

City of Santa Cruz ENVIRONMENTAL CHECKLIST FORM / INITIAL STUDY

I. Background

1. **Application No:** CP 20-0155
2. **Project Title:** Antonelli Pond Accessible Trail Project
3. **Lead Agency Name and Address:**
City of Santa Cruz
809 Center Street, Room 101
Santa Cruz, CA 95060
4. **Contact Person and Phone Number:** Clara Stanger, 831-420-5247
CStanger@cityofsantacruz.com
5. **Project Location:** 2390 Delaware Avenue (APN 003-061-13 and 003-061-14) in the western portion of the City of Santa Cruz; see Figure 1.
6. **Project Applicant's/Sponsor's Name and Address:**
Land Trust of Santa Cruz County
617 Water Street
Santa Cruz, CA 95060
7. **General Plan Designation:** NA - Natural Areas
8. **Zoning:** PK/F-P/CZ-O/SP-O (Parks/Floodplain/Coastal Zone Overlay/Shoreline Protection Overlay)
9. **Description of the Project:** The proposed project consists of a Special Use Permit, Design Permit, Historic Alteration Permit, Coastal Permit, and Watercourse Development Permit to construct a walking path and related improvements around Antonelli Pond and to allow for a year-round park host site. This project includes the removal of one heritage tree. The site plan is shown on Figure 2.

The Land Trust of Santa Cruz County (LTSCC) is planning the construction of a universally accessible nature pathway at Antonelli Pond that is partially funded by a California Coastal Conservancy grant to fund the planning process for the proposed trail system. The intention of the project is to build over half a mile of all-access trail that will meet the standards of the Americans with Disabilities Act (ADA) along the eastern and western sides of Antonelli Pond (SOURCE V.10).

The project consists of construction of a six-foot wide pervious concrete and stabilized decomposed granite trail, generally following the footprint of the existing dirt path on the east and west sides of Antonelli Pond. The total trail length is 0.29 mile on the west side and

0.13 mile on the east side for a total of 0.42 miles of upgraded trails. A short section will have a concrete band on the east side where the trail meets Delaware Avenue. Other improvements include:

- Area of slope stabilization and riparian restoration on west side
- Overlook and pond access point on east side, with boulder edging
- Overlook and accessible picnic area on west side
- Native demonstration garden on west side
- Entrance area from Delaware Avenue, with pervious concrete access to existing park host sit
- Relocation of one existing table and one existing sign
- Installation of landscape boulders and split rail fencing
- New park signage and interpretive displays.

Most of the existing site utilities and furnishing would remain intact, except for a few structure removals on the southwest side of the trail. The project would include the demolition and removal of an existing dock and stairs structure, footings, and all attached appurtenances, which are located on the southwest side of the trail. The removal of the dock and stair structure would not include the use of heavy equipment and removal of the structure would be performed by hand. Demolition and removal of an existing wood retaining wall would also be proposed. Slope stabilization and revegetation of an existing eroded slope is proposed, which would create 1,500 square feet (0.034 acre) of riparian woodland rehabilitation.

The park host site is located approximately 300 feet north of Delaware Avenue, adjacent to the west trail entrance of Antonelli Pond. Currently, the host site consists of a small trailer and is operated for 6 months out of the year. The proposed project has requested a permit to allow for an extension to a full year host site. The host site provides benefit to the park by greeting guest and visitors, as well as increase security around Antonelli Pond.

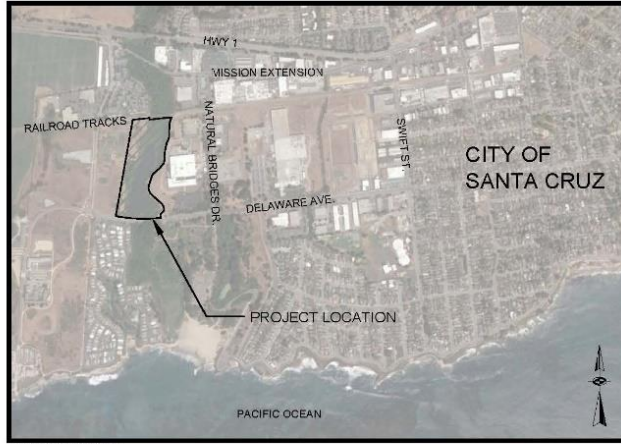
10. Other public agencies whose approval is required:

- California Department of Fish and Wildlife: Approval of Streambed Alteration Agreement
- Regional Water Quality Control Board: Potential review of report of waste discharge (ROWD)

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

FIGURE 1: Vicinity Location

VICINITY MAP



NOT TO SCALE

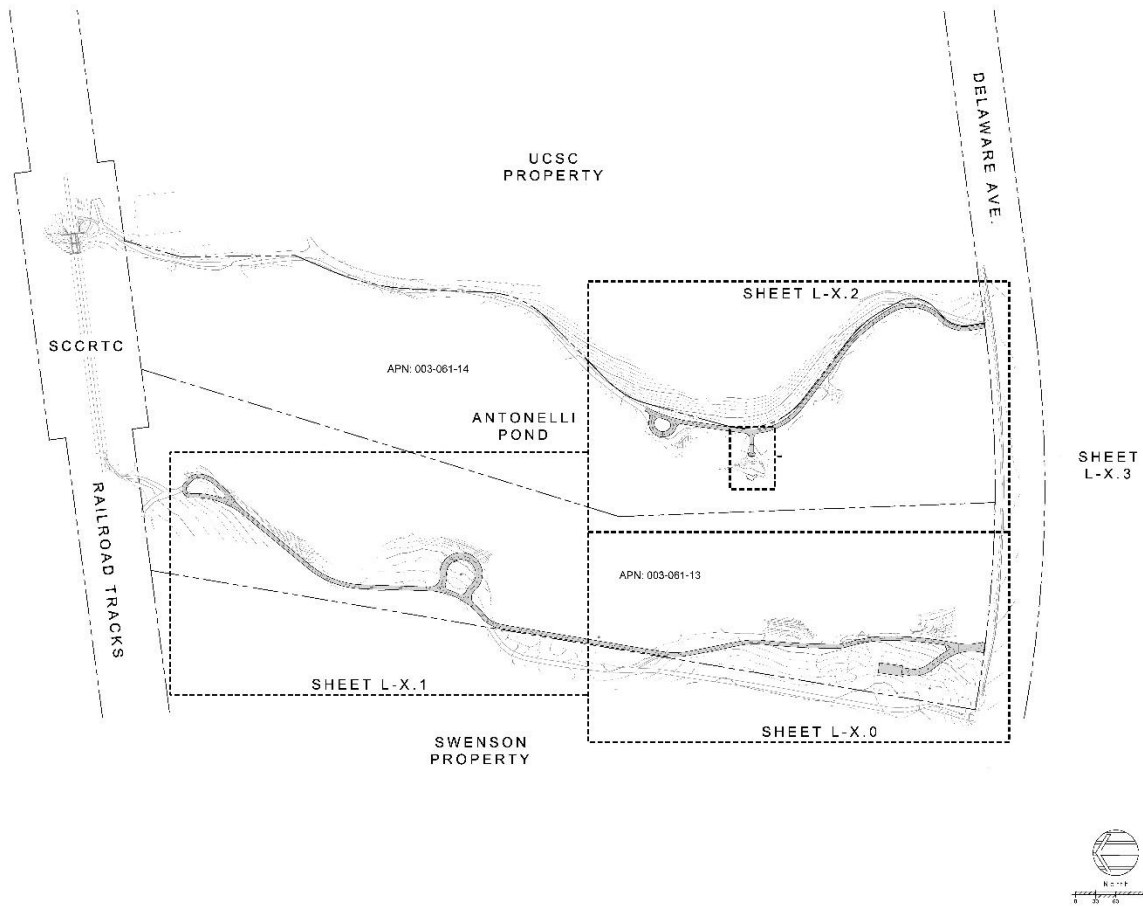
PROJECT MAP



SCALE: 1" = 300'-0"

