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# Addendum to the County of Santa Cruz Sustainability Policy and Regulatory Update Environmental Impact Report

## **2023 HOUSING ELEMENT**

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SCH NO. 2020079005

*Prepared by*

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**OCTOBER 2023**

*Revised*

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## Acronyms and Abbreviations

Acronym / Abbreviation	Definition
3CE	Central Coast Community Energy
AAQS	Ambient air quality standards
AB	Assembly Bill
ADU	Accessory Dwelling Unit
AFFH	Affirmatively Furthering Fair Housing
AM	Access + Mobility Element of Santa Cruz County General Plan/LCP
AMBAG	Association of Monterey Bay Area Governments
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ARC	Agriculture, Natural Resources + Conservation Element of Santa Cruz County General Plan/LCP
BE	Built Environment Element of Santa Cruz County General Plan/ LCP
CAAP	Santa Cruz County Climate Action and Adaptation Plan
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
CDFW	California Department of Fish and Wildlife
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CRHR	California Register of Historical Resources
CSA	Community Service Areas
dB	decibel
DOF	California Department of Finance
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
FHSZ	fire hazard severity zone
FMMP	California Farmland Mapping and Monitoring Program
GHG	greenhouse gas
GSP	Groundwater Sustainability Plan
HCP	habitat conservation plan
HCD	California Department of Housing and Community Development
HMBP	Hazardous Material Business Plan
LCP	Local Coastal Program
L <sub>dn</sub>	day-night average noise level
LHMP	Local Hazard Mitigation Plan
LRA	local responsibility area



Acronym / Abbreviation	Definition
MBARD	Monterey Bay Air Resources District
MT CO <sub>2</sub> e	metric tons of carbon dioxide equivalent
MRZ	Mineral Resource Zone
N/A	not applicable
NCCAB	North Central Coast Air Basin
NCCP	natural community conservation plan
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O <sub>3</sub>	ozone
OPR	Governor's Office of Planning and Research
OWTS	onsite wastewater treatment systems
PM <sub>2.5</sub>	fine particulate matter
PM <sub>10</sub>	coarse particulate matter
PPV	peak particle velocity
RF	County of Santa Cruz Residential Flex zone district
RHNA	Residential Housing Needs Allocation
ROG	reactive organic gases
RSL	County Rural Services Line
R-UHF	County of Santa Cruz Urban High Density Flex General Plan land use designation
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCCC	Santa Cruz County Code
SCS	Sustainable Communities Strategy
SGMA	Sustainable Groundwater Management Act
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
SqCWD	Soquel Creek Water District
SRA	state responsibility area
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
USL	County Urban Services Line
VMT	vehicle miles traveled

# 1 Introduction and Background

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**Project Title:** County of Santa Cruz 2023 Housing Element

**Lead Agency Name and Address:**

County of Santa Cruz  
Community Development & Infrastructure Department  
701 Ocean Street, Fourth Floor  
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**Contact Person:** Matthew Sundt, 831-454-3117, [Matthew.Sundt@santacruzcountyca.gov](mailto:Matthew.Sundt@santacruzcountyca.gov)

**Project location:** Unincorporated Santa Cruz County (see Figure 1)

**Other Public Agencies Whose Approval is Required:**

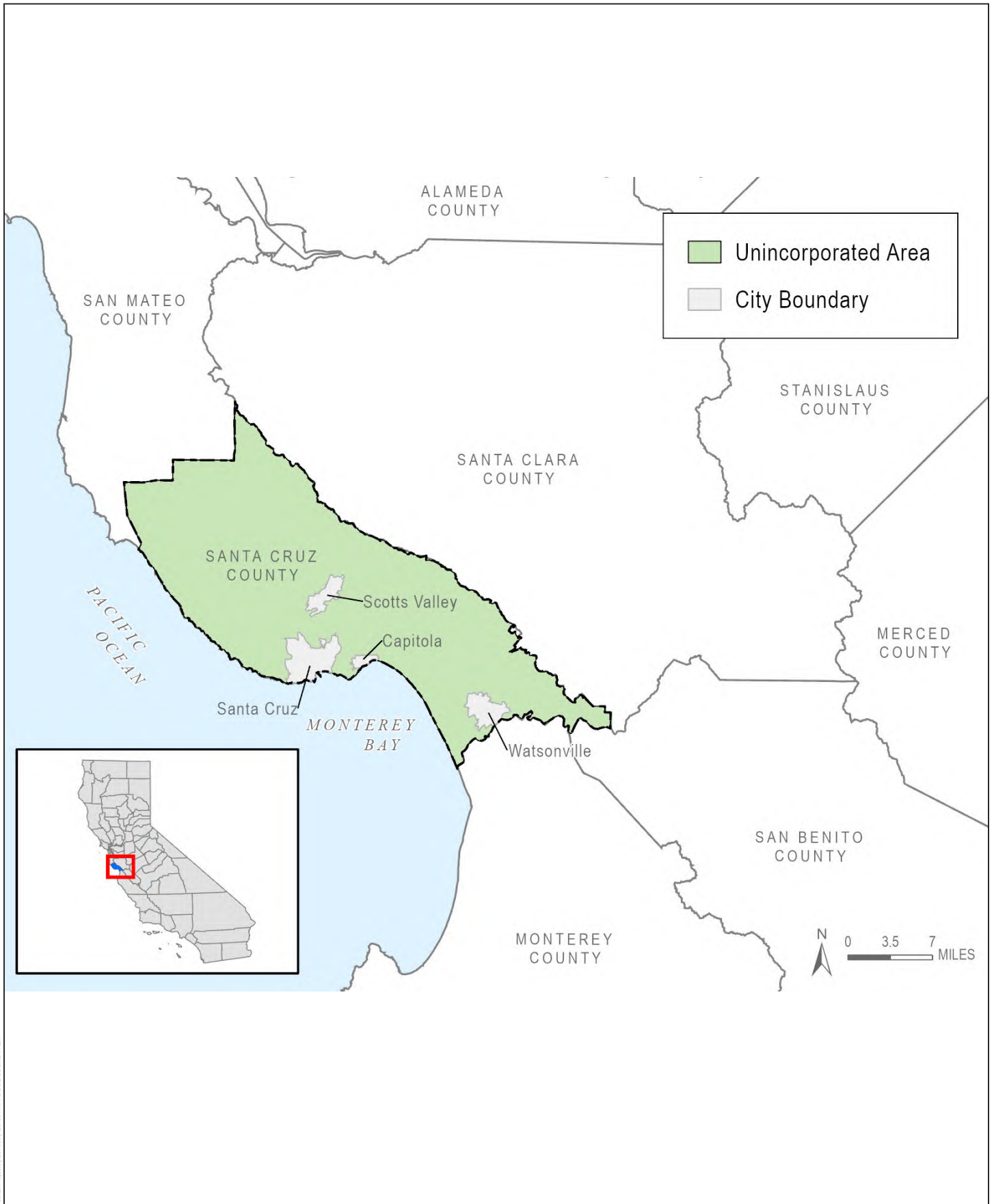
- California Department of Housing and Community Development: Approval of Housing Element

## 1.1 Introduction and Project Overview

This document is an Addendum to the Environmental Impact Report (EIR) for the County of Santa Cruz Sustainability Policy and Regulatory Update (Sustainability Update) (State Clearinghouse No. 2020079005), which was certified by the County of Santa Cruz (County) Board of Supervisors on November 15, 2022. The Sustainability Update consisted of amendments to the County's General Plan/Local Coastal Program (LCP), including four updated General Plan elements, amendments to sections of the Santa Cruz County Code (SCCC), adoption of County Design Guidelines, and General Plan land use and/or zoning map amendments for 23 properties as explained in Section 1.3.2.

The proposed project consists of an update of the County of Santa Cruz Housing Element of the General Plan in accordance with state law. Preparation and updating of a Housing Element is mandated by state law. The County's existing 2015 Housing Element provides objectives, policies and programs to meet the identified housing needs in the unincorporated area of the county. The state requires local communities to update their Housing Element every eight years to assure availability of sites to supply adequate housing to meet community needs. The proposed 2023 Housing Element covers the years 2023 through 2031.

A key component of the Housing Element is identifying availability of sites to accommodate the jurisdiction's Regional Housing Need Allocation (RHNA), which is developed by the State of California and the Association of Monterey Bay Area Governments (AMBAG). For the current 5th cycle, the County's RHNA was 1,314 housing units, which is addressed in the County's existing 2015 Housing Element. For the 6th cycle (2023-2031), the County's RHNA is 4,634 housing units, which covers the unincorporated area of the county and represents a substantial increase over the previous and past RHNA developed for the county; other jurisdictions in the AMBAG region and across the state also have seen substantial increases in the RHNA for their jurisdictions.



SOURCE: County of Santa Cruz 2021

**FIGURE 1**

**Regional Location**





## 1.2 Housing Element Requirements

### 1.2.1 State Law Requirements for Housing Elements

Pursuant to state law (Government Code sections 65580-65589.11), each city and county must prepare and adopt a Housing Element as part of its General Plan. The Housing Element is one of seven required elements of the County's General Plan, the document that guides land use planning and development activities in the unincorporated area. However, it is the only General Plan element that requires regular updates (currently every eight years) and review and certification by a state agency. State law requires that the Housing Element:

- Outline the community's production objectives consistent with state and regional growth projections.
- Describe goals, policies and implementation strategies to achieve housing objectives.
- Examine the local need for housing with a focus on special needs populations.
- Identify adequate sites for production of housing to serve all income levels.
- Analyze potential constraints to new housing production, and remove, as legally feasible and appropriate, governmental constraints to housing production, maintenance, and improvement.
- Evaluate the Housing Element for consistency with other General Plan elements.
- Evaluate Affirmatively Furthering Fair Housing.

California law also requires each city and county, when preparing its state-mandated Housing Element, to adopt local housing implementation programs to meet its regional housing needs. Under state law and California Department of Housing and Community Development (HCD) oversight, AMBAG prepares the RHNA plan for Monterey and Santa Cruz counties. The RHNA establishes the total number of housing units that each city or county within the two counties must plan for within an eight-year planning period. The amount of housing allocated to the region is determined by HCD and then distributed among the relevant jurisdictions by AMBAG.

In 2018, Assembly Bill (AB) 686, signed in 2018, established a state mandate related to "affirmatively furthering fair housing" (AFFH). AB 686 requires all state and local agencies to explicitly address, combat, and relieve disparities resulting from past patterns of housing segregation to foster more inclusive communities. AB 686 extends requirements for federal grantees and contractors to "affirmatively further fair housing," including requirements in the federal Fair Housing Act, to public agencies in California. Affirmatively furthering fair housing is defined specifically as taking meaningful actions that, taken together, address significant disparities in housing needs and in access to housing opportunity by replacing segregated living patterns with integrated and balanced living patterns; transforming racially and ethnically concentrated areas of poverty into areas of opportunity; and fostering and maintaining compliance with civil rights and fair housing laws.

### 1.2.2 Regional Housing Needs Allocation

As indicated above, AMBAG prepares the RHNA plan for Monterey and Santa Cruz counties. The amount of housing allocated is determined by HCD and distributed among the relevant jurisdictions by AMBAG. AMBAG allocates the region's housing need to each community based on planning factors in the Government Code. For the eight-year time frame covered by proposed Housing Element Update, HCD issued a Regional Housing Need Determination



to the AMBAG that determined that the region, which includes all cities and unincorporated areas in Santa Cruz and Monterey counties, must zone to accommodate a minimum of 33,274 housing units during this period (AMBAG 2022). The total number of housing units assigned by HCD is separated into four income categories that cover all income levels, from very low-income households to market rate housing.<sup>1</sup> This calculation is based on population projections produced by the California Department of Finance (DOF), as well as adjustments that incorporate the region's existing housing need.

## 1.3 County of Santa Cruz General Plan

### 1.3.1 Existing 2015 County Housing Element

The 2015 Housing Element for Santa Cruz County describes population and housing trends, housing needs, constraints affecting construction of housing, and opportunities for energy conservation; provides a housing site inventory; and includes quantified objectives, goals, policies, and programs to meet housing needs. The County's RHNA of 1,314 housing units in unincorporated Santa Cruz County between 2015 and 2023 was divided into the following income categories:

- 317 units affordable to very low-income households
- 207 units affordable to low-income households
- 240 units affordable to moderate-income households
- 550 units affordable to above moderate-income households

The 2015 Housing Element identified capacity for approximately 17,270 residential units under the existing General Plan land use designations and zoning for all types of housing throughout the unincorporated county. This included a capacity of approximately 2,340 housing units in urban areas and 2,715 in rural areas on vacant and underutilized residential sites for a total of 5,095 units. The 2015 Housing Element indicates that additional housing could be developed in the urban and rural areas of the county as accessory dwelling units (ADUs) (7,838 units), housing for agricultural employees in agricultural areas (2,423 units), and as mixed-use projects in commercial areas (1,916 units). The existing 2015 Housing Element indicates that adequate capacity exists under existing General Plan land use and zoning designations to meet the RHNA goals for 2014-2023.

Between 2015 and 2023, the County permitted 1,043 housing units, which represents 79% of its RHNA. Of the units permitted, approximately 37% (381 units) were affordable to low and very low-income households, and 63% (663 units) were affordable to moderate to above moderate-income households. Within this total, the County permitted approximately 59% of its very low-income allocation, 94% of the required low-income units, 87% of the required moderate-income units, and 83% of its above moderate-income allocation.

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<sup>1</sup> HCD divides the RHNA into the following four income categories:  
Very Low income: 0-50% of Area Median Income  
Low income: 50-80% of Area Median Income  
Moderate income: 80-120% of Area Median Income  
Above Moderate income: 120% or more of Area Median Income



### 1.3.2 Other County General Plan Elements

California state law requires each city and county to adopt a general plan for “the physical development of the county or city, and any land outside its boundaries which bears relation to its planning” (Government Code section 65300). California law requires that a general plan address the mandated elements listed in Government Code section 65302. The mandatory elements for all jurisdictions are: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. Cities and counties that have identified disadvantaged communities must also address environmental justice in their general plans, including air quality (Governor’s Office of Planning and Research [OPR] 2017). Other elements, such as Community Design, Parks and Recreation, and Public Facilities are optional.

The County’s General Plan includes all state-mandated elements, and currently includes six other elements in addition to the Housing Element. As previously indicated, the Sustainability Update, adopted by the Board of Supervisors in December 2022<sup>2</sup>, was a comprehensive update to the County’s General Plan/LCP. The goal of this Update was to develop new policies and code regulations that support more sustainable communities in Santa Cruz County with a focus on supporting the development of housing in urban areas. The Sustainability Update revised and updated the following General Plan elements: Built Environment (BE) (formerly Land Use), Mobility + Access (formerly Circulation), Agriculture, Natural Resources + Conservation (ARC) (formerly Conservation and Open Space), and Parks, Recreation + and Public Facilities (PPF). The Sustainability Update also eliminated the former Community Design element, which was incorporated into the BE Element. The Noise and Public Safety elements of the County’s General Plan were not part of the Sustainability Update as they were updated in 2019 and 2020, respectively.

The County’s General Plan/LCP guides the location, density and intensity of residential and other land uses, and includes policies that support housing. As part of the Sustainability Update, new and revised policies were included in the BE Element that address residential and mixed-use development. The BE Element addresses residential uses, among other land uses, and includes a range of goals, policies, and objectives that generally support a range of housing types, as well as infill, mixed-use, and higher density projects. A summary of BE policies and implementation strategies related to residential uses is summarized in Table 1. General Plan Goal BE-2 guides rural and urban residential land use designations and densities to enable a diversity of housing opportunities and encourages attainable housing through mixed-use development and other flexible land use strategies. Objective BE-2.1 seeks to offer urban residential land use designations that allow for a diverse range of single and multifamily housing types, with higher-density development along multimodal corridors, within activity centers, and on key opportunity sites. There also are a number of policies that support mixed-use developments that include housing in urban areas.

Objective BE-2.3 and supporting policies seek to encourage the preservation and production of housing that is attainable to residents of all income levels and household sizes through flexible residential land use strategies. Specifically, new residential policies include addressing ADUs, small lot single-family development, and other housing types that promote affordable housing, as well as home occupations to encourage telecommuting and businesses compatible with surrounding residential uses. New policies address provision of assisted living and other care facilities, as well as potential live-work units within mixed-use developments in commercial zones. The

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<sup>2</sup> The County-adopted amendments are pending approval/certification by the California Coastal Commission for those amendments applicable in the coastal zone.



BE Element includes mixed-use development policies, particularly allowing residential uses in commercially designated areas.

**Table 1. Adopted Sustainability Update Policies Related to Housing**

	Policies and Implementation Strategies
<p><b>Support for Residential, Infill, and Mixed-Use Developments, and Projects Along Transit and Multi-Modal Corridors</b></p>	<ul style="list-style-type: none"> <li>• Encourage development in Sustainable Communities Strategy (SCS) opportunity areas along transit corridors, including compact housing and infill development and do not support General Plan or zone map amendments with less intensive land use designations along transit corridors (BE-1.2.2)</li> <li>• Coordinate with AMBAG and Santa Cruz County Regional Transportation Commission (SCCRTC) to maintain consistency between local land use and regional transportation planning objectives so that development occurs in transportation-efficient locations as identified in the regional SCS/Metropolitan Transportation Plan (SCS/MTP). (BE-1.5.1)</li> <li>• Along multimodal corridors, encourage high building intensity land use designations with compact housing options, mixed-use development, and diverse employment opportunities. (BE-1.2.3)</li> <li>• Encourage infill mixed-use development along main streets. (BE-1.2.5)</li> <li>• Encourage developments with a mix of land uses in appropriate locations where the combination of uses is complementary and contributes to establishing and enhancing activity centers. (BE-1.3.2)</li> <li>• Support infill and mixed-use developments in village and town centers and potential amendment to village and town plans to allow for intensified development (BE-1.3d)</li> <li>• Provide urban residential land use designations at a range of building intensities to accommodate single and multi-family development as indicated in Table 2-1. (Additional units per acre may be allowed for qualifying projects via a density bonus.) (BE-2.1.1) BE-2.1.2-6 describe different residential density ranges, including new Urban High Density Flex Residential land use.</li> <li>• Implement urban residential land use designations through the zone districts shown in Table 2-1 of the BE and in SCCC 13.10.170. (BE-2.1a)</li> <li>• Provide rural residential land use designations at building intensities to accommodate low-density residential development as indicated in Table 2-2 of the BE. (BE-2.2.1)</li> <li>• Encourage integration of multi-family residential development within non-residential areas through mixed-use development strategies. (BE-2.3.6)</li> <li>• Mixed-use developments – allow up to 80% residential square footage in community, neighborhood, and office commercial designations. (BE-3.2.1)</li> <li>• Encourage mixed-use developments that preserve ground floor square footage for nonresidential uses, with residential uses on upper floors. (BE-3.2.7)</li> <li>• Consider potential live/work units in mixed-use commercial developments (BE-3.2b)</li> </ul>
<p><b>Support for Higher Residential Densities and/or Land Use Intensity</b></p>	<ul style="list-style-type: none"> <li>• Within activity centers, prioritize land uses with higher residential and employment density than surrounding neighborhoods. (BE-1.3.3)</li> <li>• Potential parcel redesignation/rezoning to higher densities in activity centers (BE-1.3a)</li> <li>• Within County Urban Services Line (USL)/Rural Services Line (RSL), do not approve development below minimum density and encourage development at high end of allowed density range (BE -2.1.9 &amp; BE -2.1b)</li> </ul>



**Table 1. Adopted Sustainability Update Policies Related to Housing**

	Policies and Implementation Strategies
	<ul style="list-style-type: none"> <li>• New “Urban High Flex” designation allowing 22-45 dwelling units/acre; identify opportunity sites for re-designation/rezoning (BE-2.1.1 – 2.1.6, BE-2.1d)</li> </ul>
<b>Support for Specific Housing Types</b>	<ul style="list-style-type: none"> <li>• Encourage the provision of ADUs associated with single-family and multi-family dwellings, recognizing that ADUs not only increase housing affordability (both for homeowners and tenants), but also create a wider range of housing options within neighborhoods. (BE-2.3.1)</li> <li>• Small-scale infill housing – allow small lot subdivisions and duplexes in single family zone districts and encourage “missing middle” infill housing (BE-2.3.2, BE-2.3.4, BE–2.3.5)</li> <li>• Allow multiple detached dwellings or up to two attached or semidetached dwellings per single-family zoned parcel, subject to density and development standards. (BE-2.3.3)</li> <li>• Recognize the importance of mobile home parks as a housing type that is affordable. Preserve mobile home parks and discourage conversion of mobile home park properties to short-term visitor accommodations or other land uses. (BE-2.3.8)</li> <li>• Adaptive reuse – consider conversion of nonresidential buildings and sites to residential uses (BE-2.3.9)</li> <li>• Investigate the potential for live/work units within mixed-use consumer commercial, office, and residential development. (BE-3.2b)</li> </ul>
<b>Support for Specific Housing Locations</b>	<ul style="list-style-type: none"> <li>• Conduct an inventory of potential development sites within one-quarter to one-half mile of existing and proposed transit stops and mobility hubs to identify potential locations for higher intensity development. (BE-1.2b)</li> <li>• Analyze Monterey Bay Sanctuary Scenic Trail (MBSST) corridor and identify, redesignate, and rezone appropriate sites for new commercial, mixed use, and multifamily residential development. (BE-1.2d)</li> <li>• Opportunity sites along Soquel Drive - transition from low-intensity auto services to active employment and mixed uses (BE-3.3g)</li> <li>• Cabrillo College – support development of Cabrillo College area as an activity center with higher-density housing, limited “walkable” college-serving retail and services within and near the college, as well as improved pedestrian and bicycle infrastructure. (BE-1.3g)</li> </ul>

The Sustainability Update also adjusted residential densities and development standards to facilitate more residential units. In particular, residential allowances in mixed-use developments were increased from 50% to 80% of building square footage and included a new urban high-density “flex” residential (R-UHF) General Plan land use designation, allowing multi-family development at a density range of 22 to 45 dwelling units per acre. The new R-UHF land use designation would be implemented by a new “RF” (Residential Flex) zone district. The purpose of the RF zone district is to accommodate a greater intensity of residences along and near public transportation corridors within the County’s USL, creating opportunities for infill housing available to residents at various income levels and household sizes, including workers, students, singles and seniors, specifically by encouraging compact attached housing units. Parcels within the RF zone district would be located in areas with a full range of urban services and in close proximity to multimodal corridors, commercial services, schools/colleges, and/or major employment centers. Compared to other residential zone districts, this zone district includes flexible



development standards appropriate to the more urban nature of this district, such as taller structures, no lot coverage requirements, and lower open space and parking requirements per unit.

In addition, the Sustainability Update expanded the range of the allowable density of urban residential land use designations as summarized in Table 2. The changes allowed a density increase of about 0.5 unit/acre for very low residential, an increase of 3-5 units/acre for urban low and urban medium designations, and an increase from 17 to 30 units/acre for urban high residential designation. The new urban high flex designation would allow density up to 45 units/acre. Policy BE-2.1.1 provides for a wider range of densities allowed as provided in Table 2 and also provides for revisions (along with corresponding revisions in the SCCC) to allow density in the USL to be calculated based on gross site area in order to encourage developments to achieve actual densities closer to those allowed in the General Plan/LCP. Actual density that applies to a particular zone district is established by the SCCC.

**Table 2. Sustainability Update Urban Residential Land Use Densities**

Land Use Designation	Implementing Zone Districts	Former Density (units/acre)	Sustainability Update Density (units/acre)
Urban Very Low (R-UVL)	R-1	1.0 – 4.3	1 – 5
Urban Low (R-UL)	R-1, RB, RM	4.4 – 7.2	4 – 10
Urban Medium (R-UM)	R-1, RB, RM	7.3 – 10.8	7 – 15
Urban High (R-UH)	R-1, RM	10.9 – 17.4	11 – 30
Urban High Flex* (R-UHF)	RF	–	22 – 45

\*New land use designation

## 1.4 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.) and regulations implementing CEQA, known as the CEQA Guidelines (14 California Code of Regulations Section 15000 et seq.), serve as the main framework of environmental law and policy in California. CEQA applies to most public agency discretionary actions that have the potential to adversely affect the environment. CEQA requires public agencies to inform decision makers and the public about the potential environmental impacts of proposed projects and to avoid or reduce those environmental impacts to the extent feasible.

Once an EIR or other CEQA document has been certified or adopted for a project, Sections 15162-15164 of the State CEQA Guidelines define the standards for determining the appropriate level of subsequent environmental review, and Section 15164 addresses the specific circumstances requiring the preparation of an addendum to an EIR. When it can be determined that the proposed changes to an approved project, changed circumstances, or new information would not result in the identification of new significant impacts or a substantial increase in the severity of significant impacts identified in the certified EIR, an addendum to the EIR may be prepared. If significant new impacts or a substantial increase in the severity of previously identified impacts would result, then preparation and circulation of a subsequent or supplemental EIR for additional public review is required. Public review of an addendum is not required under CEQA.





Specifically, pursuant to Section 15164(a) of the CEQA Guidelines, the lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. Under CEQA Guidelines Section 15162, no subsequent EIR shall be prepared for the project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

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

As fully explained in Section 3, this document is an Addendum to the County of Santa Cruz Sustainability Update EIR. The County has determined that the County of Santa Cruz 2023 Housing Element, as part of the County's General Plan, does not represent a substantial change in the description of the General Plan elements evaluated in the Sustainability Update EIR as documented by the review contained in Section 4.3 of this document. Public review of an addendum is not required under CEQA.



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## 2 Project Description

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### 2.1 Project Location and Setting

The proposed project is the County of Santa Cruz 2023 Housing Element, which applies within unincorporated lands within the county. Santa Cruz County is generally located between the San Francisco Bay Area on the north and the Monterey Peninsula on the south. The county is bordered by San Mateo County to the north, Santa Clara and San Benito counties to the east, and Monterey County to the south (see Figure 1). Four incorporated cities are located within the county: Capitola, Santa Cruz, Scotts Valley, and Watsonville. The county is adjacent to Monterey Bay, a federally designated marine sanctuary. Five major state routes (highways) connect Santa Cruz County with adjacent counties.

For mapping and planning purposes, the county has been divided into 15 planning areas, which were created to correspond to geographic regions, as well as to generally follow the boundaries of census tracts in order to facilitate future data analysis. These are shown on Figure 2.

- Aptos (AT)
- Aptos Hills (AH)
- Bonny Doon (BD)
- Carbonera (CB)
- Eureka Canyon (EC)
- La Selva (LS)
- Live Oak (LO)
- North Coast (NC)
- Pajaro Valley (PV)
- Salsipuedes (SS)
- San Andreas (SA)
- San Lorenzo Valley (SL)
- Skyline (SK)
- Soquel (SQ)
- Summit (SM)

The County maintains a distinction between urban and rural areas through the use of an Urban/Rural Boundary. As shown in Figure 2, the Urban/Rural boundary is represented by an Urban Services Line (USL) and Rural Services Line (RSL). Urban concentrations of development are located within the four incorporated cities in the county and in the unincorporated areas of Live Oak, Soquel, Seacliff/Aptos, and Rio Del Mar. In addition to the areas within the USL, there are also urban enclaves (located outside the USL) that are recognized as having urban densities and which may or may not have all urban services. These enclaves are defined by an RSL and include the communities of Davenport, Boulder Creek, Ben Lomond, Felton, La Selva Beach, Place de Mer, Sand Dollar Beach/Canon del Sol, Sunset Beach, Pajaro Dunes North, and Pajaro Dunes South. Within the USL and RSL, there are higher intensity residential land uses, as well as a variety of commercial and public facility uses. Nearly 90% of the unincorporated county land is located outside of the USL/RSL with lands in use as low-density residential, agriculture, open space, timber, resource conservation, and parkland.

### 2.2 Project Components

The proposed project consists of an update to the County of Santa Cruz Housing Element of the General Plan for the years 2023 through 2031 as required by state law. The draft Housing Element contains the following five sections, as well as supporting appendices.

1. **Introduction.** Describes California requirements for Housing Elements and relationship to other General Plan elements, requirements for AFFH, new state laws regarding housing, and the public participation process conducted for the project.



2. **Goals, Policies, Programs.** Provides the goals and policies and implementation programs intended to address housing needs.
3. **Overview of Housing Needs and Constraints.** Summarizes housing needs and constraints in the county.
4. **Vacant and Available Sites.** Quantifies the county’s existing and projected land available for housing for all income levels and share of the regional housing need in accordance with Section 65584
5. **Energy Conservation.** Summarizes opportunities for energy conservation in the construction of housing.

## 2.2.1 Regional Housing Needs Allocation

On November 8, 2022, AMBAG’s adopted RHNA Methodology was approved by HCD. As previously indicated, the adopted RHNA for the County’s unincorporated area current Housing Element cycle is 4,634 units, a slated increase of 353 percent from the last cycle. Table 3 shows the RHNA distribution among different income levels for unincorporated Santa Cruz County for the period of 2023 through 2031.

