City of Santa Cruz
ENVIRONMENTAL CHECKLIST FORM / INITIAL STUDY

I. Background

1. **Application No:** CP21-0065

2. **Project Title:** Mentel Aerial Sewer Improvement Project

3. **Lead Agency Name and Address:**
   City of Santa Cruz
   809 Center Street
   Santa Cruz, CA 95060

4. **Contact Person and Phone Number:** Katie Shurtleff, 831-420-5442
   kshurtleff@cityofsantacruz.com

5. **Project Location:** 158 Forest Avenue (APN 011-042-29), 202 Forest Avenue (APN 011-042-03), 105 Mentel Avenue (APN 011-221-06), and 101 Mentel Avenue-Arana Gulch Open Space (APN 011-101-12) in the eastern portion of the City of Santa Cruz; see Figure 1.

6. **Project Applicant's/Sponsor's Name and Address:**
   City of Santa Cruz Public Works Department
   809 Center Street, Room 201
   Santa Cruz, CA 95060

7. **General Plan Designation:** Low Density Residential (1.1-10 dwelling units/acre)

8. **Zoning:** R-1-5 (Single-Family Residential) and PK (Parks)

9. **Description of the Project:** The proposed project consists of a Coastal Development Permit for construction of an approximate 304-linear foot 8-inch sewer line that would be parallel to and replace an existing 6-inch sewer pipeline. The new sewer line includes 130 linear feet of aerial construction and 174 linear feet of underground construction. The existing sewer line extends across two residential properties within a 20-foot wide easement held by the City of Santa Cruz. The existing sewer line was constructed in 1926, but has been repaired or replaced over time, and thus, the original structure is not intact. The structure (pipeline and supports) has reached the end of its service life and requires replacement.

   The new sewer line will be installed in the same alignment as the existing pipeline at a distance of approximately 18 inches from the existing sewer line. The 130-linear foot aerial segment is proposed with a steel pipe on supports that extends over Hagemann Gulch as does the existing sewer line. The remaining portion of the new sewer line would be a PVC, underground line. For the aerial portion, three cast-in-place pipe support piers, 16 inches

wide and 13 or more feet deep, will replace existing wooden supports. The eastern manhole also will be replaced. In addition, a 23-linear-foot retaining wall will be constructed at the western edge of Hagemann Gulch on the residential property at 158 Forest Avenue.

The underground installation will involve the excavation of a trench that is approximately 2 feet wide and 7 feet deep. No trees will be removed, however, vegetation including non-native ivy and blackberry, will be removed to install the sewer line, construct the retaining wall and to construct a temporary access road from the northwestern end of the driveway at 105 Mentel Avenue to the base of Hagemann Gulch. Construction access and pipe installation would occur within an approximate 10-15-foot wide construction corridor within the City's easement. Upon completion of the installation, the existing aerial portion of the sewer line will be removed, and the underground portion of the existing line will be abandoned in place. Disturbed areas will be revegetated.

Construction would occur over an approximate 4-6 week period and is expected to commence in late summer/early fall of 2021 or 2022 with completion by October 31st of the year construction is initiated.

10. Other public agencies whose approval is required:

- California Department of Fish and Wildlife (CDFW): Streambed Alteration Agreement
- Central Coast Regional Water Quality Control Board: 401 Water Certification

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? No

II. Environmental Setting and Surrounding Land Uses

The approximate 6,500-acre (0.15 square feet) project site is located on primarily on privately-owned property on the east side of the city of Santa Cruz between Forest Avenue on the west and Mentel Avenue on the east. The project site is within an easement held by the City of Santa Cruz and supports an existing, aging 6-inch sewer line. The site is surrounded by developed residential uses and the city-owned Arana Gulch open space property lies to the east and south of the project site. The existing sewer line serves approximately 40 parcels between Park Way and Mentel Avenue.

The project site is located in the yards of two residential properties in an area consisting of a mix of native and non-native vegetation and crosses a small portion of the Arana Gulch open space. The existing sewer line is below ground, except for an approximate 70-linear foot segment that is above ground and traverses Hagemann Gulch. The aerial segment is currently supported by wooden structures. Hagemann Gulch is an intermittent drainage that is a tributary to Arana Gulch Creek, which flows into the upper portion of the Santa Cruz Small Craft Harbor. The watercourse drains a residential neighborhood as well as the western portion of the Arana Gulch greenbelt property. Urban development and riparian woodland occur in and around the repair site.

FIGURE 1: Vicinity Location

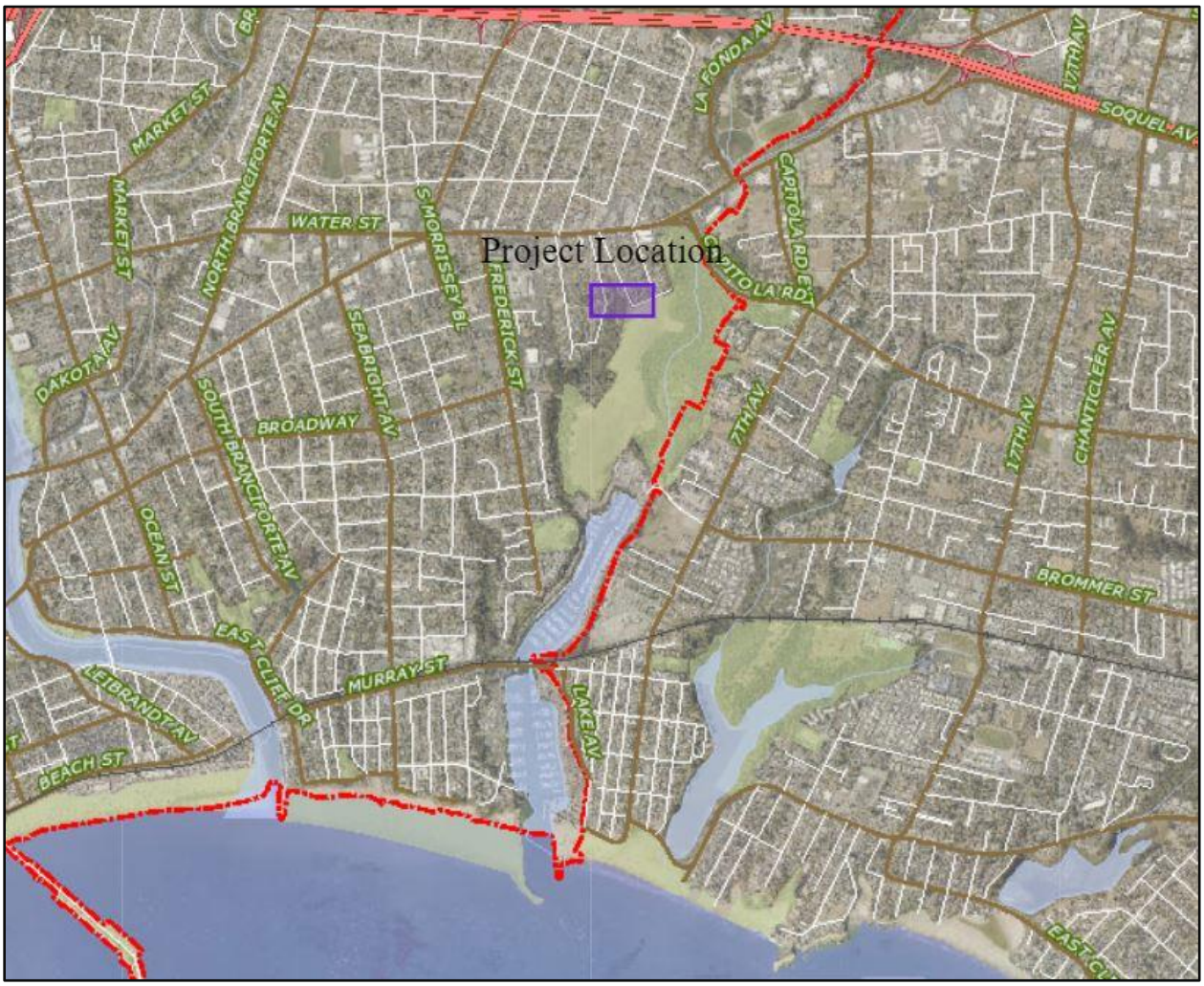
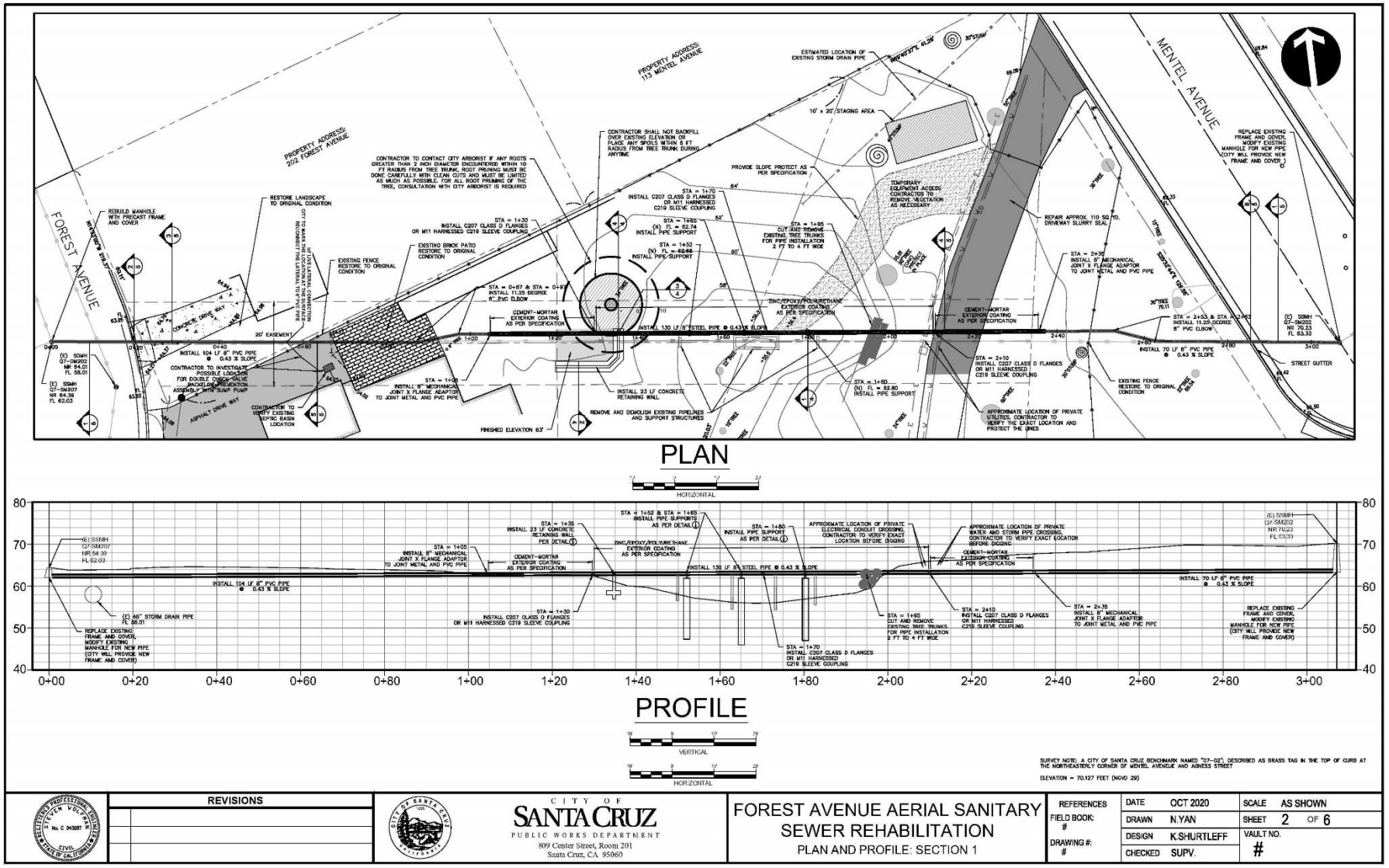