Source: SSA Landscape Architects

FIGURE 2: Proposed Site Plan Overview



Source: SSA Landscape Architects

II. Environmental Setting and Surrounding Land Uses

The approximate 13-acre Antonelli Pond property is located on the west side of the City of Santa Cruz between Delaware Avenue and Mission Street across from Natural Bridges State Park. Access to the site is currently provided via Delaware Avenue. There is no existing parking at the project site. Street parking is available along Delaware Avenue. There are no existing sidewalks and bicycle parking available at the project site or along Delaware Avenue.

The pond itself consists of 6.4 acres. The project site is located in an area with a mix of uses, including residential uses to the south, a vacant residentially designated parcel and the University of California Santa Cruz (UCSC) Coastal Sciences Campus to the west, railroad tracks and the Pacific Shore Apartments to the north, and a UCSC Administration Building to the east.

Antonelli Pond is a human-constructed pond that is fed by Moore Creek that flows into the pond from the north. Currently, the Antonelli Pond property is undeveloped, and there are no structures, other than trail signs, a fishing dock and overlook benches. The project site supports a mosaic of vegetation types, from freshwater marsh and willow riparian woodland around the pond to areas of grassland, scrub, and tree groves in upland areas. A small seasonal wetland has also been documented at Antonelli Pond.

The LTSCC has owned and managed the property for public access since 1983 and most of the funding for stewardship of the pond comes from private donations from Land Trust members. The property provides nature viewing and recreational use opportunities, receiving hundreds of user visits per month from first time visitors and dedicated neighborhood pond fans. The site currently contains approximately one mile of narrow natural surface trails which provide access to either side of the pond (SOURCE V.10).

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 evaluate 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: <ul style="list-style-type: none"> 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.1b-DEIR volume) 				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul style="list-style-type: none"> 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			✓	✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				✓
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.	


 Clara Stanger, Senior Planner

8/16/2021

Date

V. References and Data Source List

Agency Plans, Studies and Reports

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. City of Santa Cruz Adopted Plans and Studies.
 - a. Adopted August 2016. *2015 Urban Water Management Plan*. Prepared by City of Santa Cruz Water Department. Available online at: <https://www.cityofsantacruz.com/home/showdocument?id=55047>.
 - b. March 2013. Santa Cruz Historic Building Survey, Volume III.
 - c. 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*. Available online at: <http://www.cityofsantacruz.com/government/city-departments/planning-and-community-development/area-plans-planning-documents-projects/city-wide-creeks-and-wetlands-management-plan>.
 - d. May 27, 2020. "Draft SB 743 Implementation Guidelines City of Santa Cruz.
3. 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.
4. California Department of Finance. May 2021. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark." Available online at: <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.
5. CAL FIRE, California Department of Technology. 2020. "California Fire Hazard Severity Zone Viewer". California State Geoportal. Accessed May 25, 2021. Available online at: <https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/>.

6. California Department of Toxic Substances Control (DTSC). 2021. "GeoTracker Antonelli Pond, Santa Cruz." California State Water Resources Control Board. Accessed June 3, 2021. Available at: <https://geotracker.waterboards.ca.gov/>.
7. California Coastal Commission. 2007. Staff Report Prepared November 21, 2007 (for December 13, 2007 hearing) Regarding UCSC Marine Science Campus Coastal Long Range Development Plan (CLRDP), Agenda Item Th12a.

Project Studies

8. Archaeological Resource Management. January 2021. Cultural Resource Evaluation of the Property at Antonelli Pond on Delaware Avenue in the City of Santa Cruz. Prepared for Land Trust of Santa Cruz County. January 4, 2021.
9. Biotic Resources Group. April 2021. Antonelli Pond Accessible Trail Project Santa Cruz, CA (APN 003-061-13, 14) Biotic Report. Prepared for Land Trust of Santa Cruz County. Updated April 6, 2021.
10. Land Trust of Santa Cruz County and Coastal Conservancy. Undated. Antonelli Pond Accessible Trail Project Planning.
11. PAST Consultants, LLC. January 2021. Historic Evaluation for Antonelli Pond, Santa Cruz, CA APN. 003-06-113/003-06-114. January 7, 2021.
12. SSA Landscape Architects, Inc. April 2021. Antonelli Pond Accessible Trail Project Technical Specifications.

VI. Explanation of Environmental Checklist Responses

1. Aesthetics

a) Scenic Views. The project site is located in the western portion of the City between Delaware Avenue and Mission Street. The project is located north of and across from Natural Bridges State Park. According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, there are no identified panoramic views that include the project site (SOURCE V.1b-DEIR Figure 4.3 1). Portions of the site are visible from Delaware Avenue, but most of Antonelli Pond is screened from view by existing vegetation. The proposed project consists of replacing an existing dirt trail with a six-foot wide pervious concrete trail and associated improvements. The proposed construction and improvements along the trail would not block, obstruct, or otherwise affect scenic views within the project area as none exist of or from the project site. Therefore, the project would not result in a substantial adverse impact to scenic vistas, and *no impact* would occur.

(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. One tree, an ornamental plum tree, is defined by the City as a heritage tree (see Section VI.4 (e)). The tree is located within the footprint of the proposed trail, on the west side of Antonelli pond, and is proposed for removal. The ornamental plum tree is not visually prominent or distinctive and would not be considered a scenic resource. No other trees on the project site are proposed for removal nor are there other physical features that would be considered scenic resources. Therefore, the project would have *no impact* on scenic resources.

(c) Visual Character. The project area is characterized by a mix of open space and developed residential, industrial and institutional land uses. Portions of the project site are visible from Delaware Avenue and adjacent properties, although Antonelli Pond is mostly screened by vegetation. There are no existing zoning or other regulations governing scenic quality that are applicable to the proposed project.

The proposed construction of the new paved trail and trail improvements would be similar with the existing Antonelli Pond trail appearance. Proposed trail improvements would utilize natural materials and are designed to blend with the natural surroundings. The low height and minimalistic design of the trail segments would blend with the adjacent vegetation and would be compatible with and similar to the style and appearance of the existing landscape around Antonelli Pond. Thus, the proposed project would not degrade the existing visual character of the project site or surrounding area. The project does not conflict with applicable zoning and other applicable regulations governing scenic quality as none exist that are applicable to the project. Therefore, the project would result in *no impact* on the visual character of public views.

(d) Light and Glare. The proposed project does not include any lighting and would not produce glare. *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 Figure 4.15-1). The project site is designated “Urban and Built-Up Land.” Neither the project 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 (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.3a).

