segment</i> - City of Scotts Valley	116 residential dwelling units,, 8,500 commercial, and 1,500 sf of outdoor dining	CEQA review underway

4.0.5 References

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