FIGURE 2: Proposed Site Plan



III. Environmental Checklist

Environmental Factors Potentially Affected by the Project: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	Aesthetics		Agricultural and Forestry Resources	✓	Air Quality
✓	Biological Resources	✓	Cultural Resources		Energy
✓	Geology / Soils		Greenhouse Gas Emissions		Hazards and Hazardous Materials
✓	Hydrology / Water Quality		Land Use / Planning		Mineral Resources
✓	Noise		Population / Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
	Utilities / Service Systems		Wildfire		Mandatory Findings of Significance

Instructions to Environmental Checklist

1. A brief explanation is required (see Section VI, Explanation of Environmental Checklist Responses) for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question (see Section V, References and Data Source List, attached). A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that any effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level.

5. Earlier Analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case a discussion should identify the following on attached sheets:
   a) *Earlier Analysis used.* Identify earlier analyses and state where they are available for review.
   b) *Impacts adequately addressed.* Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) *Mitigation measures.* For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. The explanation of each issue should identify:
   a) The significance criteria or threshold, if any, used to evaluation each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				✓
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
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?				✓
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				✓
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:				
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? (V.1b-DEIR volume)				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
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))?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓
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?				✓
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:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				✓
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?			✓	
c) Expose sensitive receptors to substantial pollutant concentrations?			✓	
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?				✓
4. BIOLOGICAL RESOURCES. Would the project:				
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?				✓
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			✓	
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?			✓	

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			✓	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
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?				✓
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in Section 15064.5?				✓
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			✓	
c) Disturb any human remains, including those interred outside of formal cemeteries?			✓	
6. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				✓
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				✓
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (V.Ia, V.1b-DEIR volume)				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides?			✓	
b) Result in substantial soil erosion or the loss of topsoil?			✓	
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?				✓
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?				✓
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			✓	
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				✓
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
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?				✓
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ miles of an existing or proposed school?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				✓
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 for people residing or working in the project area?				✓
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✓
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				✓
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		✓		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✓
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: i) Result in substantial erosion or siltation on- or off-site; ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or				✓
iii) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami or seiche zones, risk release of pollutants due to project inundation?				✓
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✓
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				✓
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?				✓
12. MINERAL RESOURCES. Would the project:				
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?				✓
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?				✓
13. NOISE: Would the project:				
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?			✓	
b) Result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?				✓
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✓
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓
15. PUBLIC SERVICES.				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: a) Fire protection?				✓
b) Police protection?				✓
c) Schools?				✓
d) Parks?				✓
e) Other public facilities?				✓
16. RECREATION. Would the project:				
a) 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?				✓
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓
17. TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				✓
c) Substantially increase hazards due to a design feature (for example, sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?				✓
d) Result in inadequate emergency access?				✓
18. TRIBAL CULTURAL RESOURCES. Would the project:				
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 and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				✓
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 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				✓
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, ~~or~~ wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or which could cause significant environmental effects?				✓
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				✓
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?				✓
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				✓
20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response land or emergency evacuation?				✓
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
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?				✓
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?				✓
21. MANDATORY FINDINGS OF SIGNIFICANCE. Would the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)				✓
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				✓

Discussion of Environmental Checklist

See **Section VI, Explanation of Environmental Checklist Responses**, for discussion.

IV. Determination

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	✓
I find that the proposed project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Katie Shurtleff, Associate Engineer

4/27/21
Date

V. References and Data Source List

Agency Plans and Studies

1. City of Santa Cruz General Plan and EIR.
   a. Adopted June 26, 2012. General Plan 2030. Available online at: http://www.cityofsantacruz.com/home/showdocument?id=71130.
   b. April 2012. "City of Santa Cruz General Plan 2030 Final EIR." [SCH#2009032007] Certified June 26, 2012. Includes Draft EIR document, dated September 2011. Available online at: http://www.cityofsantacruz.com/Home/Components/BusinessDirectory/BusinessDirectory/102/1775.
   c. July 2018. "Cultural Resources Background Report Update with Policies, Programs, and Maps, City of Santa Cruz, Santa Cruz County, California." Prepared by Dudek.

2. Other City of Santa Cruz Adopted Plans and Certified EIRs.
   a. Adopted by City Council on February 28, 2006 and certified by the California Coastal Commission on May 9, 2008. *City-wide Creeks and Wetlands Management Plan*.
   b. Adopted August 2016. *2015 Urban Water Management Plan*. Prepared by City of Santa Cruz Water Department.
   c. June 2020. Resolution of the City Council of the City of Santa Cruz Adopting the Use of Vehicle Miles Traveled as the New Transportation Measure of Environmental Impacts. June 9, 2020 with Draft SB 743 Implementation Guidelines (May 27, 2020).

3. AMBAG. Adopted June 2018. "2018 Regional Growth Forecast."

4. California Department of Finance. May 2020. "E-5 City/County Population and Housing Estimates, 1/1/2020." Accessed on June 1, 2020. Available online at: http://dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.

5. Monterey Bay Air Resources District.
   a. Adopted March 15, 2017. *2012-2015 Air Quality Management Plan.* Adopted March 15, 2017. Available online at: http://www.co.monterey.ca.us/home/showdocument?id=62318.
   b. Revised February 2016, adopted April 1996. "Guidelines for Implementing the California Environmental Quality Act." Available online at: https://www.mbard.org/files/50d38962a/Attachment_Guidelines-for-Implementing-CEQA.pdf.
   c. February 2008. "CEQA Air Quality Guidelines." Available online at: https://www.mbard.org/files/f665829d1/CEQA_full+%281%29.pdf.

Project Studies

6. Dudek.
    a. April 2021. "Archaeological Assessment for the Mentel Avenue Sewer Replacement Project, Santa Cruz County, California."
    b. April 2021. "Aquatic Resources Jurisdictional Delineation for the Forest Avenue Aerial Sewer Line Replacement Project, Santa Cruz, California."

7. Kittleson Environmental Consulting. January 12, 2021. "Forest Avenue Aerial Sewer Line Replacement Project Biological Evaluation."

Initial Study Preparation: City of Santa Cruz Public Works Department in association with Dudek

VI. Explanation of Environmental Checklist Responses

1. Aesthetics

(a) Scenic Views. The project site is located within private residential properties between Forest Avenue and Mentel Avenue in the eastern portion of the City. The site and surrounding area is characterized by residential development and the city-owned Arana Gulch open space property. According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, the project site is not within a mapped panoramic view (SOURCE V.1b-DEIR Figure 4.3 1). The project site is not visible from Forest Avenue and is mostly screened from view from Mentel Avenue and the adjacent City-owned Arana Gulch open space property. The private property on Mentel has a vegetated fence along its eastern boundary that partially blocks views into the site as well as view of the existing aerial sewer line segment, which is low profile and situated low to the ground.