The project consists of trail improvements and vegetation preservation and restoration within the existing Antonelli Pond site. The project would not result in construction of habitable structures or a stationary source of air emissions, and would not result in an increase in population. Therefore, the project would not result in new development that would conflict with or obstruct implementation of the current AQMP for the NCCAB. *No impact* would occur.

(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 (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), inhalable particulates (PM₁₀), fine particulates (PM_{2.5}), and lead. High O₃ levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO_x), which react under certain meteorological conditions to form O₃. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants. An area is designated as "in attainment" when it is in compliance with the federal and/or state standards, as further discussed below.

The project site is located within the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD) and includes Santa Cruz, Monterey, and San Benito Counties. The NCCAB is designated attainment for the federal PM₁₀ and SO₂ standards and is designated attainment/unclassified for the other federal standards. The NCCAB is designated attainment for the state PM_{2.5}, NO₂, SO₂, and lead standards, and is designated unclassified for CO in Santa Cruz County. The NCCAB has nonattainment designations for state O₃ and PM₁₀ standards.

The MBARD 2012-2015 AQMP, adopted March 15, 2017, identifies a continued trend of declining O₃ 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 O₃ standard during the three-year period reviewed (SOURCE V.3a).

Impact Analysis. The proposed project consists of trail improvements and vegetation preservation and restoration. Upon completion of construction, the project would not result in construction of a stationary source of emissions and would not result in direct or indirect emission of any criteria air pollutant emissions at a level that would violate any local, state, or federal ambient air quality standards or contribute substantially to any air quality violations.

Demolition of dock structure or any other structure within the riparian area to be performed by hand using no mechanized equipment. Additional earthwork activities minor grading, soil preparation, construction of the new trail, and erosion control during construction. The temporary use of equipment for construction and transport of materials would result in minor vehicular emissions. The MBARD's "CEQA Air Quality Guidelines," indicate that 8.1 acres could be graded per day with minimal earthmoving or 2.2 acres per day with grading and excavation without exceeding the PM₁₀ threshold of 82 lbs./day (SOURCE V.3a). The total project site area that could potentially be disturbed would be less than approximately one acre, which is below this threshold. Thus, the project would not significantly contribute to existing or projected air quality violations, and thus, would not result in a cumulatively considerable net increase for ozone or PM₁₀. Therefore, project emissions would not be considered substantial or result in an air quality violation, and the impact would be *less than significant*.

According to the MBARD CEQA Guidelines, projects that are consistent with the AQMP would not result 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 criterion 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.3c). The project site is located on the west side of the City of Santa Cruz. The closest sensitive receptor is located at Pacific Shores Apartment, approximately 520 feet north of the project site.

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. Project construction could involve the use of diesel trucks and light equipment that would emit diesel exhaust, including DPM, which is classified as a TAC. However, the project would be constructed over a short period of time and would not be directly adjacent to sensitive receptors, resulting in a *less-than-significant* impact.

Emissions from construction activities represent temporary impacts that are typically short in duration. Since construction is anticipated to occur in several months or less, 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 the closest sensitive receptors, which are approximately 500 feet from the construction area. 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.

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 a *less-than-significant impact*.

(d) Odors. According to the Air District's *CEQA Air Quality Guidelines* (SOURCE V.3c), land uses associated with odor complaints typically include landfills, agricultural uses, wastewater treatment plants, food processing plants, chemical plants, and refineries. The project would not result in long-term generation of odors. Reconstruction of existing trails are uses that are not generally associated with creation of objectionable odors, therefore *no impact* would occur.

4. Biological Resources

A biological assessment for the project was prepared by Biotic Resources Group (SOURCE V.9), and the results are provided in the following subsections. The property supports a mosaic of vegetation types, from freshwater marsh and willow riparian woodland around the pond and areas of grassland, scrub, and tree groves in upland areas. A small seasonal wetland has also been documented.

(a) Special Status Species. Special status wildlife species include those federally- or state-listed, proposed or candidate species, as well as those identified as State species of special concern. The biotic resources assessment concluded that the site does not support suitable habitat for special status plant species and none were observed, or are predicted, to occur in the project area (SOURCE V.9).

With regards to special status wildlife species, there is one record of a California red-legged frog (CRLF) (*Rana draytonii*) listed in the CNDDDB observed at Antonelli Pond from 1996 (CDFW 2021); that frog was observed during the summer. The species is a federally-listed threatened species and a California Species of Special Concern. There are several known occurrences of CRLF in ponded areas adjacent to the railroad tracks north of the project site at the UCSC Coastal Sciences campus to the west, as well as at ponds located near Moore Creek upstream and downstream of the site. CRLF are known to breed nearby in the Wilder Creek system (approximately one mile to the west), in a pond within the Moore Creek drainage (at the UCSC Arboretum about two miles north of the site) that feeds into Antonelli Pond, and within Natural Bridges State Park (SOURCE V.7).

Antonelli Pond does not provide suitable breeding habitat for CRLF because of the presence of non-native predatory fish such as bass. In 2012, a non-profit group *Save the Frogs* installed a “barrier” across a portion of Antonelli Pond to try to exclude fish from an area and presumably provide potential breeding habitat for the CRLF. No reports or publications were found that showed any follow up surveys were conducted to determine if this barrier was successful. According to the best available information at this time, Antonelli Pond may provide some summering habitat for CRLF, but is not suitable breeding habitat (SOURCE V.9).

Antonelli Pond may provide some habitat for pond turtles. There are no records in the CNDDDB from Antonelli Pond; however, there are listed as occurring in Antonelli Pond in the City’s General Plan 2030 Draft EIR (Ecosystems West 2009). No other special status wildlife species (listed, proposed or candidate species by federal or the state resource agencies, or identified as State species of special concern) are expected to occur at this project site. The City’s General Plan 2030 identifies some species that utilize coastal habitat for roosting and/or breeding and have been recorded as occurring at Antonelli Pond, including Black-crowned night heron (*Nycticorax nycticorax*) and doublecrested cormorant (*Phalacrocorax auratus*). Nests of San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), a California Species of Special Concern, were observed in riparian areas on the site (SOURCE V.9).

Impact Analysis. Development of the trail improvements would result in ground disturbance that could directly affect CRLFs and San Francisco dusky-footed woodrats, if any individuals are present at the time of construction. This is considered a *potentially significant impact* as both of these species is considered a special status species.

Implementation of Mitigation Measures BIO-1 and BIO-2 would reduce the impact to special status wildlife species to a less-than-significant level.

MITIGATION MEASURE BIO-1. Require implementation of the following measures to avoid and minimize potential impacts to listed California red-legged frog (CRLF).

- a. At least 15 days prior to the onset of activities, the LTSCC shall submit the name(s) and credentials of a qualified biologist to the U.S. Fish and Wildlife Service (USFWS or Service) at least 15 days prior to the onset of activities. No project activities shall begin until the Service approves the biologist(s) is qualified to conduct the work.
- b. A Service-approved biologist shall survey the work site no more than 48 hours before the onset of vegetation clearing or ground disturbing activities. If CRLF are found, work shall stop and animal allowed to leave the site. Unless LTSCC receives a permission from USFWS, there shall be no capture, handling, or moving of CRLF.
- c. Before any activities begin, the Service-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of listed species and its habitat, the importance of the species and its habitat, general measures that are being implemented to conserve the species as they relate to the project, and the boundaries within which the project may be accomplished. Brochures, books and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.
- d. The Service-approved biologist shall be present at the work site during initial ground disturbance and vegetation removal to monitor on-site compliance with all minimization measures if frogs are deemed to be present in the work area.
- e. During project activities, all trash that may attract predators shall be properly contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris shall be removed from work areas.
- f. All refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from any riparian habitat or water body. The LTSCC shall ensure contamination of habitat does not occur during such operations. LTSCC shall prepare a plan to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

MITIGATION MEASURE BIO-2: To avoid impacts to San Francisco dusky-footed woodrat nests, require a qualified biologist conduct a pre-construction survey for woodrat nests prior to construction. If any nests are observed within the limits of work, the work area shall be either revised to avoid impacting the nest or a woodrat relocation program shall be developed and implemented by a qualified biologist.

