ADDENDUM

to the

SANTA CRUZ COUNTY SANITATION DISTRICT
VALENCIA CREEK SEWER RELOCATION PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Prepared for
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INTRODUCTION

Pursuant to the California Environmental Quality Act, California Public Resources Code sections 21000 et seq. ("CEQA") and the California Environmental Quality Act Guidelines, Title 14, Chapter 3 of the California Code of Regulations ("CEQA Guidelines"), the Santa Cruz County Sanitation District (SCCSD) has prepared this Addendum to the Valencia Creek Sewer Relocation Project Final Initial Study/Mitigated Negative Declaration (IS/MND), certified by SCCSD's Board of Directors on February 5th, 2009 (State Clearinghouse #2008112045), to address a proposed modification to the project.

This Addendum concludes the following with regards to CEQA compliance:

- Implementation of the proposed modification would not have any significant adverse effects on the environment.

- Similar project components have been described and previously evaluated in the certified IS/MND and the potential significant adverse effects of the project have been identified and mitigated to a less-than-significant level in the project's Mitigation Monitoring Program.

- No new or previously unidentified adverse significant impacts would result from the proposed modification of the project.

- No changed circumstances and no new information of substantial importance has been presented since the certification of the IS/MND to trigger a new significant adverse impact.

This Addendum is intended to support all future discretionary approvals for the proposed modification to the project alignment. As the CEQA lead agency for this project, SCCSD must consider this Addendum, along with the certified IS/MND, prior to approving the proposed modification; however, in accordance with CEQA Guidelines Section 15164, the Addendum is not required to be circulated for standard IS/MND public review.

Project Location

The project site is located within Aptos, a census-designated place in Santa Cruz County, California (Figure 1). It is contained within multiple County assessor parcels, including 041-021-17, 041-042-11, 041-042-14, 041-051-11, 041-052-13, 041-052-16, 041-052-17, 042-067-18, 042-071-01, 042-071-02, 042-071-03, 042-073-21, 042-073-22, 042-073-23, 042-073-24, 042-073-27, 042-073-39, and 042-073-40. Although the project alignment has changed, the general project site has not changed from that defined in the IS/MND.

IS/MND Project Description

The Valencia Creek Sewer Relocation Project, as described in the IS/MND, involved the abandonment of approximately 1,250 feet of sanitary sewer main, the installation of a new 720 gallons per minute (gpm) sewer submersible pump station with an approximately 1,000-foot long, 8-inch force main, and installation of a new 100 gpm sewer submersible pump station with an approximately 500-foot long, 4-inch force main (Figure 2).

Figure 1. Vicinity Map

Figure 2. 2008 Preliminary Project Plans

The project, as described in the IS/MND, included two conventional submersible sewage pump stations: Valencia Pump Station on the north side of Highway 1 and Carrera Pump Station on the south side. The peak design flow at the Valencia and Carrera Pump Stations was estimated to be 720 and 25 GPM, respectively. The pumps in the Carrera Pump Station would be sized for 100 GPM to create a minimum velocity of 2.5 feet per second in the 4-inch force main. Each pump station would contain two pumps, each of which was sized to handle the peak design flow. In each station, the second pump would be a backup unit and would not operate while the lead pump was in operation. Each pump station would have a standby generator in a sound attenuating enclosure. The generator and the electrical panel would be suitable for exterior use and would be the only above ground facilities at each site. An 8-inch force main from the Valencia Pump Station would extend westerly in Soquel Drive to Manhole 170, for a total length of about 1,000 feet. A 4-inch force main from the Carrera Pump Station would extend westerly in a private road for approximately 500 feet and discharge into Manhole 27, located within Moosehead Drive.

The following is a description of project components, as defined in the IS/MND:

- *Pipeline Abandonment*. The segment of the former rupture/spillage would be filled, capped and abandoned in-place, including gravity sewer mains and manholes adjacent to Valencia Creek and within the California Department of Transportation's (Caltrans) right-of-way. Approximately 1,250 feet would be abandoned in-place.

- *Valencia Pump Station.* The Valencia Pump Station would be a 720 gpm submersible dual pump station and force main that would be located adjacent to the driveway of an existing private residence located on Soquel Drive. The force main would extend into the public right-of-way of Soquel Drive. SCCSD would be responsible for acquiring easement rights on the property from the property owners.

- *Carrera Pump Station.* The Carrera Pump Station would be a 100 gpm submersible dual pump station and force main located adjacent to and within Carrera Circle, a private road. SCCSD would be responsible for acquiring easement rights on the property from the property owners for installation of the pump station and for acquiring easement rights for installation of the force main in Carrera Circle, which is maintained by the neighborhood's homeowner's association.

The newly aligned force mains would be located beneath public roads in residential areas. Construction in public rights-of-way in Soquel Drive would occur for the Valencia Pump Station's force main. Installation of the Carrera and Valencia Pump Stations themselves would require access on current privately-owned property. Construction time for the proposed project was estimated to be two months from construction start to end.

The Draft IS/MND was prepared to inform the public of the potential environmental effects of the project and identify possible ways to minimize project related impacts. Pursuant to Section 15073(a), the proposed IS/MND was circulated for a 30-day review period during which comments were received. In accordance with CEQA, this document is included in the official public record for the Initial Study. On November 17, 2008, the Draft IS/MND was distributed for a 30-day public review period to responsible and trustee agencies, interested groups, and individuals. The public review period for the Draft IS/MND ended on December 22, 2008.

A Final IS/MND was prepared to address comments received during the project's 30-day public review period. On February 5th, 2009, SCCSD certified the Mitigated Negative Declaration and adopted the project's Mitigation Monitoring Program.

Currently Proposed Project Description

As SCCSD and its project designer, HDR, Inc. (HDR), have progressed with a final project design, an alternative alignment which would greatly reduce the overall size, ground disturbance, and potential environmental impacts of the project has been proposed (Figure 3; Appendix A). The following is a description of the currently proposed project components:

- *Pipeline Abandonment*. The segment of the former rupture, including gravity sewer mains and manholes adjacent to Valencia Creek and within the Caltrans' right-of-way, would be filled, capped and abandoned in-place. Approximately 535 feet of gravity sanitary sewer would be abandoned in-place.