**Table 3: 2023-2031 Unincorporated Santa Cruz County Regional Housing Needs Allocation**

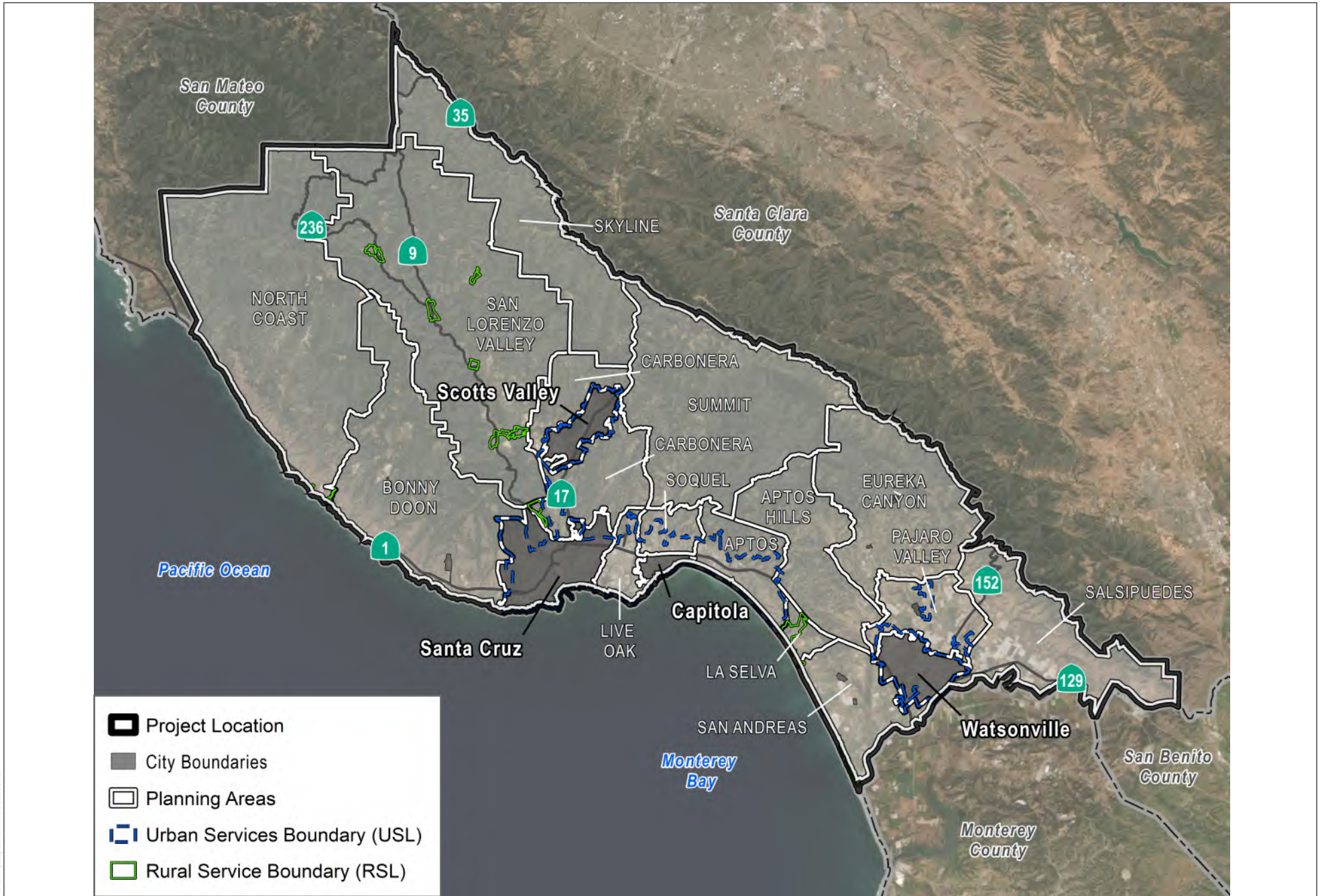
Income	Percentage of Area Median Income	Units
Very Low Income	<50	1,492
Low Income	51-80	976
Moderate Income	81-120	586
Above Moderate Income	121 +	1,580
<b>Total</b>		<b>4,634</b>

**NOTE:** HCD divides the RHNA into the following four income categories:  
 Very Low income: 0-50% of Area Median Income  
 Low income: 50-80% of Area Median Income  
 Moderate income: 80-120% of Area Median Income  
 Above Moderate income: 120% or more of Area Median Income

**Source:** AMBAG

## 2.2.2 Goals, Policies, Programs and Quantified Objectives

The County of Santa Cruz 2023 Housing Element is driven by two guiding principles: facilitating the development of new housing and affirmatively furthering fair housing. The goals and policies in the Housing Element address the County’s identified housing needs and are implemented through a series of housing programs. Housing programs describe specific actions the County will take to achieve the goals and policies presented in the Housing Element to achieve the stated housing objectives.



SOURCE: County of Santa Cruz 2021

FIGURE 2

County Planning Areas and Urban and Rural Services Lines

Addendum to the County of Santa Cruz Sustainability Policy and Regulatory Update EIR





### Housing Element Quantified Objectives

State law requires that each jurisdiction establish quantified objectives for the Housing Element planning period. The proposed Housing element includes quantified objectives, which are presented in Table 4. Assumptions are based on past program performance, funding availability, construction trends, land availability, and future programs that will enhance program effectiveness and achieve full implementation of the County’s housing goals. For the years 2023 through 2031, the County’s quantified objectives for housing are construction of 2,350 new housing units, rehabilitation of 160 housing units, and conservation of 15 units.

**Table 4. 2023 Housing Element Quantified Objectives Summary<sup>3</sup>**

Income Category	New Construction	Rehabilitation	Conservation / Preservation	Total	RHNA
Very Low <sup>4</sup>	500	119	5	624	1,492
Low	500	41	5	546	976
Moderate	150	0	5	155	586
Above Moderate	1,200	0	0	1,200	1,580
<b>TOTAL</b>	<b>2,350</b>	<b>160</b>	<b>15</b>	<b>2,525</b>	<b>4,634</b>

As shown in Table 4, the proposed objective for construction of new housing units is 2,350 units, which is less than the County’s RHNA. Quantified objectives may differ from the RHNA because they include not only targets for production of new housing units by household income level, but also include targets for rehabilitation and conservation of housing units. Local jurisdictions set their quantified objectives based on their realistic assessment of what can be achieved during the Housing Element planning period. Thus, the quantified objectives for housing production may differ from the local jurisdiction’s RHNA for new housing units for the same planning period, as is the case for the proposed County of Santa Cruz 2023 Housing Element. State law requires that the County demonstrate provision of sufficient land, appropriately designated and zoned, to accommodate construction of the targeted number of housing units established in the jurisdiction’s RHNA, while the quantified objectives for housing production represents the number of housing units that the local jurisdiction expects will be built, rehabilitated, or preserved during the same period, considering market conditions, financial resources, and other factors. Therefore, while the County’s RHNA is 4,634 housing units, the quantified objectives of the draft Housing Element indicate that 2,350 new housing units are what the County reasonably expects to be constructed from 2023 through 2031 based on historical building and market trends.

<sup>3</sup> The new construction objectives shown in Table 4 are based on approved and anticipated development projects, historic construction trends, projected permitting volumes based on past trends, and estimated permitting of new ministerial project types such as SB 9, SB 10, AB 2162. Rehabilitation and conservation/preservation objectives are based on estimated affordable housing rehabilitation and/or preservation programs and projects that qualify for inclusion in this table pursuant to housing element law.

<sup>4</sup> Includes units at the Extremely Low-Income level.



## Housing Element Goals, Policies, and Programs

The six goals of this Housing Element are as follows:

- **Goal 1:** Facilitate Development of New Housing, Primarily in Infill Areas.
- **Goal 2:** Maintain and Enhance the Quality and Affordability of Existing Housing Stock.
- **Goal 3:** Facilitate Development of Affordable and Equal Opportunity Housing.
- **Goal 4:** Assist in Provision of Housing for Special Needs Populations.
- **Goal 5:** Promote Energy Conservation and Sustainable Design.
- **Goal 6:** Collaborate Across Sectors and Publicize Housing Resources.

Policies are provided for each goal and are summarized in Table 5, and some key programs are also noted. There are 40 implementation programs that accompany the Housing Element policies that generally describe the measures required for implementation, as well as the timeframe, funding source, and responsibility for implementation. Each program specifies a “measurable outcome.” The Draft Housing Element includes some new policies and programs since the 5<sup>th</sup> Cycle 2015 Housing Element to be consistent with current codes and special needs. Table 5 summarizes key policies and programs.

**Table 5. Summary of Proposed 2023-2031 Housing Element Goals, Policies, and Key Programs**

Goal	Policies / Key Programs
<b>H-1 - Facilitate New Housing and Infill Development</b>	<ul style="list-style-type: none"> <li>• Maintain inventory of available sites to meet RHNA. (H-1.1)</li> <li>• Annual reporting to HCD. (H-1.2)</li> <li>• Ensure new residential and mixed-use developments achieve at least 75% of maximum allowable density on the site. (H-1.3)</li> <li>• Encourage and support ADUs in single-family zones. Support multi-family housing in multi-family zones at minimum density or higher and allow ADUs. (H-1.4)</li> <li>• Maintain properties designated with the R-Combining District unless property owner identifies and obtains title to alternate sites to be rezoned to replace the unit capacity available on the two R-Combining sites (Erlach and Nigh). (H-1.5)</li> <li>• Continue to implement priority processing for affordable housing projects. (H-1.6)</li> <li>• Implement pro-housing programs and standards. (H-1.7)</li> <li>• Support development of farmworker housing. (H-1.8)</li> <li>• 50% density bonus for consolidated sites in USL. (H-1.9)</li> </ul> <p><i>Key Programs:</i></p> <ul style="list-style-type: none"> <li>♦ Rezone sufficient vacant and/or underutilized property to appropriate multi-family residential and/or mixed-use zone districts to accommodate the RHNA in each income category, (H-1B)</li> <li>♦ Develop a by-right overlay zone to permit rental and owner-occupied multi-family housing uses by right (ministerially) for developments with 20% or more lower-income units pursuant to state law. (H-1C)</li> <li>♦ Update density bonus code to consider additional policy incentives to encourage parcel assembly for multi-family housing projects, inclusion of extremely low-income units, and units for special needs households. (H-1D)</li> <li>♦ Rezone appropriate urban opportunity sites to Residential Flex (RF) zoning, and increase densities on current RM-zoned sites to densities of 20 units or more per acre. (H-1E)</li> </ul>



**Table 5. Summary of Proposed 2023-2031 Housing Element Goals, Policies, and Key Programs**

Goal	Policies / Key Programs
	<ul style="list-style-type: none"> <li>◆ Review development standards for possible changes, including studying potential areas for increasing heights to 4-6 stories at key intersections and transit areas. (H-1F)</li> <li>◆ Update County procedures and codes to streamline the process for filing residential parcel maps (minor land divisions) and subdivisions maps on property within the USL. (H-1G)</li> <li>◆ Develop an SB 9 implementing ordinance to allow Senate Bill (SB) 9 housing projects within the Coastal Zone. (H-1H)</li> <li>◆ Rezone residential parcels per SB 10, which allows up to 10 units on qualifying infill parcels. (H-1J)</li> <li>◆ Provide priority permit processing for projects of seven or more new units with at least 15% lower-income, or 25% moderate-income units, and/ or projects to substantially rehabilitate 10 or more subsidized rental units. (H-1K)</li> </ul>
<p><b>H-2 - Maintain and Improve Quality and Affordability of Existing Housing</b></p>	<ul style="list-style-type: none"> <li>● Preserve existing mobile home parks. (H-2.1)</li> <li>● Conserve existing multi-family rental housing by regulating rental developments to condominium ownership. (H-2.2)</li> <li>● Strive to keep existing subsidized and/or inclusionary affordable housing affordable over time. (H-2.3)</li> <li>● Strive to ensure that existing rental housing is maintained. (H-2.4)</li> <li>● Promote, enable, and facilitate the participation of lower-income homeowners and/or owners of affordable rental housing in housing rehabilitation programs. (H-2.5)</li> <li>● Strive to preserve existing “naturally occurring affordable housing” in rural areas. (H-2.6)</li> </ul> <p><i>Key Programs:</i></p> <ul style="list-style-type: none"> <li>◆ Develop a proactive code enforcement program to bring unpermitted vacation rentals into compliance with SCCC restricting vacation rental use of housing units. (H-2H)</li> <li>◆ Support legal aid programs that provide legal aid and housing counseling to lower-income and at-risk tenants. (H-2I)</li> </ul>
<p><b>H-3 – Facilitate Development of Affordable and Equal Opportunity Housing</b></p>	<ul style="list-style-type: none"> <li>● Require new housing developments to meet applicable inclusionary housing requirements of SCCC. (H-3.1)</li> <li>● Continue to implement and actively promote density bonus program for developments that provide affordable units. (H-3.2)</li> <li>● Maintain adequate sites with appropriate multi-family and/or higher density zoning to accommodate County’s RHNA. (H-3.3)</li> <li>● Continue to use County funds and other state, federal or private funds and grants to assist development of new affordable housing. (H-3.4)</li> <li>● Require all for-sale affordable units to be deed restricted. (H-3.5)</li> <li>● Require developers to provide relocation assistance as required by SCCC. (H-3.6)</li> <li>● Do not allow development of single-family homes in multi-family residential zones. (H-3.7)</li> <li>● Require landlords to pay interest on tenants’ security deposits. (H-3.8)</li> <li>● Preserve affordable housing in coastal zone. (H-3.9)</li> <li>● Encourage development of affordable housing on publicly owned properties. (H-3.10)</li> </ul> <p><i>Key Programs:</i></p> <ul style="list-style-type: none"> <li>◆ Work with state representatives to consider state legislation to further limit the amount of rental housing application fees. (H-3D)</li> </ul>



**Table 5. Summary of Proposed 2023-2031 Housing Element Goals, Policies, and Key Programs**

Goal	Policies / Key Programs
	<ul style="list-style-type: none"> <li>◆ Commission study to evaluate all aspects of the County’s LCP that may impede the development of lower-income and/or multifamily rental housing on sites within the coastal zone included on the Sites Inventory.. (H-3G)</li> <li>◆ Inclusionary Housing Nexus Study. (H-3H)</li> </ul>
<p><b>H-4 – Provide Housing Opportunities for Special Needs Populations</b></p>	<ul style="list-style-type: none"> <li>● Provide opportunities and support for special needs households. (H-4.1)</li> <li>● Maintain provisions in SCCC to provide reasonable accommodations for people with disabilities seeking fair access to housing. (H-4.2)</li> <li>● Continue to implement SCCC provisions for development of farmworker housing. (H-4.3)</li> <li>● Continue to promote programs and projects to provide permanent housing for homeless. (H-4.4)</li> <li>● Support and encourage construction, rehabilitation, and preservation of senior housing developments. (H-4.5)</li> <li>● Support and encourage all-age housing development. (H-4.6)</li> <li>● Participate in regional collaboratives and provide funding when available that provide emergency shelter. (H-4.7)</li> <li>● Continue to ensure that individuals and families seeking housing are not discriminated against. (H-4.8)</li> <li>● Make units available for special needs households. (H-4.9)</li> </ul> <p><i>Key Programs:</i></p> <ul style="list-style-type: none"> <li>◆ Review codes for group homes, transitional and permanent housing. (H-4C)</li> <li>◆ Explore options for increasing the supply and awareness of the supply of permanent, affordable, and accessible housing for people with disabilities. (H-4D)</li> <li>◆ Continue to support housing access and affordability for local seniors (H-4F)</li> </ul>
<p><b>H-5 – Promote Energy Conservation and Sustainable Design</b></p>	<ul style="list-style-type: none"> <li>● Require all new housing projects to comply with California CalGreen Code, SCCC,, and County Design Guidelines that reduce energy consumption. (H-5.1)</li> <li>● Implement County’s Climate Action and Adaptation Plan. (H-5.2)</li> </ul> <p><i>Key Programs:</i></p> <ul style="list-style-type: none"> <li>◆ Research the feasibility of expanding electrification requirements to new residential construction. (H-5)</li> </ul>
<p><b>H-6 – Collaborate and Publicize Housing Resources</b></p>	<ul style="list-style-type: none"> <li>● Take proactive leadership role in working with community groups, other jurisdictions and agencies, non-profit housing sponsors, and building industry. (H-6.1)</li> <li>● Coordinate housing strategies with other jurisdictions and agencies. (H-6.2)</li> <li>● Implement effective community participation. (H-6.3)</li> <li>● Continue to publicize and expand opportunities for rental assistance programs. (H-6.4)</li> </ul>

### 2.2.3 Availability of Housing Sites

The draft 2023 Housing Element identifies sites available to accommodate the County’s RHNA for the years 2023 through 2031. As required by state law (Government Code Sections 65583 and 65583.2), the proposed Housing Element includes a Housing Site Inventory (Inventory) that provides a parcel-specific inventory of suitable and appropriately designated and zoned sites that could be developed with residential uses. (Appendix HE-E of the draft 2023 Housing Element includes the Inventory.) The Inventory also specifies the number of units that are



estimated “to be realistically accommodated” on each site, and indicates whether the site is adequate to accommodate lower-income housing, moderate-income housing, or above moderate-income housing. For residential parcels included in the Inventory, the development density was generally based upon the minimum density for the land use designation provided in the General Plan.

The Inventory includes pending projects, identified opportunity sites, and vacant and underutilized sites including residential, commercial, and public facility sites where housing is allowed and promoted. Underutilized sites include sites with some existing development that have additional development potential and for which the existing use has been determined to not impede additional residential units on the parcel. The County has identified a total of 25 opportunity sites, where the property owner has expressed an active interest in constructing housing on the parcel and the parcels are zoned appropriately to accommodate construction of housing units. The draft Housing Element includes maps showing locations of vacant, underutilized, and opportunity sites, which are included in Appendix A of this document.

In addition to ensuring an adequate land inventory of vacant and available sites, the County has identified other categories of sites that can realistically be developed with housing during the planning period, using a non-site-specific approach, including ADUs, which the County and Housing Element support (Policies and Programs H-1.4, H-2.6, and H-2G) and farmworker housing (supported by Policies H-1.8, H-2.6, H-4.1, and H-4.3). Development on residential sites in rural areas also is projected to continue. The County also supports housing development under SB 9,<sup>5</sup> which allows additional residential units and lot splits on qualifying residential parcels. The County will be preparing an ordinance to further promote SB 9 (Program H-1H), but as a conservative approach, is not applying units anticipated under SB 9 in the inventory calculations.

The County has identified sites available to accommodate 4,167 housing units as summarized in Table 6, which is approximately 90% of the County’s RHNA. Thus, the Housing Element includes a rezoning program (Program H-1B) and identifies a list of parcels to be rezoned that would have an estimated capacity for 2,264 additional housing units as further described below in Section 2.2.4. With these sites, the County’s Inventory identifies a total estimated capacity for 6,431 residential units as shown on Table 6. The total housing unit capacity identified in the draft Housing Element would exceed the County’s RHNA, but would provide a 38% “buffer” above the required RHNA for all income categories, although this buffer exceeds the County’s stated 10% buffer and slightly exceeds HCD recommendations for a RHNA buffer.<sup>6</sup>

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<sup>5</sup> On January 1, 2022, SB 9 went into effect to further address California’s housing shortage. This law established a ministerial streamlined process to develop two primary residential dwelling units on one eligible single-family zoned parcel, and to split one eligible single-family zoned parcel into two separate parcels of approximately equal size ministerially. SB 9 also provides more flexible property setbacks and parking standards and extends subdivision approval expirations for eligible parcels.

<sup>6</sup> HCD “recommends” jurisdictions create a 15-30% housing unit buffer to ensure that sufficient capacity exists in the Housing Element to accommodate the RHNA throughout the planning period, especially for capacity to accommodate the lower income RHNA. Jurisdictions can also create a buffer by projecting site capacity at less than the maximum density to allow for some reductions in density at a project level (California Department of Housing and Community Development 2020). Given the County’s high RHNA, the County is using a 10% buffer (463 additional units).





**Table 6. 2023 Housing Element Estimated Housing Unit Capacity for Planning Period**

	Number of Units Per Income Category				
	Very Low	Low	Moderate	Above Moderate	TOTAL
<b>RHNA</b>	<b>1,492</b>	<b>976</b>	<b>586</b>	<b>1,580</b>	<b>4,634</b>
<b>Existing Available Sites</b>					
<b>Housing Site Inventory</b>					
Pending Projects	53	52	76	154	335
Opportunity Sites	451	450	107	152	1,160
Vacant Sites	0	0	32	400	432
Underutilized Sites	15	13	81	863	972
Public Facility Sites	168	167	65	20	420
<b>Non-Site Specific Analysis</b>					
ADUs	0	110	234	134	478
Farmworker Housing	200	100	0	0	300
Rural Single-Family Dwellings	0	0	0	70	70
<b>Existing Sites Subtotal</b>	<b>887</b>	<b>892</b>	<b>595</b>	<b>1,793</b>	<b>4,167</b>
<b>GPA* /Rezone Sites</b>					
Total Sites	794	709	205	556	2,264
<b>TOTAL UNITS</b>	<b>1,681</b>	<b>1,601</b>	<b>800</b>	<b>2,349</b>	<b>6,431</b>
<b>SURPLUS ABOVE RHNA</b>	<b>189</b>	<b>625</b>	<b>214</b>	<b>769</b>	<b>1,797</b>
<b>110% of RHNA (Buffer)</b>					
	1,641	1,074	645	1,738	5,098
Surplus above 110% of RHNA	40	527	155	611	1,333
* General Plan Amendment					

## 2.2.4 Rezone Sites

As indicated above, the proposed Housing Element includes an implementation program (H-1B) that directs the County to rezone vacant and/or underutilized parcels as needed to appropriate multi-family residential and/or mixed-used zone districts by December 2026 in order to ensure availability of adequate sites to accommodate the County’s RHNA. The County has identified a total of 75 parcels suitable and available to be rezoned to zone districts that allow residential use, which could accommodate a total of 2,264 residential units, of which 1,708 units would be lower and moderate-income units. Table 7 provides a list of parcels identified in the draft Housing Element as being suitable to be rezoned, including opportunity sites to be rezoned to accommodate higher-density housing projects. Most of these parcels also would require an amendment to/change of the existing General Plan land use designation. Locations of sites are included in Appendix A of this document.

The total number of parcels identified for rezoning include 43 parcels to be rezoned pursuant to SB 10, which became effective January 1, 2022, and was enacted to help alleviate the housing crisis by increasing residential density. SB 10 allows local agencies to adopt an ordinance to allow up to 10 dwelling units on any parcel, at the height specified in the ordinance, if the parcel is located within a high-quality transit area or urban infill site, with



a finding that the increased density affirmatively furthers fair housing. Up to two ADUs or junior ADUs (JADUs) would be permitted on each parcel, and these would not count toward the 10-unit threshold allowed by the law.

In January 2023, the County began the process of amending the General Plan Land Use Map and rezoning for approximately 43 residentially designated and zoned parcels within the County's USL to the appropriate General Plan land use designation and zone district that would allow urban multi-family infill of up to 10 units per parcel, pursuant to SB 10. Pursuant to Program H-1B, these rezonings will be completed by December 2026. These rezonings are expected to yield a total net capacity crease of 365 units.



**Table 7. Parcels Proposed for General Plan Land Use Designation Amendment and/or Rezoning**

Address	Planning Area	APN	Size (Acres)	Existing GP Designation	Existing Zone District	Proposed GP Designation	Proposed Zone District	Estimated Units
3500 Paul Sweet Road	Live Oak	025-013-37-0000	0.521	C-O	PA	C-O	PA-Min	10
3134 Thurber Ln	Live Oak	025-091-49-0000	1.5	R-UM, O-U	RM-4	R-UH	RM-2	5
3161 - 3165 Prather Ln	Live Oak	025-091-52-0000	1.909	O-R	PR	R-UH/O-R	RM-2/PR	5
2091 17 <sup>th</sup> Ave	Live Oak	026-122-36-0000	1.612	R-UL	R-1	R-UH	RM-1.5	65
855 7 <sup>th</sup> Ave	Live Oak	026-261-13-0000	1.83	C-C; O-U	C-2	C-C; O-U	C-2-Min	65
901 7 <sup>th</sup> Ave	Live Oak	026-261-16-0000	6.06	C-C; O-U	C-2	C-C; O-U	C-2-Min	30
1135 17 <sup>th</sup> Ave	Live Oak	026-311-33-0000	0.948	C-N	C-1	C-N	C-1-Min	30
2021 Chanticleer Ave	Live Oak	029-071-03-0000	1	R-UL	R1-6	R-UH	RM-1.5	30
3845 Soquel Dr., Soquel	Soquel	030-061-06-0000	2.221	CS, O-U, R-UM	C4	R-UHF	RF	80
2755 41st Ave, Soquel	Soquel	030-121-61-0000	2.58	CS	C4	CC	C1	93
2590 S Main St	Soquel	030-221-46-0000	2.882	C-C	C-2	C-C	C-2-Min	22
1115 Thompson Ave	Live Oak	031-152-24-0000	2.321	C-S	M-1	R-UHF	RF	83
1110 Thompson Ave	Live Oak	031-161-11-0000	1.9	CS	M-1	R-UHF	RF	68
3701 Portola Dr	Live Oak	032-041-44-0000	0.351	C-C	C-2	C-C	C-2-Min	1
3621 Portola Dr	Live Oak	032-041-67-0000	2.109	C-C	C-2	C-C	C-2-Min	38
3501 Portola Dr	Live Oak	032-041-68-0000	1.8	C-C	C2	R-UHF	RF	65
2611 Monterey Ave	Soquel	037-191-11-0000	0.266	O-U; R-UL	R-1-6	O-U, R-UHF	RF	10
2603 Monterey Ave	Soquel	037-191-12-0000	3.5	O-U; R-UL	R-1-6	O-U, R-UHF	RF	47
5606 Soquel Dr	Soquel	037-191-13-0000	5.8	O-U; R-UL	R-1-6	O-U, R-UHF	RF	157
2613 Monterey Ave	Soquel	037-191-18-0000	1.935	O-U; R-UL	R-1-6	O-U, R-UHF	RF	30
2600 Mar Vista Dr	Aptos	039-201-36-0000	7.464	O-R	PR	R-UHF	RF	235
2600 Mar Vista Dr	Aptos	039-201-37-0000	6.195	O-R	PR	R-UHF	RF	195
9990 Soquel Dr	Aptos	041-233-24-0000	1.361	C-S; R-UL	C-4; R-1-20	C-N	C-2	24
No situs, Green Valley Rd	Pajaro Valley	050-041-35-0000	10.1	R-UVL	R-1-1AC	R-UH	RM-2	162
235 Primrose Ln	Pajaro Valley	050-041-36-0000	1.932	R-UVL	R-1-1AC	R-UH	RM-2	31
235 Primrose Ln	Pajaro Valley	050-041-38-0000	0.314	R-UVL	R-1-1AC	R-UH	RM-2	5
100 Primrose Ln	Pajaro Valley	050-041-45-0000	2.924	R-UVL	R-1-1AC	R-UH	RM-2	47



**Table 7. Parcels Proposed for General Plan Land Use Designation Amendment and/or Rezoning**

Address	Planning Area	APN	Size (Acres)	Existing GP Designation	Existing Zone District	Proposed GP Designation	Proposed Zone District	Estimated Units
No situs, Green Valley Rd / Primrose Ln	Pajaro Valley	050-041-46-0000	2.974	R-UVL	R-1-1AC-AIA	R-UH	RM-2	48
No situs, Littleway Ln at Cunningham Wy	Pajaro Valley	051-341-13-0000	4.4	R-UL	R-1-10-AIA	R-UH	RM-2	70
578 Green Valley Rd	Pajaro Valley	051-521-11-0000	4.4	R-UL	R-1-10	R-UH	RM-1.5	119
610 Clubhouse Dr	Aptos	053-011-01-0000	2.5	O-R	PR	O-R / UH	PR/ UH	24
664 Clubhouse Dr	Aptos	053-011-09-0000	48	O-R	PR	O-R / PF	PR / UH	5
<b>SB 10 Sites</b>								
3158 Thurber Lane	Live Oak	025-091-50-0000	0.52	O-U; R-UM	RM-4	O-U; R-UH	RM-2	9
3105 Stanley Ave	Live Oak	025-111-14-0000	0.49	R-UL	R-1-6	R-UH	RM-2	9
3111 Stanley Ave	Live Oak	025-111-15-0000	c	R-UL	R-1-6	R-UH	RM-2	9
2300 Benson Ave	Live Oak	025-361-01-0000	0.45	R-UL	R-1-6	R-UH	RM-1.5	9
3570 Winkle Ave	Live Oak	025-361-03-0000	0.45	R-UL	R-1-6	R-UH	RM-1.5	9
2507 Paul Minnie Ave	Live Oak	026-042-15-0000	0.42	R-UM	R-1-5	R-UH	RM-1.5	9
1127 Rodriguez St	Live Oak	026-063-13-0000	0.49	R-UM	R-1-5	R-UH	RM-1.5	10
1308 Rodriguez St	Live Oak	026-111-40-0000	0.6	R-UL	R-1-6-D	R-UH	RM-2.5-D	9
1445 17 <sup>th</sup> Ave	Live Oak	026-201-40-0000	0.42	R-UL	R-1-6	R-UH	RM-1.5	9
860 Bostwick Lane	Live Oak	026-461-31-0000	0.52	R-UM	R-1-6	R-UH	RM-2	9
1810 7 <sup>th</sup> Ave	Live Oak	026-681-08-0000	0.43	R-UM	R-1-5	R-UH	RM-1.5	9
2650 Mattison Ln	Live Oak	029-031-05-0000	0.69	R-UM	R-1-5	R-UH	RM-3	10
2044 Chanticleer Ave	Live Oak	029-081-03-0000	1	R-UL	R-1-6	R-UH	RM-4	9
2030 Chanticleer Ave	Live Oak	029-081-04-0000	0.66	R-UL	R-1-6	R-UH	RM-2.5	9
2305 Capitola Rd	Live Oak	029-111-60-0000	0.53	R-UM	RM-4	R-UH	RM-2	9
2025 Brommer St	Live Oak	029-162-08-0000	1.1	R-UL	R-1-6	R-UH	RM-4	7
(NS) Andrew Ln. / Brommer St	Live Oak	029-162-09-0000	0.54	R-UL	R-1-6	R-UH	RM-2	10
1215 Chanticleer Ave	Live Oak	029-162-44-0000	0.41	R-UL	R-1-6	R-UH	RM-1.5	6
1145 Chanticleer Ave. #5	Live Oak	029-181-43-0000	0.44	R-UM	RM-4	R-UH	RM-1.5	5



**Table 7. Parcels Proposed for General Plan Land Use Designation Amendment and/or Rezoning**

Address	Planning Area	APN	Size (Acres)	Existing GP Designation	Existing Zone District	Proposed GP Designation	Proposed Zone District	Estimated Units
1145 Chanticleer Ave. #1	Live Oak	029-181-44-0000	0.63	R-UL	R-1-6	R-UH	RM-2	5
1820 Kinsley St	Live Oak	029-182-15-0000	0.46	R-UM	RM-4	R-UH	RM-1.5	6
1300 Chanticleer Ave	Live Oak	029-191-38-0000	0.47	R-UL	R-1-6	R-UH	RM-1.5	9
1156 Chanticleer Ave	Live Oak	029-192-07-0000	0.47	R-UL	R-1-6	R-UH	RM-1.5	8
1102 Chanticleer	Live Oak	029-192-15-0000	0.44	R-UL	R-1-6	R-UH	RM-1.5	8
2275 Kinsley St	Live Oak	029-192-27-0000	0.82	R-UL	R-1-6	R-UH	RM-3	3
2240 Kinsley St	Live Oak	029-193-03-0000	0.4	R-UL	R-1-6	R-UH	RM-1.5	9
2060 Maciel Ave	Live Oak	029-391-08-0000	0.48	R-UL	R-1-6	R-UH	RM-2	9
3425 N Main St	Soquel	030-031-04-0000	0.57	O-U; R-UM	R-1-6	O-U; R-UH	RM-2	9
3240 N Main St	Soquel	030-092-01-0000	0.47	R-UM	R-1-6	R-UH	RM-2	9
2620 Capitola Ave	Soquel	030-241-13-0000	0.51	R-UL	R-1-6	R-UH	RM-1.5	8
2630 Capitola Ave	Soquel	030-241-14-0000	0.68	R-UL	R-1-6	R-UH	RM-2.5	9
2500 Rosedale Ave	Soquel	030-253-72-0000	0.92	R-UL	R-1-6	R-UH	RM-3.5	9
3491 N Main St	Soquel	030-281-08-0000	0.85	O-U; R-UM	R-1-6	O-U; R-UH	RM-3.5	9
3505 N Main St	Soquel	030-281-34-0000	0.75	O-U; R-UM	R-1-6	O-U; R-UH	RM-3	9
(NS) Thompson Ave	Live Oak	031-101-46-0000	0.53	R-UM	R-1-4	R-UH	RM-2	10
1455 Bulb Ave	Live Oak	031-113-10-0000	0.42	R-UM	R-1-4	R-UH	RM-1.5	9
1445 Bulb Ave	Live Oak	031-113-12-0000	0.41	R-UM	R-1-4	R-UH	RM-1.5	9
1430 Thompson Ave	Live Oak	031-113-48-0000	0.47	R-UM	R-1-4	R-UH	RM-2	9
1309 Thompson Ave	Live Oak	031-152-03-0000	0.78	R-UM	R-1-4	R-UH	RM-3	8
3223 Maplethorpe Ln	Soquel	037-112-16-0000	0.4	R-UL	R-1-8	R-UH	RM-1.5	9
2625 Monterey Ave	Soquel	037-191-08-0000	0.47	O-U; R-UL	R-1-9	O-U; R-UH	RM-1.5	9
(NS) Monterey Ave	Soquel	037-211-19-0000	0.44	R-UL	R-1-9	R-UH	RM-1.5	9
5720 Soquel Dr	Live Oak	037-211-34-0000	1.02	R-UL	R-1-6; R-1-9	R-UH	RM-4	9



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## 3 Use of an Addendum and Project Review

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This section considers use of an addendum to the County’s Sustainability Update EIR for CEQA evaluation of the proposed County of Santa Cruz 2023 Housing Element. As previously indicated, pursuant to Section 15164 of the State CEQA Guidelines, an addendum to a certified EIR may be prepared if only minor technical changes or additions are necessary and none of the conditions described in State CEQA Guidelines Section 15162 that call for preparation of a subsequent EIR have occurred. Under State CEQA Guidelines Section 15162, no subsequent EIR would need to be prepared unless the lead agency determines, on the basis of substantial evidence, one or more of the following:

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

### 3.1 Previously Evaluated Project

As previously indicated, the Santa Cruz County Board of Supervisors adopted the Sustainability Policy and Regulatory Update (Sustainability Update) after certifying an EIR prepared for the Update in December 2022. The Sustainability Update amended the County’s General Plan/LCP with a comprehensive update of four General Plan elements that replaced five previous elements: Built Environment (formerly Land Use), Mobility + Access (formerly Circulation), Agriculture, Natural Resources + Conservation (formerly Conservation and Open Space), and Parks, Recreation + and Public Facilities, as well as incorporation of the former Community Design Element into the BE Element. The Update also included amendments to the SCCC related to the General Plan/LCP amendments, adoption of County Design Guidelines, and General Plan/LCP land use designation amendments and/or rezonings for 23 specified parcels, 10 of which were to increase residential densities for parcels in the County’s USL. These property-specific General Plan land use designation changes and/or rezonings included opportunity sites such as the vacant property located at Soquel Drive and Thurber Lane and vacant and underutilized properties along the Portola Drive commercial corridor.