(b) Riparian and Sensitive Habitat Areas. Sensitive habitats are defined by local, state, or federal agencies as those habitats that support special status species, provide important habitat values for wildlife, represent areas of unusual or regionally restricted habitat types, and/or provide high biological diversity. Sensitive habitat areas on the project site include the open water and freshwater marsh of Antonelli Pond, the associated willow-dominated riparian woodland and the isolated seasonal wetland, which are also considered sensitive habitat areas in the City's

General Plan and Local Coastal Program (LCP) (SOURCE V.9). Wetlands are addressed below in subsection (c).

The project is located within the City of Santa Cruz and within the Coastal Zone. Activities within and adjacent to the riparian woodland along Antonelli Pond are regulated by the City of Santa Cruz. The *City-wide Creeks and Wetlands Management Plan* requires a site-specific review of activities adjacent to the pond. The Plan does not specify a development setback or management area for Antonelli Pond, but requires preparation of a site-specific biological resources investigation and specific recommendations for development, which has been completed for the proposed project. Moore Creek Reach 1 (downstream of Antonelli Pond) has a designated riparian corridor width of 100 feet, a development setback of 130 feet and a management area 155 feet, all measured outward from the centerline of the watercourse. Moore Creek Reach 2 (upstream of Antonelli Pond) has a designated riparian corridor width of 100 feet, a development setback of 150 feet and a management area of 175 feet. Only in the most southern and northern ends end of Antonelli Pond, do these Moore Creek watercourse setbacks apply (SOURCE V.9).

According to the Creeks Management Plan, a draft *Antonelli Pond Interim Management Plan* was prepared in 1980 and, in 1995, a draft *Antonelli Pond Conceptual Management Plan* was prepared. The LTSCC has been implementing the pond management plan since this time, which has included community work days to remove invasive plant species, install native species, and actions to improve aquatic resources in the pond (SOURCE V.9).

Impact Analysis. The proposed project would result in removal of a small amount of riparian woodland habitat and could result in indirect impacts to riparian habitat due to inadvertent disturbance during construction. This is considered a *potentially significant impact*.

The majority of the trail improvements would occur within the footprint of the existing trail and adjacent annual grassland. The project includes allowable uses in the riparian corridor, such as a removal of a deck and pond edge bank protection/revegetation. The trail improvements would follow the watercourse development standards set forth in the City's Creeks and Wetlands Management Plan, including use of permeable paving, construction-period best management practices, and habitat restoration and enhancement (SOURCE V.9).

However, one 250 linear-foot trail section on the west side would require removal of riparian woodland. The canopy of riparian vegetation extends onto the adjacent property and at this location trail construction would impact 6,240 square feet (0.14 acre) of riparian willow woodland. The proposed project would also remove an existing fishing dock from the edge of the pond (west side). It is also noted that dense stands of invasive, non-native plant species (poison hemlock) would also be removed in this, which would benefit the riparian area. An existing wooden deck and stairs (150 square feet [0.0003 acre]) would be removed and an area of 1,500 square feet (0.034 acre) that currently contains no vegetation would be restored with willow riparian vegetation. (SOURCE V.9). This would provide partial mitigation, but area is required to meet a riparian mitigation

replacement of 2:1, which is typically required by state resource agencies, including CDFW.

Implementation of Mitigation Measures BIO-3 and BIO-4 would reduce the impact to special status wildlife species to a less-than-significant level.

MITIGATION MEASURE BIO-3. The LTSCC shall prepare and implement a Riparian Mitigation and Monitoring Plan (RMMP) that provides a 1:1 habitat replacement for temporary impacts and 2:1 habitat replacement for permanent impacts (0.28 acres) to waters of the State, including in-kind habitat replacement for removal of riparian habitat. The RMMP shall be reviewed and approved by the City and applicable regulating agencies prior to construction. The RMMP shall specify riparian planting locations, plant species palette, success criteria, and a 5-year maintenance, monitoring, and reporting program.

MITIGATION MEASURE BIO-4. Require implementation of measures to protect the riparian woodland, freshwater marsh and open water of the pond from inadvertent impacts during construction of all project features, including installation of temporary construction fencing and silt fencing at the limit-of-work areas to prevent inadvertent entry of sediment and debris into retained habitat areas, with fencing maintained throughout the construction period. No material shall be stockpiled, stored, or side cast outside the limit of-work fencing.

(c) Wetlands. The edge of Antonelli Pond supports a band of freshwater marsh of varying width. The marsh is co-dominated by cattail (*Typha latifolia*) and California bulrush (*Schoenoplectus californicus*). Other species include water smartweed (*Persicaria spp.*), nutgrass (*Cyperus eragrostis*), and overhanging willow limbs (SOURCE V.9).

Open water occurs in the pond year-round as it is an artificial impoundment of lower Moore Creek, a perennial waterway. Water enters the pond from the upper watershed north of State Highway 1 and then through culverts under Mission Street and an open channel to the railroad tracks. The pond's water level is controlled by culverts along Delaware Avenue. Flows from Antonelli Pond reach Monterey Bay via a creek and coastal lagoon located within Natural Bridges State Park. Aquatic vegetation occurs in the ponds, most noticeable is common duckweed (*Lemna minor*) and mosquito fern (*Azolla sp.*) (SOURCE V.9).

An isolated seasonal wetland feature was documented in the northwest corner of the LTSCC property that was reported to support a mixture of native and non-native species. The approximately 0.2-acre area supports hydrophytic vegetation, hydric soils, and hydrology (SOURCE V.9).

All project elements have been designed to be sited outside of Waters of the U.S, and no permit from the U.S. Army Corps of Engineers is expected (SOURCE V.9).

Impact Analysis. Development of the trail improvements could result in inadvertent transport of sediment and construction materials into Antonelli Pond. Project plans

indicate that that erosion control measures shall be maintained in conformance with standard construction practices as required to protect the project site and/or adjacent properties from damages due to natural or man-made erosive forces. Other measures are included in the erosion control plan and include erosion control measures on bare soils between October 15 and April 15. Further erosion control measures are provided in the project specifications, including the requirement that any sediment or dust be prevented from leaving the project site, either water-borne, air-borne, on the tires of vehicles, or by spillage from hauling. With implementation of project-proposed erosion control measures, indirect impacts to Antonelli Pond would be avoided or minimized, resulting in a *less-than-significant impact*.

(d) Wildlife Movement/Nesting.

Wildlife Movement. Wildlife corridors are segments of land that provide a link between 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.). Past studies also have indicated potential dispersal movement of CRLFs to the UCSC Coastal Sciences campus from areas along Moore Creek to the north and Wilder Creek to the west that could be considered a movement corridor (SOURCE V.7).