- *New Pipeline Construction*. Approximately 1,355 feet of new gravity sanitary sewer will be constructed to convey flows around the area of the rupture, and to replace deteriorated sewer pipelines within the project site. New construction will include:

    - Approximately 311 feet of 10-inch gravity sewer crossing under Highway 1, installed via pilot-tube microtunneling.

    - Approximately 617 feet of existing 10-inch gravity sewer along the side of Highway 1 replaced with new 10-inch gravity sewer, installed via pipe bursting.

    - Approximately 213 feet of new 10-inch gravity sewer installed within Soquel Drive via open trenching construction.

    - Approximately 32 feet of existing 10-inch gravity sewer removed and replaced with new 10-inch gravity sewer between Highway 1 and Carrera Circle via open trenching construction.

    - Approximately 182 feet of existing 8-inch gravity sewer removed and replaced with new 8-inch gravity sewer between Highway 1 and Carrera Circle via open trenching construction.

    - Seven existing sanitary sewer manholes will be removed and replaced with new sanitary sewer manholes along project pipeline alignments.

    - Two new sanitary sewer manholes will be constructed along project pipeline alignments.

Construction Activities and Details

Pipeline construction would be located beneath public roads and private property easements in residential areas. Construction within private-property easements will occur between Soquel Drive and Highway 1,

Figure 3. Currently Proposed Project

and between Highway 1 and Carrera Circle. A new easement would be required for the installation of the segment between Soquel Drive and Highway 1. The segments between Highway 1 and Carrera Circle would be installed in existing easements. Because removal of abandoned pipeline segments would have greater potential adverse impacts than the proposed action of "capping" certain pipeline segments, the abandoned pipelines would be completely or partially filled ("capped with 12" lengths at end) with controlled low-strength material (CLSM) and sealed. Abandoned manholes along the pipeline segments would have their cone, grade rings, frame and cover removed, and would be backfilled to the surface. Any work within the Caltrans Highway 1 right-of-way would require an encroachment permit.

Excavation. Excavation for open trenching construction will consist of a trench approximately 4 feet wide, varying from approximately 6 to 12 feet in depth. Excavation for pipe bursting will consist of individual access shafts 8 to 10 feet square from 8 to 16 feet deep. One larger access shaft approximately 10 feet wide by 20 feet long and 20 feet deep will be required for the pilot-tube microtunneling construction. Total excavation for the project would be approximately 1,005 cubic yards. Excavated soil not re-used would be trucked off-site to Santa Cruz County's Buena Vista Landfill. Trenching for utilities in Santa Cruz County is exempt from requirements of the County Grading Ordinance.

Construction Equipment. Construction equipment will include pick-up trucks, dump trucks, front end loader, hydraulic excavators, pipe bursting equipment (bursting equipment, winches, reamers), pilot-tube microtunneling equipment (tunneling machine, hydraulic jacks), backhoe, and sheep's foot (for trench compaction). In areas that would need to be repaved, a paver and vibratory roller would also be required.

Construction Schedule. Construction time for the proposed project is estimated to be 4 months from construction start to end.

COMPARISON TO THE CONDITIONS IN CEQA GUIDELINES §15162

This Addendum has been prepared pursuant to CEQA Guidelines Section 15164, which states that "an addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred." CEQA Guidelines Section 15162 establishes the following criteria for the preparation of a Subsequent Negative Declaration, none of which may be met if an addendum is to be prepared:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or,

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The following discussion summarizes the reasons why a subsequent or supplemental negative declaration, pursuant to CEQA Guidelines Section 15162, is not required to evaluate the environmental effects of the proposed modification to the project and why an addendum is appropriate.

Changes to the Project

Minor revisions to the project alignment have been proposed by the SCCSD and HDR. The modified alignment would result in the disturbance of a limited area not previously analyzed in the IS/MND; however, the currently proposed project reduces potential environmental impacts because much of the work will be underground. Unlike the IS/MND, which proposed open trenching construction for the

entire project, trenchless construction methods including pipe bursting and pilot-tube microtunneling will be employed for most of the currently proposed project alignment, and open trenching construction is proposed mostly within existing roadways and driveways. Additionally, implementation of the proposed modification to the project will negate the need for the installation of two new submersible pump stations and a force main in Soquel Avenue, as proposed in the IS/MND. This modification would reduce the overall project size and the potential impacts of the project.

Environmental Effects

The primary environmental issues addressed in this Addendum are biological resources, cultural resources, geology and soils, greenhouse gas emissions, public services and utilities, traffic, and tribal cultural resources. Like under the IS/MND, no other environmental topics would be potentially impacted by the project. The proposed modification would not result in new significant impacts not evaluated in the IS/MND, and would not increase the severity of impacts identified in the IS/MND. Technical studies have been prepared to assess potential impacts to biological and cultural resources in support of this Addendum (Appendices B and C). These studies determined the proposed modification would not result in new significant impacts, and that no new mitigation for biological or cultural resources is required.

The potential for future development of the project in the project area was evaluated in the IS/MND, which determined that there would be no significant off-site, indirect, cumulative, or growth-inducing impacts resulting from the project. Mitigation was identified for potential on-site, direct impacts to biological resources, geology and soils, public services and utilities, and traffic and transportation. These existing mitigation measures would apply for the currently proposed project design, and are listed in *Summary of Impacts and Mitigation Measures* below.

This Addendum evaluates the potential environmental impacts associated with the proposed modification to the project's design and finds that there are no significant impacts that cannot be mitigated with existing mitigation measures and that project changes do not constitute substantial changes in the Valencia Creek Sewer Relocation Project that require revision of the IS/MND.

Project Circumstances

Recent regulatory and CEQA Guidelines changes have triggered a new requirement to evaluate greenhouse gas emissions and tribal cultural resources when assessing a proposed project's potential impacts. These issues have been evaluated in *Summary of Impacts and Mitigation Measures* below. The proposed modification to the project would not result in a new, previously unidentified significant impact in these issue areas. In conclusion, changes in project circumstances have not resulted in a new significant impact or the increase in severity of a previously identified significant impact.