The goal of the Sustainability Update was to implement new policies and code regulations that support more sustainable communities in Santa Cruz County with a focus on supporting the development of housing in urban areas to meet the needs of the entire community. As part of the Sustainability Update, new and revised policies were included in the BE that address housing and mixed-use development. The Sustainability Update also adjusted residential standards and densities to facilitate more residential units. In particular, residential allowances in mixed-use developments, and a new high-density zoning district called “Residential Flex” was developed, allowing multi-family development at a density range of 22 to 45 dwelling units per acre.

The certified Sustainability Update EIR includes the Draft EIR volume (April 2022) and the Final EIR volume (August 2022). The Sustainability Update EIR reviewed all of the topics included on the Appendix G environmental checklist in the State CEQA Guidelines as well as all sections required to be included in an EIR. The Sustainability Update EIR is a “program” EIR prepared pursuant to the State CEQA Guidelines Section 15168, which reviewed environmental impacts associated with updating four General Plan elements and the other Sustainability Update components.

The EIR also assessed future development potential within the unincorporated county area that could be accommodated as a result of implementation of the Sustainability Update. The Sustainability Update EIR considered the indirect impacts of residential and non-residential development in the unincorporated county as a whole, although specific future development of the specific sites was not specifically evaluated in the Sustainability EIR. However, the EIR estimated that the Sustainability Update had the potential to accommodate approximately 4,500 housing units throughout the county; approximately 75% of new residential development was projected to occur within the County’s USL. The EIR also estimated the potential to accommodate approximately 6,210,000 square feet of non-residential uses, with approximately 60% expected to occur within urban areas. These forecasts provided an estimate of potential growth that could occur as a result of adoption and implementation of the Sustainability Update for the purpose of evaluation in the EIR. This estimate was not a prediction of total buildout and did not establish a limit to development. Annual limits for residential units are set annually by the County pursuant to Measure J and SCCC provisions as explained in Section 4.13.2.3 of the Draft EIR volume. Additionally, it was noted that some of this projected development and growth supported by the Sustainability Update could occur under the existing General Plan/LCP without adoption of the Sustainability Update.

## 3.2 Modified Project Review

The proposed project consists of an update of the County of Santa Cruz Housing Element in accordance with state law. The Housing Element is a required element of the County’s General Plan, but pursuant to state law is required to be updated at more frequent intervals than other elements of the General Plan. The objectives, goals, policies, and programs in the draft 2023 Housing Element support a range of housing types for different income groups and population needs. Many of these goals, policies, and programs are similar to goals, policies, and programs in the existing 2015 Housing Element, and except for some new programs as explained in Section 2.2.2, there are no new major policy shifts in the proposed Housing Element from the 2015 Housing Element. Furthermore, the County’s General Plan/LCP guides the location, density and intensity of residential and other land uses, and the existing BE Element that was part of the Sustainability Update includes policies that support housing as summarized in Table 1. The proposed 2023 Housing Element is consistent with and expands housing goals, policies, and programs in the General Plan/LCP as modified by the Sustainability Update.





The proposed 2023 Housing Element provides quantified objectives for construction, rehabilitation, and conservation of housing units. It includes goals, policies and programs that support housing units for all income groups and identifies available sites to meet the County's RHNA of 4,634 new housing units for the years 2023 through 2031. The County's RHNA is 134 housing units more than the 4,500 residential units considered in the Sustainability Update EIR analyses, which is not substantially greater than the amount of potential future housing evaluated in the EIR. Since certification of the Sustainability Update EIR in December 2022, the County estimates that 56 housing units have been constructed, including 27 ADUs, which would result in remaining development potential of 4,444 housing units as analyzed in the Sustainability Update EIR. Thus, the RHNA when considered with housing units developed to date, would be approximately 190 units more than the amount analyzed in the Sustainability Update EIR. This represents approximately 4% of the residential development evaluated in the Sustainability Update EIR, which is not considered substantial. Furthermore, while the County's RHNA is 4,634 housing units, the quantified objectives of the draft Housing Element indicate that 2,350 new housing units are what the County reasonably expects to be constructed from 2023 through 2031 based on historical building and market trends, which would be within the amount of residential development evaluated in the Sustainability Update EIR.

The draft Housing Element's Housing Site Inventory estimates that 6,431 residential units could be accommodated within the Inventory. This includes 75 parcels that would be re-designated and/or rezoned to allow higher density residential development, which could accommodate an estimated 2,264 units. However, approximately 43 parcels with a potential capacity for 365 residential units are being processed under a separate SB 10 process that does not require CEQA review. Without the SB 10 parcels, there are approximately 32 parcels proposed for General Plan land use designation amendments and/or rezoning that are estimated to accommodate approximately 1,900 residential units. The proposed land use designation and zoning amendments are encouraged and supported in the General Plan as amended by the Sustainability Update. Specifically, the policies included in the Sustainability Update call for a new Urban High Residential Flex General Plan land use designation and zone district (BE-2.1.6) with identification of sites for redesignation/zoning to the a higher density (BE-2.1.1 – 2.1.6, BE-2.1d), and redesignation/rezoning to higher densities in activity centers (BE-1.3a). The proposed land use/zoning designation amendments are consistent with and serve to implement these existing General Plan policies as 22 of the proposed 30 sites would be redesignated to the new higher density residential designations, including nine sites that would be redesignated with the new Urban High Flex land use designation and zone district. It is also noted that proposed Housing Program H-1E calls for rezoning appropriate urban opportunity sites to Residential Flex (RF) zoning, and increasing densities on current RM-zoned sites to densities of 20 units or more per acre, which is consistent with policies to rezone properties to RF and the increased residential densities in the General Plan/LCP adopted as part of the Sustainability Update.

While the draft Housing Element identifies availability of sites that could accommodate development of 6,431 housing units, which exceeds the 4,500 residential units analyzed in the Sustainability Update EIR, the County need only demonstrate availability of sites that could be developed with housing to meet the County's RHNA of 4,634 units, which as indicated above, is only slightly higher than the amount of residential development analyzed in the Sustainability Update EIR. Over 4,100 units could be constructed under existing conditions on parcels without need for amendments to General Plan land use designations or zoning, and 365 units could be processed under provisions of SB 10, which would be exempt from CEQA, and is therefore excluded from further analysis in this Addendum.



Sites for which General Plan land use and zoning map amendments are proposed could result in about 1,900 residential units, and, as a conservative estimate, with the County's quantified objective for new construction of 2,350 housing units, approximately 4,250 housing units could be accommodated, which is within the amount of residential development (4,500 units) analyzed in the Sustainability Update EIR. At the worst-case, if the County fully met its RHNA and considering residential development constructed since certification of the Sustainability Update EIR, housing development would exceed the amount analyzed in the EIR by approximately 190 units, which as explained above is not considered significant. Additionally, two of the 23 parcels evaluated in the Sustainability Update EIR are identified in the draft 2023 Housing Element, and thus were considered as part of the programmatic analyses in the Sustainability Update EIR. These sites include an identified opportunity site at the corner of Soquel Drive and Thurber Land (APN 025-351-19) and a site proposed for General Plan land use and zoning map amendments on Portola Drive (APN 032-041-68).

The Sustainability Update EIR's estimate of potential growth and development was for the purpose of impact evaluations in the EIR, but did not establish a limit to future development or a total buildout estimate. The majority of sites identified in the proposed Housing Element occur within the County's USL. Implementation of the draft 2023 Housing Element with support for new housing to achieve the County's RHNA could result in more development within the County's USL than previously estimated for the Sustainability Update EIR. Residential development in the County's USL accounted for 78% of all residential development estimated in the Sustainability Update EIR, which could increase with implementation of the proposed Housing Element, although it is not known exactly where units would be constructed in the future. Based on the proposed Housing Element's Housing Site Inventory, approximately 82% are located within the USL. A potential increase of residential development in urban areas from 78% to 82% also is not considered substantial and is consistent with policies and programs in the General Plan/LCP that support intensification of development in urban areas. The Sustainability Update included numerous policies to support urban infill and development in the USL, which is in proximity to employment and activity centers, as well as transit and other transportation modes. Thus, potential additional development in the County's USL would be consistent with policy directives in the General Plan and would not lead to new significant impacts.

### 3.3 Determination

The 2023 Housing Element policies and programs are consistent with other General Plan policies and actions, and none would result directly in new development or direct physical impacts to the environment. However, implementation of the Housing Element policies and programs and efforts to meet quantified housing objectives may indirectly result in construction of new housing units. The draft Housing Element does not identify specific development projects but does provide an inventory of sites available for development of future housing, including parcels proposed to be redesignated and/or rezoned, which is consistent with existing General Plan policies. While the County's RHNA slightly exceeds the amount of development analyzed in the Sustainability Update EIR, most identified sites could be developed with residential uses under existing General Plan land use designations and zoning. The approximately 1,900 units that could be potentially developed with amendment of land use and/or zoning designations on 32 sites would be within the amount of residential development (4,500 housing units) evaluated in the Sustainability Update EIR. Furthermore, while the County's RHNA is 4,634 housing units, the quantified objectives of the draft Housing Element indicate that 2,350 new housing units are what the County reasonably expects to be constructed from 2023 through 2031 based on historical building and market trends, which also would be within the amount of residential development evaluated in the Sustainability Update EIR.



Even with future development of re-designated sites and the County fully achieving its new construction objective, housing units would total 4,250 units, which is within the residential development range evaluated in the Sustainability Update EIR.

On the basis of review of the proposed 2023 Housing Element as analyzed in Section 4 of this document, the County determines that the proposed project, as part of the County's General Plan, represents minor changes related to the project analyzed in the Sustainability Update EIR, which included major General Plan updates, and the proposed Housing Element would not result in new significant or substantially more severe impacts than identified in the certified Sustainability Policy and Regulatory Update EIR. Similarly, there are no substantial changes with respect to the circumstances under which the project is undertaken or new information of substantial importance that would result in new significant impacts or a substantial increase in severity of previously identified impacts since certification of the EIR, as explained in the following review. None of the conditions described in Section 15162 of the CEQA Guidelines have occurred that would require preparation of a Subsequent EIR. Therefore, pursuant to Section 15164 of the CEQA Guidelines, preparation of this Addendum to the certified Sustainability Policy and Regulatory Update EIR (State Clearinghouse No. 2020079005) is the appropriate environmental review document for the proposed County of Santa Cruz 2023 Housing Element.



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# 4 Environmental Review Checklist

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## 4.1 Introduction

### 4.1.1 Purpose of Environmental Review Checklist

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

### 4.1.2 Assumptions

Implementation of the proposed 2023 Housing Element policies and programs to meet quantified housing objectives may indirectly result in construction of 2,350 new housing units during the Housing Element planning period, and approximately 1,900 units could be constructed as a result of proposed General Plan land use designation and/or zoning amendments on 32 identified sites. Taken together as a conservative approach, approximately 4,250 housing units could be constructed, which is well within the total residential development (4,500 units) analyzed in the Sustainability Update EIR. Even as a worse-case assumption, if the County exceeds its new construction objective and meets its RHNA of 4,634 units, this amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR (134 units). Since certification of the Sustainability Update EIR, the County estimates that 56 housing units have been constructed, which would result in remaining development potential 4,444 housing units as analyzed in the Sustainability Update EIR. Thus, the RHNA when considered with housing units developed to date, would be approximately 190 units more than the amount analyzed in the Sustainability Update EIR, which is not considered a substantial increase as explained in Section 3.2. Furthermore, the majority of the sites identified in the 2023 Housing Element Housing Site Inventory are located in developed, urban areas within the County’s USL (approximately 82%).

No specific development proposals are part of the Housing Element. Future housing would be constructed by private and non-profit entities subject to City approvals, including project-specific environmental review. For the purpose of this environmental evaluation, potential resource constraints identified for sites proposed for land use and/or zoning redesignation are summarized in Appendix B and addressed in the Environmental Review Checklist where relevant.

## 4.2 Explanation of Checklist Evaluation Categories

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

**Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?** Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this column indicates whether the changes represented by the



current project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact.

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

**Any New Information Requiring New Analysis or Verification?** Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete is available requiring an update to the analysis of the previous environmental document to verify that the environmental conclusions and mitigation measures remain valid. If the new information shows that: (A) the project would have one or more significant effects not discussed in the prior environmental document; or (B) that significant effects previously examined would be substantially more severe than shown in the prior environmental document; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects or the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, then the question would be answered “yes” requiring the preparation of a subsequent or supplemental EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental document remain the same and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or additional mitigation is not necessary, then the question would be answered “no,” and no additional environmental documentation (supplemental or subsequent EIR) is required.

**Prior EIR Mitigation Measures Implemented or Address Impacts?** Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this column indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the mitigation measures have already been implemented. A “yes” response will be provided if mitigation measures were included in the prior environmental document or have already been implemented for the respective impact category, and the measures will be listed. “None applicable to Proposed Intertie-1 Project” indicates that the Sustainability Update EIR included mitigation measures for other components that are not applicable to the proposed intertie improvements analyzed herein. If “none” is indicated, this environmental review concludes that the impact would be less than significant with this project and therefore no mitigation measures are needed. If “not applicable” is indicated, this environmental review concludes that the impact would not occur with this project and therefore no mitigation measures are needed. The adopted Mitigation Monitoring and Reporting Program for the Sustainability Update is included in Appendix C.

**Discussion.** A discussion of the elements of the checklist is provided under each topic for each question in Appendix G of the CEQA Guidelines to clarify the answers. The discussion provides information about the particular



environmental issue, how the project relates to the issue, and the status of any mitigation measures that may be required or that have already been implemented.

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

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

### 4.3 Environmental Checklist for Supplemental Environmental Review

The supplemental environmental review checklist and explanations for all topics evaluated in the certified Sustainability Update EIR are presented on the following pages.

#### 4.3.1 Aesthetics

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:</b>					
a) Have a substantial adverse effect on a scenic vista?	DEIR pp. 4.1-13 to 4.1-15	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	DEIR pp. 4.1-15 to 4.1-17	No	No	No	No
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?	DEIR pp. 4.1-17 to 4.1-22	No	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	DEIR pp. 4.1-23 to 4.1-24	No	No	No	No





## Discussion

- a) **Scenic Views.** The Sustainability Update EIR indicates scenic views include: vistas from designated scenic roads, Coastal Special Scenic Areas, and unique hydrologic, geologic, and paleontological features. The ARC Element also indicates that ocean views, agricultural fields, wooded forests, open meadows, ridgetops, and mountain hillside views are also public scenic assets that should be identified and considered during development review permit processes (ARC-5.1.1). Development projects proposed in visual resource areas are required to be designed to protect these resources (ARC-5.1.2) and to protect scenic vistas (ARC-5.1.3). Protection of scenic ocean views and agricultural vistas also are required as part of future development projects (ARC-5.1.6 and ARC-5.1.5, respectively).

The Sustainability Update EIR, which comprehensively addressed impacts to scenic views associated with new development, concluded that most of the future development accommodated by the Sustainability Update would occur within the County's USL in areas that are already developed and generally located away from the coast or significant public scenic views. For development within the coastal zone, the EIR indicates that policies in the General Plan/LCP serve to protect significant public vistas. Table 4.1-1 in the Sustainability Update EIR (Draft EIR volume) summarizes policies that serve to avoid or minimize impacts related to substantially adversely affecting a scenic view, including review of proposed developments in Coastal Special Scenic Areas and Coastal Special Communities. The Sustainability Update EIR also indicates that County regulations in the SCCC require that development in the coastal zone be sited and designed to protect scenic coastal public views and significant trees, and site design regulations in SCCC Chapter 13.11 seek to protect scenic areas, hilltops and ridgelines, and the public viewshed throughout the county. Title 16 regulations for development in natural resource areas and hazardous areas also would protect scenic vistas. The Sustainability Update EIR concluded that with compliance with local regulations, implementation of the Sustainability Update policies and implementation strategies summarized on Table 4.1-1 in the EIR, and required future environmental review of specific development projects, future development would avoid adverse impacts to scenic views, resulting in a less-than-significant impact to scenic views.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. The majority of potential housing sites identified in the proposed Housing Element are located within the County's USL and some properties are located in the coastal zone. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts to scenic views were found to be less than significant with implementation of the Sustainability Update policies and regulations to protect scenic views. Some of the 32 sites in which specific General Plan land use and/or zoning map changes are proposed are identified as being in a scenic area (see Appendix B), which are primarily due to location adjacent to Highway 1, a County-designated scenic highway as further discussed in the next section. However, all future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR.

- b) **Scenic Resources.** There are no state highways within the county that have been officially designated as State Scenic Highways (Caltrans 2023). However, the Sustainability Update EIR indicated that there are six Eligible State Scenic Highways that have the potential to be officially designated in the future to include:
- Highway 1 - Monterey to San Mateo county lines





- Highway 9 – Highway 1 near Santa Cruz to the Santa Clara county line
- Highway 17 – Highway 1 near Santa Cruz to the Santa Clara county line
- Highway 35 - Highway 17 to the Santa Clara county line
- Highway 152 – Highway 1 to the Santa Clara county line at Hecker Pass
- Highway 236 – Highway 9 near Boulder Creek to SR 9 northeast of Big Basin Redwoods State Park.

The County's General Plan/LCP identifies seven state highway segments and 27 county roads that "are valued for their vistas," which include and generally coincide with state highways identified as potentially eligible for scenic highway status. Additionally, the General Plan/LCP ARC Element indicates that the county is highly scenic and supports scenic vistas and diverse scenic resources, including ocean vistas along the entire coastline, open agricultural lands along the northern coasts and in the southern part of the county, redwood forests, and the rolling hillsides and ridgetops of the Santa Cruz Mountains. Scenic resources also include redwood forests, coastal cliffs and estuaries, rivers, streams, watersheds, reservoirs, special geologic formations such as sandhill outcroppings, and selected vegetative communities. Steep slopes and high elevations are identified for their potential to provide scenic vistas. The General Plan/LCP designates "Coastal Special Scenic Areas" to include: a) Bonny Doon sandstone formations, generally found within the borders of Pine Flat Road, Laguna Creek, Ice Cream Grade, and Martin Road; b) the area enclosed by the Swanton Road and Highway 1; and (c) the Swanton Road Coastal Special scenic area north of Last Chance Road toward Highway 1.

The Sustainability Update EIR concluded that the Sustainability Update, which comprehensively addressed impacts to scenic resources associated with new development, could indirectly lead to future development and redevelopment throughout the county, primarily within urban areas within the USL, which could impact scenic resources. As indicated in the EIR, the General Plan/LCP includes policies that designate and define visual resource areas having regional public importance, which include: vistas from designated scenic roads, Coastal Special Scenic Areas, and unique hydrologic, geologic, paleontological features, as well as ocean views, agricultural fields, wooded forests, open meadows, ridgetops, and mountain hillside. Table 4.1-2 in the Sustainability Update EIR (Draft EIR volume) summarizes policies that serve to avoid or minimize impacts related to scenic resources. Title 16 regulations for development in natural resource areas and hazardous areas also serve to protect scenic vistas in these areas with project views, and provisions in Chapter 13.11 of the SCCC call for retention of significant natural vegetation on site, mature trees, rock outcroppings and other natural features. The EIR concluded that with implementation of the Sustainability Update policies and implementation strategies summarized on Table 4.1-2, existing and amended regulations in the SCCC for design review, zoning district development standards, compliance with regulations for development in natural resource areas, environmental review of specific development projects, future development would not result in an adverse impact to scenic resources, and impacts would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, and as indicated above, the majority of potential housing sites identified in the proposed Housing Element are located within the County's USL. Future residential development would be within the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts to scenic resources were found to be less than significant with implementation of the Sustainability Update



policies and regulations to protect scenic resources and scenic views. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations to protect scenic views along County-designated scenic roads as summarized in Table 4.1-2 of the Sustainability Update EIR. As indicated above, some of the 32 sites in which specific General Plan land use and/or zoning map changes are proposed are identified as being in a scenic area (see Appendix B), which are primarily due to location adjacent to Highway 1, a County-designated scenic highway. The Sustainability Update EIR evaluated the proposed removal of Highway 1 as a County-designated scenic road, but final County approvals retained the highway as a scenic road. Future development on any property located adjacent to County-designated scenic roads, including Highway 1, would be subject to review and compliance with County policies and design regulations that address siting and design of development adjacent to scenic roads. Specifically, as summarized in Table 4.3-2 of the EIR, ARC Policies 5.2.3 and 5.2.4 require that new development that is visible from urban scenic roads must be “respect, preserve or improve the visual quality through siting, architectural design, landscaping and appropriate signage.” Thus, all future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations, including siting and design of development adjacent to scenic roads. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR.

- c) **Effects on Visual Character of Surrounding Area.** The Sustainability Update EIR, which comprehensively addressed impacts to visual quality associated with new development, concluded that while future development could potentially result in impacts to the existing visual character of surrounding areas in non-urbanized locations, compliance with SCCC requirements to mitigate significant visual impacts of new development on coastal or other public scenic views through screening, landscaping, and other measures would prevent substantial degradation of the visual quality of these areas. In urbanized areas, future development would be required to comply with the County’s design review procedures and requirements, including adherence to the new County Design Guidelines and Site Development Permit requirements, and thus, would not conflict with applicable zoning and regulations governing scenic quality of urban areas. Therefore, with implementation of the General Plan/LCP policies as summarized in Table 4.1-3 of the Sustainability Update EIR (Draft EIR volume) and SCCC provisions related to project design and design review, including the Design Guidelines adopted as part of the Sustainability Update, the EIR concluded that future development would not adversely impact scenic resources or conflict with policies and regulations governing scenic quality, resulting in a less-than-significant impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. The majority of potential housing sites identified in the proposed Housing Element are located within the County’s USL, and future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts related to degradation of visual character were found to be less than significant. Future residential development would be subject to review under County Design Guidelines and other zoning requirements, and would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR. It is noted that Housing Program H-1F calls for review of development standards for possible changes, including studying potential areas for increasing heights to four to six stories at key intersections and transit areas. Since this program is a recommendation for further study, there are no specific recommendations included in the proposed Housing Element, and any future study that leads to proposed amendments to development standards in



the General Plan/LCP and/or SCCC regulations would be subject to environmental review at the time such amendments may be proposed.

- d) **Light and Glare.** The Sustainability Update EIR identifies potential sources of light and glare, and concluded that future development could result in exterior lighting and potential sources of glare, but new development would be subject to SCCC requirements, including section 13.11.074(D)(1), which requires that all site, building, security, and landscape lighting be directed onto the site and away from adjacent properties and not be visible from adjacent properties. Light sources can be shielded by landscaping, structure, fixture design or other physical means. Building and security lighting shall be integrated into the building design. The regulations also specify that all lighted parking and circulation areas shall utilize low-rise light standards or light fixtures attached to the building. Light standards to a maximum height of 15 feet are allowed. The EIR concluded that future development projects would be required to comply with existing SCCC requirements regarding lighting, which would prevent creation of substantial new sources of light. Therefore, the Sustainability Update concluded that with compliance with County regulations, future development projects would avoid impacts related to generation of light and glare, resulting in no impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, and the majority of potential housing sites identified in the proposed Housing Element are located within the County's USL. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts related to creation of light and glare were found to be less than significant. Future residential development would be subject to review under County Design Guidelines and other zoning requirements, and would be required to comply with applicable General Plan/LCP policies and SCCC regulations with regards to exterior lighting. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified for potential impacts related to light and glare.

## Mitigation Measures

None were identified in the Sustainability Update EIR, and none are required with the proposed project as a significant impact has not been identified.

## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to aesthetics than previously evaluated in the Sustainability Update EIR.



### 4.3.2 Agriculture and Forestry Resources

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<p><b>II. AGRICULTURE AND FORESTRY RESOURCES</b> – 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 Dept. 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:</p>					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	DEIR pp. 4.2-18 to 4.2-25 FEIR pp 3-2	No	No	No	MM AGR-1
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	DEIR pp. 4.2-25 to 4.2-26	No	No	No	None
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])?	DEIR pp. 4.2-28 to 4.2-29	No	No	No	None
d) Result in the loss of forest land or conversion of forest land to non-forest use?	DEIR pp. 4.2-28 to 4.2-29	No	No	No	None
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?	DEIR pp. 4.2-26 to 4.2-29	No	No	No	None

#### Discussion

- a) **Conversion of Prime Farmland to Non-Agricultural Use.** There are approximately 18,900 acres of land that are designated Prime Farmland, Farmland of Statewide Importance, and Unique Farmland in the California Farmland Mapping and Monitoring Program (FMMP) within unincorporated Santa Cruz County. The



Sustainability Update EIR, which comprehensively addressed impacts to agricultural lands as a result of future development, concluded that future structural development as a result of the Sustainability Update could result in limited conversion of Important Farmlands as defined by the state's FMMP. The EIR found that the Sustainability Update retains policies to limit conversion, as well as inclusion of other controls that would serve to avoid or minimize impacts related to conversion of Important Farmland as summarized in Table 4.2-4 of the Sustainability Update EIR (Draft EIR volume) in addition to compliance with SCCC regulations. However, the EIR found that should a future residential, agricultural support facility, or public/quasi-public projects result in the conversion of Important Farmlands, the impact would be considered potentially significant. One of the Sustainability Update amendments clarifies "agriculturally oriented structures" to include these residential uses: one residence, one accessory unit, and farmworker housing. Section 13.10.631 addresses provisions for permitting farmworker housing on properties zoned CA (Commercial Agriculture).

The EIR found that the Sustainability Update amendments to SCCC regulations would require that any development exceeding 35,000 square feet in size to place an agricultural property of equal or greater size in a permanent agricultural easement, which would provide better protection to other existing agricultural lands, but would not fully mitigate the impacts. The EIR includes Mitigation Measure AGR-1, which added public/quasi-public facilities to this requirement. The EIR also indicates that individual projects, including agricultural support uses for which discretionary review is required, would be subject to CEQA review and any loss of agricultural land could be evaluated using the Land Evaluation and Site Assessment (LESA) model to determine if impacts would be significant, which in some cases may determine that the impact is less than significant.