The project consists of constructing a new trail in the location of an existing trail, and would not result in any new structures that would obstruct or otherwise interfere with wildlife move. Therefore, the project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, resulting in *no impact*.

Nesting Birds. The trees and shrubs on the property provide potential nesting habitat for migratory birds which are protected by the Migratory Bird Treaty Act (MBTA) and California Department of Fish and Wildlife (CDFW) Code. In addition, all raptor nests are protected by the CDFW Code.

Impact Analysis. The project would result in removal of one non-native, horticultural tree, which has the potential to destroy bird nests, eggs or chicks if any are present during construction. Construction activities also have the potential to cause direct and indirect impacts to nesting migratory birds and raptors within the project area, if any are present. Removal of vegetation, and increased noise and dust from construction activities has the potential to indirectly impact nesting birds potentially resulting in the abandonment of nests by parent birds, and death to eggs or nestlings (SOURCE V.9). This is considered a *potentially significant impact*.

Implementation of Mitigation Measure BIO-5 would reduce the impact to nesting birds to a less-than-significant level.

MITIGATION MEASURE BIO-5. To avoid impacts to migratory birds and raptors that may be present in the project area, all ground disturbances (including vegetation removal) shall be scheduled to occur outside the bird-breeding season on the Central California Coast, which is September 1 to February 1 of any given year. If project activities are scheduled during the nesting season (February 1 through September 1) of protected raptors and other avian species protected under the MBTA, a focused survey for active nests of such birds shall be conducted by a CDFW-approved qualified biologist within three (3) days prior to the beginning of project activities. Surveys shall be conducted in all suitable habitat located at project work sites, in staging, storage and soil stockpile areas, and along transportation routes. The minimum survey radii surrounding the work area shall be the following: 250 feet for passerines; 500 feet for other small raptors such as accipiters; and 1,000 feet for larger raptors such as buteos. Surveys shall be conducted at the appropriate times of day, and during appropriate nesting times and shall concentrate on areas of suitable habitat. If a lapse in project activities of seven (7) days or longer occurs, another focused nesting bird survey shall be completed. If any active bird nests are observed, the biologist shall designate a buffer zone around the nest tree or shrub as follows: 200 feet for nesting raptors and 50 feet for all other bird species. This buffer zone may be adjusted if the biologist determines that other factors may help shield the active nest, such as vegetative screening between the nest and the vegetation removal site that reduces the nesting bird's ability to see the activity. No vegetation removal shall take place within the buffer zone until the biologist has determined that all chicks have fledged and are able to feed on their own. (Creek Plan Standard 12)

(e) Conflicts with Local Ordinances – Tree Removal. The proposed project identified thirty-three (33) existing trees, nineteen (19) of which are identified as heritage trees under City definitions. One heritage tree, a non-native plum (*Prunus sp.*), would be removed. The *Prunus sp.* is located amid the trail path and would need to be removed to allow for trail improvements. Furthermore, the trunk is split and the tree health is compromised (SOURCE V.9).

Chapter 9.56 of the City Municipal Code defines heritage trees, establishes permit requirements for the removal of a heritage tree, and sets forth mitigation requirements as adopted by resolution by the City Council. Generally, trees with a 14-inch or larger diameter are heritage trees. Resolution NS-23, 710 adopted by the City Council in April 1998 establishes the criteria for permitting removal of a heritage tree and indicates that one or more of the following findings must be made by the Director of Parks and Recreation:

- 1) The heritage tree or heritage shrub has, or is likely to have, an adverse effect upon the structural integrity of a building, utility, or public or private right of way;
- 2) The physical condition or health of the tree or shrub, such as disease or infestation, warrants alteration or removal; or
- 3) A construction project design cannot be altered to accommodate existing heritage trees or heritage shrubs.

Resolution NS-21, 436 sets forth the tree replacement/mitigation requirements for approved removal of a heritage tree to include replanting three 15-gallon or one 24-inch size specimen or the current retail value which shall be determined by the Director of Parks and Recreation. In the coastal zone, the City's certified Local Coastal Program (LCP) requires a two-to-one replacement ratio for removal of heritage trees, which would be six 15-gallon or two 24-inch specimens. Removal would be permitted if found in accordance with the above criteria and requirements. Approval of a tree removal permit automatically requires replacement trees as set forth above. Removal of heritage trees consistent with City regulations and requirements is not considered a significant impact.

Impact Analysis. Project construction would result in the removal of one heritage tree, a non-native ornamental plum tree, located on the west side of Antonelli pond, amid the willow riparian woodland. The project plans do not identify a replacement tree, and thus, the project would result in a conflict with existing heritage tree regulations, which is considered a *significant impact*. The tree is located in the path of the improved trail and would need to be removed to allow for trail improvements. Furthermore, the trunk is split and the tree health is compromised. There is no reasonable alteration of the proposed site plan that would allow for retention of the removed tree.

Implementation of Mitigation Measure BIO-6 would reduce the impact to a less-than-significant level as replacement trees in the required ratio would be provided in accordance with City regulations. Removal of heritage trees consistent with City regulations is not considered a significant impact.

MITIGATION MEASURE BIO-6. Require project plans to show replacement of one heritage tree identified for removal with planting six (6) 15-gallon trees or two (2) 24-inch trees to satisfy the City's replanting ratio in the coastal zone.

(f) Habitat Conservation Plans. There are no adopted Habitat Conservation or Natural Community Conservation Plans in the project vicinity.

5. Cultural Resources

(a) Historical Resources. Historically, the project site made up a portion of Rancho Refugio, originally granted by Governor Juan B. Alvarado to María Candida, Jacinta, and María de los Angeles Castro. In 1850 the area now known of Hyde Grove, near the northeast corner of the pond, was the location of the home of George Hyde. The land was the property of Dwight Younglove in the 1880s. By 1908 the property was owned by the San Vicente Lumber Company, who flooded an approximately seven acre portion of Moore Creek, creating the pond. They operated their lumber mill on the property, with logs being delivered to the property via the adjacent railroad tracks. The San Vicente Lumber Mill was utilized as a setting for several early silent films in the 1910's and 1920's. The former boiler house of the lumber mill was converted in the mid-1920s for use as a mushroom farm by the Young Brothers. Shortly thereafter, during prohibition, the boiler house was used as an illicit distillery and speakeasy. This structure was

later converted for use as the boathouse and rowboat concession for Mazzoni's Hotel, located across Delaware Avenue (SOURCE V.11).

By the mid-20th century the property was owned by the Antonelli Brothers, who operated a begonia farm on the property, with the pond providing irrigation and used as a fishing hole. These begonias were utilized in the begonia festival and parade in Capitola Village. Since that time, the body of water has been known as Antonelli Pond.

The project site is not located within a designated historic district (SOURCE V.1b-DEIR Figure 4.9-4). There are no existing structures on the project site, except for a trail, small dock and benches. However, the project site is listed in the City's Historic Building Survey (Volume III). The property contains the only remaining historic resource from the era of the San Vicente Lumber Company: the log staging pond for the lumber mill (SOURCE V.2b). The survey states:

Originally created as a 6.4-acre log pond fed by Moore Creek in 1908 by San Vicente Lumber Company, the pond was later named for the Antonelli family who cultivated begonias nearby. This man-made body of water is the only remaining vestige of the turn-of-the-century San Vicente Lumber Company. A rare historic resource in the Santa Cruz area, it is a significant representation of the lumbering industry that was such a large part of the city's early history. Encroaching development on the site prompted the acquisition of the land by the Land Trust of Santa Cruz County. Since the early twentieth century it has been evolving as a 13.7-acre historical and ecological landmark (SOURCE V2b).