New Information

No new information of substantial importance has been identified or presented to the SCCSD such that the proposed modification to the project would result in: 1) significant environmental effects not identified in the IS/MND, or 2) more severe environmental effects than shown in the IS/MND, or 3) require mitigation measures which were previously determined not to be feasible, or mitigation measures that are considerably different from those recommended in the IS/MND.

Conclusion

Based on the analysis in this Addendum, the SCCSD concludes that the IS/MND adequately addresses the environmental effects of the proposed modification to the project, and that the project constitutes a minor refinement of the IS/MND's description of the Valencia Creek Sewer Relocation Project based upon various factors identified in this Addendum. As detailed in the IS/MND, all potential impacts of the project would be reduced to less-than-significant levels either through standard conditions of project approval (air quality, cultural resources, noise) or mitigation measures (biological resources, geology and soils, public services and utilities, transportation and traffic). The SCCSD finds that this modification to the project would not result in significant environmental effects not already identified in the IS/MND and would not increase the severity of any previously identified impacts. Furthermore, implementation of the proposed project modification would ultimately reduce ground disturbance and potential impacts because there would be no need to install two new submersible pump stations or a force main in Soquel Avenue.

No new information or evidence of substantial importance has been presented to the SCCSD from any other responsible agency or from the general public that would indicate that the proposed modification to the project has the potential for new significant environmental effects or that it would substantially increase the severity of previously identified significant effects on the environment beyond that previously analyzed under the certified IS/MND.

Section 15164 of the CEQA Guidelines states that a lead agency shall prepare an addendum to a previously certified negative declaration if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent negative declaration have occurred. Based on the information in this Addendum, SCCSD has determined none of these conditions have occurred, this Addendum is sufficient to meet CEQA requirements, and a subsequent negative declaration is not required.

SUMMARY OF IMPACTS AND MITIGATION MEASURES

The IS/MND identified the significant impacts that could potentially result from the project, and provided mitigation to reduce those impacts to less-than-significant levels under CEQA. Those impacts and mitigation measures are included in the following discussion. In addition, discussions of *Greenhouse Gases Emissions* and *Tribal Cultural Resources* are included here because these sections have been added to the CEQA process since certification of the IS/MND.

Geology and Soils

IMPACT: THE PROJECT SITE WOULD BE SUBJECT TO POTENTIALLY SEVERE GROUND SHAKING DURING A MAJOR EARTHQUAKE ON AN ACTIVE FAULT IN THE REGION.

Because the project site is in a seismically active region, it would be subject to potentially severe ground shaking during a major earthquake on an active fault in the region. The project does not involve construction of any new structures that would expose inhabitants to seismic safety risks. However, a significant seismic event could potentially damage the replaced sewer pipeline. Because of severe ground shaking, the pipeline may be damaged and would need to be repaired.

A geotechnical investigation shall be prepared for the proposed project, which will include specific seismic design parameters that would be incorporated into the project to reduce the effects of ground shaking. Inclusion of these measures shall ensure impacts from seismic shaking are less-than-significant.

Mitigation Measure 1
A project-specific geotechnical report shall be prepared for the proposed project; including seismic design parameters and soils specifications. Recommendations from the geotechnical report shall be incorporated into the project design by the project engineer prior to 100% design and shall be implemented as required during construction by the project contractor.

IMPACT: THE PROJECT SITE WOULD BE SUBJECT TO SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION.

Areas along the alignment may contain deposits of older alluvial deposits that have high potential for liquefaction. The geotechnical investigation prepared for the proposed project includes specific design parameters that shall be incorporated into the project design and construction to reduce the effects of potential liquefaction. Inclusion of these measures shall ensure impacts from liquefaction are less-than-significant. (*Refer to Mitigation Measure 1*).

IMPACT: THE PROJECT WOULD SUBJECT PEOPLE OR IMPROVEMENTS TO DAMAGE FROM SOIL INSTABILITY AS A RESULT OF ON OR OFF-SITE LANDSLIDE, LATERAL SPREADING, TO SUBSIDENCE, LIQUEFACTION, OR STRUCTURAL COLLAPSE.

In sloped areas, trenchless drilling methods would be implemented to reduce soil instability or lateral spreading. In trenched areas where lateral spreading would likely occur, the pipe would be backfilled as per specifications to be defined in the Geotechnical Report. This would ensure that these impacts are reduced to less-than-significant levels. (*Refer to Mitigation Measure 1*).

Biological Resources

IMPACT: THE PROJECT COULD HAVE AN ADVERSE EFFECT ON 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 THE U.S. FISH AND WILDLIFE SERVICE.

Special-status species are those plants and animals that have been formally listed or proposed for listing as Endangered or Threatened, or are Candidates for such listing under the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA). Listed species are afforded legal protection under the ESA and CESA. Species that meet the definition of Rare or Endangered under the CEQA Section 15380 are also considered special-status species. Animals on the CDFW's list of "species of special concern" (most of which are species whose breeding populations in California may face extirpation if current population trends continue) meet this definition and are typically provided management consideration through the CEQA process, although they are not legally protected under the ESA or CESA.

Plants listed as rare under the California Native Plant Protection Act (CNPPA) or included in California Native Plant Society (CNPS) California Rare Plant Ranks (CRPR; formerly known as CNPS Lists) 1A, 1B, 2A, and 2B are also treated as special-status species as they meet the definitions of Sections 2062 and 2067 of the CESA and in accordance with CEQA Guidelines Section 15380. In addition, species of vascular plants, bryophytes, and lichens listed as having special-status by the CDFW are considered special-status plant species.

Raptors (e.g., eagles, hawks, and owls) and their nests are protected in California under Fish and Game Code Section 3503.5. In addition, fully protected species under the Fish and Game Code Section 3511 (birds), Section 4700 (mammals), Section 5515 (fish), and Section 5050 (reptiles and amphibians) are also considered special-status animal species. Species with no formal special-status designation but thought by experts to be rare or in serious decline may also be considered special-status animal species in some cases, depending on project-specific analysis and relevant, localized conservation needs or precedence.