The analyses in the Sustainability Update EIR included potential future residential development on agricultural lands within the limits of SCCC zoning development standards, which would also be subject to review, findings, and potential mitigation depending on the size of the project. The Sustainability Update included new requirements and findings for structures permitted on agricultural lands in order to limit and mitigate for the conversion of agricultural land. The EIR concluded that limited conversion of agricultural lands could occur with future structural development as could be permitted under County regulations (residential, agricultural support services, and wastewater treatment facilities), as well as other structural development that may result from implementation of the Sustainability Update, including other public facilities, breweries and distilleries. Although no specific projects or sites were known or evaluated in the EIR, the EIR indicated that some future development, though limited, could result in conversion of Important Farmlands as defined by the state's FMMP, although the EIR found that General Plan policies to limit conversion and avoid or minimize impacts related to conversion of Important Farmland as summarized in Table 4.2-4 of the Sustainability Update EIR (Draft EIR volume), and compliance with SCCC regulations would reduce the impact.

For any proposed residential or agricultural support project that would result in a total development footprint on agricultural resource soils that exceeds 35,000 square feet, findings per SCCC 13.10.313(E) require an applicant to provide an analysis of alternative sites and evaluate alternative designs to reduce the total development area on agricultural resource soils to less than 35,000 square feet. For any residential or agricultural support development that would result in a total development footprint on farmable land that exceeds 35,000 square feet, placement of a permanent agricultural conservation easement on the subject



parcel or another CA-zoned parcel would be required to mitigate or partially mitigate for the conversion of farmland and to protect the land for future farming use. However, the Sustainability Update EIR concluded that there is no known mitigation measure that would reduce the impact to a less-than-significant level. As indicated above, SCCC regulations would require that any development exceeding 35,000 square feet in size to place an agricultural property of equal or greater size in a permanent agricultural easement. This would provide better protection to other existing agricultural lands, but would not fully mitigate the impacts. Mitigation Measure AGR-1 in the EIR added public/quasi-public facilities to this requirement, but the EIR concluded that the impact of potential future conversion of these Important Farmlands would be significant and unavoidable.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, however, the majority of potential housing sites identified in the proposed Housing Element are located within or adjacent to the County's USL. None of the properties identified as available sites for residential development in Appendix HE-E of the draft Housing Element, including the sites proposed for land use and zone map changes, are located on parcels designated or zoned for agricultural uses, except for one property. A 10-acre site on Murphy Road east of the City of Watsonville is identified in the Housing Element as an "opportunity site" that potentially could support 80 farmworker housing units. The site is designated Agriculture in the General Plan, is zoned CA, and appears to be designated Prime Farmland in the FMMP. SCCC regulations permit a single-family residence and accessory unit in CA zones, and agricultural employee (farmworker) housing is a principally permitted use in the CA zone, subject to SCCC 13.10.631 regulations. Section 13.10.631 allows farmworker housing in CA zones. Agricultural employee housing (farmworker housing) is considered an agricultural use pursuant to the Employee Housing Act. While the draft Housing Element includes an agriculturally zoned parcel that appears to support Prime Farmland and identifies the potential for 80 housing units on the identified opportunity site on Murphy road, any housing development would be required to comply with County regulations that limit the size of a farmworker housing project and protect the agricultural resource.

Except for the one parcel described above, future residential development as envisioned in the proposed Housing Element would not result in residential projects on agricultural lands and would not result in conversion of farmland to non-agricultural uses, resulting in no impact related to conversion of farmland. However, farmworker housing is defined in the County's General Plan/LCP and SCCC as an agricultural use, not a residential use. Should a farmworker housing project be proposed on the identified opportunity site on Murphy Road, the project would be required to comply with County zoning regulations and potential mitigation as analyzed and described in the Sustainability Update EIR. Therefore, future potential residential farmworker housing on the one site designated for agriculture in the draft 2023 Housing Element Housing Site Inventory of residential sites would be within the scope analyses of impacts in the EIR, which included future residential uses,

- b) **Conflict with Zoning or Williamson Act Contract.** The Sustainability Update EIR concluded that the amendments to General Plan/LCP policies related to agricultural resources and accompanying changes to the SCCC would ensure that the zoning regulations are consistent with the General Plan/LCP. The EIR further concluded that the Sustainability Update would not result in conflicts with existing zoning for agricultural use or Williamson Act contracts, resulting in no impact.





Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, and as indicated above, none of the properties identified as available sites for residential development are located within agricultural areas or on parcels zoned for agricultural uses, except for one site. Therefore, future residential development as envisioned in the proposed Housing Element would not result in residential projects on agricultural lands and would not result in impacts related to conflicts with agricultural zoning or Williamson Act contract, resulting in no impact. With regards to the one parcel described above as identified as an opportunity site for housing, it appears to be in a Williamson Act contract, Williamson Act contracts permit all uses allowed by the agricultural zone district. As agricultural employee housing is considered an agricultural use under the Employee Housing Act and is also an allowed use in the zone district, the use would not conflict with the Williamson Act contract.

- c-d) **Conflicts with Forest/Timberland Zoning and/or Conversion of Timberland.** The Sustainability Update EIR found that the majority of the anticipated growth anticipated would occur within the existing USL and would not affect forest or timber lands. The EIR also concluded that County policies and regulations that seek to maintain and protect timberlands and limit residential development as summarized in Table 4.2-6 of the Sustainability Update EIR (Draft EIR volume), would serve to avoid or minimize potential impacts to forest and timber lands. The EIR concluded that with implementation of County General Plan/LCP policies and regulations, including SCCC Chapter 16.52 that regulates timber harvesting, the Sustainability Update would not conflict with or cause rezoning of forest or timber lands, resulting in no impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, but the majority of potential housing sites identified in the proposed Housing Element are located within the County's USL. None of the properties identified as available sites for residential development are located on sites zoned Timberland Preserve or Timber Production (TP) and none are located in or adjacent to timber resources areas. Therefore, future residential development as envisioned in the proposed Housing Element would not result in impacts on forest resources, resulting in no impact, and thus, future potential residential development would be within the scope analyses of impacts in the EIR, which included future residential uses,

- e) **Indirect Conversion of Agricultural Lands.** The Sustainability Update EIR reviewed the types of conflicts that are typically found with non-agricultural development adjacent to or in proximity to lands in agricultural production, which can then indirectly lead to conversion of agricultural lands. The EIR found that General Plan/LCP policies and SCCC regulations require agricultural buffers and other measures to reduce potential conflicts between agricultural and non-agricultural land uses. To protect agricultural land from potential conflicts with non-agricultural uses, there is a required 200-foot agricultural buffer setback between habitable uses (includes outdoor areas) and commercial agricultural land is retained. In addition to required agricultural buffers, the Sustainability Update EIR found that other policies serve to avoid or reduce conflicts between agricultural operations and non-agricultural uses as summarized in Table 4.2-5 of the Sustainability Update EIR (Draft EIR volume). These include requirements for windbreaks in buffers (ARC-1.4.4), siting of structures to minimize conflicts with adjacent agricultural operations (ARC-1.4.5), and recordation of agricultural notification for land divisions and properties adjacent to commercial agricultural lands (ARC-1.4.13 and 1.4.14). Additionally, the EIR found that the Sustainability Update would allow extension of sewer and water lines on commercial agricultural lands in the coastal zone, but only under specified circumstances that would require safeguards to ensure that such facilities would not result in the





subsequent conversions of commercial agricultural lands to non-agricultural uses due to the utility extensions (ARC-1.1-14). Therefore, the EIR concluded that implementation of and compliance with County policies and regulations, the Sustainability Update, potential indirect conversion of agricultural lands due to potential conflicts and/or introduction of services would be considered a less-than-significant impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, but as indicated above, most of the properties identified as available sites for residential development are located within urban areas. In addition to the agriculturally designated parcel described above, two of the 32 sites proposed for land use designation and/or rezoning map amendments are identified as being within 200 feet of property zoned CA. The site designated as agricultural is identified for potential farmworker housing, which is a permitted agricultural use in the SCCC. Potential future residential development on the other sites in proximity to agricultural lands would be required to provide a buffer in accordance with County regulations, providing protection to adjacent agricultural farming activities. Therefore, future residential development as envisioned in the proposed Housing Element would not lead to development of residential projects adjacent to agricultural lands that could lead to conflicts with agricultural uses, resulting in potential indirect conversion of agricultural lands. Therefore, the implementation of the proposed 2023 Housing Element would result in no impact related to changes in existing environment that could lead indirect conversion of farmland, and thus, future potential residential development would be within the scope analyses of impacts in the EIR, which included future residential uses,

## Mitigation Measures

The Sustainability Update EIR included one mitigation measure that required amendment of SCCC section 13.10.313(E) to add public/quasi-public facilities to the types of projects for which special findings and requirements apply to address conversion of agricultural land. This was subsequently included in the approval of the Sustainability Update and is not applicable to the proposed 2023 Housing Element. Therefore, no mitigation measures that would be applicable to the proposed project were identified in the EIR, and none are required with the proposed project as a new significant impact has not been identified.

## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to agricultural and forest resources than previously evaluated in the Sustainability Update EIR.



### 4.3.3 Air Quality

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>III. AIR QUALITY</b> – 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?	DEIR pp. 4.3-17 to 4.3-18, 4.3-22 to 4.3-23	No	No	No	None
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?	DEIR pp. 4.3-23 to 4.3-27 to 4.3-30	No	No	No	None
c) Expose sensitive receptors to substantial pollutant concentrations?	DEIR pp. 4.3-27 to 4.3-25	No	No	No	None
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	DEIR pp. 4.3-30 to 4.3-31	No	No	No	None

#### Discussion

a) **Conflict with Air Quality Management Plan.** The Sustainability Update EIR reported that in 1991, the Monterey Bay Air Resources District (MBARD), formerly the Monterey Bay Unified Air Pollution Control District, 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. 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 EIR further reported that MBARD’s “CEQA Guidelines” consider inconsistency with the AQMP to be a significant cumulative adverse air quality impact. As indicated above, the AQMP is prepared to address attainment of the state ambient air quality standards (AAQS) and maintenance of the federal AAQS. The plan accommodates growth by projecting growth in emissions based on different indicators. For example, population forecasts adopted by the AMBAG are used to forecast population-related emissions. Through the planning process, emissions growth is offset by basin-wide controls on stationary, area, and transportation sources of air pollution. Thus, population-related emissions have been forecast in the AQMP using



population forecasts adopted by AMBAG, and population-changing projects which are consistent with these forecasts are consistent with the AQMP. Projects that are not consistent with the AQMP's population projections have not been accommodated in the AQMP and would have a significant cumulative impact on regional air quality unless emissions are totally offset.

The Sustainability Update EIR concluded that potential development that could be accommodated by the Sustainability Update and which was evaluated in the EIR, would not conflict with or obstruct implementation of the applicable air quality plan as dwelling unit estimates were within estimates included in the AQMP. The Sustainability Update EIR estimated that approximately 4,500 new dwelling units could be constructed as a result of the proposed project, which would bring the total number of housing units in the unincorporated area of the county to 61,827 units in 2040. The current AQMP is based on AMBAG's 2014 Regional Growth Forecast (AMBAG 2014), which only includes projections to year 2035.<sup>7</sup> Based on the 2014 Regional Growth Forecast, housing units in 2035 were projected to total 62,315 units for unincorporated Santa Cruz County. As such, the housing units accommodated by the Sustainability Update for year 2040 would be 488 units less than what was assumed in the AQMP for year 2035 for unincorporated Santa Cruz County. Therefore, the Sustainability Update EIR concluded that although adoption and implementation of the Sustainability Update could indirectly result in increased dwelling units and associated population increase, this growth would not conflict with or obstruct implementation of the applicable air quality plan.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. As explained in Section 3.2, the County's quantified objective for new housing construction (2,350 units) and potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units) total 4,250 housing units, which would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, if the County exceeds its new construction objective and fully meets its RHNA of 4,634 units and also considering housing units that have been constructed since certification of the Sustainability Update EIR (56), potential development could result in approximately 190 dwelling units over the 4,500 analyzed in the EIR. This amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR and would be within the AQMP growth forecasts for the year 2014, which showed an excess of 488 units beyond the 4,500 evaluated in the EIR. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to potential conflicts with the AQMP.

- b) **Criteria Pollutant Air Emissions.** The U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established AAQS that are the maximum levels of ambient (background) air pollutants considered safe, with an adequate margin of safety to protect public health and welfare. Criteria pollutants include ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), inhalable particulates (PM<sub>10</sub>), fine particulates (PM<sub>2.5</sub>), and lead. High O<sub>3</sub> levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO<sub>x</sub>), which react under certain meteorological conditions to form O<sub>3</sub>. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-

<sup>7</sup> Although AMBAG has adopted the 2018 Regional Growth Forecast, in order to determine consistency with the current AQMP, projects need to compare their housing units to the data incorporated into the AQMP (i.e., AMBAG's 2014 Regional Growth Forecast).



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.

Santa Cruz County is located within the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the MBARD and includes Santa Cruz, Monterey, and San Benito Counties. The NCCAB is designated as non-attainment for the state PM<sub>10</sub> standard, and as unclassified or attainment for all other state and federal standards (CARB 2022).

The Sustainability Update EIR concluded that future development by the Sustainability Update could result in air pollutant emissions, including ROG, NO<sub>x</sub>, particulate matter, and CO from vehicular traffic, area sources, and energy sources (i.e., natural gas appliances, and space and water heating), as well as during construction of future development projects. The EIR indicated that the scale and timing of construction of development accommodated by the Sustainability Update is unknown, but that the MBARD CEQA Guidelines provide screening levels for potential significant impacts, and projects that are cover 2.2 or more acres may be required to implement dust suppression measures during construction unless future project-level construction-emissions modeling indicates that pollutant thresholds established by the MBARD would not be exceeded. Therefore, the Sustainability Update EIR concluded that with implementation and application of MBARD recommended measures, if required, potentially significant project-specific construction emissions would be to a less than significant.

With regards to operational emissions resulting from future development, the Sustainability Update EIR found that vehicular emission rates are anticipated to lessen in future years due to continuing improvements in automobile and fuel efficiency programs implemented by the State of California, and the MBARD’s latest AQMP forecasts a substantial reduction in emissions through 2035. Regarding energy sources, the EIR indicated that new development would be required to comply with the applicable building codes (in effect at the time of construction, which include energy-efficient requirements that are anticipated to become more stringent. In addition, the EIR found that compliance with General Plan/LCP policies summarized in Table 4.3-4 in the Sustainability Update EIR (Draft EIR volume) would help reduce vehicle-related emissions. The Sustainability Update includes policies that set forth measures to avoid and minimize adverse impacts on air quality, including prioritizing connectivity of bicycle and pedestrian infrastructure, infrastructure for electric vehicles, siting new development to facilitate access to transit, and reduction of vehicle trips and emissions. Additionally, existing Public Safety Element policies identified in the EIR require future development projects to implement applicable MBARD control measures and/or air quality mitigations in the design of new projects as set forth in MBARD’s CEQA Guidelines. Therefore, the Sustainability Update EIR concluded that construction and operational emissions resulting from future development would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts related to air emissions were found to be less than significant. All future residential development would be required to comply with applicable General Plan/LCP policies, including implementation of and MBARD air pollution control measures. As explained in Section 3.2 and summarized above, the County’s quantified objective for new housing construction (2,350 units) and potential development resulting from proposed amendments to existing General Plan land use



designations and/or zoning (1,900 units) total 4,250 housing units, which would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, if the County exceeds its new construction objective and fully meets its RHNA and also considering housing units that have been constructed since certification of the Sustainability Update EIR, potential development could result in approximately 190 dwelling units over the 4,500 analyzed in the EIR. This amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR and would be within the AQMP growth forecasts for the year 2014, which showed an excess of 488 units beyond the 4,500 evaluated in the EIR. Thus, future development arising from the proposed Housing Element would be within forecasts used to develop the AQMP, and therefore, would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to criteria pollutant air emissions. Even considering a worst-case scenario in which a slightly increased amount of residential development over the EIR estimate could occur as a result of the Housing Element if the County fully meets its RHNA, this amount would not be substantial enough to result in emissions exceeding MBARD emission thresholds or result in a new significant impact.

- c) **Expose Sensitive Receptors to Substantial Pollutant Concentrations.** As described in the Sustainability Update EIR, land uses where air-pollution-sensitive individuals are most likely to spend time include schools and schoolyards (i.e., preschools and kindergarten through grade 12 schools), parks and playgrounds, daycare centers, nursing homes, hospitals, live-in housing (i.e., prisons, dormitories, hospices, or similar), and residential communities (sensitive sites or sensitive land uses). Sensitive receptors such as these are located throughout the county.

The Sustainability Update EIR reviewed potential CO and toxic air contaminant (TAC) emissions that might affect sensitive receptors. The EIR concluded that development accommodated by the Sustainability Update would not significantly contribute to a CO hotspot and would not indirectly generate construction-related TAC emissions and associated health risk, resulting in a less-than-significant impact. Furthermore, the EIR found that existing air quality protection policies and other policies amended as part of the Sustainability Update would reduce vehicle miles traveled (VMT) and/or air emissions as summarized in Table 4.3-4 of the Sustainability Update EIR (Draft EIR volume), which also are consistent with the goals of the MBARD's AQMP. The EIR concluded that compliance with existing General Plan Public Safety Element policies, which require future development projects to implement applicable MBARD control measures and/or air quality mitigations in the design of new projects as set forth in the MBARD's CEQA Guidelines, as well as project-specific environmental review required under CEQA, would ensure that TACs would be assessed and minimized, and sensitive receptors would be located away from sources of air pollution. Therefore, the EIR determined that the Sustainability Update would not expose sensitive receptors to substantial pollutant concentrations, and the impact would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. The majority of potential housing sites identified in the proposed Housing Element are located within the County's USL, and future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts related to exposure of sensitive receptors to substantial pollutant concentrations were found to be less than significant with implementation of the Sustainability Update policies and regulations. All future residential development would be required



to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR.

- d) **Other Emissions – Odors.** According to the MBARD, objectionable odors include sulfur compounds and methane, and typical sources of odors include landfills, rendering plants, chemical plants, agricultural uses, wastewater treatment plants, and refineries. As indicated in the Sustainability Update EIR, future development occurring as a result of the Sustainability Update would generate odors from vehicles and/or equipment exhaust emissions during construction. Odors would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly and generally occur at magnitudes that would not affect substantial numbers of people, and the EIR concluded that these types of odors would result in a less-than-significant impact.

While the specific locations of future development projects accommodated by the Sustainability Update were not known, the Sustainability Update EIR indicated that the Update did not identify, designate, or support any new uses that would be considered likely significant odor-generating facilities. The EIR also acknowledged that agricultural uses would continue under the Sustainability Update in proximity to urbanized uses. Existing and proposed General Plan/LCP policies and SCCC regulations require a 200-foot buffer between agricultural uses and residential uses as well as a signed notification acknowledging the presence of agricultural operations that can include odors and other nuisances. Therefore, the Sustainability Update EIR concluded that sensitive receptors near agricultural operations would not be exposed to substantial, potentially significant impacts related to odor, resulting in a less-than-significant operational impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, and future residential development would be in locations evaluated in the Sustainability Update EIR for which potential impacts related to odors were found to be less than significant. Residential uses were not identified as being the type of use that would generate substantial odors. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR. Furthermore, residential uses typically do not result in generation of substantial odors, thus resulting in no impact.

## Mitigation Measures

None were identified in the Sustainability Update EIR, and none are required with the proposed project as a significant impact has not been identified.

## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to air quality than previously evaluated in the Sustainability Update EIR.





### 4.3.4 Biological Resources

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>IV. BIOLOGICAL RESOURCES</b> – 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 Game or U.S. Fish and Wildlife Service?	DEIR pp. 4.4-11 to 4.4-12, 4.4-29 to 4.4-31, DEIR Appendix E, FEIR pp 3-3 to 3-4.	No	No	No	None
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 Game or U.S. Fish and Wildlife Service?	DEIR pp. 4.4-12 to 4.4-16, 4.4-32 to 4.4-37, FEIR pp. 3-4	No	No	No	MM BIO-2B
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?	DEIR pp. 4.4-13 to 4.4-15, 4.4-32 to 4.4-35	No	No	No	None
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?	DEIR pp. 4.4-16 to 4.4-17, 4.4-29 to 4.4-31, 4.4-37 to 4.4-38	No	No	No	None
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	DEIR pp. 4.4-39	No	No	No	None
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?	DEIR pp. 4.4-39 to 4.4-40, FEIR pp. 3-4 to 3-5	No	No	No	None





## Discussion

- a) **Special Status Species.** The Sustainability Update EIR reported that a total of 93 special-status plant and 55 special-status wildlife species have been documented within the county. Federally designated critical habitat is present in a number locations, including designated critical habitat for eight wildlife species and four plant species.

The Sustainability Update EIR indicated that future development accommodated by the Sustainability Update could potentially result in significant impacts, either directly, or through modifications to habitat that supports special status plant and/or wildlife species. However, the EIR found that the majority of the future development is expected to occur within the USL and community enclaves within the RSL where natural vegetation communities undisturbed by human activity are very limited or do not occur at all. In areas where parcels contain or are adjacent to sensitive habitats (e.g., riparian communities, streams, wetlands), future development of these parcels would be subject to local, state, and federal regulations protecting special status species and their habitats. Furthermore, SCCC Chapter 16.32 requires preparation of biotic assessments and biotic reports where potential rare, endangered or threatened species may occur, and requires development proposals to mitigate potentially significant impacts. In addition, the General Plan/LCP includes policies to protect special status species, as summarized in Table 4.4-3 of the Sustainability Update EIR (Draft EIR volume); Policy ARC-3.1.10 specifically requires protection of rare, endangered, and threatened species. The EIR concluded that with compliance with federal, state and local regulations, implementation of the proposed Sustainability Update policies and implementation strategies summarized on Table 4.4-3, and required future environmental review of specific development projects, potential impacts to special status species due to future development resulting from implementation of the Sustainability Update would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, primarily located within the County's USL, where the potential for special status species would be limited due to existing development. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts to special status species were found to be less than significant with implementation of federal, state, and local policies and regulations. However, there may be some properties identified in the proposed Housing Element as available sites for residential development that may be located adjacent to or near areas of known special status species that could result in potential impacts. However, the EIR addressed future development on any site with potential special status species, which would include all sites identified the draft Housing Element Housing Site Inventory. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations regarding protection of habitats, including those that support protection of special status species. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to potential impacts to special status plant and wildlife species.

- b-c) **Riparian, Wetland, and Other Sensitive Habitats.** The Sustainability Update EIR indicated that sensitive habitats include the following: (1) vegetation communities designated as sensitive by the California Department of Fish and Wildlife (CDFW) (CDFW sensitive natural communities); (2) riparian communities and aquatic resources, including wetlands; and (3) County-designated sensitive habitats, many of which



overlap with the other two categories. The General Plan/LCP and Chapter 16.32 of the SCCC also define “sensitive habitat,” and in addition to riparian and aquatic sensitive habitat, other specified unique biotic communities are identified.

The Sustainability Update EIR reported that aquatic resources include waters of the United States regulated under the federal Clean Water Act; waters of the State regulated under the Porter-Cologne Water Quality Act; and rivers, streams, and lakes regulated under section 1602 of the California Fish and Game Code. Because the EIR analysis was at the county level and programmatic, no jurisdictional delineations were conducted for the EIR; formal delineations of potentially jurisdictional aquatic resources would need to be conducted at a project-specific level for future development activities. In addition, portions of riparian communities may also be regulated as wetlands under the federal Clean Water Act.

The Sustainability Update EIR concluded that future development resulting from implementation of the Sustainability Update could impact sensitive habitats, including riparian and wetland habitats. However, in areas where parcels contain or are adjacent to sensitive habitats (e.g., riparian communities, streams, wetlands), the EIR found that future development of these parcels would be subject to federal and state regulations protecting sensitive habitats and County regulations in SCCC Chapters 16.30 and 16.32, which require protection of sensitive habitats. Specifically, Chapter 16.30 establishes required riparian setbacks for new development based on stream characteristics, and Chapter 16.32 requires preparation of biotic assessments and biotic reports where impacts to sensitive habitats may occur, and requires development proposals to mitigate potentially significant impacts. General Plan/LCP policies and regulations in Chapter 16.32 require 100-foot wetland buffers to protect these sensitive habitat areas. Furthermore, policies to protect sensitive habitats, as summarized in Table 4.4-4 in the Sustainability Update EIR (Draft EIR volume), would protect sensitive habitats against disruption of habitat values through future review of development siting. Therefore, the EIR concluded that with adherence to local and state regulations, and implementation of General Plan/LCP policies and implementation strategies summarized on Table 4.4-3, as well as required future environmental review of specific development projects, potential impacts to sensitive habitats, including riparian and wetland, due to future development resulting from implementation of the Sustainability Update would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, primarily located within the County’s USL, where the potential for sensitive habitats is limited due to existing development. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts to sensitive habitats were found to be less than significant. However, there may be some properties identified as available sites for residential development that may be located adjacent to or near areas of known sensitive habitats that could result in potential impacts. However, the Sustainability Update EIR addressed future development on any site with potential sensitive habitats, which would include all sites identified the draft Housing Element Housing Site Inventory. Nine of the 32 sites in which specific General Plan land use and/or zoning map changes are proposed were identified as being located on or adjacent to sensitive habitat areas (see Appendix B). All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations regarding protection of riparian, wetland, and sensitive habitats. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to potential impacts to sensitive species.



The Sustainability Update EIR also considered impacts for potential future development at 23 sites that were proposed for General Plan land use and/or zoning map changes. This includes two sites, one on Portola Drive with no sensitive biological resources identified, and an approximate 6-acre parcel located at the northeast intersection of Soquel Drive and Thurber Lane that is traversed by an approximately 1,000-foot-long unnamed ephemeral stream channel and riparian corridor as defined by County regulations. This site is also identified as an opportunity site in the proposed 2023 Housing Element. The EIR evaluated potential development scenarios for the site. Under the first scenario, the stream would remain as it currently exists and the riparian corridor would be retained with future development, resulting in potential less-than-significant impacts to sensitive habitat and potential special status species supported by this habitat. However, the EIR concluded that potential development that includes filling the stream and replacing it with an underground stormwater pipe, which could result in a potentially significant impact to sensitive habitat if mitigation was not successful. Mitigation Measure BIO-2B requires riparian restoration under this scenario, but the EIR concludes that the impact could remain significant and unavoidable if the mitigation were determined to be infeasible at a development project level or implementation of the mitigation measure was not successful.

- d) **Wildlife Movement and Breeding/Nesting.** The Sustainability Update EIR reported that generally, mountainous watersheds, creeks, streams, and other riparian areas serve as the primary wildlife corridors within the county and are generally more present or natural in the north coast and mountain areas of the county. In the urbanized and southern portions of the county, wildlife corridors are typically limited to rural areas toward the north and east, away from developed areas of the county. All streams and associated riparian vegetation in the county are also considered wildlife corridors for native fish and wildlife.

The Sustainability Update EIR found that future development as a result of the Sustainability Update would primarily occur on vacant infill sites or underutilized properties within the USL. The primary wildlife movement corridors are located along major watercourses and within undeveloped, open space lands in the Santa Cruz Mountains, where little or any new development other than potential single-family homes on large lots would be constructed. Projects adjacent to watercourses would be subject to setback requirements set forth in SCCC Chapter 16.30 and federal and state regulations protecting streams and riparian habitat and thus protecting wildlife movement habitat. In addition, the EIR found that General Plan/LCP policies intended to protect wildlife movement as summarized on Table 4.4-5 in the Sustainability Update EIR (Draft EIR volume), would avoid or minimize impacts related to wildlife movement or nesting birds.

The EIR also found that construction activities associated with future development could also affect nesting birds, if any are present during construction activities, including tree removal, which could disrupt nesting activities. This could lead to injury to individuals and/or abandonment of nests. However, the EIR found that with required compliance with existing federal, state, and local regulations, and implementation of General Plan/LCP policies and implementation strategies summarized on Table 4.4-5 of the Sustainability Update EIR (Draft EIR volume), potential impacts to wildlife movement and/or breeding or nesting, due to future development resulting from implementation of the Sustainability Update, would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, and the majority of potential housing sites identified in the proposed Housing Element are



located within the County's USL. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts related to wildlife movement and breeding/nesting were found to be less than significant. Future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations with regards to protection of trees and biological resource protection. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified for potential impacts related to wildlife movement, breeding, and/or nesting.

- e) **Conflicts with Local Tree Preservation or Biological Resource Protection Policies or Ordinances.** The County's General Plan/LCP ARC Element includes objectives and policies pertaining to biological resources. In addition, the SCCC has regulations to protect riparian corridors and wetlands (Chapter 16.30), to protect sensitive habitats (Chapter 16.32), and to protect significant trees (Chapter 16.34).

The Sustainability Update EIR found that potential future development could occur throughout the county, but primarily within urban areas and within the USL. The EIR reported that some parcels within the coastal zone may contain trees protected under SCCC Chapter 16.34, Significant Trees Protection, and that any future development proposing the removal of such trees within the coastal zone would need to apply for a tree removal permit and would be required to mitigate for loss of trees by replacing them with trees acceptable to the County Planning Department. Some parcels contain or abut "areas of biotic concern" as defined by SCCC Chapter 16.32, Sensitive Habitat Protection, including unincorporated areas of Aptos within the S-P zone for Santa Cruz long-toed salamander. Any future development activity within an area of biotic concern would be subject to biotic approval from the County and be required to mitigate for project-level impacts. Therefore, the EIR concluded that with implementation of General Plan/LCP policies and implementation strategies and adopted County Code regulations, conflicts with local regulations would be avoided, resulting in no impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, and the majority of potential housing sites identified in the proposed Housing Element are located within the County's USL. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which no potential impacts related to conflicts with local policies and regulations were identified. Future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations with regards to protection of trees and biological resource protection. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified for potential impacts related to conflicts with local regulations.