According to the City of Santa Cruz's historic preservation ordinance, alterations to a listed historic property must conform to the *Secretary of the Interior's Standards for Rehabilitation* before a Historic Alteration Permit is granted, as outlined in Chapter 24.08.930 of the City of Santa Cruz Municipal Code.

Impact Analysis: The proposed project consists of construction of a pervious concrete and decomposed granite trail, generally following the existing dirt path, removal of existing stairs and dock platform on west bank and replacement with boulder terraces consisting of water-washed granite; and relocation or installation of new park benches and picnic tables. The proposed improvements were evaluated for conformity to the Secretary of Interior *Standards* for rehabilitation, and it was determined that the proposed design alterations meet the *Secretary of the Interior's Standards for Rehabilitation of Cultural Landscapes* (SOURCE V.11). The proposed changes do not impact the remaining character-defining features or overall historic integrity of the site. Because the proposed alterations meet the *Standards*, the alterations are considered as mitigated to a level of less than a significant impact on the historic resource and do not constitute a substantial adverse change to the historic resource (Ibid.). Therefore, the project would result in a *less-than-significant impact* to historical resources. However, the project historian recommended that an interpretive panel that describes Antonelli Pond's unique cultural history be installed at the project site.

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

An archaeological investigation of the site was conducted in 2021, which included a records search at the California Historical Resources Information System (CHRIS) at the Northwest Information Center (NWIC) at Sonoma State University. Archival research revealed that no previously recorded sites are located within the project area. However, seven previously recorded resources are located within a ¼ mile radius of the project area (SOURCE V.8).

An intensive general surface reconnaissance was conducted by a qualified archaeologist on all visible open land surfaces in the project area. A controlled intuitive reconnaissance was performed in places where burrowing animals, exposed banks and inclines, and other activities had revealed subsurface stratigraphy and soil contents. No traces of significant cultural material, prehistoric or historic, were noted during pedestrian survey (SOURCE V.8).

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, and no previously recorded archaeological resources are located within the proposed project area. However, seven previously recorded resources are located within a one-quarter mile radius of the proposed project area, and the project area has been the site of a variety of historic activities since the creation of Antonelli Pond in 1908. Due to the proximity of multiple recorded prehistoric archaeological sites, as well as the variety of historic activities which occurred within the proposed project area, the project archaeologist recommended that archaeological monitoring be carried out during earth moving activities for the proposed project. However, the project does not propose substantial grading or excavation to create the proposed widened, accessible trail segments. Therefore, potential disturbance to cultural resources is considered 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. 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.

Although mitigation measures are not required as a significant impact has not been identified, the following Condition of Approval is recommended in accordance with recommendations in the project archaeological report.

RECOMMENDED CONDITION OF APPROVAL: Require that an archaeological monitor be present during earth moving activities for the proposed project.

6. Energy

Pacific Gas and Electric Company (PG&E) provides electricity and natural gas service to the City. PG&E 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 in the nation. 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 includes replacing existing dirt trails with a pervious surface and improving other trail features. The temporary use of equipment for construction and transport of materials would result in minor energy consumption related to equipment use and construction worker trips. The future use of the Antonelli Trail is intended for outdoor recreation, and there would be no increased in permanent energy demand. Therefore, the use of the new trail would not contribute to the wasteful, inefficient, or unnecessary consumption of energy and other resources and would result in *no impact*.

(b) Conflicts with Plans. Construction of the proposed trail would not conflict with or obstruct implementation of a state or local plan for renewable energy. 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, which is approximately 8 miles to the northeast and the San Gregorio, which is approximately 13 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). The closest active fault is the San Andreas fault, located approximately 9.9 miles northeast of the project site. Therefore, the project would result in *no impact* related to adverse impacts of fault rupture.

(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, Antonelli Pond is located in an area or adjacent to an area susceptible to liquefaction (SOURCE V.1b-DEIR Figure 4.10-4). 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. However, the proposed trail would not result in construction of new habitable structures, and therefore, would not directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving seismic shaking or liquefaction. Thus, the project would result in a *less-than-significant impact*.

(b) 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 Watsonville loam and Baywood sandy loam (SOURCE V.1b-DEIR Figure 4.10-6), neither of which are rated as having a high erosion hazard (SOURCE V.1b-DEIR volume). The project would not result in substantial grading that could lead to erosion due to limited proposed grading and proposed erosion control measures, and once completed, the trails would not lead to loss of topsoil. Therefore, the project would not result in substantial soil erosion or loss of topsoil, resulting in a *less-than-significant impact*.

(c) Geologic Hazards. Non-seismically induced hazards include slope instability, cliff retreat, and non-seismic settlement and landslides (SOURCE V.1a). The project site is relatively flat or gently sloping is not identified as being in an area subject to landslides as shown in the City's *General Plan 2030* and included in the General Plan EIR (SOURCE V.1b-DEIR Figure 4.10-3). The proposed trail would not be subject to geologic hazards, resulting in *no impact*. result in a *less-than-significant impact* related to erosion, and no mitigation measures are required.

(d) Expansive Soils. The project consists of improvement of existing trails and would not result in construction of structures that would be subject to expansive soils, resulting in *no impact*.

(e) Septic Systems. The project does not propose 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 (SOURCE V.1b-DEIR Figure 4.9-5), which is one of four geologic units in Santa Cruz County known to contain fossils. Paleontological resources have been found along the coast and scattered locations in the City (SOURCE V.1b, DEIR volume).

Impact Analysis. While the project site does not contain known paleontological resources, construction activities could potentially destroy unknown paleontological resources if discovered during construction. However, the proposed project would involve minor grading for alignment of the proposed trail where an existing dirt trail exists, and would not involve substantial excavation. Nonetheless, 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 would 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 CONDITION OF APPROVAL: 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 would take over the next 10 years to reduce GHG emissions by 30 percent.

The proposed project involves construction of a 6-foot wide pervious trail along the alignment of an existing dirt trail with habitat restoration. The project does not involve any new sources of stationary or mobile greenhouse gas emissions. Temporary construction activities include delivery of materials from supply sources to the project area and use of small mechanized construction equipment and hand tools. The trail improvements and habitat restoration would not generate any greenhouse gas emissions except for minimal, temporary emissions during delivery of construction materials to the project area and during some construction activities. Therefore, emissions would be minor and temporary, and the project would result in a *less-than-significant impact* with regards to greenhouse gas emissions.

(b) Conflicts with Applicable Plans. The project would not conflict with state plans adopted for the purpose of reducing GHG emissions. The General Plan EIR found no impacts related to conflicts with applicable plans related to GHG emissions and reduction strategies.

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, measures are outlined for the following sectors: municipal, residential, commercial, and community programs. There are no measures that are applicable to the proposed project. Therefore, the project would not conflict with provisions of the CAP, and *no impact* would occur.