The project site and adjacent areas were evaluated for the presence of special-status plant and wildlife species known to occur in the area. A reconnaissance survey was conducted at the site on August 24, 2018 by DD&A Senior Environmental Scientist Josh Harwayne and Assistant Environmental Scientist Liz Camilo to verify that site conditions had not changed from that documented in the IS/MND, and to assess biological conditions within areas not evaluated in the IS/MND. A Biological Resources Report was prepared for the project in support of this addendum (Appendix B). The California Natural Diversity Database (CNDDB) was examined for all special-status species within the Soquel U.S. Geological Survey (USGS) quadrangles and surrounding quadrangles (Felton, Laurel, Loma Prieta, Watsonville West, and Santa Cruz), and the U.S. Fish and Wildlife Service (USFWS) IPaC Resource List was examined for federal special-status species within the site. From these resources, a list of special-status plant and wildlife species known or with the potential to occur near the site was created (Appendix C of the Biological Resources Report). The list presents these species along with their legal status, habitat requirements, and a brief statement of their likelihood to occur within the project site.

Special-Status Plants

As identified in the IS/MND, the vast majority of impacts associated with the proposed project will occur within existing roadways and roadside areas bordering woodland and landscaped areas. The project will employ open trenching construction only in existing asphalt and driveways. Most of the pipeline will be installed via microtunneling and pipe bursting, which are trenchless methods of construction that do not impact vegetation.

Special-status plant species known or with the potential to occur within the vicinity of the project site were evaluated in the IS/MND. Based on site-specific analysis, it was determined that there would be no impacts to habitats along the alignment that could support these species.

Eight plant species not evaluated in the IS/MND have since been designated special-status and are included in this current analysis (Appendix B). No appropriate habitat for these species is present within areas to be disturbed by the project. The species are therefore unlikely to occur within the site and will not be impacted by the project. In addition, the regulatory status of three of the species evaluated in the IS/MND and the scientific name of one species have changed since certification of the document (Appendix B). This new information does not represent a significant impact, and no new mitigation is required.

Special-Status Wildlife

The analysis in the IS/MND determined that there were eight special-status wildlife species known or with the potential to occur within or adjacent to the project site: pallid bat (*Antrozous pallidus*), hoary bat (*Lasiurus cinereus*), Cooper's hawk (*Accipiter cooperii*), white-tailed kite (*Elanus leucurus*), western pond turtle (*Emys marmorata*), foothill yellow-legged frog (*Rana boylii*; FYLF), tidewater goby (*Eucyclogobius newberryi*), and central California coast steelhead (*Oncorhynchus mykiss irideus*; CCC steelhead). The IS/MND impact analysis for these species are presented below.

The 2018 biological report determined that two additional wildlife species not evaluated in the IS/MND—Townsend's big-eared bat (*Corynorhinus townsendii*) and golden eagle (*Aquila chrysaetos*)—have a low potential to occur within or immediately adjacent to the site. Incorporation of these species into existing mitigation measures from the IS/MND will reduce potential impacts to less-than-significant under CEQA. No other wildlife species are expected to occur on the site. No new significant impacts are expected, and no new mitigation is required.

Central California Coast Steelhead

Steelhead trout are a federally threatened species regulated by NOAA Fisheries under the federal Endangered Species Act. Steelhead are the anadromous form of rainbow trout. In North America, steelhead are found in Pacific Ocean drainages from southern California to Alaska. In California, known spawning populations are found in coastal streams form Malibu Creek in Los Angeles County to the Smith River near the Oregon border and in the Sacramento and San Joaquin River systems. The present distribution and abundance of steelhead in California has been greatly reduced from historical levels. Steelhead are born in fresh water, emigrate to the ocean where most growth occurs, and return to fresh water to spawn. Unlike Pacific salmon, steelhead do not necessarily die after spawning. Repeat spawning rates are generally low and vary considerably among populations. Peak spawning occurs from December through April in small streams and tributaries. In general, steelhead migrate to sea as two-year-old fish,

spend two years in the ocean, and then return to fresh water to spawn. Steelhead have traditionally been grouped into seasonal runs according to their peak migration period; in California, there are well-defined winter, spring, and fall runs.

Valencia Creek is the southernmost boundary for the Central California Coast Distinct Population Segment (DPS). Steelhead are known to occur within Valencia Creek; dozens of juvenile steelhead were observed in a small pool near the intersection of Moosehead Drive and Spreckels Drive on July 22, 2008 (David Keegan, Personal Observation). Steelhead are not present within project boundaries (trenching will occur within roadways), but steelhead are assumed present in Valencia Creek. With implementation of standard Best Management Practices (BMPs), incorporation of the following Worker Education Program mitigation, and incorporation of additional vegetation conservation and recovery measures, potential impacts to steelhead and/or steelhead critical habitat (Valencia Creek and associated riparian corridor) will be avoided.

Mitigation Measure 2

The project contractor shall ensure that a qualified biologist train all project staff, including the construction crew regarding habitat sensitivity, special-status species potentially present, and/or affected by the project, construction limits, and reduction of impacts to offsite resources; training is required prior to the start of construction. This Worker Education Program training shall include a brief review of the biology of wildlife species potentially present in adjacent riparian habitat areas (including steelhead, Hoary and Pallid bats, foothill yellow legged frog, western pond turtle, and nesting raptors), the general measures that are being implemented to conserve these species, guidelines to avoid impacts to these species during the construction period, the penalties for non-compliance, reporting requirements in the event of construction methodology changes, and the specific boundaries of the project area (i.e., no impacts to riparian habitat). A fact sheet or other supporting materials containing this information shall be prepared and distributed to all project staff. Upon completion of training, employees shall sign a form stating that they attended the training and understand all the conservation and protection measures. Worker Education Programs shall be conducted for new personnel before they participate in onsite construction activities. The crew foreman shall be responsible for ensuring that all crew members comply with the guidelines. In addition, the foreman shall be responsible for contacting the project biological monitor (see Mitigation Measure 9) in the highly unlikely event that special-status wildlife species are encountered within project boundaries.

Mitigation Measure 3

The project contractor shall ensure that vegetation not planned for removal shall be protected during construction to the maximum extent feasible. This shall include the use of exclusionary fencing of herbaceous and shrubby vegetation, such as hay bales and protective wood barriers for trees (as needed). Only certified weed-free straw shall be used to avoid the introduction of non-native, invasive species.

Mitigation Measure 4

The project contractor shall ensure that following construction, the disturbed areas (trenches) shall be restored to pre-project conditions to the maximum extent feasible and revegetated (where applicable) using locally-occurring native species and/or native erosion control seed mix.