- f) **Conflicts with the Adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).** The Sustainability Update EIR reported that approximately 20 approved HCPs have been issued within Santa Cruz County in the last 15+ years under the Federal Endangered Species Act (FESA) to entities undertaking projects that might result in take of an endangered or threatened species, of which two are currently active in unincorporated county areas. There are no known NCCPs in the county. The EIR found that undeveloped parcels within the RSL in areas within approved HCPs would be required to comply with provisions of the applicable HCP. These areas would be considered an "area of biotic concern" under SCCC Chapter 16.32, and any future development would therefore be subject to its provisions. The County would



not issue a permit for development on a site with an approved HCP until a biological assessment is performed by an applicant-funded and County-approved biologist. The County would typically not allow development of a site with an approved HCP if it would conflict with the HCP. Therefore, the EIR concluded that future development resulting from the Sustainability Update, which would primarily be within urban areas and within the USL, would result in no impact related to potential conflicts with an HCP or NCCP with implementation of General Plan/LCP policies and code sections in the SCCC.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, and the majority of potential housing sites identified in the proposed Housing Element are located within the County’s USL. Future residential development would be in locations evaluated in the Sustainability Update EIR. Future residential development would be required to comply with applicable HCPs. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which no impact was identified related to potential conflicts with a HCP.

### Mitigation Measures

The Sustainability Update EIR included one mitigation measure that requires riparian restoration mitigation for a specified site within the USL if future development alters the existing onsite stream. The specified site is identified as an opportunity site in the proposed 2023 Housing Element, and this mitigation would be applicable to future development on that property if the stream is filled. The mitigation measure would only be applicable to the specified parcel. No other mitigation measures are required with the proposed project as a new significant impact has not been identified.

### Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to biological resources than previously evaluated in the Sustainability Update EIR.

### 4.3.5 Cultural Resources

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>V. CULTURAL RESOURCES – Would the project:</b>					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	DEIR pp. 4.5-20 to 4.5-24	No	No	No	Yes MM CUL-1 MM CUL-2
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	DEIR pp. 4.5-24 to 4.5-25	No	No	No	None





	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
c) Disturb any human remains, including those interred outside of formal cemeteries?	DEIR pp. 4.5-24 to 4.5-25	No	No	No	None

Discussion

- a) **Historical Resources.** The Sustainability Update EIR indicates that there are 17 federally and state-listed historical resources in the unincorporated county, as well as 266 parcels identified by the County as being local historical resources as designated by the Historic Landmark Combining District. The EIR indicated that future development accommodated by the Sustainability Update could be in areas with known historical sites or in areas where structures have not yet been evaluated for historical significance. Buildings that are over the age of 50 years old and are proposed for modification or alteration in the future would require evaluations to determine eligibility for listing in the California Register of Historical Resources (CRHR) and/or National Register of Historic Places (NRHP), and if found eligible, the building would be considered a historical resource under CEQA. The EIR found that future potential redevelopment of existing developed sites may result in alteration or removal of historical structures, affecting the significance of historical values if the structure is considered an historical resource under CEQA definitions.

The EIR indicated that the Sustainability Update’s ARC Element of the County’s General Plan/LCP includes policies that would serve to reduce potential future impacts to historical resources as summarized in Table 4.5-4 of the Sustainability Update EIR (Draft EIR volume). For development activities on properties containing historic resources, policies require protection, enhancement, and/or preservation of the resource, and plans for protection/preservation are required on properties with a designated historical resource. The Sustainability Update requires review of applications for demolition of any structure more than 50 years old to determine whether the structure is an historical resource under CEQA (ARC-8.2p). County policies also protect and preserve historical resources (ARC-3.2.3 and ARC-8.2.4). Additionally, compliance with local regulations provided in SCCC Chapter 16.42 regarding historic alteration or demolition would also serve as the mechanism for review of projects that may alter existing historical resources as designated by the Historic Landmark Combining District.

The Sustainability Update EIR determined that, through compliance with federal, state, and local regulations, and implementation of mitigation measures identified through project-level CEQA reviews and County-required historical evaluations for any structure over 50 years old, the potential for adverse effects to historical resources would be identified, and mitigation would be required if a significant impact were identified. Nonetheless, the EIR found that preservation, reuse, maintenance, and/or avoidance of historical resources may not always be feasible, especially with potential redevelopment and intensification of uses in the USL, and recordation of a significant historical resource, alone, would not constitute adequate mitigation for a substantial adverse change to that resource. Therefore, because the potential for future



development accommodated by the Sustainability Update to cause a substantial adverse change to an historical resource could not be precluded, the Sustainability Update EIR concluded that impacts to historical resources could be potentially significant.

The Sustainability Update EIR included Mitigation Measure CUL-1, which would require the review of listed, eligible, or unevaluated sites or structures over 50 years old to determine whether a historical resource exists, and if so, provide mitigation to reduce potentially significant impacts to a less-than-significant level. Mitigation would include compliance with the Secretary of the Interior Standards pursuant to CEQA guidelines 15064.5(b)(3). However, since the Sustainability Update EIR is a program-level analysis and no specific development projects were proposed, the EIR indicated that it is not possible to determine whether individual projects would be able to attain compliance with the Secretary of Interior's Standards.

The Sustainability Update EIR also included MM CUL-2, which provides on-site preservation guidance, and in the event that a structure or resource cannot be preserved, it ensures that actions would be taken to appropriately record and document an identified historical resource. While the potential for adverse effects on historical resources would be substantially reduced with MM CUL-2, the Sustainability Update EIR acknowledges that recordation of the resource would not constitute adequate mitigation for a substantial adverse change to that resource. Therefore, the Sustainability Update EIR analysis conservatively concluded that the potential impacts to historical resources due to future development resulting from implementation of the Sustainability Update would be potentially significant and unavoidable.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, primarily located within the County's USL. Future residential development could be located on sites with existing buildings over the age of 50 years old, which would require evaluations to determine eligibility for listing in the NRHP or CRHR. It is noted that some of the 32 sites in which specific General Plan land use and/or zoning map changes are proposed, have existing buildings that may be 50 or more years of age or older. If determined to be eligible for listing, such resources would be considered historical resources under CEQA, and their demolition or alteration could result in a significant impact. All future residential developments would be required to comply with applicable General Plan/LCP policies and SCCC regulations pertaining to historical resources which require review of potential historical resources that are over the age of 50 years old; protection, enhancement, and/or preservation of historical resources. In addition, future residential development accommodated by the 2023 Housing Element would be subject to MM CUL1 and MM CUL2 identified in the Sustainability Update EIR. The Sustainability Update EIR addressed future development on any site with potential historical resources, which would include any sites identified in the draft Housing Element Housing Site Inventory with historic-age buildings that don't require General Plan or zoning map amendments. Future residential development would be in locations evaluated in the Sustainability Update EIR for which potential impacts to historical resources were evaluated. Thus, future development indirectly resulting from the proposed 2023 Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a potentially significant and unavoidable impact was identified related to potential adverse changes in the significance of a historical resource.

- b-c) Archaeological Resources and Human Remains.** The Sustainability Update EIR indicates that sensitive archaeological areas are found throughout the county in all planning areas. The EIR found that grading, trenching, and other subsurface construction activities associated with future development could damage





or destroy known archaeological resources or potentially to encounter unknown archaeological resources during construction, especially in identified sensitive areas. The same development activities also have the potential to disturb or destroy Native American burial sites if known or encountered during future construction. As described in the EIR, future development proposals located within archaeologically sensitive areas defined by the County would be required to prepare archaeological investigations. The EIR found that the Sustainability Update's ARC Element of the County's General Plan/LCP includes policies and implementation strategies, which would serve to reduce impacts related to archaeological resources and human burials as summarized in Table 4.5-3 of the Sustainability Update EIR (Draft EIR volume). The General Plan/LCP includes policies that requires preparation of archaeological investigations for any project located within a sensitive archaeological area (ARC-8.1.1) and identified archaeological sites must be protected (ARC-8.1.3) and evaluated (ARC-8.1.4). Additionally, the County's accidental discovery policy (ARC-8.1.5) and procedures (SCCC Chapter 16.40) would also apply to properties in the study area in the event construction encounters unidentified archaeological deposits. Similarly, County policies and regulations, as well as state regulations, require construction to be stopped in the event that human remains are found, and state law requires that the County Coroner be notified in the event of this occurrence. If human remains are identified, state law sets forth the procedures for contacting the NAHC and Native American tribes. Therefore, the Sustainability Update EIR concluded that, with compliance with County policies and state and local regulations, potential impacts to archaeological resources and/or accidental human remains during construction of future development resulting from implementation of the Sustainability Update would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, primarily located within the County's USL. Future residential development would be in locations evaluated in the Sustainability Update EIR for which potential impacts to archaeological resources were evaluated. Some of the properties identified as available sites for residential development may be located within archaeologically sensitive areas or could result in inadvertent discoveries of archaeological resources during ground-disturbing construction activities. Ten of the 32 sites in which specific General Plan land use and/or zoning map changes are proposed were identified as being located archaeologically sensitive areas in the County's Geographic Information System (GIS) database. However, the EIR addressed future development on any site with potential archaeological resources, which would include all sites identified the draft Housing Element Housing Site Inventory. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to adverse change in the significance of an archaeological resource and disturbance of human remains.

## Mitigation Measures

The Sustainability Update EIR identified MM CUL1 requiring review of listed, eligible, or unevaluated sites or structures over 50 years old to determine whether a historical resource exists, and if so, provide mitigation to reduce potentially significant impacts to a less-than-significant level through compliance with the Secretary of the Interior Standards. The Sustainability Update EIR also identified MM CUL2 to provide guidance on preservation of historical resources, or recordation and documentation of historical resources in the event that they cannot be preserved. MM CUL1 and MM CUL2 would be applicable to future residential developments resulting from



implementation of the proposed 2023 Housing Element that are located on sites with buildings that are 50 years or older. No new mitigation measures related to cultural resources are required as no new significant impacts or substantially more severe significant impacts have been identified.

### Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to cultural resources than previously evaluated in the Sustainability Update EIR.

### 4.3.6 Energy

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>VI. ENERGY – Would the project:</b>					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	DEIR pp. 4.6-10 to 4.6-15	No	No	No	None
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	DEIR pp. 4.6-15 to 4.6-16	No	No	No	None

### Discussion

a) **Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources.** The Sustainability Update EIR indicates that energy demand would increase under the Sustainability Update, including demand for electricity, natural gas, and petroleum. Land uses to be developed under the Sustainability Update would entail the consumption of electricity for multiple purposes including, but not limited to, building heating and cooling, lighting, appliances, and electronics. Similarly, natural gas consumption would be required for various purposes, including building heating and cooling. Future development accommodated by the Sustainability Update would be required to comply with the efficiency standards of the California Building Code (CBC) (Title 24 Part 6 and Part 11), and the EIR concluded that additional energy demand as a result of development resulting from the Sustainability Update would not be unusual or wasteful as compared to overall local and regional demand for energy resources. In addition, the Sustainability Update included a number of amended policies in the County’s General Plan/LCP that seek to improve energy efficiency and encourage alternative energy, as summarized in Table 4.6-2 of the Sustainability Update EIR (Draft EIR volume), which would also serve to reduce/minimize energy consumption. Therefore, the Sustainability Update EIR concluded that electricity and natural gas consumption from future development as a result of



the Sustainability Update would not be considered inefficient or wasteful, and impacts would be less than significant.

Land uses developed under the Sustainability Update would also involve the consumption of petroleum fuel associated with motor vehicles traveling to and from land uses, and would be a function of VMT and vehicle fuel efficiency. Motor vehicles are expected to use decreasing amounts of petroleum over time, primarily due to advances in fuel economy and the increasing use of electric vehicles. As discussed in the Sustainability Update EIR, there are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles that combines the control of smog-causing pollutants and greenhouse gas (GHG) emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California. In addition, use of transit and non-vehicular modes of transportation is anticipated to increase over time, as local and regional plans and policies facilitating increased use and development of transit and non-vehicular transportation modes are implemented. Finally, the EIR found that development accommodated by the Sustainability Update is the type of compact land use development that is encouraged by AMBAG to reduce VMT, and the Sustainability Update also includes the expansion of multi-modal transportation options in order to achieve the energy use and GHG reductions from the land use and transportation sectors. Therefore, the EIR concluded that, given these considerations, the petroleum consumption associated with the proposed project would not be considered inefficient or wasteful, and impacts would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. As explained in Section 3.2, the County's quantified objective for new housing construction (2,350 units) and potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units) total 4,250 housing units, which would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, if the County exceeds its new construction objective and fully meets its RHNA of 4,634 units and also considering housing units that have been constructed since certification of the Sustainability Update EIR (56), potential development could result in approximately 190 dwelling units over the 4,500 analyzed in the EIR. This amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR. In addition to the CBC's energy efficiency standards, all future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to wasteful, inefficient, or unnecessary consumption of energy.

Furthermore, the proposed Housing Element's Goal H-5 promotes energy conservation and sustainable designs and specifically includes two policies that address sustainable design and implementation of the County's Climate Action and Adaptation Plan (CAAP), including strategies to require the electrification of new housing units. In addition, Housing Element Policy H-5.1 would require all new housing projects to comply with the California CalGreen Code, County Code Chapter 13.11, and the County Design Guidelines, all of which would reduce energy consumption through measures such as energy-efficient buildings, compact communities that reduce VMT and vehicle emissions, and encouraging alternative, more energy-



efficient modes of transportation. Section 4.5 of the proposed 2023 Housing Element summarizes opportunities for energy conservation in the construction of housing in Santa Cruz County.

- b) **Conflicts with Renewable Energy or Energy Efficiency Plans.** The Sustainability Update EIR reported that Part 6 of Title 24 of the California Code of Regulations establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically (every 3 years) to incorporate and consider new energy efficiency technologies and methodologies. Title 24 also includes Part 11, the California Green Building Standards (CALGreen). CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial and state-owned buildings. The Sustainability Update EIR found that development facilitated by the Sustainability Update would meet any applicable Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency.

Additionally, as described in the Sustainability Update EIR, Central Coast Community Energy (3CE) started providing clean energy to the county as of 2018. 3CE is on a pathway to 60% clean and renewable energy by 2025 and 100% clean and renewable energy by 2030, as indicated in the EIR. The EIR determined that overall, the county's procurement of energy through 3CE and the projected 100% clean and renewable energy sourcing by 2030 would give customers the option of purchasing this clean energy 15 years ahead of California's SB 100 requirement of zero carbon energy by 2045. The County also adopted its Climate Action Strategy in 2013 and its Climate Action and Adaption Plan (CAAP) in 2022, which outline the County's course of action to reduce GHG emissions produced by governmental operations and community activities within unincorporated Santa Cruz County, and includes energy-consumption-reduction measures. The County has implemented a variety of strategies from the plan to achieve GHG reductions, efforts which will continue in the future.

The Sustainability Update EIR concluded that, because the land uses to be developed under the Sustainability Update would comply with all applicable energy standards and regulations, and that policies within the Sustainability Update's General Plan/LCP amendments also focus on compact growth, efficient energy use, and renewable energy, the Sustainability Update and future development would result in a less-than-significant impact associated with the potential to conflict or obstruct a state or local plan for renewable energy or energy efficiency.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. The majority of potential housing sites identified in the proposed Housing Element are located within the County's USL, and future residential development would be in locations evaluated in the Sustainability Update EIR for which potential impacts related to conflicts with plans for renewable energy or energy efficiency were found to be less than significant. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR. In addition to the CBC's energy efficiency standards, all future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Furthermore, residential development accommodated by the 2023 Housing Element would tend to be compact, energy-efficient growth primarily within the USL.



### Mitigation Measures

None were identified in the Sustainability Update EIR, and none are required with the proposed project as a significant impact has not been identified.

### Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to energy than previously evaluated in the Sustainability Update EIR.

### 4.3.7 Geology and Soils

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>VII. GEOLOGY AND SOILS</b> - Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	DEIR pp. 4.7-18 to 4.7-20	No	No	No	None
ii) Strong seismic ground shaking?	DEIR pp. 4.7-18 to 4.7-20	No	No	No	None
iii) Seismic-related ground failure, including liquefaction?	DEIR pp. 4.7-18 to 4.7-20	No	No	No	None
iv) Landslides?	DEIR pp. 4.7-18 to 4.7-20	No	No	No	None



	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
b) 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?	DEIR pp. 4.7-21 to 4.7-23	No	No	No	None
c) Result in substantial soil erosion or the loss of topsoil?	DEIR pp. 4.7-24 to 4.7-25	No	No	No	None
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?	DEIR pp. 4.7-25 to 4.7-26	No	No	No	None
e) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	DEIR pp. 4.7-26 to 4.7-27, FEIR pp. 3-6	No	No	No	None

## Discussion

- a) **Seismic Hazards.** The Sustainability Update EIR indicates that Santa Cruz County is located in a seismically active region of California, between two major Holocene-active faults, including the San Andreas Fault, located along the northeast county boundary, and the San Gregorio Fault, located along the northwest county coast. The EIR found that future development as a result of the Sustainability Update could occur on lands subject to seismic hazards, including active faulting, off-fault ground cracking, liquefaction, lateral spreading, seismically induced landslides, differential settlement, and collapsible soils. However, anticipated future development would not cause or exacerbate the potential for such seismic hazards to occur. Adherence to existing regulations and standards, including the CBC, the County’s Building Regulations, and various policies and actions established in the proposed Sustainability Update and listed in Table 4.7-2 of the Sustainability Update EIR (Draft EIR volume), would minimize seismic-related impacts. Therefore, the EIR concluded that potential impacts related to seismic hazards as a result of future development resulting from implementation of the Sustainability Update would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, primarily concentrated within the County’s USL. Because the potential sites identified in the 2023 Housing Element are located in the same geographical area as the Sustainability Update, residential development resulting from the Housing Element would be within the scope of the seismic hazards impacts analyzed in the Sustainability Update EIR. Future residential development occurring under the 2023





Housing Element would also be subject to the CBC, County Building Regulations, and all applicable General Plan/LCP policies and SCCC regulations. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to seismic hazards.

- b) **Non-Seismic Geologic Hazards.** The Sustainability Update EIR indicates that some areas of the county are subject to other non-seismic geologic hazards including landslides and soil collapse in mountainous areas and coastal erosion including landslides, coastal bluff retreat, and unstable soils in coastal areas. As indicated in the EIR, the county is not in an area of regional ground subsidence and no subsidence-related impacts would occur. The EIR found that future development accommodated by the Sustainability Update could occur in areas subject to coastal erosion that could result in bluff retreat, landslides and unstable soils and in areas of steep slopes and potential slope instability. Impacts would be minimized through required adherence to the SCCC, including the County's Building Regulations, Geologic Hazard Code, Grading Ordinance, and Erosion Control Ordinance, as well as the General Plan/LCP policies listed in Table 4.7-3 of the Sustainability Update EIR (Draft EIR volume). Therefore, the Sustainability Update EIR concluded that, with compliance with County policies and state and local regulations, potential impacts to non-seismic geologic hazards due to future development resulting from implementation of the Sustainability Update would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, primarily within the County's USL. Because the potential sites identified in the 2023 Housing Element are located in the same geographical area as the Sustainability Update, residential development resulting from the Housing Element would be within the scope of the non-seismic geological hazards impacts analyzed in the Sustainability Update EIR. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to geological hazards.

- c) **Soil Erosion and Loss of Topsoil.** The Sustainability Update EIR indicates that most of the soils in the county consist of loamy sands and sandy loams, which are susceptible to erosion. The EIR found that future development accommodated by the Sustainability Update would result in ground disturbance during clearing and grading, which could in turn result in soil erosion and loss of topsoil, particularly on steep slopes. Grading and construction activities occurring as a result of future development accommodated by the Sustainability Update would be required to adhere to SCCC and General Plan/LCP requirements, including best practices to manage grading, erosion, and stormwater runoff. General Plan/LCP policies that would serve to reduce soil erosion and loss of topsoil are listed in Table 4.7-4 of the Sustainability Update EIR (Draft EIR volume). In addition, for development including ground disturbance of more than one acre, grading and construction would be completed in compliance with the State Water Resources Control Board (SWRCB) Construction General Permit, which would minimize soil erosion and off-site transport of soils through implementation of a Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practices (BMPs). Therefore, the Sustainability Update EIR concluded that, with compliance with County policies and state and local regulations, the Sustainability Update and future development resulting from implementation of the Sustainability Update would result in a less-than-significant impact related to soil erosion and loss of topsoil.



The proposed 2023 Housing Element could indirectly result in new residential development. Because the potential sites identified in the 2023 Housing Element are located in the same geographical area as the Sustainability Update, residential development resulting from the Housing Element would be within the scope of the soils impacts analyzed in the Sustainability Update EIR. All future development would be subject to the same regulations and policies described in the Sustainability Update EIR, including adherence to the SCCC, Construction General Permit, and General Plan/LCP policies, thereby minimizing soil erosion and loss of topsoil. Thus, future residential development resulting from the proposed Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to soil erosion and loss of topsoil.

- d) **Expansive Soils.** Expansive soils are clay-rich deposits that expand when wet and contract when dry. Alternating soil expansion and contraction can result in distress and damage to overlying structure foundations and/or infrastructure. The Sustainability Update EIR found that future development accommodated by the Sustainability Update could potentially be located on expansive soil but, with incorporation of standard geotechnical engineering, in compliance with the County Building Regulations and the CBC, would not create substantial direct or indirect risks to life or property. Therefore, the EIR determined that the impact related to expansive soils due to future development resulting from the Sustainability Update would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, which, like development under the Sustainability Update, could potentially occur on sites with expansive soils. Because the potential sites identified in the 2023 Housing Element are located in the same geographical area as the Sustainability Update, residential development resulting from the Housing Element would be within the scope of the expansive soils impact analyzed in the Sustainability Update EIR. All future residential development resulting from the proposed 2023 Housing Element would also be required to adhere to the County Building Regulations and CBC, and implement standard geotechnical engineering practices as discussed in the EIR. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to expansive soils.

- e) **Unique Geologic Features and Paleontological Resources.** The Sustainability Update EIR indicates that four areas within the county are identified as being “Significant Hydrological, Geological, and Paleontological Features:” Majors Creek Canyon, Martin Road, Table Rock, and Wilder Creek. Seven areas within the county are likely to have rare or unique geological and paleontological resources related to their scarcity, scientific or educational value, aesthetic quality, or cultural significance. The largest of these areas is located between the Lompico and Glenwood areas in the Santa Cruz Mountains and Scotts Valley. Another area is located within the north coast and urban areas on the northwestern edge of the City of Santa Cruz. The remaining five areas are all located within the north coast area, with two occurring close together north of Bonny Doon, and three located on marine terraces along the coast between Davenport and the City of Santa Cruz.

The Sustainability Update EIR determined that potential development that could occur under the Sustainability Update could potentially damage or destroy unique geologic features or paleontological resources, if present. However, the EIR indicates that implementation of General Plan/LCP policies outlined in Table 4.7-5 of the Sustainability Update EIR (Draft EIR volume) would serve to avoid or reduce potential



impacts to these features. Additionally, the SCCC Chapter 16.44 seeks to protect paleontological resources and provides methods and regulations for the identification and treatment of paleontological resources within the county, including preparation of a paleontological survey for specified developments in areas of known paleontological resources, and implementation of measures to protect resources during ground disturbing development activities. Therefore, the EIR concluded that that, with implementation of these policies and regulations, future development accommodated by the Sustainability Update would have a less-than-significant impact on unique geologic features and paleontological resources.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, which, like development under the Sustainability Update, could potentially damage or destroy unique geologic features or paleontological resources, if present. However, like development under the Sustainability Update, all future residential development indirectly resulting from the 2023 Housing Element would also be required to adhere to the General Plan/LCP policies and SCCC related to protection of unique geologic features and paleontological resources. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to unique geologic features and paleontological resources.

### Mitigation Measures

None were identified in the Sustainability Update EIR, and none are required with the proposed project as a significant impact has not been identified.

### Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to geology and soils than previously evaluated in the Sustainability Update EIR.

## 4.3.8 Greenhouse Gas Emissions

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>VIII. GREENHOUSE GAS EMISSIONS</b> – Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	DEIR pp. 4.8-29 to 4.8-32	No	No	No	None



	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	DEIR pp. 4.8-32 to 4.8-37, FEIR pp. 3-7	No	No	No	None

### Discussion

a) **Greenhouse Gas Emissions.** The Sustainability Update EIR indicates that future development accommodated by the Sustainability Update would result in the generation of GHG emissions from off-road equipment and vehicles during construction; however, because the scale and timing of future development was unknown, the EIR did not quantify construction GHG emissions. The EIR included an estimate of operational GHG emissions that would be generated by future development accommodated by the Sustainability Update from area, energy, mobile, waste, and water sources. While GHG emissions from area, energy, waste, and water sources would be higher under the Sustainability Update relative to existing (2019) conditions, GHG emissions from mobile sources would be lower under the Sustainability Update than existing conditions due to cleaner on-road mobile sources in the future. As a result of the reduction in mobile source emissions, the EIR found that overall GHG emissions generated by the Sustainability Update in 2040 would be approximately 195,109 MT CO<sub>2</sub>e per year less than existing (2019) conditions. In addition, as identified in Table 4.8-5 of the Sustainability Update EIR (Draft EIR volume), the Sustainability Update included several amended policies in the County’s General Plan/LCP that seek to increase energy efficiency and reduce VMT and GHG emissions, such as through the support of zero-emission vehicles and charging infrastructure and alternative transportation options. Therefore, the EIR concluded that the Sustainability Update and resulting development would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, resulting in a less-than-significant impact related to the generation of GHG emissions.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. As explained in Section 3.2, the County’s quantified objective for new housing construction (2,350 units) and potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units) total 4,250 housing units, which would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, if the County exceeds its new construction objective and meets its RHNA of 4,634 units and also considering housing units that have been constructed since certification of the Sustainability Update EIR (56), potential development could result in approximately 190 dwelling units over the 4,500 analyzed in the EIR. This amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR. The increase in approximately 190 residential units over what was analyzed in the Sustainability Update EIR would result in an incremental increase in GHG emissions; however, overall emissions would



remain below existing (2019) conditions due to the reduction in GHGs due to cleaner on-road mobile sources in the future, as described above. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to the generation of GHG emissions.

- b) **Conflict with GHG Reduction Plans.** The Sustainability Update EIR included an analysis of the potential for the Sustainability Update to conflict with relevant plans that include GHG reduction strategies, including the County of Santa Cruz Climate Action Strategy, AMBAG's 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), and CARB's Scoping Plan. The analysis in the EIR determined that the Sustainability Update would not conflict with the goals and GHG reduction strategies contained in these plans, resulting in a less-than-significant impact. Subsequent to the certification of the EIR, updates were made to the AMBAG 2045 MTP/SCS (adopted in June 2022) and 2022 CARB Scoping Plan (approved in December 2022). The major goals of the AMBAG 2045 MTP/SCS are the same as those evaluated in the Sustainability Update EIR for the 2040 MTP/SCS, which found that the Sustainability Update would not inhibit AMBAG from achieving any of the goals.

The 2022 Scoping Plan identifies measures for cutting GHG emissions and reducing the utilization of fossil fuels within California, transitioning to zero-emission transportation, and phasing out the use of petroleum and natural gas used for heating homes and buildings. It also sets a more aggressive goal to reduce carbon emissions by 48% below 1990 levels in 2030, which represents an 8% increase from the current SB 32 target of a 40% reduction. The Plan identifies three priority areas for local governments including electrification of transportation, reducing VMT, and decarbonization of buildings. As described in the Sustainability Update EIR, development accommodated by the Sustainability Update would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable. Therefore, the EIR concluded that the Sustainability Update would result in a less-than-significant impact related to potential conflicts with GHG reduction plans.

The County also adopted its first Climate Action Strategy in 2013, which identifies specific strategies to reduce GHG emissions and energy consumption. In 2022, subsequent to the certification of the Sustainability Update EIR, the County adopted an updated CAAP that provides actionable steps towards reducing GHG emissions, adapting to climate hazards, and ensuring the safety and well-being of those most vulnerable to climate change. Regarding energy conservation, the CAAP includes strategies for the elimination of fossil fuel use in new and existing housing. Combined with the 100% renewable electrical energy provided by 3CE by 2030, implementation of these strategies would reduce or eliminate GHG emission in new and existing housing. The CAAP recognizes that providing housing to meet community needs, focusing on infill housing within urban areas, can help to mitigate climate change, by reducing driving times and utilizing existing infrastructure.

The proposed 2023 Housing Element would not result in conflicts with existing plans adopted for the purpose of reducing GHG emissions. Future residential development would be in locations evaluated in the Sustainability Update EIR for which potential impacts related to potential conflicts with GHG reduction plans were found to be less than significant with implementation of the Sustainability Update. Furthermore, policies and programs in the proposed Housing Element align with a focus on infill housing in urban areas



and support for housing and increased density along and near transportation corridors, consistent with the County’s CAAP. Sites identified for potential housing in the draft Housing Element would tend to result in compact, infill development primarily within the USL, which would serve to reduce VMT and associated GHG emissions. In addition, all future residential development would be required to comply with applicable adopted plans. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to conflicts with GHG reduction plans.

### Mitigation Measures

None were identified in the Sustainability Update EIR, and none are required with the proposed project as a significant impact has not been identified.

### Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to GHG emissions than previously evaluated in the Sustainability Update EIR.

## 4.3.9 Hazards and Hazardous Materials

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:</b>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	DEIR pp. 4.9-17 to 4.9-19	No	No	No	None
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?	DEIR pp. 4.9-19 to 4.9-20	No	No	No	None
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	DEIR pp. 4.9-20 to 4.9-21	No	No	No	None





	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
d) Be located on a site that 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?	DEIR p. 4.9-21	No	No	No	None
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	DEIR pp. 4.9-21 to 4.9-22	No	No	No	None
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	DEIR pp. 4.15-32, 4.17-18 to 4.17-19	No	No	No	None

Discussion

a) **Routine Transport, Use, or Disposal of Hazardous Materials.** The Sustainability Update EIR indicates that a variety of commercial, industrial, and other land uses (i.e., agricultural uses) involve the handling, storage, and disposal of potentially hazardous materials. Commercial manufacturing, petroleum exploration, industrial fabrication, biotechnology, gas stations and other automotive-service-related businesses, and utilities may use potentially hazardous materials, including petroleum-based fuels, chlorinated solvents, acrylic coatings, corrosive or caustic additives, as well as chemical fertilizers, pesticides, and herbicides. Non-retail, commercial service and light industrial land uses such as auto services, storage, landscape/timber businesses, research and development, manufacturing, and processing uses are concentrated in the vicinity of 41<sup>st</sup> Avenue, Highway 1, and Soquel Drive, as well as pockets in Live Oak. The county does not currently have heavy industrial land use aside from quarries in the San Lorenzo Valley, Carbonera, and the North Coast, four of which are still active.