The project would replace an existing sewer line that would mostly be underground and not visible. A 130-foot segment would be above ground across Hagemann Gulch adjacent to the existing aerial line, which would be removed upon completion and operation of the new sewer line. Neither the existing nor the proposed line would be visible from scenic viewpoints and are not in a location that would block or affect ocean or scenic views as none exist on the project site. therefore, the proposed project would result in *no impact* to scenic views.

(b) Scenic Resources. There are no designated state scenic highways or roads within the City. The project site is not located near a state scenic highway. Therefore, *no impact* to scenic resources within a state scenic highway would occur. Thus, the project would result in *no impact* on scenic resources. Furthermore, the proposed sewer line replacement would not result in removal of trees.

(c) Visual Character. The project area is located within a residential neighborhood on the east side of the City. The City of Santa Cruz is an "urbanized area" under the definition of the term in CEQA Guidelines section 15387. Therefore, per the Environmental Checklist question as amended in 2018, the City need not specifically consider existing visual character or the

project's potential effect on it, but whether the project would conflict with applicable zoning and other regulations governing scenic quality. Applicable regulations include height limits established in the zoning ordinance and requirements for approval of a Design Permit. One of the findings set forth in section 24.08.430 of the City's zoning ordinance for approval of a Design Permit is that the site plan shall be situated and designed to protect views along the ocean and of scenic coastal areas.

Implementation of the project would replace an existing, pre-dominantly underground sewer pipeline. The project does not require a Design Permit and does not conflict with applicable zoning and other regulations governing scenic quality as none exist applicable to the proposed project. Therefore, would result in *no impact* on the visual character of the surrounding area. However, it is noted that both the existing and proposed approximate 130-foot above-ground sewer line segment would be partially visible from the eastern property line at 105 Mentel Avenue, but the view is limited due to existing vegetation.

(d) Light and Glare. The project consists of a mostly underground sewer line and would not have any associated lighting. In addition, construction would occur only during daylight hours. Therefore it would not have the potential to create light or glare, and *no impact* would occur.

2. Agriculture and Forestry Resources

The project site does not contain farmland or grazing land as mapped on the Santa Cruz Important Farmland Map by the California Department of Conservation Farmland Mapping and Monitoring Program (SOURCE V.1b-DEIR volume). The project site is designated as "Urban and Built-Up Land." Surrounding lands are designated as "Urban and Built-Up Land." Neither the site nor adjacent lands are designated for agricultural uses in the City's General Plan. The project site is not zoned Timberland Production. Therefore, the project would not result in the conversion of agricultural or forest lands to other uses and *no impact* would occur.

3. Air Quality

(a) Conflict with Air Quality Management Plan. In 1991, the Monterey Bay Air Resources District[1] (MBARD) adopted the Air Quality Management Plan (AQMP) for the Monterey Bay Region in response to the California Clean Air Act of 1988, which established specific planning requirements to meet the ozone standards. The California Clean Air Act requires that AQMPs be updated every three years. The MBARD has updated the AQMP seven times. The most recent update, the *2012-2015 Air Quality Management Plan* (2016 AQMP), was adopted in 2017. The 2016 AQMP relies on a multilevel partnership of federal, state, regional, and local governmental agencies. The 2016 AQMP documents the MBARD's progress toward attaining the state 8-hour ozone standard, which is more stringent than the state 1-hour ozone standard. The 2016 AQMP builds on information developed in past AQMPs and updates the 2012 AQMP. The primary elements from the 2012 AQMP that were updated in the 2016 revision include the air quality trends analysis, emission inventory, and mobile source programs (SOURCE V.5a).

[1] The agency's former name was the Monterey Bay Unified Air Pollution Control District (MBUAPCD).

The project consists of replacement of a sanitary sewer line, and would not result in new structural development, increased population growth, or new housing units. Once the replacement pipeline has been installed, the project would not result in operational emissions. Therefore, the proposed project would not result in conflicts with or obstruction of implementation of the AQMP, resulting in *no impact*.

(b) Project Emissions. The U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards that are the maximum levels of ambient (background) air pollutants considered safe, with an adequate margin of safety to protect public health and welfare. Criteria pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), inhalable particulates (PM_{10}), fine particulates ($PM_{2.5}$), and lead. High O_3 levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO_x), which react under certain meteorological conditions to form O_3. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants. An area is designated as "in attainment" when it is in compliance with the federal and/or state standards, as further discussed below.

The project site is located within the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD) and includes Santa Cruz, Monterey, and San Benito Counties. The NCCAB is designated attainment for the federal PM_{10} and SO_2 standards and is designated attainment/unclassified for the other federal standards. The NCCAB is designated attainment for the state $PM_{2.5}$, NO_2, SO_2, and lead standards, and is designated unclassified for CO in Santa Cruz County. The NCCAB has nonattainment designations for state O_3 and PM_{10} standards.

The MBARD 2012-2015 AQMP, adopted March 15, 2017, identifies a continued trend of declining O_3 emissions in the NCCAB primarily related to lower vehicle miles traveled (VMT), showing that the region is continuing to make progress toward meeting the state O_3 standard during the three-year period reviewed (SOURCE V.5a).

Impact Analysis. The proposed project would indirectly generate air pollutant emissions during the approximate 4-6 week construction period, but would not exceed MBARD thresholds. Therefore, project emissions would not be considered substantial and would not result in an air quality violation or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment . Thus, the impact would be *less than significant*.

Project construction would result in generation of fugitive dust and PM_{10} emissions. According to the MBUAPCD's CEQA Air Quality Guidelines, 8.1 acres could be graded per day with minimal earthmoving or 2.2 acres per day with grading and excavation without exceeding the MBUAPCD's PM_{10} threshold of 82 pounds per day (SOURCE V.5c). The project site is approximately 0.15 acres in size. Therefore, the area of soil disturbance and construction would be less than the MBARD's threshold and impacts related to fugitive dust generation and PM_{10} emissions would be *less than significant*.

No stationary sources would be constructed as part of the proposed project that would be long-term permanent sources of emissions. The project would not result in new long-term operational emissions from vehicle trips (mobile emissions), the use of natural gas (energy source emissions), and consumer products, architectural coatings, and landscape maintenance equipment (area source emissions). Once the sewer line is installed, there would be no direct or indirect project emissions.

According to the MBARD CEQA Guidelines, projects that are consistent with the AQMP would not result in in cumulative impacts, as the AQMP already accounts for regional emissions. The MBARD prepares air quality plans, which address attainment of the state and federal air quality standards, and which incorporate growth forecasts developed by AMBAG. The AQMP takes into account cumulative development within the City, and thus, cumulative emissions have been accounted for in the AQMP. As indicated above in subsection 3(a), the project would not conflict with the AQMP. Therefore, the project's contribution to cumulative air pollutant emissions would be *less-than-significant*.

(c) Sensitive Receptors. For CEQA purposes, a sensitive receptor is defined as any residence, including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade 12 (K-12) schools; daycare centers; and healthcare facilities such as hospitals or retirement and nursing homes (SOURCE V.5c). The project site is located in a developed area of the City of Santa Cruz and the project is located on two developed residential properties, which are considered sensitive receptors.

Diesel particulate matter (DPM) was identified as a toxic air contaminant (TAC) by the State of California in 1998. Subsequently, the CARB developed a comprehensive strategy to control DPM emissions. The *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*—a document approved by the CARB in September 2000—set goals to reduce DPM emissions in California by 75 percent by 2010 and 85 percent by 2020. This objective would be achieved by a combination of approaches, including emission regulations for new diesel engines and low-sulfur fuel program. An important part of the DPM risk reduction plan is a series of measures for various categories of in-use on- and off-road diesel engines, which are generally based on the following types of controls:

- Retrofitting engines with emission-control systems, such as DPM filters or oxidation catalysts;
- Replacement of existing engines with new technology diesel engines or natural gas engines; and
- Restrictions placed on the operation of existing equipment.

Once the DPM risk reduction plan was adopted, the CARB started developing emission regulations for a number of categories of in-use diesel vehicles and equipment. In July 2007, the CARB adopted regulations for in-use, off-road diesel vehicles that will significantly reduce particulate matter emissions by requiring fleet owners to accelerate turnover to cleaner engines and install exhaust retrofits.

Impact Analysis. Excavation and installation of the new sewer line could involve the use of diesel trucks and equipment that would emit diesel exhaust, including DPM, which is

classified as a TAC. The proposed project is located on two residential adjacent properties and in proximity to one house that would be indirectly exposed to temporary construction emissions.

Emissions from construction activities represent temporary impacts that are typically short in duration. Since construction is anticipated to occur over an approximate 4-6 week period, which is less than one-half of one percent of the 70-year maximum exposed individual criteria used for assessing public health risk due to emissions of certain air pollutants. Assessment of TAC-related (including DPM) cancer risks is typically based on a 70-year exposure period. Due to the intermittent and short-term temporary nature of construction activities, emissions of DPM would not be sufficient to pose a significant risk to sensitive receptors from construction equipment operations. Project construction activities that would use diesel-powered equipment would expose nearby residents to possible diesel exhaust for a very limited number of days out of a 70-year (365 days per year, 24 hours per day) period. Because exposure to diesel exhaust would be well below the 70-year exposure period and, given the limited and short-term nature of activities that would use diesel equipment, construction-related DPM emissions would not be considered significant. Therefore, the project would not be expected to expose sensitive receptors to substantial pollutant concentrations, and the impact would be *less-than-significant.*

Furthermore, the State is implementing emission standards for different classes of on- and off-road diesel vehicles and equipment that applies to off-road diesel fleets and includes measures such as retrofits. Additionally, Title 13 of the California Code of Regulations (Section 2485(c)(1)) prohibits idling of a diesel engine for more than five minutes in any location. Thus, the project would not expose sensitive receptors to substantial pollutant concentrations, and potential exposure of sensitive receptors to DPM and associated risks would be considered *less-than-significant*.