Mitigation Measure 5

The project contractor shall ensure that protective fencing shall be placed so as to keep construction vehicles and personnel from impacting riparian vegetation adjacent to the project site, outside of work limits.

Mitigation Measure 6

The project contractor shall ensure that trenching, excavating, and any other activities that involve substantial soil disturbance adjacent to riparian habitat shall be planned and carried out in consultation with a qualified hydrologist, engineer, or erosion control specialist, and shall utilize standard erosion control techniques to minimize erosion and sedimentation to native vegetation.

Tidewater Goby

The tidewater goby is a federal endangered species. The tidewater goby is a small native goby found along the Pacific coast of California from the Smith River in Del Norte County, south to Agua Hedionda Lagoon in San Diego County. Individuals of this species are in different developmental stages throughout the year. The spawning peak of this species can be separated into two periods: from late March through July, and from late August through November. The male tidewater goby digs a vertical burrow approximately 100-200 mm into the sandy bottom in water 25-50 cm deep, which the male then guards after the female completes egg deposition. It has been reported that mollusks, insects, and crustaceans are the primary food for the tidewater goby.

Tidewater goby have not been reported to occur in Valencia Creek, but are known to occur near the mouth of Aptos Creek, which lies less than 500 ft from the proposed project site. Tidewater goby are not present within the project alignment, and although their status in Valencia Creek is unknown, they are assumed present for the sake of project impact analysis. With implementation of standard BMPs and the Mitigation Measures 2 through 6 (above), potential impacts to goby and/or goby habitat will be avoided.

Pallid Bat, Hoary Bat, and Townsend's Big-Eared Bat

The pallid bat is a California species of special concern, and is a year-round resident in California. This species of bat occurs in a wide variety of habitats including grasslands, shrublands, arid desert areas, oak savanna, coastal forested areas, and coniferous forests of the mountain regions of California and forests ranging from sea level up through mixed conifer forests. Pallid bats are most common in open, dry habitats with rocky areas for roosting. Day roosts of this species includes caves, crevices, mines, and occasionally in hollow trees and buildings. This species seems to prefer rocky outcrops, cliffs, and crevices with access to open habitats for foraging. Pallid bats make use of similar structures for night roosting and will use more open sites, such as eaves, awnings, and open areas under bridges for feeding roosts. Pallid bats feed on large insects (20 to 70 mm in length). Foraging takes place over open ground, at heights generally not greater than 7.5 feet, although prey is most often caught on the ground. Jerusalem crickets, scorpions, and beetles make up most of the diet of pallid bats in central California. Copulation occurs in the fall, October through December. Females store the sperm and ovulation occurs in the following spring. Parturition timing is determined by local climate and embryonic development usually takes about 9 weeks with birth occurring in May or June. Twins are the norm in northern California, but in other areas, they are known to have triplets. Maternity colonies range from 20 to 200 individual adult bats. Males roost in much smaller groupings. The CNDDB reports pallid bat occurrences approximately 5 km west of the proposed project site and approximately 8 km north of the proposed project site.

The hoary bat was a California species of special concern when the IS/MND was prepared, but this species has been delisted and is no longer considered special-status; however, this species is included in this analysis for consistency with the IS/MND. Hoary bats have the broadest range of any North American bat, ranging from Northern Canada to South America. This bat has even managed to colonize remote and isolated areas such as the Hawaiian Islands. The hoary bat roosts in the branches of deciduous and coniferous trees. In Oregon, the hoary bat prefers old-growth Douglas fir forests. Males are solitary and females roost with their young, but do not form maternity colonies. The hoary bat is a migratory species and the Pacific Northwest population appears to winter in California and Mexico. Over a portion of its range, males and females occupy separate summer areas. Mating occurs in fall or winter and sperm is stored over winter. Fertilization occurs in early spring and gestation is 80 to 90 days. One to four young are born in late May to late June (Nowak 1994). Young are capable of sustained flight at six weeks, and family groups stay together for several weeks after young are flying. With its swift flight and low frequency echolocation calls, this bat is well adapted for capturing large prey. The primary prey of the hoary bat is moths, beetles, and dragonflies. The hoary bat hunts above canopy level, in clearings, and over water. This species has been known to set up foraging territories at bright lights where insects congregate.

Townsend's big-eared bat is a California species of special concern. It is found primarily in rural areas from inland deserts to coastal redwoods, oak woodlands of the inner Coast Ranges and Sierra foothills, and low to mid-elevation mixed coniferous-deciduous forests. It typically roosts during the day in limestone caves, lava tubes, and mines, but can roost in buildings that offer suitable conditions. This species is extremely sensitive to disturbance of roosting sites, and may abandon roosting sites after a single disturbance event. The nearest CNDDB occurrence of this bat is a historical 1945 occurrence approximately 5 km west of the project site. Because suitable roosting habitat is not present within the project site, this species has a low potential to occur on the site.

Given the presence of mature trees along and immediately adjacent to the project alignment, pallid bat and Townsend's big-eared bat may be affected by proposed construction activities if present. Construction phase noise and disturbance (machinery, vehicles, presence of personnel, etc.) has the potential to disrupt any immediately adjacent bat roosts.

Mitigation Measure 7

The project contractor shall ensure that a qualified bat specialist conduct project alignment surveys to characterize potential bat utilization of the site and to assess potential species composition present (techniques utilized to be determined by the biologist); survey focus should be identification of roosting features capable of supporting local bat species (i.e., large snags, abandoned buildings, rock outcrops, etc.). Based on the results of these preliminary surveys, one or more of the following shall occur.

- *If it is determined that bats are not present at the site, or are unlikely to be impacted in the judgment of the bat specialist, the contracted specialist shall prepare a memo presenting his preliminary findings and stating that no additional mitigation is required.*

- *If the contracted specialist determines that bats may be utilizing the site and could be impacted by construction phase activities, preconstruction bat surveys shall be conducted no more than 30 days prior to construction initiation; survey areas to be determined by contracted biologist. If the*

bat specialist determines that the project may impact a bat roost, he or she must determine the type of roost (foraging, day, night, maternity); survey technique utilized to be determined by bat specialist.