9. Hazards and Hazardous Materials

(a-b) Hazardous Material Use, Sites and Emissions. The proposed project does not include the routine transport, use, or disposal of hazardous materials. Project construction would be conducted with hand tools or small mechanized equipment that would not require use of hazardous materials such as fuels and oils. No herbicides would be used to control invasive, non-native plant species. Thus, there would be *no impact* related to routine transport, use, disposal or accidental release of hazardous materials.

c) Hazardous Emissions. There are two schools, UCSC Coastal Sciences Campus and Pacific Collegiate School, that are located within one-quarter mile of the project site. UCSC coastal campus is located approximately 0.25 miles to the west, and Pacific Collegiate School on Mission Street is located approximately 0.25 miles north of the project site. However, the proposed trail rehabilitation project would not result in stationary sources that would result in hazardous emissions. Therefore, the proposed project would result in *no impact* related to hazardous emissions near school facilities.

d) Hazardous Materials Site. The project site is not included on the California Department of Toxic Substance Control and State Water Resources Control Board list of hazardous materials sites (SOURCE V.6). The project would not create a significant hazard to the public; therefore, *no impact* would occur.

(e) Location Near Airports. The project site is not located within two miles of a public airport or private airstrip. Therefore, the project would result in *no impact*.

(f) Emergency Response. Existing and proposed access to the project site is from Delaware Avenue. The project would 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 site is not located in a fire hazard area (SOURCE V.1b-DEIR Figure 4.6-1). Natural Bridges State Beach, located approximately 200 feet south of the project site, is designated as an area of high fire hazard (SOURCE V.1b-Figure 4.6-1). All construction for the proposed trail replacement and rehabilitation is proposed to be completed with temporary use of small mechanical equipment and hand tools. The project would not result in construction of new habitable structures, but would allow for continued passive recreational use at Antonelli Pond. Thus, the project would not expose structures to wildfire risks and would not expose people to significant injury or death as the recreational use at the

project site would be restricted and/or people evacuated in event of nearby wildfires. Therefore, the proposed project would result in *no impact*. See also section IV.20 below.

10. Hydrology and Water Quality

(a) Water Quality. The principal surface water drainage in project area is Antonelli Pond, which is fed by Moore Creek.

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.

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 could result in erosion and/or inadvertent transport of construction debris into Antonelli Pond, resulting in water quality degradation if standard Best Management Practices (BMPs) are not implemented. This is considered a *potentially significant impact*.

Some minor potential for erosion exists during the construction phase, although as discussed in section V1.7(b) above, the project does not propose substantial grading or excavation that could lead to substantial erosion, and project plans include erosion control measures. Other construction debris or materials could be inadvertently carried into Antonelli Plan. However, implementation of the proposed erosion control measures and construction water quality BMPs set forth in Mitigation Measures HYDRO-1 would reduce the impact to a *less-than-significant impact*, and the project would not result in adverse impacts to water quality

MITIGATION MEASURE HYDRO-1. Implement erosion control measures during project construction as proposed, including, but not limited to: 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 adjacent to Antonelli Pond during construction to prevent inadvertent erosion and offsite transport of sediments or construction materials into the pond. Locate all construction equipment, soils and other materials in upland areas away from the pond.

(b) Groundwater. The project site is located within the West Santa Cruz Terrace groundwater basin (SOURCE V.1b-DEIR Section 4.5). The project site is not located within a water supply aquifer. The proposed trail project would not utilize groundwater, and the proposed pervious surfacing would not affect groundwater recharge. Therefore, the project would have *no impact* on groundwater supplies or recharge.

(c-i, iii) Drainage. The project site is located adjacent to Antonelli Pond. The proposed trail project, which consists primarily of pervious surfacing, would not result in an increase in runoff due to an increase in impervious surfaces. Therefore, the project would not alter existing drainage pattern or result in substantial increases in runoff that would result in substantial on- or off-site erosion or siltation or exceed capacity of existing stormwater drainage facilities, resulting in a *less-than-significant impact*.

(c-ii, d) Flood and Tsunami Zones. Antonelli Pond is located within a Federal Emergency Management Agency (FEMA) flood hazard area (SOURCE V.1b-DEIR Figure 4.7-1) and in a tsunami inundation zone (SOURCE V.1b-DEIR Figure 4.7-2). However, once constructed, the proposed trail project would not result in release of pollutants or contaminants to Antonelli Pond, and 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 adjacent to Antonelli Pond. Water quality objectives are included in the Water Quality Control Plan for the Central Coastal Basin (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 the proposed trail improvements would not result in permanent increases in runoff or affect water quality. Project proposed erosion control measures and Mitigation Measure HYDRO-1 would prevent water quality impacts during construction.. A sustainable groundwater 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.

11. Land Use and Planning

(a) Physical Division of Community. The project site is located in an existing natural area that is surrounded by institutional, residential and industrial uses. The proposed project would not

physically divide an established community as it is a trail within Antonelli Pond. *No impact* to an established community would occur as a result of the project.

(b) Consistency with Local Policies/Plans. The proposed trail improvement project is consistent with the General Plan and zoning designations for the site. The City's LCP and *General Plan 2030* includes a number of policies for protecting sensitive habitat areas and avoiding/mitigating potential impacts from development. These policies are intended to protect sensitive habitat areas and important vegetation communities and wildlife habitat and to prevent disturbance during breeding or loss of habitat due to construction and recreational activities. Revegetation and restoration of native plant areas also is supported in the General Plan. The General Plan also indicates that as part of the CEQA review process, future development projects would be required to evaluate and mitigate potential impacts to sensitive habitat (including special-status species) for sites located within or adjacent to these areas.

The proposed project would improve an existing trail and proposes riparian restoration. Additional Mitigation Measure BIO-3 also requires additional riparian mitigation. The project is consistent with the *City-wide Creeks and Wetlands Management Plan*, which requires site-specific reviews prior to development approval for activities that could impact potential resources. A biological resources assessment was conducted for the project, and potential impacts were identified that could occur during construction, but could be mitigated to a less-than-significant level with mitigation measures included in the biological report and in this Initial Study. Therefore, the project would not cause a significant impact due to a conflict with a plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and would result in *no impact* related to conflicts with City policies and regulations.

12. Mineral Resources

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

13. Noise

a) Exposure to Noise Standards in Excess of Standards. The proposed trail project would not result in construction of new structures or introduction of persons that would be subject to noise or result in increased ambient noise levels in the project area. Trail use would not result in a permanent increase in ambient noise levels as discussed below. Thus, the project would result in *no impact* related to exposure of people to noise standards that exceed adopted standards.

b) Exposure to or Generation of Vibration. Construction of the project would not require the use of explosives, pile driving, or other equipment that would generate excessive ground borne vibration or ground borne noise levels. The new trail would be constructed with hand tools and small mechanical equipment that would not result in vibration. Therefore, the proposed project would result in *no impact* regarding exposure to or generation of vibration.

(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 proposed project consists of trail improvements and protection and preservation of surrounding vegetation. The project does not include development of new homes, businesses, extension of roads, or other infrastructure that would result in increased population. Therefore, the project would not directly or indirectly induce population growth and would result in *no impact* related to population increases.

(b) Displacement of People or Housing. The project would result in improvements to the existing trail at Antonelli Pond. The project would not displace people or result in a substantial displacement of housing. Therefore, the project would result in *no impact*.