(d) Odors. According to the Air District's *CEQA Air Quality Guidelines* (SOURCE V.5c), land uses associated with odor complaints typically include landfills, agricultural uses, wastewater treatment plants, food processing plants, chemical plants, and refineries. The proposed sewer line replacement project would not create objectionable odors and *no impact* would occur.

4. Biological Resources

(a) Special Status Species. The site is located in a developed residential neighborhood. According to maps developed for the City's General Plan 2030 and included in the General Plan EIR, the project site is not located within a sensitive habitat area (SOURCE V.1b, DEIR Figure 4.8-3), although it is located just west of mapped potential Monarch butterfly habitat. The project biological evaluation indicated that suitable Monarch butterfly habitat is present on the project site (eucalyptus trees), although there are no records of the species occurring in the area and none were observed on the project site during the site visit conducted in December 2020 (SOURCE V.7). Eucalyptus, acacia and pine trees groves provide winter habitat when they have adequate protection from wind and nearby source of water (Ibid.). The proposed project would not remove trees, and the limited

4-6 week project construction period would occur before October 31st, and the beginning of the butterfly overwintering period, and, therefore, no impacts to this species are anticipated.

Plant species of concern include those listed by either the Federal or State resource agencies as well as those identified as rare by CNPS (List 1B). No special status plant species have been recorded in the CNDDB as occurring within the immediate project area, although the Arana Gulch greenbelt is known to support Santa Cruz tarplant (*Holocarpha macradenia)*, a State and Federally-listed plant species (SOURE V.7).

The special status wildlife species, San Francisco dusky-footed woodrat (*N. fuscipes annectens*) (Species of Special Concern), has the potential to occur in the project area; however no woodrat houses were observed in the project area during the site visit in December 2020 (SOURE V.7). California red-legged frog (*Rana draytonii*) has not been observed in Hagemann Gulch, Arana Creek or adjacent tributaries to the Santa Cruz. The nearest observations of red-legged frog to the project site are in the Moore Creek watershed and Natural Bridges State Park, more than 4 miles west of this project site. California red-legged frogs do not generally utilize or inhabit creeks and waterways in highly urbanized areas, such as this project site. This species is, therefore, considered to be absent from the Arana Gulch watershed, in general, and this project site, in particular (Ibid.). Additionally, Hagemann Gulch drains to the Santa Cruz Harbor through a culvert under the Harbor Maintenance Yard and is not known to support a fishery. Due to the ephemeral nature of the subject drainage and lack of aquatic habitat, no special status fish species are expected to be in the project area (Ibid.).

Therefore, the project would result in *no impact* to special status species.

(b-c) Sensitive Habitat. According to maps developed for the City's General Plan 2030 and included in the General Plan EIR, the project site is not located within a sensitive habitat area (SOURCE V.1b, DEIR Figure 4.8-3), although it is located adjacent to riparian habitat. The project site is located within the riparian corridor of Hagemann Gulch as depicted on the *City-wide Creeks and Wetlands Management Plan*.

The project site is located at the upper extent of Hagemann Gulch, and two plant community types were observed within the project area: eucalyptus woodland and ruderal (weedy) riparian bottomland. The riparian woodland habitat is characterized by blue-gum eucalyptus and valley oak, with scattered red and arroyo willow (*Salix laevigata, S. lasiolepis)* downstream of the sewer crossing. The riparian understory vegetation is dominated by English ivy, thornless blackberry, and Cape ivy. Within the project area, scattered non-native Himalayan blackberry (*Rubus armeniacus*) and native California blackberry (*Rubus ursinus)* can be found under the thick mat of non-native spineless blackberry canes and Cape ivy vines. The adjacent properties are residential. The project site is accessed through residential properties that have mowed and managed landscapes (SOURCE V.7).

The project site is within the riparian management area of the *City-wide Creeks and Wetlands Management Plan* that was adopted by the City Council to provide a comprehensive approach to managing all creeks and wetlands within the City. The Plan recommends specific setback requirements based on biological, hydrological, and land use characteristics for various

watercourse types within the City. The recommended setbacks within a designated management area include a riparian corridor setback and a development setback area; an additional area extends from the outward edge of the development area to the outer edge of the management area. The Management Plan outlines a process for permitting development adjacent to watercourses. Projects that require a Watercourse Development Permit would be subject to the provisions in Chapter 24.08, Part 21 of the City's Municipal Code (Zoning Regulations) that pertain to issuance of these permits unless a project requires permits from the U.S. Army Corps of Engineers (USACE), CDFW and/or RWQCB. The Plan and zoning regulations include specified development standards and management guidelines (SOURCE V.2a).

The project site is within this mapped Hagemann Creek corridor. For Hagemann Gulch Reach 1 in the project site is located, the Creeks Management Plan requires a 40-foot wide riparian corridor and a development setback of 60 feet. However, repair or replacement of utilities are permitted within this area.

The proposed project will require work within an intermittent reach of Hagemann Gulch that does not support wetland vegetation and is not considered a federal-jurisdiction wetland. The reach of Hagemann Gulch through the project site was determined to lack any jurisdictional waters of the United States as regulated by the U.S. Army Corps of Engineers (USACE) (SOURCE V.6b). However, The CDFW and RWQCB jurisdictional width encompassed the lateral extent of Hagemann Gulch's top-of-bank and riparian extent within the survey area, and ranged from 60 to 125 feet. The jurisdictional length of Hagemann Gulch extended approximately 153 linear feet within the survey area. A total of 0.18 acres of CDFW and RWQCB jurisdiction, all of which would be considered vegetated, non-wetland waters of the state, occurs within the survey area (Ibid.)

Impact Analysis. Project construction includes replacement of an existing sewer line, including an aerial above-ground segment that crosses Hagemann Gulch. Installation of the new sewer line would result in temporary disturbance within the riparian woodland. Placement of a temporary access route down the left bank from the existing driveway and establishment of a temporary staging area will be done in areas covered in turf and non-native vegetation (SOURCE V.7). The impact to riparian habitat would be predominantly to invasive and non-native species, including Cape and English ivy, within the riparian corridor, as well as spineless blackberry. No native trees are located in the proposed work impact area, and no standing trees will be removed during construction.

The sewer repair work includes placement of concrete pipe supports that will result in fill and temporary disturbance within the riparian zone, which is classified as work within Waters of the State. Direct temporary impacts to streambed and riparian areas within CDFW and RWQCB jurisdiction would occur as a result of the installation of the replacement infrastructure, including 0.016 acre (approximately 50 linear feet) within the Hagemann Gulch streambed and 0.016 acre (153 linear feet) within the riparian area, for a total temporary impact of approximately 0.032 acre to jurisdictional areas.

The project would result disturbance to non-native riparian habitat and result in a minor

fill of state jurisdictional area, would not result in a substantial adverse effect to riparian or wetland areas due to presence of non-native species and limited area of disturbance. Furthermore, the project site will be revegetated upon completion of construction. Therefore the project would result in a *less-than-significant impact*.

(d) Wildlife Movement/Nesting. Wildlife corridors are segments of land that provide a link between these different habitats while also providing cover. Wildlife dispersal corridors, also called dispersal movement corridors, wildlife corridors or landscape linkages, are features whose primary wildlife function is to connect at least two significant or core habitat areas and which facilitate movement of animals and plants between two or more otherwise disjunct habitats (SOURCE V.1b-DEIR volume). Three main corridors have been identified within the City that could provide connectivity between core habitats within or adjacent to the city: western corridor (Moore Creek), central corridor (San Lorenzo River and major tributaries), and eastern corridor (Arana Gulch) (Ibid.). The project consists of replacement of a primarily underground sewer line, which would not interfere with movement of wildlife, and thus, would result in *no impact*.

No trees would be removed to construct the project. Furthermore, the project is scheduled to be constructed at the end of the summer (late August to October), which would be outside of the nesting bird period, should any birds nest in trees on the project site. Therefore, the project would result in *no impact* to nesting birds. If the construction schedule changes and construction is scheduled prior to August 1st, a pre-construction nesting survey shall be implemented as required in the *City-wide Creeks and Wetlands Management Plan* (Standard 12). Although no mitigation measures are required as no significant impact has been identified, it is recommended that the following Creeks Management Plan measure be included in the project construction specifications.

> RECOMMENDED CONSTRUCTION SPECIFICATION. Require that a pre-construction nesting survey be conducted by a qualified wildlife biologist if construction, including tree removal, is scheduled to begin between March and late July adjacent to bird habitat areas identified on Table 2-2 of the Management Plan, to determine if nesting birds a e in the vicinity of the construction sites. If nesting raptors are found, construction may need to be delayed until late-August or after the wildlife biologist has determined the nest is no longer in use or unless a suitable construction buffer zone can be identified by the biologist (Creeks Plan Standard 12).