- *If a single bat and/or only adult bats are roosting, demolition or removal of the structure can proceed after the bats have been safely excluded from the roost. If in the opinion of the specialist, creation of alternate habitat is required, the specialist shall prepare a mitigation plan for provision of alternate habitat, and the mitigation plan shall be approved by CDFW prior to implementation. In the event that roost exclusion is to be undertaken, exclusion techniques shall be determined by the contracted specialist.*

- *If an active maternity roost is detected, work in the vicinity of the roost (offset to be determined by contracted specialist) shall be postponed until the qualified biologist monitoring the roost determines that the young have fledged and are no longer dependent on the roost. The contracted specialist shall ensure that all bats have left the impact area prior to initiation of construction activities. If disruption of a maternity roost cannot be avoided, a depredation permit would be required from CDFW.*

Foothill Yellow-Legged Frog

The foothill yellow-legged frog is a California species of special concern. FYLF occurs in the Coast Ranges from the Oregon border south to the Transverse Mountains in Los Angeles County, in most of northern California west of the Cascade crest, and along the western flank of the Sierra south to Kern County. Its elevation range extends from near sea level to 6,370 feet in the Sierra. The FYLF is found in or near rocky streams in a variety of habitats, including valley-foothill hardwood, valley-foothill hardwood-conifer, valley-foothill riparian, ponderosa pine, mixed conifer, coastal scrub, mixed chaparral, and wet meadow types. Rocky creeks and streams bordered by mixed chaparral, and deciduous and evergreen woodland are the primary habitat for this frog. However, there have been occurrences of FYLF along sandy stream courses, presumably as non-breeding habitat. Adult dispersal is poorly understood, but congregation around breeding sites occurs May-July. In later summer, adult presence near breeding sites is low, possibly indicating dispersal into adjacent vegetation, a reduction in diurnal activities, and/or dispersal upstream.

The CNDDB reports FYLF occurrences near the headwaters of Bridge Creek (tributary to Aptos Creek) and along Soquel Creek, but no FYLF have been reported along Valencia Creek or within 5 km of the project site. As Valencia Creek and Aptos Creek converge within adjacent to the project site, FYLF may be present (or occasionally present) within portions of Valencia Creek. FYLF are not anticipated within project boundaries (paved, roadside, urban areas); however, FYLF are assumed present (or occasionally present) in Valencia Creek for this analysis. Although the project will not directly impact riparian habitat and FYLF are not anticipated within project boundaries, this species will be included in the Worker Education Program described in Mitigation Measure 2. In addition, the following mitigation is presented in the highly unlikely event that FHLYF enter the project site during construction (i.e., during night-time cessation of construction activities).

Mitigation Measure 8

To prevent inadvertent entrapment of foothill yellow-legged frogs (or other wildlife species) during construction related trenching and excavation, the project contractor shall ensure that all excavated, steep-walled holes or trenches more than two feet deep shall be covered at the close of each working day with plywood or similar materials. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals. If this practice becomes infeasible, ramps shall be constructed within the trenches to allow any trapped animals the opportunity to escape.

Mitigation Measure 9

The project contractor shall ensure that a qualified biological monitor be contracted prior to construction initiation. The biological monitor shall be immediately contacted by the project foreman in the event that foothill yellow-legged frogs are observed within project boundaries, particularly within trenches or excavated areas. The biological monitor shall capture and relocate any foothill yellow-legged frogs to the nearest appropriate habitat outside of the project impact area; handling of individual animals should be minimized and shall conform to The Declining Amphibian Task Force Fieldwork Code of Practice. The contracted biologist shall possess appropriate California Department of Fish & Game Scientific Collection Permit authorizations and shall coordinate with California Department of Fish & Game regarding the need for a memorandum of understanding prior to moving foothill yellow-legged frogs.

Western Pond Turtle[1]

Western pond turtle *(Emys marmorata)* is a California species of special concern. Western pond turtles are uncommon to common in permanent or nearly permanent aquatic resources in a wide variety of habitats throughout California, west of the Sierra-Cascade crest and are absent from desert regions, except in the Mojave Desert along the Mojave River and its tributaries. Elevation range extends from near sea level to 1430 meters (4690 feet). Pond turtles require basking sites, such as partially submerged logs, rocks, mats of floating vegetation, or open mud banks. The western pond turtle is not known to be territorial, but aggressive encounters, including gesturing and physical combat, are common and may function to maintain spacing on basking sites and to settle disputes over preferred spots. This species is considered omnivorous and food sources include aquatic plant material, beetles, and a wide variety of aquatic invertebrates. Fishes, frogs, and carrion have also been reported among their food. During the spring or early summer, females move overland for up to 100 meters (325 feet) to find suitable sites for egg-laying. Three to 11 eggs are laid from March to August depending on local conditions.

The CNDDB reports western pond turtle occurrences approximately 5 km west of the project site along Soquel Creek. Although no pond turtles have been reported along Valencia or Aptos Creeks, appropriate habitat for this species is present within these creeks, and pond turtles may occur (or occasionally occur) within Valencia Creek. However, as project related impacts will occur within currently paved areas and in urbanized and upland commercial/residential areas (outside of pond turtle habitat), pond turtles are not anticipated to occur within project boundaries. Given implementation of BMPs and additional vegetation

[1] Western pond turtle was analyzed as the subspecies southwestern pond turtle (*Emys marmorata pallida)* in the IS/MND. This report refers to the species as western pond turtle for consistency with CNDDB occurrence reports; however, the impact analysis remains the same as in the IS/MND. In addition, western pond turtle was called *Clemmys marmorata* and *Actinemys marmorata* in the IS/MND. Although these are two of several scientific names for this species, this report follows the current CDFW binomial nomenclature for this species (*Emys marmorata*).

conservation/recovery mitigation above, no direct or indirect impacts to riparian habitat are anticipated. As such, no impacts to western pond turtle are anticipated, and species-specific mitigation is not required. Nonetheless, this species will be included in the Worker Education Program.