The Sustainability Update EIR addressed impacts associated with the routine transport, use, or disposal of hazardous materials, concluded that potential future development accommodated by the Sustainability Update could result in land uses that involve the routine use, transport, and disposal of hazardous materials, including pesticide use in agricultural operations, biological or other hazardous waste in medical facilities, and common hazardous household products in residential uses. In particular, new industrial development, expected to be primarily within the USL in the South County area with smaller areas in the San Lorenzo Valley and North Coast, would be expected to use some hazardous materials and generate



hazardous waste. The Sustainability Update EIR found that the type of industry and business that currently exist within the county and which are supported in the Sustainability Update are not the type that would be significant sources of hazardous material use or generators of substantial amounts of hazardous waste.

The EIR notes that strict federal and state regulations are in place for the transport of hazardous materials and wastes, and state and local regulations for the storage and handling of hazardous materials, including SCCC 7.100, which requires Hazardous Materials Business Plans (HMBPs) for quantities of hazardous materials that are less than the state thresholds. Implementation of existing General Plan policies summarized in Table 4.9-3 of the Sustainability Update EIR (Draft EIR volume) in the Public Safety Element of the County's General Plan/LCP would serve to reduce impacts related to the transport, use, or disposal of hazardous materials. The Sustainability Update EIR concluded that with adherence to applicable regulations, as well as implementation of existing General Plan/LCP policies, the impact related to routine transport, use, and disposal of hazardous materials as a result of development accommodated by the Sustainability Update would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development primarily within the USL. Construction activities would involve the use of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, adhesive materials, grease, solvents, and architectural coatings. Operation of residential uses would also involve the use of common hazardous household products, as described in the Sustainability Update EIR. All future residential development would be required to comply with applicable regulations governing the transport, use, and disposal of hazardous materials, as well as General Plan/LCP policies and SCCC regulations. The Sustainability Update EIR found routine transport, use and disposal of hazardous materials would be primarily associated with industrial and heavy commercial uses and not residential uses. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to hazards due to the routine transport, use, and disposal of hazardous materials.

- b) **Creation of a Significant Hazard.** The Sustainability Update EIR indicates that the county contains current and former land uses involving hazardous materials, resulting in the potential for past and/or ongoing site contamination. Hazardous materials may be found in the materials of older buildings (e.g., asbestos-containing materials, lead-based paint, or polychlorinated biphenyls [PCBs]), or may have been used routinely in the operation of land uses such as auto repair shops, agricultural fields, medical offices, dry cleaners, and photo processing centers. In addition, the county contains numerous sites where known releases of hazardous materials have occurred in the past (e.g., leaking underground storage tank [LUST] sites), which are primarily concentrated in urban areas and documented in databases of the Department of Toxic Substances Control and SWRCB.

The Sustainability Update EIR addressed impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials, and concluded that potential future development accommodated by the Sustainability Update could expose the public to hazardous materials due to siting near contaminated soils or groundwater, airborne releases, or accidental releases. Remediation of contaminated sites occurring through new development accommodated by the Sustainability Update would ultimately reduce the future risk of hazardous materials releases in remediated areas, but site cleanup could entail transport of hazardous materials off site, which could result in accidental



release. Businesses that generate airborne toxic emissions would be subject to the MBARD's Rule 1000, requirements for regulating sources of TACs. This includes preparation of a health risk assessment in situations where TACs may exceed regulatory thresholds. Demolition or renovation of existing buildings which may contain hazardous materials would also be subject to regulations, including Occupational Safety and Health Administration (OSHA) standards to protect workers, MBARD's Rule 306 for reporting and investigation of certain buildings with asbestos as established under federal law, and the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) set forth in 40 CFR Part 61 to prevent "visible emissions" of asbestos when buildings are demolished or retrofitted. Under federal law, a building must be inspected for asbestos prior to demolition or renovation, and federal and state agencies must be notified prior to demolition. According to the CARB, removal and disposal of asbestos procedures and controls must be specified in the notification form. Therefore, the Sustainability Update EIR concluded that with adherence to applicable regulations, the impact related to potential upset or accidents leading to release of hazardous materials would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development primarily within the USL. Future residential development could be located on sites with existing buildings that contain hazardous building materials such as asbestos or lead-based paint or could be located on sites where past hazardous materials releases occurred. Thus, construction activities could have the potential to release hazardous building materials into the environment during demolition of existing structures, or potentially hazardous soil-based materials into the environment during site grading and excavation. However, as indicated in the Sustainability Update EIR, future development would be required to comply with applicable state and local regulations, which would apply to residential development as well if located in an area where release of hazardous materials is suspected. Thus, future development resulting from the proposed 2023 Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to upset and accident conditions involving the release of hazardous materials.

- c) **Hazardous Materials Near Schools.** The Sustainability Update EIR indicates that the county contains 10 public school districts with several public schools, as well as a number of private schools, charter schools, alternative education schools, and the University of California and Cabrillo College campuses. The Sustainability Update EIR, evaluated potential impacts associated with hazardous materials use or emissions near schools, and concluded that potential future development accommodated by the Sustainability Update that uses hazardous materials or emits TACs within 0.25 mile of school facilities could expose students and workers to these materials. However, as discussed above, hazardous material use is regulated by a number of state and local agencies providing for proper storage, use, and disposal of these materials, and TACs are regulated by the MBARD to prevent exceedances of regulatory thresholds which could result in public health impacts. Therefore, the Sustainability Update EIR concluded that, with adherence to applicable regulations, the impact related to hazardous emissions or handling of hazardous materials with 0.25 mile of schools would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, some of which may be located with 0.25 mile of existing or proposed schools. Residential land uses are not associated with TAC emissions and have a relatively low likelihood of emitting hazardous emissions or handling hazardous materials. Nonetheless, as indicated in the Sustainability Update EIR, all



future residential development would be required to comply with applicable regulations regarding hazardous emissions and hazardous materials. Thus, future development resulting from the proposed 2023 Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to emission of hazardous emissions or handling of hazardous materials near schools.

- d) **Hazardous Materials Release Sites.** As described above, the Sustainability Update EIR indicates that there are numerous sites within the county that are included on the list of hazardous material sites compiled pursuant to Government Code section 65962.5 (i.e., the Cortese List). At the time of the publication of the Sustainability Update EIR, the county contained 150 sites on the Cortese List, most of which were LUST sites. The Sustainability Update EIR, which evaluated impacts associated with Cortese List sites, concluded that any future development project that may occur as a result of the Sustainability Update would be required to identify whether a proposed site is on the Cortese List as part of the CEQA environmental review process, and if so, would be required to complete site remediation measures in accordance with state and/or federal laws. Therefore, the Sustainability Update EIR concluded that, with adherence to applicable regulations, the impact related to future development on a site that is included on the Cortese List would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. If future residential development were proposed on a site with a known hazardous material release or residual contamination in soils or groundwater, development activities would be subject to review and oversight by the applicable regulatory agency as addressed in the Sustainability Update EIR, which would determine appropriate remedial actions that would be required. All future residential development would be required to comply with applicable regulations regarding site contamination and remediation. Thus, future development resulting from the proposed 2023 Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to Cortese List sites.

- e) **Airport Safety Hazards.** The Sustainability Update EIR indicates that the county contains one public airport and three private airports: the public Watsonville Municipal Airport at 100 Aviation Way, the private Monterey Bay Academy airport at 681 Beach Drive, the private Las Trancas Airport at 3564 SR 1, and the private Bonny Doon Village Airport at 8647 Empire Grade. SCCC Chapter 13.12, Airport Combining Zone District, regulates land uses and development standards within six safety zones surrounding the Watsonville Municipal Airport. The Sustainability Update EIR, which evaluated impacts associated with airport hazards, found that the Sustainability Update included a number of policies in the Built Environment Element that would serve to protect residents from public safety hazards from aircraft, as summarized in Table 4.94 of the Sustainability Update EIR (Draft EIR volume). The Sustainability Update EIR concluded that, with implementation of the proposed policies and compliance with other federal and state regulations regarding airports, future development would not be exposed to aviation safety hazards, and the impact would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, which would primarily be concentrated within the county's USL, similar to potential development accommodated by the Sustainability Update. All future residential development would be



required to comply with applicable regulations regarding airport safety zones General Plan/LCP policies should any future development be located within designated airport zones. Thus, future development resulting from the proposed 2023 Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to airport hazards.

f) **Emergency Response and Evacuation.** See discussion in Sections 4.3.17 and 4.3.20 below.

### Mitigation Measures

None were identified in the Sustainability Update EIR, and none are required with the proposed project as a significant impact has not been identified.

### Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to hazards and hazardous materials than previously evaluated in the Sustainability Update EIR.

## 4.3.10 Hydrology and Water Quality

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>X. HYDROLOGY AND WATER QUALITY – Would the project:</b>					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	DEIR pp. 4.10-33 to 4.10-38, FEIR pp. 3-10 to 3-11	No	No	No	None
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	DEIR pp. 4.10-38 to 4.10-43, FEIR pp. 3-11	No	No	No	None



	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> <li>i) result in substantial erosion or siltation on or off site;</li> <li>ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;</li> <li>iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or</li> <li>iv) impede or redirect flood flows?</li> </ul>	DEIR pp. 4.10-43 to 4.10-47	No	No	No	None
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	DEIR pp. 4.10-47 to 4.10-48	No	No	No	None
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	DEIR pp. 4.10-48 to 4.10-49	No	No	No	None
f) 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?	DEIR pp. 4.10-49 to 4.10-51	No	No	No	None

## Discussion

- a) **Violation of Water Quality Standards or Waste Discharge Requirements or Substantially Degrade Water Quality.** The Sustainability Update EIR reported that there are numerous streams throughout the county, which total over 850 miles; the San Lorenzo River and Pajaro River are the two rivers in the county. The mountainous topography of the county encompasses 15 principal watersheds. The Sustainability Update





EIR describes existing surface and groundwater quality issues in the county, including impaired surface waters designated under the Clean Water Act. Surface water quality can be affected by pollution from point sources, such as discharge from industrial facilities, or from nonpoint sources, such as pollutants or contaminants that are carried by stormwater runoff. Within the county, water quality degradation also can result from erosion, which leads to sedimentation, as well as from urban contaminants in urban stormwater runoff, pesticides and fertilizers in runoff from agricultural lands, and infiltration from faulty septic systems. Stormwater pollutants present in the watersheds of the county include metals, solvents, paint, concrete, masonry products, detergents, vehicle fuels and fluids, oil and grease, pesticides and herbicides (organic compounds and nutrients), debris and litter, bacteria, pathogens and oxygen demanding compounds, and sediment and silt. Groundwater quality can be adversely affected by a range of constituents, including minerals, pathogens, nitrates, and toxic materials as explained in the Sustainability EIR.

The Sustainability Update EIR found that future development that could be accommodated by the Sustainability Update could result in potential water quality degradation due to increased stormwater runoff with associated urban contaminants and potential erosion due to grading and construction disturbances. However, the EIR concluded that all future development projects would be required to adhere to the Central Coast Regional Water Quality Control Board (RWQCB) requirements as enforced by the County. Future development projects would be required to prepare and submit stormwater drainage plans that show compliance with the County's stormwater and water quality control requirements established in Chapter 7.79 of the SCCC and also would be required to comply with County grading and erosion control regulations in the SCCC. In addition, implementation of existing and proposed General Plan/LCP policies summarized in Table 4.10-5 of the Sustainability Update EIR (Draft EIR volume), also would serve to avoid and/or minimize potential impacts of future development related to water quality degradation, including potential impacts to waters of the Monterey Bay. In particular, the ARC Element includes a policy that requires development to be designed to minimize water pollution from urban runoff (ARC-4.1.14).

Therefore, the Sustainability Update EIR concluded, that with implementation of County policies and compliance with state regulations and local regulations, including the post-construction requirements of Central Coast RWQCB and County stormwater regulations, future development accommodated by the Sustainability Update would avoid or minimize adverse water quality effects associated with stormwater runoff, erosion, and discharges, resulting in a less-than-significant impact. It is noted that EIR concluded that potential water quality degradation due to runoff from agricultural lands and faulty or leaking septic systems were not anticipated due to existing regulations.

The proposed 2023 Housing Element could indirectly result in new residential development. The majority of potential housing sites identified in the proposed Housing Element are located within the County's USL and future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts related to water quality degradation were found to be less than significant. Future residential development would be subject to the same regulations and policies described above, including adherence to and compliance with state and local regulations and policies, including the SCCC, Construction General Permit, and General Plan/LCP policies, thereby minimizing or avoiding impacts related to water quality degradation. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to water quality degradation.



- b) **Groundwater Impacts.** The Sustainability Update EIR reported that Santa Cruz County overlies three different groundwater basins including the Santa Margarita Groundwater Basin, the Santa Cruz Mid-County Groundwater Basin (Mid-County Basin), and the Pajaro Valley Groundwater Subbasin, which are all used as a primary source of water for urban and agricultural land uses within the county. According to the basin prioritization in accordance with the Sustainable Groundwater Management Act (SGMA), Santa Cruz Mid-County Basin and Pajaro Valley Subbasin are considered high priority basins, and Santa Margarita is a medium priority basin. Both high and medium priority basins are required to adhere to the requirements of SGMA by preparing and implementing a groundwater sustainability plan (GSP). None of these three groundwater basins, however, are adjudicated but all three are in some level of overdraft where more water has been extracted from the aquifers than is naturally recharged. The Santa Cruz Mid-County Basin and Pajaro Valley Subbasin are both designated as “critically overdrafted,” resulting in an accelerated timeline for SGMA implementation. The Groundwater Sustainability Agency set up for each basin pursuant to state law are implementing plans to reach sustainable groundwater levels in the next 20 years and have made progress in meeting sustainable groundwater management goals as summarized below for each basin.

The County designates the areas where major groundwater recharge or infiltration is known to occur as Primary Groundwater Recharge areas on General Plan/LCP Resource Constraints Maps and County GIS system. These areas are locations where local soil conditions and underlying geologic formations allow for infiltration and percolation of rainfall and runoff into groundwater basins. Land divisions and density are regulated by County policy in primary groundwater recharge areas.

The Sustainability Update EIR found that future development and redevelopment resulting from the Update would result in additional demands for potable water supplies that are provided by groundwater resources in three groundwater basins in the county, two of which are experiencing seawater intrusion (Mid-County Basin and Pajaro Valley Subbasin), and the Pajaro Valley Subbasin also is in an overdraft condition. Development potentially accommodated by the Sustainability Update would primarily occur within the county’s urbanized areas. The net increase in residential growth associated with the Sustainability Update by 2040 was estimated to be approximately 4,450 housing units and a total of 6,209,500 square feet in non-residential growth, although the EIR indicated that some of this potential development would occur under the existing General Plan/LCP without the proposed project.

As indicated above, the three different groundwater basins/subbasins are all subject to implementation of sustainable groundwater management requirements of SGMA and either have completed or are in the midst of completing GSPs (or alternative). The Sustainability Update EIR reported that current trends have shown that improvements have been made in management of the basins even during extended drought periods. The estimated increased demands on groundwater indirectly resulting from the Sustainability Update due to future development were determined to be relatively modest. The Sustainability Update included revised goals and policies in the ARC Element of the General Plan, which include long-term sustainable management and conservation of water and groundwater resources. In addition, implementation of General Plan/LCP policies summarized in Table 4.10-6 in the Sustainability Update EIR (Draft EIR volume) also would serve to avoid and/or minimize potential impacts related to groundwater supplies or recharge. Considering the long-term planning measures that are required by SGMA and implementation of the GSPs, combined with the sustainable policies of the proposed project, the EIR concluded that increased demands from future development would not substantially decrease groundwater



supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin, resulting in a less-than-significant impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, and future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR. The majority of potential housing sites identified in the proposed Housing Element (approximately 82%) are located within the County's USL, which is similar to what was evaluated in the Sustainability Update EIR with approximately 78% of new dwelling units estimated in the USL. As explained in Section 3.2, the County's quantified objective for new housing construction (2,350 units) and potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units) total 4,250 housing units, which would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, if the County exceeds its new construction objective and fully meets its RHNA of 4,634 units and also considering housing units that have been constructed since certification of the Sustainability Update EIR (56), potential development could result in approximately 190 dwelling units over the 4,500 analyzed in the EIR. This amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR, although it could occur within the impacted groundwater basins. This amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR, and could be within service areas of potentially impacted water agencies. Even considering a worst-case scenario in which a slightly increased amount of residential development over the EIR estimate could occur as a result of the Housing Element, this amount would incrementally, but not substantially, increase the severity of potential impacts to groundwater supplies given the small amount of potential increased demand, implementation of County General Plan/LCP policies that require that development be allowed only where adequate water supplies are available, and that all public water purveyors would have to approve new connections as part of future development project reviews. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to groundwater supplies and recharge.

- c) **Stormwater Drainage.** Stormwater runoff in the county is conveyed in a number of man-made and natural runoff conveyance systems discharging to various drainages. Stormwater runoff flows overland via sheet flow and channels and in developed areas via streets, gutters and storm drain pipes. In some locations, runoff travels relatively long distances before reaching an inlet or receiving water and can form small ponds that either infiltrate, transpire evaporate over time. The storm drain inlet types range from older inlets to more modern gutter grates.

The Sustainability Update EIR found that future development that could be accommodated by the Sustainability Update could result in increased stormwater runoff associated with new impervious surfaces, but would not result in a substantial alteration of existing drainage patterns, either through alteration of a stream or through introduction of impervious surfaces that would lead to erosion, flooding or drainage issues. County regulations require preparation and implementation of a stormwater Management Plan for any new developments larger than 5,000 square feet in size. Per the County's requirements, the plan must show how stormwater overflow will be conveyed and controlled and that runoff shall not negatively impact neighboring properties or stormwater (drainage) pathways. Thus, all future development projects would be



subject to the County's stormwater regulations that require preparation of stormwater management plans to meet County standards.

Furthermore, the EIR found that General Plan/LCP policies summarized in Table 4.10-7 in the Sustainability Update EIR (Draft EIR volume) would serve to avoid or minimize impacts related to stormwater drainage resulting from future development. In particular, Policy PPF-4.4.1 requires that runoff levels with new development or redevelopment be maintained at predevelopment rates for a minimum design storm as determined by County Design Criteria by requiring projects to provide both on- and off-site improvements, including on-site percolation methods. These policies and required compliance with County stormwater regulations would ensure that increased stormwater runoff resulting from future development would be designed to prevent offsite impacts. SCCC chapters 16.10 and 16.13 include requirements to minimize injury, loss of life, and damage to public and private property floods and coastal processes. Therefore, the Sustainability Update EIR concluded that compliance with existing regulatory requirements would ensure that stormwater generated by construction and operation of future development projects accommodated by the Sustainability Update would not substantially change existing drainage patterns or result in adverse erosion/siltation, flooding, or storm drain capacity issues, resulting in a less-than-significant impact.

The proposed 2023 Housing Element could indirectly result in new residential development. The majority of potential housing sites identified in the proposed Housing Element are located within the County's USL, and future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts related to stormwater drainage were found to be less than significant. Future residential development would be subject to the same regulations and policies described above, including adherence to and compliance with state and local regulations and policies, including the SCCC and General Plan/LCP policies, thereby minimizing or avoiding impacts related to drainage. Thus, future residential development resulting from the proposed Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related stormwater drainage.

- d) **Release of Pollutants Due to Flooding.** Flooding can occur when stormwater runoff exceeds the conveyance capacity of existing drainages or control systems, dam or levee failures, high tides/storm surges, tsunamis, sea level rise, or other causes. Floods usually occur in relation to precipitation. Within Santa Cruz County, there are numerous areas subject to flooding due to rivers, creeks, or coastal storms. The two main rivers in the county that are subject to flooding are the Pajaro River and the San Lorenzo River.

The Sustainability Update EIR found that some future development that could be accommodated by the Sustainability Update Some of these projects could be located within flood prone, tsunami, or seiche hazard areas. However, the EIR concluded that future development and redevelopment projects would be required to adhere to SCCC chapters 16.10 and 16.13, which include requirements to avoid inappropriate land uses in flood zones. In addition, construction in a flood-prone area would also require flood protection measures incorporated into the project design to avoid inundation. Future development also could include industrial uses that could require the use and storage of hazardous materials or otherwise involve sources of pollutants that adversely affect waters in the event of inundation due to flooding. Any commercial or industrial land uses would be required to adhere to existing regulatory requirements for storage of



hazardous materials, as discussed in Section 4.9, Hazards and Hazardous Materials, of the Draft EIR. State and local regulations require all businesses that store or handle specified quantities of hazardous materials to prepare and implement a HMBP and obtain a Hazardous Materials Permit. Therefore, the Sustainability Update EIR concluded that required compliance to existing regulatory requirements related to development in a flood zone and related to the storage and handling of hazardous materials and wastes would reduce the potential impact of potential release of pollutants from inundation due to future development to a less-than-significant level.

The proposed 2023 Housing Element could indirectly result in new residential development. The majority of potential housing sites identified in the proposed Housing Element are located within the County's USL, and future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR for which potential impacts related to release of pollutants due to flooding were found to be less than significant. Future residential development would be subject to the same regulations and policies described above including adherence to and compliance with requirements regarding location in flood prone areas and storage of hazardous materials in such areas.. Thus, future residential development resulting from the proposed Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related release of pollutants due to flooding. Furthermore, as discussed in the Sustainability Update EIR, potential accidental release of pollutants due to inundation was found to occur with industrial uses to which the residential development indirectly resulting from the Housing Element would not contribute.

- e) **Conflicts with Water Quality Control Plan or Sustainable Groundwater Management Plan.** The Sustainability Update EIR reported that future development projects potentially accommodated by the Sustainability Update would be required to adhere to any applicable waste discharge and other regulatory requirements. The EIR concluded that the Sustainability Update includes policies that would be applied to future development to protect water quality, and thus, these policies would be consistent with goals of the Central Coast Basin Plan for water quality and would not conflict or obstruct implementation of the water quality control plan for the region.

The Sustainability Update EIR concluded that potential future development and redevelopment projects indirectly resulting from the proposed project would represent an increase in water demands, but projected water demand increases alone would not necessarily result in a conflict with the three different groundwater sustainability plans that are or will be implemented within the three underlying groundwater basins/subbasins. SGMA requires that the GSPs identify mechanisms to achieve a sustainable yield by 2040. Future development would occur in accordance with the proposed policies of the General Plan/LCP ARC Element, which have long-term sustainable management and water conservation policies that would be consistent with the groundwater sustainability plans in the county, as well as existing SCCC regulations. Therefore, the EIR concluded that the Sustainability Update's policies regarding protection of groundwater resources, which would be consistent with directives in the GSPs, and would not conflict with or obstruct implementation of a GSP, resulting in *no impact*.

The proposed 2023 Housing Element could indirectly result in new residential development. The majority of potential housing sites identified in the proposed Housing Element are located within the County's USL, and future residential development would be in locations evaluated in the Sustainability Update EIR. Future





residential development would be subject to the same regulations and policies described above, including adherence to and compliance with state and local regulations and policies regarding water quality, discharges, and groundwater. Thus, future development resulting from the proposed Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to potential conflicts with water quality control plan or a GSP.

- f) **Inadequate Soils for Septic or Alternative Wastewater Systems.** The Sustainability Update EIR indicates that areas not served by wastewater disposal service providers outside of the USL typically have septic systems, also referred to as onsite wastewater treatment systems (OWTS). The EIR found that future development accommodated by the Sustainability Update is expected to primarily occur within the County's USL, and potential future development in planning areas outside of the USL is not expected to increase beyond what could occur under the existing General Plan/LCP. New residential and non-residential uses in rural areas would utilize OWTS for wastewater treatment and disposal. Some areas of the county may have geologic features or soils that are incapable of adequately supporting, or are incompatible with, the installation of OWTS, thereby potentially leading to adverse groundwater quality impacts if OWTS are not properly sited, designed, or maintained. Constraints include areas with noted high groundwater conditions, areas with clay soil conditions, areas with sandy soils or areas in proximity to streams or water supply sources. The EIR found that future development and redevelopment projects accommodated by the Sustainability Update would be required to adhere to County regulations set forth in Chapter 7.38 of the SCCC, which regulate OWTS. The regulations require a permit for the construction, reconstruction, repair, addition, or upgrade of any individual sewage disposal system or any portion thereof on any property within the unincorporated area of the county. The regulations also set forth certain prohibitions and lot size requirements for OWTS. Future development also would be subject to requirements of the Local Area Management Plan, which was prepared by the County to meet requirements set forth in the State OWTS Policy. In addition, the General Plan/LCP PPF Element includes policies that require adequate provision of OWTS as summarized in Table 4.108 of the Sustainability Update EIR (Draft EIR volume). With required compliance with these regulations, the Sustainability Update EIR found that potential impacts related to adequate disposal capabilities of OWTS that are installed to support future development would be less than significant.

The proposed 2023 Housing Element could indirectly result in new residential development, primarily within the County's USL. Most of the sites on the Housing Site Inventory in the proposed Housing Element and all of the rezone sites are located within the USL where development would be served by wastewater disposal service providers. Potential future residential development could occur outside of the USL and, if OWTS are required, would be required to comply with all SCCC regulations for OWTS, requirements of the LAMP, and General Plan/LCP policies pertaining to OWTS as summarized in Table 4.10-8 of the EIR. Furthermore, future residential development would be in locations evaluated in the Sustainability Update EIR. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to OWTS.

## Mitigation Measures

None were identified in the Sustainability Update EIR, and none are required with the proposed project as a significant impact has not been identified.





## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to hydrology and water quality than previously evaluated in the Sustainability Update EIR.

### 4.3.11 Land Use and Planning

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>XI. LAND USE AND PLANNING – Would the project:</b>					
a) Physically divide an established community?	DEIR pp. 4.11-15 to 4.11-16	No	No	No	None
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?	DEIR pp. 4.11-16 to 4.11-33, FEIR pp. 3-11 to 3-12	No	No	No	None

## Discussion

- a) **Physical Division of Established Community.** The Sustainability Update EIR indicates that existing communities, neighborhoods, and village centers that are developed at urban densities are located along the coast in the Live Oak, Soquel, and Aptos planning areas, as well as in the vicinity of the City of Watsonville and in towns and villages in the San Lorenzo Valley. Much of the county’s urban coastal development is organized around existing corridors. If adopted, the Sustainability Update would continue to guide the location, form, and intensity of all development within unincorporated Santa Cruz County for the next 20 years. The Sustainability Update EIR found that future development resulting from the Sustainability Update would have the potential to divide an established community if infrastructure (e.g., roadways, utilities) or other incompatible land uses were developed within an established community. However, the EIR determined that the Sustainability Update would primarily promote future development within established communities where public infrastructure and services already exist, and numerous policies in the General Plan/LCP, summarized in Table 4.11-4 of the Sustainability Update EIR (Draft EIR volume), would provide for land use compatibility to ensure that established communities remain intact while accommodating future development. Therefore, the EIR found that future development resulting from the Sustainability Update would result in no impact related to physical division of an established community.



Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, primarily concentrated within the County's USL. The Housing Element does not propose specific development on any specific site, but rather identifies sites throughout the county where residential development could be accommodated. These sites are primarily located in urban areas, and in the same geographical locations evaluated in the Sustainability Update EIR. Many sites represent infill sites, development on which would not divide an established community, and would be consistent with General Plan policies to direct infill development in urban areas. Similar to the Sustainability Update, individual parcels within these areas would not be large enough such that development could result in a physical division of an established community. Future residential development would be in locations evaluated in the Sustainability Update EIR. Thus, future development resulting from the proposed 2023 Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which no impact was identified related to physical division of an established community.

- b) **Conflict with Plans, Policies, and Regulations.** The Sustainability Update EIR reviewed the Sustainability Update to identify potential conflicts with policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect, including the General Plan, LCP/Coastal Act, AMBAG's 2040 MTP/SCS, and Watsonville Airport Land Use Compatibility Plan, and found no apparent conflicts between the Sustainability Update and such land use plans, policies, or regulations. The EIR determined that because the Sustainability Update includes objectives and policies consistent with these adopted plans, and requires coordination with regional plans and programs, adoption and implementation of the Sustainability Update would not cause a significant environmental impact due to a conflict with a regional plan, policy, or program, and the impact would be less than significant.

The proposed 2023 Housing Element includes amending General Plan/LCP land use designations and/or zoning of 32 vacant and/or underutilized properties to provide adequate sites for residential development. These parcels are proposed for intensified land uses in support of the Sustainability Update's policies that encourage and support development intensification in urban areas and along major transportation corridors. The proposed 2023 Housing Element, including policies, programs, and proposed land use designation/zoning amendments, is consistent with policies that were included in the BE Element of the Sustainability Update that address housing and mixed-use development, as summarized in Table 1 above. The BE Element addresses residential uses, among other land uses, and includes goals, policies, and objectives that generally support a range of housing types, as well as infill, mixed-use, and higher density projects. All future residential development would be required to comply with General Plan/LCP policies. Thus, future development resulting from the proposed 2023 Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to conflicts with plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect.

While none of the proposed Housing Element policies or programs or subsequent future residential development would conflict with plans, policies or regulation adopted for the purpose of avoiding or mitigating an environmental effect, it is noted that five of the 32 parcels proposed for land use designation and/or zoning amendments are currently designated Parks, Recreation, and Open Space (O-R). All are proposed for redesignation to high density residential designations, and three would continue to include the O-R designation. The PFF Element includes Policy PPF-1.2.3, which establishes overlay districts to



designate specific parcels proposed to be acquired in whole or in part for future public park sites and references Appendix M. PPF-2.2c further directs the County to review new development applications for consistency with Appendix M of the General Plan/LCP to ensure that designated park sites remain available for recreation opportunities. None of the five parcels proposed to be wholly or partially redesignated from O-R to residential uses are included in Appendix M, and none are zoned “D”, the combining district to denote a designated park. Thus, the proposed redesignation/rezoning of these parcels would not conflict with policies or regulations to protect designated parks.