(e) Conflicts with Local Ordinances – Tree Removal. The project would not result in removal of trees, and thus, would not conflict with City regulations governing removal of heritage trees. Therefore, the project would result in *no impact* related to conflicts with local ordinances, such as tree preservation.

(f) Habitat Conservation Plans. There are no adopted Habitat Conservation or Natural Community Conservation Plans that are applicable to the proposed project.

5. Cultural Resources

(a) Historical Resources. According to the maps developed for the City's *General Plan 2030* and included in the General Plan EIR, the project site is not located within a designated Historic District (SOURCE V.1b, DEIR Figure 4.9-3). The project does not include demolition or alteration of existing structures, except that the aerial portion of the existing pipeline will be removed once the new pipeline is installed. The existing aerial sanitary sewer was constructed in 1926, but has been repaired or replaced over time, and thus, the original structure is not intact. Therefore, the project would result in *no impact* to historical resources.

(b-c) Archaeological Resources. According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, as updated in 2018, the project site is located within an area that is identified as being sensitive for cultural resources (SOURCE V.1c).

An archaeological investigation of the site was conducted, which included a records search at the California Historical Resources Information System (CHRIS) at the Northwest Information Center (NWIC) at Sonoma State University. The records search indicated that one cultural resources report included a portion of the APE. Additionally, one recorded cultural resource intersects with the APE, the Live Oak Ranch, which is listed in the National Register of Historic Places and the California Register of Historic Resources. (SOURCE V.6a).

A pedestrian survey of the project site was conducted. Overall soil visibility was adequate for the purposes of the field investigation, and no significant cultural resources were identified. No indications of significant cultural resources were found during the pedestrian survey (SOURCE V.6a). The archaeological investigation concluded that the project site does not contain intact cultural resources, and, therefore, the project would not result in impacts to archaeological resources.

Section 24.12.430 of the City's Municipal Code sets forth the procedure to follow in the event that prehistoric or cultural features are accidentally discovered during construction, and the project would be subject to these requirements. Under provisions of this Code section, work shall be halted within 50 meters (150 feet) of the find until it can be evaluated by a qualified professional archaeologist. If the find is determined to be significant, the Planning Director shall be immediately notified, and appropriate mitigation measures shall be formulated and implemented. Additionally, the County Coroner and shall be notified in accordance with provisions of Public Resources Code 5097.98-99 in the event human remains are found and the Native American Heritage Commission shall be notified in accordance with the provisions of Public Resources Code section 5097 if the remains are determined to be Native American.

Impact Analysis. The project site is located within an area of known archaeological sensitivity, but no evidence of resources was found during the archaeological investigation. However, construction may disturb unknown resources, although there would be limited excavation for installation of the new sewer line. Therefore, potential disturbance to cultural resources is a *less-than-significant impact*.

Although, there is a potential for the discovery of unknown cultural resources on the property during soil disturbing activities, such discoveries would be subject to review in accordance with City and state requirements. If archaeological resources or human remains are exposed or discovered during either site clearing or during subsurface construction, operations shall stop within 150 feet of the find, and a qualified professional archaeologist shall be contacted for further review and recommendations. If a find is determined to be significant, the Planning Director shall be immediately notified, and appropriate measures shall be formulated and implemented in accordance with Section 24.12.430 of the City's Municipal Code – "Protection of Archaeological Resources." The County Coroner and shall be notified in accordance with provisions of Public Resources Code 5097.98-99 in the event human remains are found and the Native American Heritage Commission shall be notified in accordance with the provisions of Public Resources Code section 5097 if the remains are determined to be of Native American origin.

6. Energy

Pacific Gas and Electric Company (PG&E) provides electricity and natural gas service to the City. PG&E, a subsidiary of PG&E Corporation, provides natural gas and electric service to approximately 16 million homes and businesses across a 70,000 square-mile service area.

The state of California's per capita electrical use has been the lowest or one of lowest of any state. California is among the top states in the nation in net electricity generation from renewable resources. The state leads the nation in net electricity generation from solar, geothermal, and biomass.

Monterey Bay Community Power (MBCP) was formed in March 2017 as a joint powers authority to provide locally controlled, 100% carbon-free electricity to residents and businesses in Monterey, San Benito and Santa Cruz Counties through the Community Choice Energy (CCE) model established by the State of California. The CCE model enables communities to choose clean-source power at a cost equivalent to PG&E while retaining PG&E's role in maintaining power lines and providing customer service. The CCE model helps ensure local economic vitality because surplus revenues that would normally flow to PG&E will stay in the community. MBCP started supplying electricity to customers in spring 2018 with existing customers automatically enrolled.

In 2007, Santa Cruz became one of the first municipalities in the nation to require new construction to include the adoption of environmentally superior building materials and designs. Builders in Santa Cruz now use best practices for their construction projects that enhance building energy efficiency and water conservation as well as to improve air quality, waste reduction and recycling, and erosion and runoff control.

(a) Energy Use. The proposed project consists of replacement of an existing sewer line. The project would result in a minor, incremental increase in the consumption of energy resources during construction. Construction activities would include conventional (open cut) trenching with excavators and loaders for installation of the new sewer line. All project construction

equipment would be required to comply with the California Air Resources Board (CARB) emissions requirements for construction equipment, which includes measures to reduce fuel-consumption, such as imposing limits on idling and requiring older engines and equipment to be retired, replaced, or repowered. As a result, energy use associated with the small temporary increase in consumption of fuel during construction would not be considered wasteful or inefficient. Upon completion, the project would not result in permanent energy consumption. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, and would result in *no impact.*

(b) Conflicts with Plans. As an underground pipeline, the project would not result in permanent energy consumption, and would not result in conflicts with local or other state plans. Therefore, the project would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency, and would result in *no impact*. Therefore, the project would result in *no impact*.

7. Geology and Soils

(a.i) Fault Rupture. The project site is located in a seismically active region of California and the region is considered to be subject to very intense shaking during a seismic event. The City of Santa Cruz is situated between two major active faults: the San Andreas, approximately 11.2 miles to the northeast and the San Gregorio, approximately 9.9 miles to the southwest. There are no active fault zones or risk of fault rupture within the City (SOURCE V.1b-DEIR Section 4.10). Therefore, the probability of adverse effects from surface fault rupture is low (Ibid.), and *no impact* would occur.

(a.ii-iv) Seismic Hazards. Seismically induced hazards include ground shaking, surface rupture, ground failure, settlement, landslides, and water waves (SOURCE V.1a). According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, the project site is not located in an area subject to liquefaction (SOURCE V.1b-DEIR Figure 4.10-4).

The project site is likely to be subject to strong seismic shaking during the life of the improvements. The project would not result in construction new habitable structures, and thus, there is no risk of injury or death. Furthermore, the proposed replacement sewer line would be designed in accordance with the California Building Code, taking into account, structural and seismic requirements. The aerial portion of the new sewer line will be constructed of steel with flexible connections and flexible couplings at each end. Therefore, the project would not directly or indirectly cause potential substantial adverse impacts related to seismic hazards, resulting in a *less-than-significant impact*.

(b, d) Soils and Erosion. According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, soils on the project site consist primarily of the Elkhorn sandy loam, 2 to 9 percent slopes (SOURCE V.1b-DEIR Figure 4.10-6). According to the U.S. Department of Agriculture Soil Survey of Santa Cruz County, this soil type has low shrink-swell potential. Additionally, this soil type does not have a high erosion hazard potential (SOURCE V.1b-DEIR Table 4.10-5).

Some potential for erosion exists during the construction phase of the project in locations where open trenching would occur for pipeline installation. Soil sediments could be inadvertently transported into the downstream Hagemann Gulch, potentially affecting water quality, which is addressed below in subsection 10d(a). Following sewer pipeline installation, trenches would be filled; and disturbed areas would be seeded or planted with native ground plants. Upon completion of the sewer line installation, there would be no loss of topsoil.

(c,d) Geologic Hazards. Non-seismically induced hazards include slope instability, cliff retreat, and non-seismic settlement and landslides (SOURCE V.1a). As shown in the City's *General Plan 2030* and included in the General Plan EIR, the project site is not identified as being located in an area of 30-50% slope or greater than 50% slope (SOURCE V.1b-DEIR Figure 4.10-5). The project site is not located within a mapped landslide area (SOURCE V.1b-DEIR Figure 4.10-3). The replacement of a predominantly underground sewer pipeline would not be located on a geologic unit or soil that is unstable or would become unstable as a result of the project that could result in on- or off-site landside, lateral spreading, liquefaction or collapse. Therefore, the project would result in *no impact*.

(e) Septic Systems. The project is replacement of an existing sewer line, and does not include developed that would use septic systems. Therefore, *no impact* would occur.

(f) Paleontological Resources. According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, the project site is located within an area mapped as the Santa Cruz Mudstone unit and is adjacent to the Late Pleistocene Alluvium unit (SOURCE V.1b-DEIR Figure 4.9-5). Santa Cruz County is known to contain fossils in the following geological units: Late Pleistocene alluvium; the Purisima Formation; the Santa Cruz Mudstone; and the Santa Margarita Sandstone (SOURCE V.1b, DEIR volume).