15. Public Services

(a-e) Fire, Police, Schools, Parks, and Other Public Services. The proposed project would be served by existing public services. The project consists of trail improvements and restoration at Antonelli Pond. The project would not include an expansion of recreational facilities or introduction of new uses but would provide a more accessible path than currently exists. The project would not result in increased demand for fire protection services, schools, parks or other public services. The recreational uses associated with the proposed project would not substantially increase police service calls. While there may be some increased recreational use with the new trail and potential service calls to the Police Department, the extent of such potential calls would have no measurable impact on existing public services in that it would not require expansion of police service facilities. Construction of new fire or police facilities to serve the project would not be warranted. Therefore, the project would result in *no impact* to public services.

16. Recreation

(a) Increased Recreational Use and Deterioration of Facilities. The proposed trail improvements would not result in population growth that would increase use of existing neighborhood and regional parks. The project would replace approximately 0.8 miles of existing trails around Antonelli Pond. The purpose of the project is to provide people of all abilities a way to access the pond shoreline. The project would improve public access around the pond by providing an accessible trail. By providing defined routes, and by reinforcing the trail surfaces with firm, stable and porous material, the capacity of the trail system to accommodate visitors would be enhanced. The inclusion of wheelchair access and upgraded trail surfaces may attract more visitors; however, this potential increase is not anticipated to be so substantial that accelerated deterioration of the trail system would result. Therefore, the project would result in *no impact* related to increased usage at Antonelli Pond that would result in a substantial physical deterioration of the facility.

(b) Recreational Facility Impacts. The proposed project consists of trail improvements and restoration at Antonelli Pond. Potentially significant impacts have been identified regarding biological resources and water quality, which can be mitigated to a *less-than-significant* level as discussed in subsections VI.4 and VI.10.

17. Transportation/Traffic

(a) Conflict with Circulation Plan, Policy, or Ordinance. The *General Plan 2030* includes goals, policies and actions that set forth comprehensive measures to reduce vehicle trips, increase vehicle occupancy, encourage use of alternative transportation modes, and promote alternative-sustainable land use patterns, all of which would help reduce vehicle trips, and avoid and minimize adverse impacts related to traffic. The project consists of improvements to an existing recreational trail in a neighborhood with residential, recreational and institutional uses. The project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, or pedestrian facilities. 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 and would result 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.

A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's VMT and may revise those estimates to reflect professional judgment based on substantial evidence. A lead agency may elect to be governed by the provisions of this section immediately; beginning on July 1, 2020, the provisions shall apply statewide.

The City of Santa Cruz adopted a VMT transportation threshold on June 9, 2020 in accordance with CEQA and state requirements. The threshold establishes a no net increase in VMT for residential, retail and other non-residential uses for land use projects, and the City has developed guidelines to determine whether a land use project is within the VMT threshold. The process includes a screening process in which situations are identified under which projects are determined not to have a significant impact and further analysis is not required. The guidelines indicate that projects that generate less than 110 daily trips would be considered to result in less-than-significant impacts related to project VMT (SOURCE V.2d).

The proposed trail improvements could result in some increased trips due to improved accessibility, but the project site does not provide onsite parking and there would be no change to on-street parking along Delaware Avenue. The project would not be expected to generate more than 110 new daily trips, and therefore, would not conflict or be inconstant with City adopted VMT thresholds, resulting in *no impact*.

(c) Design-Safety. The proposed project does not change existing road designs and would make the existing trails at Antonelli Pond accessible to more users. Therefore, the project would not result in design elements that would substantially increase safety 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 proposed project trail improvements would have no effect on emergency access. Therefore, the project would result in *no impact* related to emergency access.

18. Tribal Cultural Resources

(a-b) 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. 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.

No Native American tribe has contacted the City of Santa Cruz to request notification and consultation pursuant to AB 52 requirements. As described in Section VI.6 above, an archaeological investigation of the site was conducted and found that the project would not result in impacts to known archaeological resources, and no tribal cultural resources have been identified. 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 archaeological resources, the discovery of which would be subject to procedures outline in City regulations as described in section VI.6. Therefore, the proposed project would result in *no impact* to tribal cultural resources.

19. Utilities and Service Systems

(a) Relocation or Construction of Utilities. The project would not require relocation or new or expanded water or sewer lines. Therefore, the project would result in *no impact*.

(b-c) Water Supply and Wastewater Treatment. The proposed project consists of trail improvements and would not result in demands for potable water supply or wastewater collection and treatment. There is an existing water line used for the park host site, and wastewater is hauled off site. There are no proposed additional connections to the City's municipal water or sanitary sewer systems as part of the proposed project. Therefore, the project would have no impact on City water supplies or wastewater treatment.

(d-e) Solid Waste Disposal. The General Plan EIR concluded that the City's landfill would be adequate to handle growth and development accommodated by the General Plan and would not require expansion or construction of facilities to serve future growth (SOURCE V.1b, DEIR volume). The proposed project would not substantially increase visitor use or result in substantially increased solid waste generation. Therefore, the proposed project would result in *no impact* related to generation of solid waste.

20. Wildfire

(a) Emergency Plans. Existing and proposed access to the project site is from Delaware Avenue. The project includes improvement to existing trails and habitat restoration, but would 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 currently undeveloped with no structures, other than trail signs, a fishing dock and overlook benches. The area supports a mosaic of vegetation types, from freshwater marsh and willow riparian woodland around the pond and areas of grassland, scrub, and tree groves in upland areas. The project site is surrounded by a mix of open space and institutional, low-density residential, and industrial development.

The project site is not located in an area of moderate or high fire hazards as mapped in the City General Plan (SOURCE V.1b-Figure 4.6-1). However, Natural Bridges State Beach, located approximately 200 feet south of the project site, is designated as an area of high fire hazard (SOURCE V.1b-Figure 4.6-1). The project site is located in a local responsibility area. Local responsibility areas are located within incorporated city limits, and therefore, fire protection would be provided by the City's fire departments.

The project would not result in construction of habitable structures and the project would require one tree removal and some vegetation clearing adjacent to the trail. The project would not exacerbate wildfire risks or expose people or structures to significant risks including downslope or downstream flooding or landslides as a result of post-fire conditions. Therefore, the proposed project would result in a *no impact*. See also section VI.9(g) above.

(c) Fire Hazards. The project would not require installation of infrastructure or utilities that would exacerbate fire risks. Therefore, the project 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. The proposed project would have no significant effect on cultural resources or result in elimination of important examples of major period of California history or prehistory with implementation of mitigation measures. The project would have a less-than-significant effect on biological resources during construction of the proposed trail improvements with implementation of mitigation measures, but would not substantially reduce habitat, cause a wildlife population to drop below self-sustaining levels, threaten to eliminate a species or substantially reduce or restrict the range of a species because the site is adjacent to development, and the majority of the project site would be retained in its existing natural condition. The project would not degrade the quality of the environment or otherwise substantially adversely affect fish and wildlife habitats or threaten to eliminate a plant or animal community. Therefore, the project would result in a *less-than-significant impact*.

(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 trail improvement project would not contribute to the identified significant cumulative impacts. Therefore, the project's cumulative contribution would not be considerable.

(c) Substantial Adverse Effects on Human Beings. No environmental effects have been identified that would have direct or indirect adverse effects on human beings.