Nesting Raptors and Other Protected Avian Species

Raptors and their nests are protected under California Fish and Game Code, and some are further designated "fully protected species" and/or state species of special concern. Raptor species that have the potential to nest at the site include (but are not limited to) golden eagle, Cooper's hawk, red-tailed hawk (*Buteo jamaicensis*), and red-shouldered hawk (*Buteo lineatus*). White tailed-kite (*Elanus leucurus*) may occasionally forage near the site, but are not anticipated to nest within adjacent riparian habitat. While the life histories of these species vary, overlapping nesting and foraging similarities (approximately February 15- August 1) allows their concurrent discussion.

Raptors are breeding residents throughout most of the wooded portions of the state. Stands of live oak, riparian deciduous, or other forest habitats, as well as open grasslands, are used most frequently for nesting. Breeding occurs between February and August, with peak activity May through July. Prey for these species may include birds, small mammals, and some reptiles and amphibians. Many raptor species hunt in open woodland and habitat edges.

Given the presence of mature trees throughout the site, construction activities (noise, vibration, dust, machinery, etc.) could impact nesting raptors (and other avian species) potentially present within and adjacent to the project alignment.

Mitigation Measure 10

If project activities will initiate during the typical avian nesting season (February 15 - August 1), the project contractor shall ensure that a qualified biologist conduct preconstruction surveys for nesting raptors (and other avian species) in all areas that may provide suitable nesting habitat within 300 feet of the construction area; surveys shall be conducted no more than 14 days prior to initiation of construction activities. If active nests are found, a suitable construction buffer shall be established by the contracted biologist, and no work shall occur within that buffer until August 1, when young are assumed fledged.

Alternatively, the project contractor shall retain a qualified biologist to conduct weekly (or bi-weekly) nest checks to gauge nestling/fledgling status, and construction may proceed once fledglings have dispersed from the nest provided written concurrence from CDFW.

The project contractor shall ensure that no active nest is impacted or removed without a depredation permit from CDFW, and a depredation permit will not be issued for impacts to Fully Protected Species, such as the white-tailed kite. For activities that occur outside of the nesting season (generally September 1 through February 14), preconstruction surveys are not required. If construction is initiated outside of the nesting season and continues into the nesting season, preconstruction surveys are required if construction will occur in areas not previously accessed and/or disturbed (>300 feet from previous construction activities).

IMPACT: THE PROJECT COULD CONFLICT WITH LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES (SUCH AS A TREE PRESERVATION POLICY OR ORDINANCE).

No trees are planned for removal during construction of the project; however, roadway trenching may require limbing and root system/drip-line impacts to onsite and immediately adjacent Coastal redwood trees (*Sequoia sempervirens*). According to Chapter 16.34 of the Santa Cruz County Code, the definition of a "significant tree" is as follows:

a. Within the Urban Services Line or Rural Services Line, any tree which is equal to or greater than 20 inches diameter breast height (dbh) (approximately 5 feet in circumference); any sprout clump of five or more stems each of which is greater than 12 inches dbh (approximately 3 feet in circumference); or any group consisting of five of more trees on one parcel, each of which is greater than 12 inches dbh (approximately 3 feet in circumference).

b. Outside the Urban Services Line or Rural Services line, where visible from a scenic road, any beach, or within a designated scenic resource area, any tree which is equal to or greater than 40 inches dbh (approximately 10 feet in circumference); any sprout clump of five or more stems, each of which is greater than 20 inches dbh (approximately 5 feet in circumference); or, any group consisting of ten or more trees on one parcel, each greater than 20 inches dbh (approximately 5 feet in circumference).

c. Any tree located in a sensitive habitat as defined in Chapter 16.32.

All trees located within a riparian zone would classify as “significant” according to definition “C” stated above. If any “significant trees” require removal or trimming the project proponent must obtain a Significant Tree Removal Permit from the County. A Significant Tree Removal Permit is an administrative permit that is processed by the Environmental Planning staff. SCCSD may be required to present professionally prepared evidence to document the need for the tree removal (report by either a licensed arborist or other professional). If the Significant Tree Removal Permit is necessary, the SCCSD may be required to plant one or more replacement trees from a list of approved species or implement other mitigation measures.

Although no trees are planned for removal, trenching and excavation within the drip-line and/or root zone of such trees may reduce structural integrity, introduce pathogens and/or disease, reduce or interrupt nutrient/water uptake, and/or eventually lead to tree loss (death). In addition, substantial tree limbing may be required to facilitate trenching or excavation. If not conducted properly, substantial tree limbing may likewise result in tree mortality.

Mitigation Measure 11
The project contractor shall ensure no soil is removed from within the drip-line of any tree and that no fill of additional soil can exceed two inches (2") within the drip-lines of trees, unless it is part of approved construction and is reviewed by a qualified forester or certified arborist. Because existing trees are sensitive to the addition of fill, excavated material must either be removed from the site or retained away from redwood trunks (a minimum of one-foot clearance) and as much of tree rooting zones as possible.

Roots exposed by excavation must be pruned and recovered as quickly as possible to promote callusing, closure, and healthy regrowth. Where excavation will occur within tree driplines and/or limbing is proposed, the following measures are recommended:

The project contractor shall ensure that all tree work (limbing, pruning, excavation within drip-line and/or root zone) shall be completed by a qualified forester or certified arborist to reduce overall impacts and to facilitate recovery as quickly as possible; techniques utilized to be determined by the consulting specialist. Examples of standard techniques utilized to reduce impacts to root systems are presented below; please note that any alternative/additional measures recommended by the contracted forester/arborist shall supersede the following:

Gently expose and cleanly sever roots one foot further from the tree than the final limit of grading and then hand dig the final foot of width. Roots should then be cleanly pruned to the side wall of excavation with a saw, Sawzall, narrow trencher with sharp blades, or clippers. Hydraulic or pneumatic excavation technologies are available which can expose and minimize damage to roots. Exposed roots should be draped immediately with at least two layers of untreated burlap or carpets secured to cover the excavated surface to a depth of 3 feet. Burlap or carpeting (or temporary fill) shall be soaked nightly and kept in place until the excavated surface is backfilled and watered.

Greenhouse Gas Emissions

The IS/MND did not contain an analysis of greenhouse gas (GHG) emissions and climate change because at the time the IS/MND was prepared, the Global Warming Solutions Act (AB32) and associated updates to the CEQA statutes and guidelines were not in effect. Although an analysis of potential climate change impacts was not completed as part of the IS/MND, air quality analysis and potential impacts were evaluated in the IS/MND. As described in the IS/MND all potential air quality related effects associated with the Valencia Creek Sewer Relocation Project were considered less-than-significant due to the temporary nature of project emissions and the application of standard air quality control measures as required as conditions of approval. GHG emissions associated with proposed modifications to the project design would also be temporary in nature and subject to standard measures as conditions of approval.