Impact Analysis. While the project site does not contain known paleontological resources, it is located in a sensitive geologic formation with regards to paleontological resources, and construction activities could potentially destroy unknown paleontological resources. General Plan Action HA1.2.3 requires the City to notify applicants within paleontologically sensitive areas of the potential for encountering such resources during construction and condition approvals that work will be halted and resources examined in the event of encountering paleontological resources during construction. If the find is significant, the City would require treatment of the find in accordance with the recommendations of the evaluating paleontologist. Treatment may include, but is not limited to, specimen recovery and curation or thorough documentation. With implementation of *General Plan 2030* policies and actions, the impact would be considered *less-than-significant*.

RECOMMENDED CONSTRUCTION SPECIFICATION: In the event that paleontological resources are encountered during construction, work shall be halted in the vicinity of the find until it can be evaluated by a professional paleontologist. If a find is determined to be significant, treatment of the find in accordance with the recommendations of the evaluating paleontologist shall be required. Treatment may include, but is not limited to, specimen recovery and curation or thorough documentation.

8. Greenhouse Gas Emissions

(a) Greenhouse Gas Emissions. Climate change refers to any significant change in measures of climate, such as average temperature, precipitation, or wind patterns over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, attributed to accumulation of greenhouse gas (GHG) emissions in the atmosphere. Greenhouse gases trap heat in the atmosphere, which in turn heats the surface of the Earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. Climate change models predict changes in temperature, precipitation patterns, water availability, and rising sea levels, and these altered conditions can have impacts on natural and human systems in California that can affect California's public health, habitats, ocean and coastal resources, water supplies, agriculture, forestry, and energy use (SOURCE V.1b-DEIR volume).

The most common GHG that results from human activity is carbon dioxide, followed by methane and nitrous oxide. The primary contributors to GHG emissions in California are transportation (about 37 percent), electric power production (24 percent), industry (20 percent), agriculture and forestry (6 percent), and other sources, including commercial and residential uses (13 percent). Approximately 81 percent of California's emissions are carbon dioxide produced from fossil fuel combustion (SOURCE V.1b-DEIR volume).

The State of California passed the Global Warming Solutions Act of 2006 (AB 32), which seeks to reduce GHG emissions generated by California. The Governor's Executive Order S-3-05 and AB 32 (Health & Safety Code, § 38501 et seq.) both seek to achieve 1990 emissions levels by the year 2020. Executive Order S-3-05 further requires that California's GHG emissions be 80 percent below 1990 levels by the year 2050. AB 32 defines GHGs to include carbon dioxide, methane, nitrous oxide, hydrocarbons, perfluorocarbons and sulfur hexafluoride.

The California Air Resources Board (CARB) is the lead agency for implementing AB 32. In accordance with provisions of AB 32, CARB conducts an annual statewide GHG Emission Inventory that provides estimates of the amount of GHGs emitted to the atmosphere by human activities within California. In accordance with requirements of AB 32, CARB adopted an Initial Scoping Plan in 2008 and is required to update the scoping plan at least every five years. The First Update to the Scoping Plan, approved in 2014, established a 2030 emissions target of 40 percent below 1990 levels. The current (2017) Scoping Plan identifies a balanced mix of strategies to meet the State's 2030 GHG limit.

The City's *General Plan 2030* includes goals, policies, and actions on climate change, including reducing communitywide GHG emissions 30 percent by 2020, reducing 80 percent by 2050 (compared to 1990 levels), and for all new buildings to be emissions neutral by 2030. In October 2012, the City also adopted a "Climate Action Plan" that outlines the actions the City will take over the next 10 years to reduce GHG emissions by 30 percent.

The proposed project would result in an incremental increase in GHG emissions by usage of fossil fuels during construction. The CAP does not include any specific GHG emissions reduction strategies that specifically relate to construction emissions. The CAP strategy primarily intends to reduce GHG emissions by implementing measures such as reducing vehicle miles traveled and other efforts related to residential and municipal GHG reduction measures. The project would have no impact on vehicle miles traveled or energy use in the county. Upon completion of construction, there would be no permanent operations that would generate GHG emissions. As a result, the temporary increase in GHG emissions during construction would be a *less-than-significant impact.* No mitigation would be required.

(b) Conflicts with Applicable Plans. The project would not conflict with state plans adopted for the purpose of reducing GHG emissions. In October 2012, the Santa Cruz City Council adopted a Climate Action Plan (CAP) that addresses citywide greenhouse emissions and reduction strategies. The CAP outlines the actions the City and its partners may take pertaining to reduction of GHG emissions to meet the goals and implement the policies and actions identified in the *General Plan 2030*. The CAP provides City emissions inventories, identifies an emissions reduction target for the year 2020, and includes measures to reduce energy use, reduce vehicle trips, implement water conservation programs, reduce emissions from waste collection, increase solar systems, and develop public partnerships to aid sustainable practices. Measures are outlined for the following sectors: municipal, residential, commercial, and community programs. Each chapter, as well as Appendix A, provides a table of actions necessary to meet each reduction measure, quantifies the potential GHG emission reduction, and prioritizes implementation based on funding, ease, and current infrastructure. With a couple of exceptions, all measures establish the year 2020 as the target date to achieve the specified reductions. The CAP includes an Implementation chapter that identifies tracking and reporting of the success of the measures, including City staff responsibilities.

Three are no CAP measures or programs that are applicable to the proposed sewer line replacement project. However, upon completion of the construction, the project would not result in operational energy or service demands that would directly or indirectly generate GHG emissions. Thus, the project would not conflict with provisions of the CAP, and *no impact* would occur.

9. Hazards and Hazardous Materials

(a) Hazardous Material Use. The proposed project consists of replacement of an existing sewer line and would not result in permanent development that would involve the routine transport, use, or disposal of hazardous materials. Construction would not involve the use of hazardous materials other than routine materials required to run machinery such as gasoline, which would be located away from the work area. The transport, use, and storage of hazardous materials during maintenance activities would be conducted in accordance with best management practices. Therefore, the proposed project would not create a substantial hazard to the public through the routine transport, use or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, resulting in a *less-than-significant impact*.

(b, d) Release of Hazardous Materials or Hazardous Emissions. The site is not included on the list of hazardous material sites compiled pursuant to Government Code Section 65962.5, and would not result release of hazardous materials or create a significant impact. Therefore, the project would result in *no impact*.

(c) Hazardous Emissions. The project site is not located within ¼ mile of an existing or proposed school, although the site is located approximately 0.9 miles west of the Harbor High School. However, the project consists of replacement of an existing sewer line and would not involve emissions of hazardous materials. Therefore, *no impact* would occur.

(f) Emergency Response. Proposed access to the project site would be from Forest Avenue. The project does not include any changes to existing public roadways that provide emergency access to the site. Therefore, the project would have *no impact* related to interference with adopted emergency response or evacuation plans.

(g) Wildland Fire Hazard. According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, the project is located adjacent to an area designated as a high fire hazard area (SOURCE V.1b-DEIR Figure 4.6-1), which primarily covers the existing Arana Gulch open space property. The proposed project consists of installation of a replacement sewer line and would not result in construction of habitable structures. Therefore, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, resulting in a *less-than-significant impact*. See also section IV.20 below.

10. Hydrology and Water Quality

(a) Water Quality. The project site is located at the northern end of Hagemann Gulch, which is an intermittent drainage that is a tributary to Arana Gulch Creek; the gulch includes a main stem and a smaller side tributary, all of which empty into the upper harbor. The watercourse drains a residential area as well as the western portion of the Arana Gulch greenbelt property. The main stem of Hagemann Gulch (Reach 1), in which the project site is located, is a vegetated watercourse that runs from approximately the Agnes Street/Mentel Avenue intersection downstream to behind the Harbor Maintenance Yard (where it goes underground into a culvert that drains into the upper harbor) (SOURCE V.2a).

Urban runoff and other "non-point source" discharges are regulated by the 1972 Federal Clean Water Act (CWA), through the National Pollutant Discharge Elimination System (NPDES) permit program that has been implemented in two phases through the California Regional Water Quality Control Boards (RWQCB). Phase I regulations, effective since 1990, require NPDES permits for stormwater discharges for certain specific industrial facilities and construction activities, and for municipalities with a population size greater than 100,000. Phase II regulations expand the NPDES program to include all municipalities with urbanized areas and municipalities with a population size greater than 10,000 and a population density greater than 1,000 persons per square mile. Phase II regulations also expand the NPDES program to include construction sites of one to five acres. Construction activity on projects that disturb one or more acres of soil must obtain coverage under the State's General Permit for Discharges of Storm

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

Installation of the proposed sewer line would not result disturbance to an area of one or more acres; the project construction disturbance area is approximately 6,500 square feet. Therefore, the project is not required to prepare a SWPPP.

The City of Santa Cruz (City) has developed a Storm Water Management Program (SWMP) in order to fulfill the requirements of the Phase II NPDES General Permit for Discharges of Storm Water from Small Municipal Separate Storm Sewer Systems (MS4) (General Permit) and to reduce the amount of pollutants discharged in urban runoff. In compliance with the Phase II regulations, the City's comprehensive SWMP is designed to reduce the discharge of pollutants to the Maximum Extent Practicable (MEP) and to protect water quality (SOURCE V.1b-DEIR volume). In 1998, the City of Santa Cruz adopted an ordinance for "Storm Water and Urban Runoff Pollution Control" (Chapter 16.19 of the city's Municipal Code) as part of its Storm Water Management Program in accordance with the RWQCB's requirements. The ordinance identifies prohibited discharges and required Best Management Practices (BMPs) for construction and new development.