There are also eight parcels proposed for land use designation and/or zoning amendments that are partially designated Urban Open Space (O-U) that would be removed on two of the parcels. However, Policy ARC-9.2.3 allows development on portions of a site with a designation other than O-U, and Policy ARC-9.2.4 does allow consideration of development within areas identified as O-U. All new development would be required to comply with SCCC Title 16 regarding protection of environmental resources. Thus, redesignation would not conflict with General Plan policies. Additionally, future development at one of the two parcels (APN 025-351-19 on Thurber Lane) was analyzed in the Sustainability Update EIR.

### Mitigation Measures

None were identified in the Sustainability Update EIR, and none are required with the proposed project as a significant impact has not been identified.

### Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to land use and planning than previously evaluated in the Sustainability Update EIR.

### 4.3.12 Mineral Resources

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>XII. MINERAL RESOURCES – Would the project:</b>					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	DEIR p. 4.2-30	No	No	No	None
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?	DEIR p. 4.2-30	No	No	No	None



## Discussion

**a-b) Loss of Mineral Resources.** The State Geologist classifies mineral resource zones (MRZs) solely on the basis of geologic factors. Classification of an area as a MRZ-2 indicates the existence of a deposit that meets certain criteria for value and marketability. The General Plan/LCP recognizes the State classification and designation process by showing these lands as Mineral Resource areas on the General Plan Resources and Constraints Maps. The Mineral Extraction (M-3) Zone District is used to implement the Mineral Resource protection policies. The Sustainability Update EIR indicates that the county has approximately 3,300 acres of land in quarry/mineral processing uses, including four active quarries and four closed quarries. A large area extends from the coast up through San Lorenzo Valley and south to Aptos with lands mostly classified as MRZ-3 (areas containing known or inferred mineral resources of undetermined significance) and MRZ-4 (areas where geologic information is inadequate to assign to any other MRZ category) with some locations designated MRZ-1 (areas where little likelihood exists for the presence of significant mineral resources). MRZ-1 and MRZ-3 lands are found in the southern portion of the county from Watsonville to the coast.

The EIR found that the Sustainability Update would not lead to development that would result in impacts on mineral resources. The General Plan/LCP contains policies that would serve to avoid or minimize impacts on mineral resources as summarized in Table 4.27 of the Sustainability Update EIR (Draft EIR volume). The Sustainability Update did not include any proposed changes to properties designated Mineral Resources or zoned for mineral extraction and did not propose development near existing quarry operations in the county. Therefore, the EIR concluded that the Sustainability Update would have no impact on mineral resources.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, primarily located within the County's USL. Like the Sustainability Update, the Housing Site Inventory and sites identified for land use and/or zoning map amendments in the 2023 Housing Element are not located near existing quarry operations or on parcels that are designated Mineral Resources or zoned for mineral extraction. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to mineral resources.

## Mitigation Measures

None were identified in the EIR, and none are required with the proposed project as a significant impact has not been identified.

## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to mineral resources than previously evaluated in the Sustainability Update EIR.



### 4.3.13 Noise

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>XIII. NOISE</b> – Would the project result in:					
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?	DEIR pp. 4.12-22 to 4.12-25	No	No	No	None
b) Generation of excessive groundborne vibration or groundborne noise levels?	DEIR pp. 4.12-25 to 4.12-26	No	No	No	None
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?	DEIR pp. 4.12-26 to 4.12-27	No	No	No	None

### Discussion

- a) **Temporary or Permanent Increase in Ambient Noise Levels.** The Sustainability Update EIR indicates that new development accommodated by the Sustainability Update would have the potential to increase ambient noise levels. However, the General Plan/LCP Noise Element includes policies to protect sensitive receptors from permanent noise effects of new development with requirements for preparation of acoustical studies and implementation of mitigation or sound-reducing measures if needed as summarized in Table 4.12-9 of the Sustainability Update EIR (Draft EIR volume). These requirements are largely incorporated into the SCCC (Chapter 13.15), which would ensure that noise-generating land uses would not result in noise levels that would exceed County standards. Where the expected noise increase from a proposed development would be substantial, appropriate noise mitigation measures would need to be developed, as feasible. Also, if a proposed use or development includes fixed noise sources that are subject to noise limits in the SCCC, then noise impacts and appropriate mitigation would be identified and incorporated into project design to reduce noise to meet those limits and reduce noise as perceived by nearby sensitive receptors.



The Sustainability Update EIR found that new development or redevelopment accommodated by the Update could also result in increased ambient noise levels from vehicular traffic, special events, and construction of individual projects. The EIR found that traffic-related noise would not exceed thresholds of significance, and special events that could generate noise would be controlled through a permit process with restrictions on amplified noise if needed—in particular, a community event or fundraiser with 100 or more guests would be allowed only once per year without amplified music at a given property and up to two events per year with approval of a Minor Use Permit. The Sustainability Update included standards for events including notification to owners and occupants of properties within 500 feet, restrictions on hours of amplified music, and establishment of maximum number of guests based on site size, access and other physical characteristics. Similarly, SCCC regulations would limit the use of property for commercial weddings and could include restrictions or limitations on amplified music. Thus, the EIR concluded that these types of events would not be expected to result in generation of substantial permanent or temporary noise increases with the limits and restrictions that would be imposed by permit.

The EIR indicated that construction of individual projects would result in temporary noise increases which would fluctuate throughout the day, depending on the nature of construction activities and equipment in use. However, regulations in the SCCC set decibel limits for sounds levels during the day, evening, and night, which would be applicable to future development projects, and provide an exemption for construction activities during daytime hours. Additionally, Policy 9.2.6 of the Noise Element requires the use of mitigation or best management practices to reduce construction noise as a condition of approval. Therefore, with compliance with County policies and regulations, future temporary increases in noise levels due to construction of individual development projects would not be considered substantial. Therefore, the Sustainability Update EIR concluded that future development resulting from the Update would result in a less-than-significant impact related to permanent or temporary increases in ambient noise levels.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. Like the Sustainability Update, residential development accommodated by the 2023 Housing Element would tend to be concentrated primarily within the USL, but would be spread throughout the USL. As explained in Section 3.2, the County's quantified objective for new housing construction (2,350 units) and potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units) would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, the County exceeds its new construction objective and meets its RHNA and considered residential development since certification of the Sustainability Update EIR, this amount of residential development would only be slightly higher (up to 190 units) than what was evaluated in the Sustainability Update EIR. Residential development is not a land use type that would generate a substantial amount of noise during operation, and the relatively limited increased traffic associated with development would be spread out and would not be substantial in any location to result in substantial increases in traffic-related noise that would exceed thresholds established in the Sustainability Update EIR. Construction of residential projects would generate temporary noise, but daytime construction activities are exempt from SCCC noise regulations as described in the Sustainability Update EIR. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations related to the reduction of construction noise. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to the generation of noise.





- b) **Groundborne Vibration.** The Sustainability Update EIR indicates that development accommodated by the Sustainability Update could result in the generation of groundborne noise or vibration from construction of projects allowed under the General Plan/LCP, certain commercial and industrial operations, and roadway traffic. The Sustainability Update did not directly include elements that would generate long-term/permanent operational groundborne noise and vibration.

Groundborne vibration attenuates rapidly, even over short distances. Using standard Federal Transit Administration vibration attenuation formulas, non-pile driving construction activities would exceed the Caltrans recommended threshold of significance of 0.3 in/sec PPV at a distance of approximately 11 feet. The Sustainability Update EIR determined that it would be unlikely that the center of operations for heavy construction equipment would operate within 11 feet of sensitive receptors based on the mandatory buffers required by the SCCC (e.g., setbacks, buffers, easements, rights-of-way, etc.), which would result in structures typically separated by at least 12 feet. Therefore, the EIR concluded that construction activities would not be anticipated to generate groundborne noise and vibrations levels in excess of the Caltrans guideline threshold criteria of 0.3 in/sec PPV and the impact would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. Like the Sustainability Update, residential development accommodated by the 2023 Housing Element would tend to be concentrated primarily within the USL. Residential development could result in the generation of groundborne noise or vibration during construction. As described in the Sustainability Update EIR, required setbacks, buffers, easements, and rights-of-way would provide enough distance between structures such that construction activities would not be anticipated to generate groundborne noise and vibration levels in excess of Caltrans thresholds. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to generation of groundborne noise or vibration.

- c) **Airport Noise.** Watsonville Municipal Airport is located adjacent to the boundary of the county unincorporated areas within the City of Watsonville. The Sustainability Update EIR indicates that there is potential for future development to be located within 2 miles of the airport. The Noise Element policies limit the adverse effects of airport-related noise through land use planning and the establishment of noise level thresholds for residential and non-residential land uses within the 60-decibel (dBA) CNEL/L<sub>dn</sub> noise contour. Additionally, SCCC Chapter 13.12, Airport (AIA) Combining District, identifies allowed and prohibited uses, densities, and other development standards within six airport safety zones in the 2 miles surrounding the airport. The purpose of the district is to prevent any exposure to safety issues with the airport and prevent any incompatible land uses from being developed adjacent to the airport. The Sustainability Update did not include any proposed land use changes in the AIA Combining District. Furthermore, the General Plan/LCP Noise Element includes policies to ensure that future development is sited and designed to avoid exposure to excessive aircraft noise, as summarized in Table 4.12-10 of the Sustainability Update EIR (Draft EIR volume). Therefore, the Sustainability Update EIR concluded that, with compliance with existing policies and other local, state and federal airport regulations, the Sustainability Update would result in a less-than-significant impact related to excessive airport noise.



Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, which would be in the same geographical location evaluated in the Sustainability Update EIR relative to the Watsonville Municipal Airport. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations pertaining to airport-related noise (if located within the AIA Combining District, the airport safety zones, and airport noise contours). Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to exposure to airport noise.

### Mitigation Measures

None were identified in the EIR, and none are required with the proposed project as a significant impact has not been identified.

### Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to noise than previously evaluated in the Sustainability Update EIR.

## 4.3.14 Population and Housing

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>XIV. POPULATION AND HOUSING – Would the project:</b>					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	DEIR pp. 4.2-2 to 4.2-6, 4.2-12 to 4.2-14; 4.13-13 to 4.13-15	No	No	No	None
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	DEIR pp. 4.2-14 to 4.2-15; 4.13-15 to 4.13-16	No	No	No	None

### Discussion

- a) **Unplanned Population Growth.** The Sustainability Update EIR indicates that the population growth rate in Santa Cruz County has been declining since the 1960s, slowed considerably in the 1990s and 2000s, and has remained low since then. In 2020, the county’s unincorporated population of 133,153 comprised



approximately half of the county's total population. From 2010 to 2020, the unincorporated population grew by 3,414, comprising an average annual growth rate of 0.3%.

Every four years, AMBAG updates its Regional Growth Forecast for population, housing, and employment to support the development of the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), Regional Travel Demand Model and other planning efforts. The 2018 Regional Growth Forecast was adopted at the time that the Sustainability Update EIR Notice of Preparation (NOP) was published. The 2022 Regional Growth Forecast was subsequently adopted in June 2022 after the release of the NOP and the Sustainability Update Draft EIR, and after the close of the Draft EIR public review period<sup>8</sup>. Based on AMBAG's 2018 Regional Growth Forecast, the 2040 population forecast estimated an increase of 4,754 persons in the county's unincorporated area, which represents an average annual growth rate of 0.2%; however, based on the actual 2020 population reported in the U.S. Census which was lower than AMBAG forecasted, the population increase by 2040 would be 8,492 persons, representing an average annual growth rate of 0.3%. The 2018 Regional Growth Forecast projected a total of 60,841 housing units in the county's unincorporated area by 2040 (an increase of 3,514 housing units relative to the existing number of housing units in 2020).

The Sustainability Update EIR, which comprehensively addressed impacts associated with population growth, found that the Sustainability Update could indirectly result in future residential development and population increase that would exceed current forecasts by approximately 2,895 to 6,630 residents in the year 2040 based on potential future development of 4,500 residential dwelling units with an associated population increase of 11,385 residents. The resulting population increase represents an annual average growth rate of approximately 0.4%, which the EIR indicated is slightly higher than the AMBAG forecast annual average rate of 0.2%, as well as an average annual rate of 0.3% based on existing 2020 population. The annual average growth potentially induced by the Sustainability Update also was found to be slightly higher than the 2021 and 2022 annual Measure J growth rate established by the County (0.25%), but less than the 2020 established annual growth rate of 0.5%. It is noted that the 2023 annual Measure J growth rate established by the County was 0.5%.

The Sustainability Update EIR found that the population increases potentially resulting from the Update were a conservative estimate for the purposes of analyses included in this EIR, and that residential development within the unincorporated area is subject to annual growth rates and residential building permit limits established by the County of Santa Cruz Board of Supervisors. However, the EIR concluded that even as a conservative estimate, the average annual growth rate of 0.4% resulting from potential development accommodated by the Sustainability Update, was not substantially higher than forecasted rates (0.2%) and the historical average annual growth rates of 0.3% experienced between 2010 and 2020 and 0.4% experienced between 1990 and 2000.

The Sustainability Update EIR found that General Plan/LCP policies, as summarized in Table 4.13-8 of the Sustainability Update EIR (Draft EIR volume), would serve to avoid and minimize impacts related to population growth, and that compliance with General Plan policies, Measure J, and the SCCC would result in establishment of annual growth rates that are relatively consistent with regional and state projections.

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<sup>8</sup> As explained in the Final EIR, the Sustainability Update was reviewed with the adopted Regional Growth Forecast (2018) that was in effect at the time the NOP was released, which establishes the baseline condition for EIR analyses.



Thus, the EIR concluded that the Sustainability Update and resulting residential development would not induce substantial unplanned population growth in the unincorporated area of Santa Cruz County. The EIR also indicated that the regional population projections prepared by AMBAG are routinely updated to reflect population trends, and forecasts are adjusted if needed to reflect actual population growth trends. As AMBAG projections are developed in part based on locally adopted land use plans, the local basis for AMBAG's successive projections would shift if the County were to adopt the proposed project. Therefore, the EIR concluded that future residential development would not induce substantial unplanned population growth in the unincorporated area of Santa Cruz County, and the impact would be less than significant because the average annual growth rate would not be substantially higher than projected, and compliance with Measure J, proposed policies, and the SCCC would result in establishment of annual growth rates that are relatively consistent with regional and state projections.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. As explained in Section 3.2, the County's quantified objective for new housing construction from 2023 through 2031 is 2,350 units, which is well within the amount of residential development (4,500 units) analyzed in the Sustainability Update EIR. This new housing construction is what the County reasonably expects to be constructed during the 2023 Housing Element timeframe based on historical building and market trends. Even with addition of potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units), the total amount of housing (4,250 units) would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, the County exceeds its new construction objective and meets its RHNA of 4,634 units, this amount of residential development is only slightly higher (134 units) than what was evaluated in the Sustainability Update EIR. Based on an average household size of 2.53 persons per household, 134 additional housing units would result in an additional population of 340 persons over the population estimate considered in the Sustainability Update EIR. This would represent an increase of 3% over the number of housing units and population considered in the Sustainability Update EIR, which is not considered substantial. Even with consideration of housing units that have been constructed since certification of the Sustainability Update EIR (56), potential residential development could result in approximately 190 dwelling units over the 4,500 analyzed in the EIR with a population increase of 480, which represents an increase of approximately 4%.

While the 2023 Housing Element shows availability of sites to meet its RHNA, which if constructed would allow for a growth increment in excess of what was analyzed in the Sustainability Update EIR, this would not be considered substantial unplanned growth as RHNA represents the State's housing plan. The proposed Housing Element is a plan for the housing needs of the County while meeting the State's housing goals and Housing Element requirements, including showing adequate availability of sites to meet the County's RHNA. The RHNA is developed by the State based on the California Department of Finance population projections and regional population forecasts used in preparing regional transportation plans and allocated among local Monterey Bay area jurisdictions by AMBAG. Jurisdictions are not required to provide new housing units, but instead must demonstrate (through the housing element) that the RHNA number could be achieved when taking into account a jurisdiction's amount of available housing sites and its regulatory framework. The Housing Element identifies adequate land and planning mechanisms to accommodate the future housing needs of the county's projected population derived from population growth estimates for the region; therefore, by definition, the Housing Element would not induce unplanned population growth.



Furthermore, the potential population increase above what was considered in the Sustainability Update EIR is a temporary, non-physical effect that would be addressed in AMBAG's subsequent revisions of its population projections, which would account for changes in local land use plans and trends. Most of the identified housing sites are within the County USL, consistent with Sustainability Update policies to encourage new development within the USL and RSL. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, and no new significant impact related to unplanned population growth would result from implementation of the proposed Housing Element.

- b) **Displace Existing People or Housing.** The Sustainability Update EIR indicates that future development may be constructed on properties with existing development, particularly on underutilized properties that may be developed at higher densities and/or land use intensities and on 12 of the 23 parcels analyzed in the Sustainability Update EIR for a General Plan/LCP land use designation and/or zoning map change. The Sustainability Update EIR, which evaluated impacts associated with displacement of existing housing or people, concluded that the Sustainability Update would result in a less-than-significant impact related to displacement of existing housing or people because existing units likely would be vacated prior to demolition in accordance with state and local law to avoid displacement of people. Furthermore, the EIR concluded that state's streamlining laws include protections for preservation or reconstruction of rental housing and that the redeveloped site would be expected to result in a net increase in housing units.

Implementation of the 2023 Housing Element could indirectly lead to new residential development, some of which could be located on sites with existing housing units. In the event that existing residential units are found on a site proposed for residential development, these units likely would be vacated prior to demolition in accordance with state and local law to avoid displacement of people, and they are required to be replaced if the existing units are affordable units as determined in the Sustainability Update EIR. Furthermore, policies in the proposed Housing Element includes provisions to avoid displacement including preservation of mobile homes as a more affordable housing option, relocation assistance, and replacement housing for displaced residents so that new housing developments avoid the permanent displacement of current residents. Thus, future residential development resulting from the proposed Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to displacement of existing people or housing.

## Mitigation Measures

None were identified in the EIR, and none are required with the proposed project as a significant impact has not been identified.

## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to population and housing than previously evaluated in the Sustainability Update EIR.



### 4.3.15 Public Services

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
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#### XV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?	DEIR pp. 4.14-15 to 4.14-17	No	No	No	None
Police protection?	DEIR pp. 4.14-17 to 4.14-18	No	No	No	None
Schools?	DEIR pp. 4.14-19 to 4.14-20	No	No	No	None
Parks?	DEIR pp. 4.14-20 to 4.14-22	No	No	No	None
Other public facilities?	DEIR p. 4.14-22	No	No	No	None

#### Discussion

##### a) Fire Protection, Police Protection, Schools, Parks, and Other Public Facilities

###### *Summary of Sustainability Update Conclusions*

Fire Protection Facilities. As described in the Sustainability Update EIR, fire protection in Santa Cruz County is provided by 13 entities, including nine fire protection districts, two community service areas (CSAs), and two city fire departments. The Sustainability Update EIR, which evaluated impacts associated with fire protection services, concluded that the population growth and new development resulting from the Sustainability Update would result in increased demand for fire protection services throughout the county, primarily within the Central Fire District, which serves most of the properties within the USL where new development would be concentrated. The EIR concluded that future growth would not result in the need for additional fire protection facilities in order to maintain acceptable service ratios and response times in the future. Furthermore, with compliance with federal, state, and local regulations in addition to implementation of the proposed Sustainability Update policies and implementation strategies summarized in Table 4.14-5 of the Sustainability Update EIR (Draft EIR volume), impacts related to fire protection services would be





avoided and minimized. The EIR concluded that the Sustainability Update and future development arising from the Update would result in a less-than-significant indirect impact on fire protection facilities.

Police Protection Facilities. As described in the Sustainability Update EIR, the Santa Cruz County Sheriff's Office provides police protection services in the unincorporated areas of the county. The California Highway Patrol maintains a mutual aid agreement with the Santa Cruz County Sheriff's Office and assists local governments during emergencies when requested. The Sustainability Update EIR, which evaluated impacts associated with police protection services, concluded that the County Sheriff's Office has adequate facilities to serve the projected growth increases associated with implementation of the Sustainability Update, and no additional facilities would be needed to maintain response times; however, staffing is currently at minimal levels. New development and growth accommodated by the Sustainability Update would not substantially reduce response times or require new or physically altered police protection facilities that could result in significant physical impacts. Table 4.14-7 of the Sustainability Update EIR (Draft EIR volume) summarizes General Plan/LCP policies that would serve to avoid and minimize impacts related to police protection services. The EIR determined that, with compliance with federal, state, and local regulations in addition to implementation of the policies and implementation strategies summarized in Table 4.14-7, the impact of future development and growth on police protection services would be considered less than significant.

Schools. As described in the Sustainability Update EIR, there are 10 public school districts located within the county with a total enrollment of nearly 40,000 students at the kindergarten to high school levels, as well as one community college district (Cabrillo) and one state university (University of California, Santa Cruz). Two additional school districts are located outside of the county but serve some residents within the county. The County and individual jurisdictions provide the procedures for project applicants to pay school impact fees as part of local development approvals to ensure that adequate school facilities continue to be provided in the county. Development impact fees are collected for the following districts: Aromas-San Juan Unified School District, Bonny Doon Union Elementary School District, Happy Valley Elementary School District, Live Oak School District, Loma Prieta Joint Union School District, Mountain Elementary School District, Pacific Elementary School District, Pajaro Valley Unified School District, San Lorenzo Valley Unified School District, Santa Cruz City Schools, Scotts Valley Unified School District, and Soquel Union Elementary School District. All fees are collected at the time of issuance of a building permit.

The Sustainability Update EIR, which evaluated impacts associated with school services, concluded that some schools, particularly in urban areas, could experience exceedances in enrollment capacity in some years, but with payment of required school impact fees to fund necessary facility expansion and/or additions if needed, the impact of growth indirectly resulting from the Sustainability Update on schools would be less than significant. Table 4.18-8 of the Sustainability Update EIR (Draft EIR volume) summarizes General Plan/LCP policies that would serve to avoid and minimize impacts related to school enrollments. The EIR concluded that because the County and its individual jurisdictions will be required to conduct environmental review prior to any significant expansion of school facilities or the development of new school facilities, as well as current state law requirements that the environmental impact of new development on school facilities is considered fully mitigated through the payment of required development impact fees, this impact would be considered less than significant.



**Parks.** As described in the Sustainability Update EIR, Santa Cruz County Parks, Open Space, and Cultural Services Department (County Parks) manages 43 parks and open space properties totaling nearly 1,600 acres and 29 miles of coastline. The County parks system serves the county in two ways: regional facilities that serve the entire county's population and local parks (e.g., neighborhood, rural, and community parks) that serve unincorporated neighborhoods that are outside an independent recreation and park district boundary. Along with parkland belonging to the County, there are a number of state lands, including 1,500 acres managed by CDFW, and 42,120 acres managed by California State Parks. In addition, the county contains federal lands administered by the Bureau of Land Management, consisting of the approximately 5,800-acre Cotoni-Coast Dairies property, a California Coastal National Monument.

The Sustainability Update EIR, which evaluated impacts associated with park services, concluded that the Sustainability Update and resulting development and growth would have a less-than-significant impact on parks. The EIR found that the County's Parks Strategic Plan determined that the County provides sufficient parklands for its residents. Table 4.14-9 of the EIR describes existing and proposed policies that avoid and minimize impacts related to parks and recreational facilities. These policies include guidance standards for 2-3 net acres of usable classifications of parkland and 5-6 acres of recreational facilities per 1,000 residents in order to maintain acceptable levels of service. The EIR also found that policies in the Sustainability Update also set forth guidelines for development of new parks and placement near compatible uses. Also, the County Ordinance has prescriptive open space requirements that would be adhered to on a project-by-project basis. Because existing countywide parklands are sufficient to serve its population and the County continues to plan for additional parks, the Sustainability Update EIR concluded that the increase in population accommodated by the Update would not substantially increase usage of park facilities such that provision of new facilities would be required.

**Other Public Facilities.** As described in the Sustainability Update EIR, library services are provided by the Santa Cruz Public Libraries District and are governed by a Joint Powers Authority (JPA) that includes all jurisdictions in Santa Cruz County, except for Watsonville, which manages its own public library system. The City of Watsonville operates two facilities—the Main Library and the Freedom Branch Library. The Sustainability Update EIR concluded that the Sustainability Update retained and expanded policies to ensure adequate provision of public services, including provision libraries and library services. With implementation of the General Plan/LCP policies and implementation strategies, the Sustainability Update EIR concluded that impacts related to libraries and other public facilities would be less than significant.

### ***2023 Housing Element Review***

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, and future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR. The majority of potential housing sites identified in the proposed Housing Element (approximately 82%) are located within the County's USL, which is similar to what was evaluated in the Sustainability Update EIR with approximately 78% of new dwelling units estimated in the USL. As explained in Section 3.2, the County's quantified objective for new housing construction (2,350 units) and potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units) total 4,250 housing units, which would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, if the County exceeds its new



construction objective and fully meets its RHNA and also considering housing units that have been constructed since certification of the Sustainability Update EIR, potential development could result in approximately 190 dwelling units over the 4,500 analyzed in the EIR. This amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR, This small potential increase in development could potentially result in a minor incremental increase in demand for fire and police protection services, schools, parks, and other public facilities, which would not be substantial enough to require construction of new public service facilities. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations intended to minimize impacts on public services. Additionally, new residential developments would be required to pay school impact fees. As described in the EIR, if new or expanded school facilities were required to accommodate increased student enrollment levels, potential impacts from their construction would be addressed through separate environmental review when specifics of those projects are known. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to fire and police protection services, schools, parks, and other public facilities.

### Mitigation Measures

None were identified in the EIR, and none are required with the proposed project as a significant impact has not been identified.

### Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to public services than previously evaluated in the Sustainability Update EIR.

### 4.3.16 Recreation

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification ?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>XVI. RECREATION</b>					
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	DEIR pp. 4.14-20 to 4.14-22	No	No	No	None



	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification ?	Prior EIR Mitigation Measures Implemented or Address Impacts?
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	DEIR pp. 4.14-20 to 4.14-22	No	No	No	None

## Discussion

- a) **Increased Use of Parks and Recreational Facilities.** As described in the Sustainability Update EIR, and in Section 4.3.15, Public Services, above, County Parks manages 43 parks and open space properties totaling nearly 1,600 acres and 29 miles of coastline. The County parks system serves the county in two ways: regional facilities that serve the entire county’s population and local parks (e.g., neighborhood, rural, and community parks) that serve unincorporated neighborhoods that are outside an independent recreation and park district boundary. Along with parkland belonging to the County, there are a number of state lands, including 1,500 acres managed by CDFW, and 42,120 acres managed by California State Parks. In addition, the county contains federal lands administered by the Bureau of Land Management, consisting of the approximately 5,800-acre Cotoni-Coast Dairies property, a California Coastal National Monument.

The Sustainability Update EIR, which evaluated impacts associated with use of parks and recreational facilities as a result of potential future development concluded that the Sustainability Update would have a less-than-significant impact related to increased use of recreational facilities. The EIR found that potential increased population accommodated by the Sustainability Update could result in an increased use of existing parks and recreational facilities, especially in areas within the County’s USL and RSL. The potential increased use of parks and recreational facilities would be distributed throughout existing neighborhood and community parks throughout the USL and specific parks and recreational facilities, including school playgrounds and joint use facilities. Furthermore, the EIR found that with implementation of policies summarized in Table 4.14-9 of the Sustainability Update EIR (Draft EIR volume), potential impacts related to parks and recreational facilities. Therefore, the EIR concluded that the Sustainability Update and subsequent development would not 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.

The 2023 Housing Element could indirectly result in an increment of population growth in excess of what was analyzed in the Sustainability Update EIR and an associated incremental increase in demand for parks and recreational facilities as explained above in Section 4.3.15. However, as described for the Sustainability Update, increased use of parks and recreational facilities would be distributed throughout the USL. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations intended to minimize impacts on parks and recreational facilities. Furthermore, new residential



development would be required to pay park impact fees which are used in part for improvements to existing parks. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to increased use and potential deterioration of parks and recreational facilities.

- b) **Construction or Expansion of Recreational Facilities.** As described in the Sustainability Update EIR, implementation of the Sustainability Update would support future development of recreational facilities but does not directly propose the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. The Sustainability Update EIR, which evaluated impacts associated with construction or expansion of recreational facilities, concluded that the Sustainability Update would have a less-than-significant impact related to construction or expansion of recreational facilities, with implementation of the General Plan/LCP policies and implementation strategies, in combination with existing regulations and park impact fees for new development.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, some of which could include parks or recreational facilities. Construction or expansion of specific parks or recreational facilities would require environmental review in accordance with CEQA at the time such projects are proposed, which would ensure that environmental impacts would be disclosed and mitigated to the extent possible. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations intended to minimize impacts on parks and recreational facilities, as well as payment of park impact fees to fund acquisition of new parkland and development of new parks in existing and new park facilities. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to increased use of parks and recreational facilities.

## Mitigation Measures

None were identified in the EIR, and none are required with the proposed project as a significant impact has not been identified.

## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to recreation than previously evaluated in the Sustainability Update EIR.



### 4.3.17 Transportation

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification ?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>XVII. TRANSPORTATION</b> – Would the project:					
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	DEIR pp. 4.15-26 to 4.15-31	No	No	No	None
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	DEIR pp. 4.15-19 to 4.15-26	No	No	No	MM TRA-1, MM TRA-2
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	DEIR pp. 4.15-31 to 4.15-32	No	No	No	None
d) Result in inadequate emergency access?	DEIR pp. 4.15-32	No	No	No	None

#### Discussion

- a) **Conflict with Circulation Systems Policies or Regulations.** The Sustainability Update EIR reports that the circulation system within the county consists of nearly 1,135 miles of freeways, arterials, collectors, and local roads with connectivity within and between communities and regions. The County maintains a roadway network of over 600 miles including all of the associated bridges, ramps, bicycle facilities, stop signs, signals and other traffic controls. In the urban areas of the county arterial roads and major state highways make up 14% of the roadway miles but carry over 70% of the VMT.