While the IS/MND did not evaluate potential GHG related effects associated with the Valencia Creek Sewer Relocation Project, those effects would not be considered significant for the purposes of CEQA. As described below, the proposed project would not result in any new significant environmental effects beyond those identified in the IS/MND. The proposed modifications to the project would cause temporary increases in GHG emissions during project construction, but no new significant or more severe impacts would occur. This analysis reflects updated CEQA requirements and changes in regulatory conditions since the certification of the IS/MND. The following discussion provides a more detailed analysis of each of the applicable thresholds of significance identified in Appendix G of the CEQA Guidelines.

IMPACT: WOULD THE PROJECT GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?

Construction and operation of the proposed modification to the project and the project in its entirety would generate a minor amount of GHG emissions, directly during construction and indirectly through electricity demand and vehicular access to the site during operation. The project site lies within the North

Central Coast Air Basin, where air quality is regulated by in the Monterey Bay Air Resources District (MBARD). MBARD does not currently have an adopted threshold of significance for GHG emissions. This represents a less-than-significant impact. No mitigation is required.

IMPACT: WOULD THE PROJECT CONFLICT WITH AN APPLICABLE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?

The proposed project modification and the project in its entirety would not conflict with any plan, policies, or regulations adopted for the purpose of reducing greenhouse gas emissions. No impact will result from the project, and no mitigation is required.

Public Services and Utilities

IMPACT: THE PROJECT WOULD RESULT IN THE NEED FOR NEW OR PHYSICALLY ALTERED PUBLIC FACILITIES, THE CONSTRUCTION OF WHICH WOULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES, OR OTHER PERFORMANCE OBJECTIVES FOR FIRE PROJECT AND POLICE PROTECTION SERVICES.

Project construction would require lane closures and/or detours that could affect emergency access. Therefore, a traffic control plan (TCP) is required for approval by the Santa Cruz County Department of Public Works, as well as by Caltrans, for portions of the alignment adjacent to Highway 1. Following construction, trenched areas would be reconstructed and re-paved to existing conditions, and there would be no long-term disruption to fire or police protection.

Mitigation Measure 12

The project contractor shall provide traffic control plans (TCPs) to the Santa Cruz County Department of Public Works and Caltrans prior to construction activities, during time frames determined by the Department of Public Works. The Department of Public Works shall decide if prior public notification requirements are necessary. The traffic control plans shall indicate the work area, all proposed signs, the spacing and location of all traffic control devices (arrow boards, flagmen, barricades, cones, pylon construction markers, etc.) the limits of proposed parking prohibitions, and the width and location of any reduced traffic lanes. The traffic control plans must be approved by the County prior to any installation of traffic control devices. Timing of lane closures shall be at discretion of the County and no more than one lane shall be closed at any one time.

Traffic

IMPACT: THE PROJECT COULD CAUSE AN INCREASE IN TRAFFIC THAT IS SUBSTANTIAL IN RELATION TO THE EXISTING TRAFFIC LOAD AND CAPACITY OF THE STREET SYSTEM (I.E., SUBSTANTIAL INCREASE IN EITHER THE NUMBER OF VEHICLE TRIPS, THE VOLUME TO CAPACITY RATIO ON ROADS, OR CONGESTIONS AT INTERSECTIONS).

Existing roadways and intersections in the project vicinity currently operate at acceptable levels of service. No additional permanent traffic would be generated by the project, however temporary traffic disruptions may occur during project construction activities.

Construction along public roadways will require lane closures, traffic detours, and/or restriction of traffic movements; however, implementation of Mitigation Measure 12 would reduce this potentially significant impact to less-than-significant.

IMPACT: THE PROJECT COULD CAUSE AN INCREASE IN HAZARDS TO MOTORISTS, BICYCLISTS, OR PEDESTRIANS.

Project construction would result in a temporary increase in construction -related trips on roads used to access the project site, which could potentially increase traffic conflicts or hazards; however, implementation of Mitigation Measure 12 would reduce this potentially significant impact to less-than-significant.

Tribal Cultural Resources

The IS/MND did not analyze tribal cultural resources because this issue was not part of the CEQA process when the IS/MND was prepared; however, the IS/MND analyzed some aspects of tribal cultural resources as part of the cultural resources analysis, and found that no significant impacts to those resources would result from the project. In addition, a cultural resources technical report prepared for this addendum resulted in a negative finding for sensitive tribal cultural resources (Appendix C). Impacts to tribal cultural resources are therefore not expected, and no new mitigation is required. The following discussion provides a more detailed analysis of each of the applicable thresholds of significance identified in Appendix G of the CEQA Guidelines.

IMPACT: 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

The project site does not contain any resources that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources. No impacts to these resources will result from the project, and no mitigation is required.

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 AMERICA TRIBE.

The technical cultural report for this addendum resulted in a negative finding for tribal cultural resources, as defined by Public Resources Code Section 5024.1. As noted in the cultural resources discussion in the IS/MND, project construction activities would occur primarily in areas previously disturbed by residential

development and no significant impacts to archaeological resources are expected to occur. However, pursuant to Section 16.40.040 of the Santa Cruz County Code, if at any time during site preparation, excavation, or other ground disturbance associated with this project human remains or unknown archaeological resources are discovered, the responsible persons shall immediately cease and desist from all further site excavation and notify the sheriff-coroner and the Planning Director. If the coroner determines that the remains are not of recent origin, a full archaeological report shall be prepared, and representatives of the local Native Californian Indian group shall be contacted. Disturbance shall not resume until the significance of the archaeological resources is determined and appropriate mitigations to preserve the resource on the site are established. This is considered a less-than-significant impact, and no mitigation is required.

APPENDIX A

CURRENTLY PROPOSED PROJECT PLANS

APPENDIX B

2018 BIOLOGICAL RESOURCES REPORT

APPENDIX C
2018 CULTURAL RESOURCES REPORT