Impact Analysis. Project construction and trenching to install the new sewer line could result in erosion and/or inadvertent transport of construction debris into Hagemann Gulch and downstream Arana Creek if standard erosion control measures are not implemented. This is considered a *potentially significant impact*.

Some potential for erosion exists during the construction phase of the project in locations where open trenching would occur for pipeline installation. Soil sediments could be inadvertently transported into the downstream Hagemann Gulch, potentially affecting downstream water quality. Following sewer pipeline installation, trenches would be filled; and disturbed areas would be seeded or planted with native ground plants. Upon completion of the sewer line installation, there would be no loss of topsoil. Implementation of erosion control measures and construction water quality BMPs set forth in Mitigation Measures HYDRO-1 and HYDRO-2 would reduce the impact to a less-than-significant level, and the project would not result in adverse impacts to water quality

MITIGATION MEASURE HYDRO-1. Implement erosion control measures during project construction, including, but not limited to: limiting ground disturbance and vegetation removal during construction; conducting work prior to the rainy season if possible and protecting disturbed areas during the rainy season; and immediately revegetating disturbed areas. Require temporary fencing on the perimeter of the site during construction to prevent inadvertent erosion and offsite transport of sediments.

a. Install plastic mesh fencing at the perimeter of the work area to prevent inadvertent impacts to the adjacent forest vegetation, creek channel, and injury to adjacent native trees. Protective fencing shall be in place prior to ground disturbances and removed once all construction is complete.
b. During construction, no grading, construction or other work shall occur outside the designated limits of work.

MITIGATION MEASURE HYDRO-2: Best management practices will be used to prevent spillage of hazardous materials with the following measures:

a. No excess soil, chemicals, debris, equipment or other materials shall be dumped or stored outside the designated limits of work.
b. All staging of equipment and materials, and refueling of equipment, shall be located in the proposed left bank upland staging area, existing roadways and parking areas. The contractor shall prepare and implement a fuel spill prevention and clean-up plan.
c. Oily or greasy substances originating from the Contractor's operations will not be allowed to enter Hagemann Gulch or be placed where they will later enter the aquatic system. Equipment driven and/or operated within the riparian zone shall be checked and maintained daily to prevent leaks of materials that, if introduced to soil or water, could be deleterious to aquatic life, wildlife, or riparian habitat. Equipment or vehicles driven and/or operated within or adjacent to the riparian zone shall be cleaned of all external oil, grease, and materials that, if introduced to water, could be deleterious to aquatic life, wildlife or riparian habitat.
d. All mechanized equipment working in the riparian zone will have a double containment system for diesel and oil fluids. Equipment will be maintained in good working order to prevent leakage. Vegetable- oil-based hydraulic fluids will be used in equipment operated near the stream channel. No equipment will be left in the riparian zone overnight.
e. Any refueling or equipment maintenance will be accomplished in the staging area away from the riparian habitat to prevent fuel spillage into the corridor.
f. Construction equipment used within the intermittent stream channel (top of bank to top of bank) will be checked daily prior to work and, if necessary, action will be taken to prevent fluid leaks. If leaks occur during work in the channel (top of bank to top of bank), the contractor will contain the spill and remove the affected soil.

(b) Groundwater. The project site is located within the West Santa Cruz Terrace groundwater basin (SOURCE V.1b-DEIR Section 4.5). The project would not include groundwater wells and would continue to receive municipal water from the City of Santa Cruz. Therefore, the project would have *no impact* on groundwater supplies or recharge.

(c) Drainage. Hageman Gulch is an intermittent drainage that is a tributary to Arana Gulch Creek. The gulch includes a main stem and a smaller side tributary, all of which empty into the upper harbor. The watercourse drains a residential area as well as the western portion of the Arana Gulch greenbelt property. The project would not alter existing drainage pattern and

would not result increases in impervious surfaces or substantial increases in runoff resulting. Therefore, the project would result in *no impact*.

(d) Flood and Tsunami Zones. The project site is not located within a Federal Emergency Management Agency (FEMA) flood hazard area (SOURCE V.1b-DEIR Figure 4.7-1) or in a tsunami inundation zone (SOURCE V.1b-DEIR Figure 4.7-2). As indicated in 10a above, the project with mitigation, will prevent construction-related sediments and pollutants from entering the Hagemann Gulch/Arana Gulch Creek stream. Therefore, the project would result in *no impact* related to release of pollutants in flood or tsunami zones.

(e) Conflict with Plans. The project site is located at the northern end of Hagemann Gulch that is a tributary to Arana Gulch Creek, but it is not referenced in the Water Quality Control Plan for the Central Coastal Basin (Basin Plan). Water quality objectives are included in the Basin Plan for protection of surface water and groundwater quality in the Central Coast Region. This Basin Plan lists beneficial uses for surface waters and describes the water quality objectives that must be maintained to allow those uses. The proposed project would not result in new discharges or conflict with provisions in the Basin Plan as erosion and water quality control measures would be implemented during construction to prevent water quality degradation, and the project would not result in post-construction stormwater runoff. A sustainable ground-water management plan for the area in which the project is located has not yet been prepared. Therefore, the project would not conflict with adopted water quality or groundwater plans and would result in *no impact*.

11. Land Use and Planning

(a) Physical Division of Community. The project site is located in an existing developed area of the City, and the proposed project consists of replacement of an existing approximate 300-linear foot sewer line. Therefore, the project would not physically divide an established community and would result in *no impact*.

(b) Consistency with Local Policies/Plans. The proposed project consists of installation of a replacement sewer line. The project does not conflict with provisions of the City-wide Creeks and Wetlands Management Plan; see subsection 4-Biological Resources. The project would not result in a conflict with any General Plan or Local Coastal Program policies or regulations adopted for the purpose of avoiding or mitigating an environmental impact.

12. Mineral Resources

There are no mines or areas of known mineral resources within the City (SOURCE V.1b-DEIR). Therefore, the project would have *no impact* on mineral resources.

13. Noise

(a) Generation of Substantial Noise Increases. The project consists of installation of an approximate 300-foot replacement sewer line that extends between two residential properties.

Project construction would result in a temporary increase in existing noise levels during excavation and construction of the project. Noise impacts resulting from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive receptors, as well as existing ambient noise levels. Noise generated during construction would vary throughout the construction period and on any given day, depending on the construction phase and the type and amount of equipment used at the construction site. There are several homes adjacent to the project area that would subject to temporary and short-term increases in ambient sound levels. However, overall, construction noise levels would be temporary, short-term, and fluctuate throughout the course of the estimated 4-6 week project construction period. There are no standards in the City's General Plan or Municipal Code that regulate construction impacts, although section 9.36.10(e) permits construction of specified activities between the hours of 10 PM and 8 AM with City approval. Because construction noise impacts would be temporary, the impact of construction noise would be considered a *less than significant impact*.

(b) Generation of Excessive Vibration. Construction activities can cause vibration that varies in intensity. The use of pile driving and vibratory compaction equipment typically generates the highest construction-related groundborne vibration levels. Activities associated with the project, including demolition, are not expected to create significant sources of groundborne vibrations or other excessive noise events as no equipment is anticipated to be used that would generate substantial groundborne vibration. Therefore, the project would result in *no impact*.

(c) Location Near Airport. The project site is not located near a public airport or private airstrip, therefore *no impact* would occur.

14. Population and Housing

(a) Population Growth. The City had a population of 64,424 people as of January 1, 2020 (SOURCE V.4). The project consists of replacement of an existing sewer line and would not result in construction of new residential units or population. Therefore, the proposed project would not induce unplanned population growth, and the project would result in a *less-than-significant impact*.

The project consists of replacing the existing 6-inch ductile iron sanitary sewer line with an 8-inch steel and PVC sewer line. The increase in pipe diameter from 6 to 8 inches will allow the new sewer line to be regularly cleaned and video inspected, but would not result in additional service capacity that could indirectly induce population growth.

(b) Displacement of People or Housing. The project would result in installation of a new sewer line to replace an existing sewer line. Currently, there are no residential units at the project construction site. Therefore, the proposed project would not result in the displacement of people or housing and would result in *no impact.*

15. Public Services

(a-e) Fire, Police, Schools, Parks, and Other Public Services. The project area is be served by existing public services provided by the City of Santa Cruz and the Santa Cruz City Schools. The project would replace an existing sewer pipeline and upon completion of construction, the project would not result in a demand for public services. The project would not result in any new permanent structures or uses that would generate the need for fire or police services, schools, parks or other public facilities. Therefore, the project would result in *no impact*, and would have no measurable effect on existing public services in that the incremental increase in demand would not require expansion of any services to serve the project.

16. Recreation

The project site is located north of the City-owned Arana Gulch Open Space property. The property has a developed ADA compliant, multi-use path that connects Brommer Street, Broadway, and Agnes Street, and also includes approximately one mile of trails on grasslands overlooking the Santa Cruz Harbor.

The proposed project would not result in permanent structures or uses that would result in a demand for or use of existing neighborhood and regional parks or other recreational facilities. The project does not include new recreational facilities and would not require the expansion of recreational facilities. Therefore, the project would result in *no impact* regarding recreational facilities.

17. Transportation/Traffic

(a) Conflict with Circulation Plan, Policy, or Ordinance. The City's General Plan strives to maintain the established "level of service" D or better at signalized intersections (M3.1.3). "Level of service" (LOS) is typically used to evaluate traffic operations, in which operating conditions range from LOS "A" (free-flowing) to LOS "F" (forced-flow). The City's General Plan also accepts a lower level of service and higher congestion at major regional intersections if necessary improvements would be prohibitively costly or result in significant, unacceptable environmental impacts (M3.1.4). The General Plan also includes policies that promote multi-modal transportation options, including pedestrian, bicycle, and transit options.

The project would create a small incremental increase in traffic on Mentel Avenue and nearby Soquel Avenue during construction due to construction workers and materials deliveries, but construction activities would mostly occur outside of existing roads and would not affect the vicinity circulation system, including transit, bicycle and pedestrian facilities. The increase in vehicle trips would be both minimal (estimated to be fewer than 10 trips/day for 4-6 weeks) and temporary. The project would not affect the performance of transit, bicycle, or pedestrian facilities. Therefore, the project would not conflict with plans or policies regarding the City's circulation system, resulting in *no impact*.

(b) Conflicts with State CEQA Guidelines. CEQA Guidelines section 15064.3, subdivision (b) codifies the switch from LOS to vehicle miles traveled (VMT) as the metric for transportation

analysis pursuant to state legislation adopted in 2013. In September 2013 Governor Brown signed Senate Bill 743 which made significant changes to how transportation impacts are to be assessed under CEQA. SB 743 directs the Governor's Office of Planning and Research (OPR) to develop a new metric to replace LOS as a measure of impact significance and suggests vehicle miles travelled as that metric. According to the legislation, upon certification of the guidelines, automobile delay, as described solely by LOS shall not be considered a significant impact (Section 21009(a)(2)). SB 743 also creates a new CEQA exemption for certain projects that are consistent with the regional Sustainable Communities Strategy.

The City of Santa Cruz adopted a VMT transportation threshold on June 9, 2020 in accordance with CEQA and state requirements. The threshold generally establishes that a project exceeding a level of 15% below the County-wide average VMT may be a significant transportation impact. The City's guidelines to determine whether a land use project is within the VMT threshold includes a screening process in which situations are identified under which projects are determined not have a significant impact and further analysis is not required (SOURCE V.2c). The proposed project consists of installation of a replacement sewer line and would not result in new trips upon completion of construction. Thus, the project would not result in a significant impact related to VMT based on the City's adopted threshold and would not conflict or be inconsistent with CEQA Guidelines section 15064.3, resulting in *no impact*.

(c) Design-Safety. The proposed driveway has been designed in accordance with City requirements, and there are no access designs that would substantially increase hazards. Therefore, the project would result in *no impact* related to project design that could result in substantial increases in hazards.

(d) Emergency Access. The project has been designed in accordance with City police and fire department requirements and would provide for adequate emergency access. Therefore, the project would result in *no impact* related to emergency access.

18. Tribal Cultural Resources

Assembly Bill (AB) 52 requires that California lead agencies consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if so requested by the tribe. No Native American tribe has contacted the City of Santa Cruz and requested notification/consultation pursuant to AB 52.

AB 52 also specifies that a project with an effect that may cause a substantial adverse change in the significant of a tribal cultural resource (TCR) is a project that may have a significant effect on the environment. Defined in Section 21074(a) of the Public Resources Code, a TCR is a site feature, place, cultural landscape, sacred place, or object, which is of cultural value to a California Native American tribe and is either listed in or eligible for listing in the California Register of Historical Resources or a local historic register, or the lead agency, at its discretion, chooses to treat the resource as a TCR.

A sacred lands search request to the Native American Heritage Commission (NAHC). The NAHC responded with positive results and recommended contacting the Costanoan Ohlone Rumsen-

Mutsen Tribe for more information as well as reaching out to the listed tribal representatives. Letters were sent to all tribal representatives recommended by the NAHC. Chairman Patrick Orozco of the Costanoan Ohlone Rumsen-Mutsen tribe responded that there may be Native American sites in the area of the project. He recommended tribal monitoring during construction. Kanyon Sayers-Rood of the Indian Canyon Mutsun Band of Costanoan recommended both archaeological and tribal monitoring. Follow-up contacts with both representatives were made to identify any tribal cultural resources within the Project Area. Both identified the Old Holy Cross Cemetery (P-44-000654), located within the 0.25-mile study buffer, but not on the project site, as important to their tribal band, but neither identified any tribal cultural resources within the Project Area (SOURCE v.6a).

a-b) Tribal Cultural Resources. The California Public Resources Code section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." The Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. To date, no such request has been made to the City of Santa Cruz.

The archaeological investigation conducted for the project did not identify archaeological resources or tribal cultural resources. A search of the Sacred Lands File by the NAHC for the project area and 0.25-mile buffer yielded positive results. Follow-up contacts with Native American tribal represents indicated that that the Holy Cross Cemetery at the edge of the study buffer would be considered an important cultural site to their tribes due to the indigenous re-burials, but neither identified any tribal cultural resources within the project area.

While no known TCRs are located on the project site, it is possible that ground-disturbing activities would have the potential to encounter unknown subsurface resources and/or human remains, the discovery of which would be subject to procedures outline in City regulations as described in section VI.5. Section 24.12.430 of the City's Municipal Code sets forth the procedure to follow in the event that unknown archaeological materials are unearthed during construction, as described in Section VI.5 above. Thus, the project would not affect tribal cultural resources as defined in CEQA, and would result in *no impact* to tribal cultural resources.

19. Utilities and Service Systems

(a) Relocation or Construction of Utilities. The proposed project would replace an existing sewer line, but would not require or result in the relocation of other utility lines (water, storm drain, electric, gas or telecommunications) or relocation or construction of new or expanded wastewater treatment facilities. The impacts of the proposed sewer line replacement have been evaluated in this Initial Study, and identified water quality related to erosion and construction can be reduced to a less-than-significant level with implementation of mitigation measures.

(b) Water Supply. The project site is located within the service area of the City of Santa Cruz Water Department, which serves an approximate 20-square-mile area. The service area

includes the entire City of Santa Cruz, adjoining unincorporated areas of Santa Cruz County, a small part of the City of Capitola, and coastal agricultural lands north of the City. The City's water system is comprised of four main sources of supply: San Lorenzo River diversions (including the Tait wells); North Coast spring and creeks; Loch Lomond Reservoir; and the Beltz wells. Water is treated at the City's Graham Hill Water Treatment Plant (GHWTP), except for groundwater, which is treated as part of the Beltz well system.

The project would only use small amounts of water during construction for dust control and concrete work as may be needed. However, no water use would be required during the operational phase of the project. Therefore, the project would result in a temporary, *less-than-significant* impact during construction and no impact upon completion of construction.

(c) Wastewater Treatment Capacity. The project consists of replacement of an existing sewer line, but would not result in an increase in wastewater flows to the City's wastewater treatment plant. Therefore, the project would result in *no impact*.

(d-e) Solid Waste Disposal. The project would not generate solid waste during the operational phase of the project. However, construction debris would be generated during construction, but would not be substantial and would not exceed local or state standards, or require additional landfills or recycling centers; therefore, impacts would be *less-than-significant*.

20. Wildfire

(a) Emergency Plans. Proposed access to the project site would be from Forest Avenue. The project does not include any changes to existing public roadways that provide emergency access to the site. Therefore, the project would not substantially impair an adopted emergency response or evacuation plan and would result in *no impact*.

(b-d) Wildfire Impacts and Exposure. The project site is not located in or near a state responsibility area, although it is located adjacent to a locally mapped fire hazards are at Arana Gulch (SOURCE V.1a-DEIR Figure 4.6-1). The potential for wildlands fires represents hazards where development is adjacent to open space or within close proximity to wildland fuels or designated fire severity zones. The proposed project is located in an urban environment adjacent to the City-owned Arana Gulch open space property. However, the project consist of replacement of an underground sewer line and does not contain any structures that would be subjected to fire safety codes and fire protections. Therefore, the project would not exacerbate wildfire risks, resulting in *no impact.*

(c-d) Fire Hazards. Improvements associated with the project consist of replacement of mostly underground sewer line and installation would not exacerbate wildfire risks or result in conditions that would result in off-site flooding, landslides or post-fire impacts. Therefore, the project and surrounding area would not expose people or structures to a significant risk related to wildfires, resulting in *no impact.* See also section IV.9(g) above.

21. Mandatory Findings of Significance

(a) Quality of the Environment. Based on biological and cultural resource evaluations conducted for the project, the proposed project wound not result in substantial degradation of habitat, impacts to fish or wildlife species or elimination of important examples of major period of California history or prehistory with implementation of mitigation measures. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

(b) Cumulative Impacts. Cumulative impacts related to development accommodated by the City's General Plan over the next 12+ years were found to be less than significant in the General Plan EIR, except for potential significant cumulative impacts related to traffic, water supply, population, and noise. The proposed sewer line replacement project would not contribute to these identified significant cumulative impacts as the project would not result in construction of new habitable structures or post-construction operations that would generate population, noise, service demands or traffic. Therefore, the project would not contribute to cumulative impacts. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

(c) Substantial Adverse Effects on Human Beings. No environmental effects have been identified that would have direct or indirect substantial adverse effects on human beings. Less-than-significant impacts to sensitive receptors were identified for exposure to construction emissions (diesel particulates) and noise. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.