The county has approximately 100 miles of bicycle facilities, which account for 8 percent of the county’s roadway system, although there are few Class I bikeways (bike paths) in the unincorporated county. Pedestrian facilities include sidewalks, walkways, curb ramps, crosswalks, furnishings, traffic control devices, and other amenities. Public transit in Santa Cruz County is primarily provided by the Santa Cruz Metro Transit District (METRO). There is currently no year-round passenger rail service in Santa Cruz County. The Santa Cruz Branch Rail Line, which was acquired by the SCCRTC in 2012, formerly provided freight rail service. The Santa Cruz County Regional Transportation Commission (SCCRTC) purchased the rail corridor to preserve the corridor for existing and future transportation uses, including freight rail, passenger rail service/transit, and bicycle and pedestrian facilities.

The Sustainability Update provided an updated Circulation Element to the General Plan in the new Access + Mobility (AM) Element. The AM Element generally provides a greater focus on an enhanced multi-modal





transportation system, and includes policies that support transit, bicycle, and pedestrian travel modes, as well as policies for operations. The element continues support for use of the Santa Cruz Branch Line and the Santa Cruz Big Trees rail corridors for recreational travel, freight and high-quality transit service, as determined by the SCCRTC and other rail corridor owners. The new AM Element includes an objective and supporting policies and implementing strategies to increase shuttle, transit, and active transportation travel within the tourism sector to the county's beaches, parks, and other recreational areas. The proposed element includes policies that support development of facilities addressing the overall circulation system, including roads, bicycle, pedestrian, and transit facilities as summarized in Table 4.15-7 of the Sustainability Update Draft EIR. In addition, several new connector road segments are proposed in the USL, primarily in Live Oak and Soquel, including pedestrian and bicycle connections, which would improve circulation.

The Sustainability Update EIR concluded that the amendments to the General Plan and SCCC would not result in conflicts with existing local or regional programs, plans, ordinances or policies addressing the county's circulation system. The EIR also concluded that the Sustainability Update is consistent with regional plans: AMBAG's Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and SCCRTC's RTP. Specifically, the AM policies summarized in Table 4.15-7 are consistent with the 2040 MTP/SCS goal and policy objectives to "Provide convenient, accessible, and reliable travel options while maximizing productivity for all people and goods in the region." Therefore, the EIR concluded that adoption and implementation of the proposed Sustainability Update would not result in conflicts with existing plans, programs, policies, or ordinances that address the circulation system in the unincorporated county, including road, transit, bicycle, and pedestrian facilities, resulting in a less-than-significant impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, and as previously indicated, the majority of potential housing sites identified in the proposed 2023 Housing Element are located within the County's USL. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR. The goals, policies and implementation programs included in the proposed Housing Element are focused on supporting a range of housing types. The Housing Element also supports higher densities in urban areas, which is consistent with goals and policies in the Sustainability Update that support infill development in proximity to different modes of transportation. None of the proposed Housing Element policies would result in conflicts with local or regional plans and policies regarding addressing transportation circulation systems. Thus, the Housing Element components would be within the scope of impact analyzed within the Sustainability Update EIR and would not result in conflicts with existing plans, programs, policies or ordinances that address the circulation system in the unincorporated area of the county, including road, transit, bicycle, and pedestrian facilities.

- b) **Conflicts with County VMT Standards or CEQA Guidelines section 15064.3, subdivision (b).** CEQA Guidelines Section 15064.3(b) focuses on VMT for determining the significance of transportation impacts and sets forth the criteria for analyzing transportation impacts related to VMT. It is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The County adopted a VMT threshold in 2020 pursuant to state law and consistent with the criteria in section 15064.3(b). The County's adopted VMT thresholds follow the guidance provided by the state (Governor's Office of Planning and Research 2018), which generally recommend a threshold that is 15% below the existing county-wide average VMT per capita for residential uses and 15% below the county-wide average



VMT per employee, except for retail uses, which would be measured by a net increase in total VMT. The County of Santa Cruz also has published guidelines for the implementation of VMT reviews and thresholds along with screening criteria that uses the guidance published within the OPR technical advisory as a reference point.

The Sustainability Update EIR concluded that adoption and implementation of the proposed Sustainability Update and future development that could result from the Update would result in residential and employee VMT that does not meet the County's VMT threshold, although VMT resulting from development evaluated in the Sustainability Update EIR would be below the County's existing VMT. However, the VMT associated with the Sustainability Update would not meet the County's VMT threshold (15% below existing countywide average) for residential per capita and employee VMT (except for retail employee VMT), resulting in a significant impact. The EIR indicated that there are a number of transit, bicycle, and pedestrian improvements that are planned or proposed that could help reduce VMT by providing enhanced alternative modes of transportation other than automobile travel. However, because many of these projects are not funded, and the traffic model cannot forecast reductions due to new and improved active transportation facilities or employer-required transportation demand management (TDM) programs. Therefore, reductions related to increases in bicycle and pedestrian mode share, carpooling, and new TDM programs are not accounted for in the Sustainability Update VMT results, and therefore the results were considered conservative.

The EIR indicates that the Sustainability Update includes policies that support transportation improvements and other measures that would serve to reduce VMT as summarized in Table 4.15-6 of the Sustainability Update EIR. These include policies that support multiple transportation modes (AM-2.1.1, AM-2.1.2, AM-2.1.3), coordinated land use and transportation planning (BE-1.2.1), and multi-modal improvements as part of future development projects (AM-6.2.2). Policies support the implementation of high-quality transit facilities in the county, as well as bicycle and pedestrian improvements, the implementation of which would serve to help reduce total VMT by providing additional and/or enhanced opportunities for alternative transportation modes. In addition, the proposed Sustainability Update encourages infill, mixed-use, and intensified development within the USL, which would serve to locate higher density development in proximity to transit, bicycle, and pedestrian facilities that would encourage and promote use of transportation modes other than automobiles. The County's VMT Guidelines also include TDM strategies that can be implemented as project design features and/or mitigation measures to offset a project's VMT.

The Sustainability Update EIR concluded that development and growth evaluated as part of the Update would result in VMT that is higher than the County's threshold for residential and non-residential uses (except retail uses), and thus, even with full implementation of TDM measures, there likely would not be a sufficient reduction to meet the County's VMT threshold. Therefore, while the proposed project reduces VMT from existing conditions and contains policies that focus new development in the USL and seek to coordinate land use and transportation improvements, encourage the development and use of non-motorized transportation facilities, as well as several transportation improvements to facilitate an efficient circulation system, the project would result in a significant impact related to VMT.

It is noted that future development projects would be subject to review under the County's VMT Guidelines, which identify projects that require VMT analysis and others that would be automatically considered within



significance thresholds due to size, proximity to high quality transit, and other screening criteria. The County's significance thresholds are based on land use type, broadly categorized as efficiency and net change metrics. Efficiency metrics include VMT per capita and VMT per employee and are used for residential and non-residential uses, respectively. Therefore, some types of future projects, such as small projects, projects near high quality transit, local-serving retail projects, and affordable housing projects could be found to meet the County's VMT threshold, while others will require mitigation to meet the threshold.

The EIR also found that implementation of Mitigation Measure TRA-1 would require development and implementation of a funding mechanism to support regional VMT-reducing projects, and Mitigation Measure TRA-2 recommends a General Plan/LCP implementing strategy to further review parking requirements as another means to reduce vehicle travel and VMT. However, because of the uncertainty as to whether such a VMT program under Mitigation Measure TRA-1 could fully fund VMT-reduction measures to the level needed to meet the County's VMT threshold, the EIR concluded that impacts may not be fully mitigated to a less-than-significant level, resulting in a significant and unavoidable impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. As explained in Section 3.2, the County's quantified objective for new housing construction from 2023 through 2031 is 2,350 units, which is well within the amount of residential development (4,500 units) analyzed in the Sustainability Update EIR. This new housing construction is what the County reasonably expects to be constructed during the 2023 Housing Element timeframe based on historical building and market trends. Even with addition of potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units), the total amount of housing (4,250 units) would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, the County exceeds its new construction objective and meets its RHNA of 4,634 units, this amount of residential development is only slightly higher (134 units) than what was evaluated in the Sustainability Update EIR. Even with consideration of housing units that have been constructed since certification of the Sustainability Update EIR (56), potential residential development could result in approximately 190 dwelling units over the 4,500 analyzed in the EIR.

A review of potential VMT impacts indirectly arising from implementation of the proposed Housing Element was conducted and is included in Appendix D. The review found that the potential additional 134–190 units represented by the RHNA and housing construction since the Sustainability Update would result in a 3.0 to 4.2% increase in total housing growth within the county and an increase of 1,514 to 2,147 daily VMT within unincorporated Santa Cruz County, which represents a 0.08 to 0.1% increase in the total daily VMT produced by residential uses evaluated in the Sustainability Update EIR. This minor increase is well within the margin of error of travel demand models, and thus, would not materially alter the findings of the VMT analysis performed for the Sustainability Update EIR or result in a substantially more significant impact than analyzed in the EIR (Kimley-Horn 2023).

- b) **Substantially Increase Hazards.** The Sustainability Update EIR indicates that the Update includes several proposed new roadways in the USL, but roadway geometrics have yet to be designed. Future roadways would be designed to meet all applicable road design and sight distance standards that would avoid creation of hazardous conditions including fire department requirements. In addition, new roadways, as well



as new access driveways would be required to meet the County of Santa Cruz Design Criteria, which provides standards for safe roadway design. Furthermore, Sustainability Update included several policies and goals in the AM Element to avoid or minimize impacts related to hazardous conditions within road and transportation system designs that are summarized in Table 4.15-8 of the Sustainability Update EIR (Draft EIR volume). These proposed policies provide for safe access and improvements to the roadway system within the county, as well as prevent incompatible land uses to avoid transportation conflict and potential roadway safety hazards. Therefore, the Sustainability Update EIR concluded that future development of would not substantially increase hazards due to a geometric design feature or incompatible uses, resulting in a less-than-significant impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR, and would be required to comply with County regulations and design standards regarding provisions of adequate access and design of new roads within a specific development project. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR.

- d) **Emergency Access.** The Sustainability Update EIR concluded that the Update would not directly result in new development that would result in inadequate emergency access. Additionally, the proposed AM Element includes policies that would minimize the impacts related to provision of inadequate emergency access. Specifically, proposed Policy AM-6.1.1 calls for adequate roads for fire and emergency response access, which would be reviewed as part of future development project applications. In addition, County staff would work in conjunction with the Fire Department, and other emergency access providers to continue to coordinate development review and review of new roads with Fire District and Sheriff's Office staff (AM-6-1a). Therefore, the Sustainability Update concluded that the Update would not directly result in inadequate emergency access, and the project would result in a less-than-significant impact.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR, and would be required to comply with County regulations and design standards regarding access and provision of adequate emergency access where required. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR.

## Mitigation Measures

The Sustainability Update EIR included two mitigation measures to address VMT impacts. Mitigation Measure TRA-1 requires development and implementation of a funding mechanism to support regional VMT-reducing projects, and Mitigation Measure TRA-2 recommends a General Plan/LCP implementing strategy to further review parking requirements as another means to reduce vehicle travel and VMT. Both of these measures are directives to the County for implementation. However, future residential development would be subject to County requirements in effect at the time projects are approved. No other mitigation measures are required with the proposed project as a significant impact has not been identified.



## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to transportation than previously evaluated in the Sustainability Update EIR

### 4.3.18 Tribal Cultural Resources

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification ?	Prior EIR Mitigation Measures Implemented or Address Impacts?
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#### VIII. TRIBAL CULTURAL RESOURCES

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)?	DEIR pp. 4.5-25 to 4.5-26	No	No	No	None
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?	DEIR pp. 4.5-25 to 4.5-26	No	No	No	None

## Discussion

**a-b) Substantial Adverse Change in Tribal Cultural Resources.** The archaeological records search and the County’s outreach to Native American tribes that was conducted for the Sustainability Update EIR did not result in the identification of any specific tribal cultural resources. The Indian Canyon Band of Costanoan Ohlone People responded that the Sustainability Update area overlaps a potentially eligible cultural site. However, three follow-up attempts from the County failed reach the respondent for further information. The Sustainability Update EIR found that the ARC Element of the County’s General Plan/LCP includes policies and implementation strategies that would serve to protect tribal cultural resources and reduce impacts



related to tribal cultural resources as summarized in Table 4.5-4 of the Sustainability Update EIR (Draft EIR volume). The General Plan/LCP policies includes a policy that prohibits disturbance of Native American sites cultural sites or tribal cultural resources without an appropriate permit. Additionally, the County's accidental discovery policy (ARC-8.1.5) and procedures (SCCC Chapter 16.40) would also apply to properties in the event future construction encounters unidentified tribal cultural resources. This regulation requires that construction be stopped if archaeological resources are encountered during construction, and that the Planning Director be notified and the discovery analyzed. Therefore, the Sustainability Update EIR concluded that with compliance with General Plan/LCP policies and County regulations, future development would result in less-than-significant impacts related to tribal cultural resources.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, primarily located within the County's USL. The County provided tribal notification regarding the opportunity to consult on the 2023 General Plan Housing Element update for the purpose of protecting and/or mitigating impacts to possible tribal cultural resources. Tribal notification was provided on June 20, 2023 to the Amah Mutsun Tribal Band, Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Ohlone Rumsen-Mutsen Tribe, Indian Canyon Mutsun Band of Costanoan, and the Wuksachi Indian Tribe/Eshom Valley Band. No comments were received by any tribes provided notice within the 90-day State Statute.

Some of the properties identified as available sites for residential development may be located within archaeologically sensitive areas or could result in inadvertent discoveries of tribal cultural resources during ground-disturbing construction activities. However, the Sustainability Update EIR addressed future development on any site with potential tribal cultural resources, which would include all sites identified the draft Housing Element Housing Site Inventory. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to adverse change in the significance of a tribal cultural resource.

## Mitigation Measures

None were identified in the EIR, and none are required with the proposed project as a significant impact has not been identified.

## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to tribal cultural resources than previously evaluated in the Sustainability Update EIR.





### 4.3.19 Utilities and Service Systems

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>XIX. UTILITIES AND SERVICE SYSTEMS</b> – Would the project:					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	DEIR pp. 4.16-33	No	No	No	None
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	DEIR pp. 4.16-34 to 4.16-37	No	No	No	None
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?	DEIR pp. 4.16-37 to 4.16-38	No	No	No	None
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?	DEIR pp. 4.16-38 to 4.16-40	No	No	No	None
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	DEIR pp. 4.16-38 to 4.16-40	No	No	No	None

#### Discussion

- a) **New, Expanded or Relocated Utilities.** The unincorporated area of the county is served a variety of public and private agencies and entities. The Sustainability Update EIR found that the future development and growth accommodated by the Sustainability Update would not induce substantial unplanned population growth in the unincorporated area of Santa Cruz County. The EIR concluded that there were no known new or relocated public utility facilities that would be required as a result of future development accommodated by the Sustainability Update based on discussions with service providers. The EIR found that compliance with County General Plan/LCP policies would ensure future development projects could be adequately



served by water and sewer infrastructure as part of the development approval process as summarized in Tables 4-16-5 and 4-16-6 of the Sustainability EIR (Draft EIR volume). Therefore, the EIR concluded that the project would not result in the need for relocated or new public utility facilities related to water or wastewater treatment facilities. The EIR also concluded that no new or expanded storm drainage or energy utility infrastructure were identified, except for some low to moderate priority storm drain improvements and one high priority improvement in urban areas that have been identified in County's Storm Drain Master Plan and are being addressed by Master Plan updates as described in the EIR. Therefore, the future development accommodated by the Sustainability Update would result in a less-than-significant impact related to the need for new or expanded utilities. (See Section 4.3.10(c) regarding stormwater drainage.)

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. The majority of potential housing sites identified in the proposed Housing Element are located within the County's USL, and future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR. As explained in Section 3.2, the County's quantified objective for new housing construction and potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units) total 4,250 housing units, which would be within the amount of development analyzed in the Sustainability Update EIR for which potential impacts related to new or expanded utilities were found to be less than significant. Thus, future residential development would be within the scope of impact analyzed within the Sustainability Update EIR.

- b) Water Supplies.** The Sustainability Update EIR reported that nearly all of Santa Cruz County's water supply is derived from local surface water (streams and reservoirs - 20% of supply) and groundwater (80% of supply), which are fed entirely by precipitation and do not receive any imported water. A small amount of recycled water is produced for irrigation (4%). Domestic supply within the region is provided by five large public agencies, four medium water systems, 115 small water systems, and some 8,000 individual wells. Potable water supplies within the County's USL and RSL are provided by six agencies. Unincorporated areas of the county not serviced by the larger water purveyors rely on private wells and stream diversions for their water supply.

The Sustainability Update EIR found that future development as a result of the Update would occur primarily within the County's USL and would result in additional demand for domestic potable water. The EIR found that future potential development and growth appeared to be within growth projections developed for each of the six major public water districts serving the unincorporated county area, although potential development may approach or exceed estimates in the City of Santa Cruz and Soquel Creek Water District (SqCWD) forecasts in their respective 2020 Urban Water Management Plans (UWMPs). However, the EIR further found that implementation of the Sustainability Update policies summarized in Table 4.16-5 of the Sustainability Update EIR (Draft EIR volume) and compliance with SCCC water conservation requirements would serve to reduce water demand. Furthermore, General Plan/LCP policies require that development be allowed only where adequate water supplies are available, and all public water purveyors would have to approve new connections as part of future development project reviews.

The Sustainability Update EIR concluded that implementation of County policies and compliance with water conservation regulations and requirements of the water purveyors would serve to reduce demand and ensure availability of adequate water supplies prior to approval of future developments. Therefore, the



Sustainability update EIR concluded that the Update's potential indirect impact on water supplies would be considered less than significant, except conservatively concluded that the impact could be potentially significant for the Santa Cruz Water Department and SqCWD. The EIR indicated that General Plan/LCP policies and regulations would require incorporation of water-conserving fixtures, measures and landscaping as part of new development in the county, which would serve to minimize water demands. However, no other mitigation measures were identified that would reduce potential impacts on water supply of the City of Santa Cruz and SqCWD to a less-than-significant level. Therefore, the EIR concluded that the impact for these two water suppliers would remain potentially significant and unavoidable.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR with a slightly increased potential for additional residential units within the County's USL, which would be within the potable water service areas of the City of Santa Cruz and SqCWD. All future residential development would be required to comply with applicable General Plan/LCP policies, including installation of water conserving fixtures and landscaping, as well as, with requirements of water agencies serving a project.

As explained in Section 3.2, the County's quantified objective for new housing construction (2,350 units) and potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units) total 4,250 housing units, which would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, if the County exceeds its new construction objective and fully meets its RHNA and also considering housing units that have been constructed since certification of the Sustainability Update EIR, potential development could result in approximately 190 dwelling units over the 4,500 analyzed in the EIR. This amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR, and could be within service areas of potentially impacted water agencies. Even considering a worst-case scenario in which a slightly increased amount of residential development over the EIR estimate could occur as a result of the Housing Element, this amount would incrementally, but not substantially, increase the severity of potential impacts to water supplies of the City of Santa Cruz and SqCWD or result in a new significant impact. Furthermore, General Plan/LCP policies require that development be allowed only where adequate water supplies are available, and all public water purveyors would have to approve new connections as part of future development project reviews. Thus, water demand arising future development or arising from implementation of the Housing Element programs would be within the scope of water supply impacts analyzed in the Sustainability Update EIR or slightly higher if the County fully meets its RHNA.

- c) **Wastewater Treatment Capacity.** The collection, conveyance, and treatment of wastewater within the unincorporated areas of the county are managed by a number of agencies. Wastewater services within Santa Cruz County are provided by three cities, four special districts, and six County Service Areas (CSAs). Facilities range from individual or small community onsite wastewater treatment systems (OWTS, also known as septic systems) to local wastewater collection systems and regional treatment plants. Wastewater infrastructure includes septic systems, collection and sewer main lines, lift stations, treatment plants and recycled water treatment systems. Wastewater systems are closely regulated both for health and environmental concerns. The RWQCB regulates operations and discharges from sewage systems, while the County regulates individual and small OWTS with flows up to 10,000 gallons per day.



The Sanitation Division of the County Community Development & Infrastructure Department staffs three County sanitation districts, which include the Davenport County Sanitation District, the Santa Cruz County Sanitation District (SCCSD), and the Freedom County Sanitation District, as well as five County Service Areas (CSAs): 2 (Place de Mer), 5 (Sand Dollar), 7 (Boulder Creek), 10 (Rolling Woods), and 20 (Trestle Beach). These agencies provide sanitary sewer collection services. Collected wastewater is treated at the City of Santa Cruz wastewater treatment facility (WWTF) for the Santa Cruz County Sanitation District and CSA 10, and at the City of Watsonville wastewater treatment facility for the Freedom County Sanitation District.

The Sustainability Update EIR concluded wastewater flows resulting from future development accommodated by the Sustainability Update EIR could be accommodated within the remaining capacity of the existing regional wastewater treatment providers. Furthermore, implementation of the Sustainability Update policies and implementation strategies summarized in Table 4.16-6 of the Sustainability Update EIR (Draft EIR volume) would ensure that adequate sewer services are available as part of future development project reviews. Therefore, the Sustainability Update EIR concluded that impacts of future development on wastewater treatment capacity would be considered less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development. Future residential development would be in the same geographical locations evaluated in the Sustainability Update EIR with a slightly increased potential for additional residential units within the County's USL, which would be served by regional wastewater treatment plants in Santa Cruz and Watsonville. As explained in Section 3.2, the County's quantified objective for new housing construction (2,350 units) and potential development resulting from proposed amendments to existing General Plan land use designations and/or zoning (1,900 units) total 4,250 housing units, which would be within the amount of development analyzed in the Sustainability Update EIR. Even as a worst-case assumption, if the County exceeds its new construction objective and fully meets its RHNA and also considering housing units that have been constructed since certification of the Sustainability Update EIR, potential development could result in approximately 190 dwelling units over the 4,500 analyzed in the EIR. This amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR. Even considering a worst-case scenario in which a slightly increased amount of residential development over the EIR estimate could occur as a result of the Housing Element, adequate wastewater treatment capacity exists at regional treatment plants. Thus, future development arising from implementation of the Housing Element would be within the scope of water supply impacts analyzed in the Sustainability Update EIR, and would not result in a new significant impact related to wastewater treatment capacity.

- d) **Generation of Solid Waste.** As described in the Sustainability Update EIR, Santa Cruz County Recycling and Solid Waste Services (Recycling & Trash) is responsible for the operation and administration of solid waste diversion and disposal in the unincorporated areas of the county. Recycling & Trash operates the County's two solid waste facilities, the Buena Vista Landfill located west of the City of Watsonville at 1231 Buena Vista Drive and the Ben Lomond Transfer Station located east of Ben Lomond in the San Lorenzo Valley at 9835 Newell Creek Road. The Sustainability Update EIR indicates that the Buena Vista Landfill has 26% remaining capacity (1,947,631 cubic yards) and is expected to close in 2030, after which refuse from the unincorporated county will be transferred to the Monterey Regional Waste Management District (MRWMD) Monterey Peninsula Landfill, and the County is currently in the process of studying a transfer station to be located at the current Buena Vista Landfill site to facilitate the transition. The Monterey Peninsula Landfill



has 98% remaining capacity (over 48.5 million cubic yards) and is expected to have capacity for approximately at least 90 more years.

The Sustainability Update EIR, which addressed impacts associated with solid waste disposal, concluded that adequate landfill capacity is available to serve development accommodated by the Sustainability Update and beyond. Table 4.16-7 of the Sustainability Update EIR (Draft EIR volume) lists proposed and retained General Plan/LCP policies that would serve to avoid and minimize impacts related to solid waste disposal. Furthermore, the Sustainability Update EIR indicates that the County is working to implement its Zero Waste Plan, which would ultimately result in no net increase in solid waste generation. Thus, the Sustainability Update's impact related to generation of solid waste would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly result in slightly higher new residential development than was analyzed in the Sustainability Update EIR, which could result in an incremental increase in solid waste generation. As described in the EIR, the area landfills serving the County have adequate capacity to serve development accommodated by the Sustainability Update and beyond. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations related to solid waste generation and disposal. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to solid waste generation.

- e) **Solid Waste Statutes and Regulations.** As described in the Sustainability Update EIR, future development accommodated by the Sustainability Update would be required to comply with all applicable regulations associated with the reduction of solid waste entering landfills, as well as plans, policies, and programs related to recycling/diversion and disposal of solid waste. Solid waste generated during construction and operation of development projects would be expected to be recycled to the maximum extent possible, and unsalvageable materials generated from development projects would be disposed of at authorized sites in accordance with all applicable federal, state, and local statutes and regulations. Thus, the Sustainability Update's impact related to generation of solid waste and compliance with applicable solid waste regulations would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly result in new residential development, which would be concentrated in the County's USL. Future residential development under the 2023 Housing Element would be subject to and comply with the same statutes and regulations as described in the EIR associated with reduction of solid waste entering landfills, and programs related to recycling/diversion and disposal of solid waste. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to compliance with solid waste statutes and regulations.

## Mitigation Measures

None were identified in the EIR, and none are required with the proposed project as a significant impact has not been identified.



## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to utilities than previously evaluated in the Sustainability Update EIR.

### 4.3.20 Wildfire

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification ?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>XX. WILDFIRE</b> – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	DEIR pp. 4.17-14 to 4.17-18	No	No	No	None
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?	DEIR pp. 4.17-14 to 4.17-18	No	No	No	None
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?	DEIR pp. 4.17-14 to 4.17-18	No	No	No	None
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?	DEIR pp. 4.17-14 to 4.17-18	No	No	No	None
e) Substantially impair an adopted emergency response plan or emergency evacuation plan?	DEIR pp. 4.17-18 to 4.17-19	No	No	No	None

## Discussion

- a) **Wildland Fire Hazards.** The Sustainability Update EIR indicates that the risk of significant wildfire exists in the county due to topography, fuels, and weather conditions. The county experiences annual cycles of





elevated fire danger, with the wildfire season typically extending from roughly May into late October or early November. The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire hazard severity zones (FHSZs) throughout the county. According to CAL FIRE's currently adopted (2007) FHSZ maps, most of the county is designated as moderate to high FHSZs, while a small area of Bonny Doon and areas along the eastern boundary of the county are designated as being very high FHSZs. Large areas of the county have also been mapped and designated in the County's General Plan as Critical Wildfire Hazard Areas due to accumulations of wildfire prone vegetation, steep and dry slopes, and the presence of structures vulnerable to wildland fires. These areas are generally situated in the steeper higher elevations of the county. Most of these areas are along the border of Santa Clara County or in the coastal ridges between Highway 9 and Highway 1. At the local level, the County is responsible for managing emergency preparedness, response, and evacuation through its Local Hazard Mitigation Plan (LHMP), which includes mitigation strategies for reducing wildland fire risks, creating defensible space around structures, improving access, and inter-agency coordination of efforts.

The Sustainability Update EIR, which evaluated impacts associated with wildfire hazards, found that the Sustainability Update could lead to some development in areas that are located within designated FHSZs; however, all development would be required to comply with local regulations regarding building and fire codes, including requirements for provision of adequate access and water supply, fire sprinkler systems in new buildings, and exterior defensible space. Future development would be required to comply with applicable policies as summarized in Table 4.17-1 of the Sustainability Update EIR (Draft EIR volume), would serve to avoid or minimize impacts related to exposure to wildfires. While some future development could be located in fire hazard zones, with compliance with state and local regulations and implementation of the existing and proposed General Plan/LCP policies, future development would be designed to minimize risks resulting from exposure to wildland fire hazards. Therefore, the Sustainability Update EIR concluded that, with compliance with state and local regulations and implementation of the County's General Plan/LCP policies and LHMP mitigation strategies, the impact related to wildfire would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to new residential development, which would primarily be concentrated within the county's USL. All future residential development would be required to comply with local regulations regarding building and fire codes, including requirements for provision of adequate access and water supply, fire sprinkler systems in new buildings, and exterior defensible space, as well as General Plan/LCP policies and SCCC regulations which serve to avoid or minimize impacts related to exposure to wildfires. Thus, future development resulting from the proposed 2023 Housing Element would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to wildfire hazards.

- b-d) Exacerbation of Wildfire Risks.** The Sustainability Update EIR indicates that the risk of significant wildfire exists in Santa Cruz County, due to the local climate and topography as well as existing development patterns where over 50% of the county's population lives in the WUI. As described in the EIR, CAL FIRE has mapped fire hazard severity zones throughout the county's state responsibility area (SRA), including moderate, high, and very high FHSZs. In addition, large areas of the county have been mapped and designated in the County's General Plan as Critical Wildfire Hazard Areas due to accumulations of wildfire prone vegetation, steep and dry slopes, and the presence of structures vulnerable to wildland fires.



According to CAL FIRE's currently adopted (2007) FHSZ mapping,<sup>9</sup> most of the county is designated as moderate to high fire hazard severity, while a small area of Bonny Doon and areas along the eastern boundary of the county are designated as being very high FHSZs. Critical wildfire hazard areas identified by the County are primarily located along the border of Santa Clara County in the South County region and in the coastal ridges of the Mountain and North Coast regions.

The Sustainability Update EIR, which comprehensively addressed impacts associated with wildfire hazards, concluded that development accommodated by the Sustainability Update would primarily be located in urban areas with the County's USL, where wildfire hazards are relatively lower than in WUI areas. Future development in WUI areas would be required to comply with state and local regulations and local policies regarding siting and design of structures to avoid/minimize risks of exposure to fires. Requirements for adequate access, water supply, building design, and defensible space would also minimize conditions that would lead to exacerbation of a wildfire hazard or result in an adverse secondary effect as a result of development, such as grading of steep slopes or inadequate drainage. Additionally, the Sustainability Update did not forecast an increase in new residential units in rural planning areas over what could have occurred under the existing General Plan/LCP, although there could be some increased non-residential development in these areas. However, as described in the EIR, all development would be required to be designed in accordance with fire and building code requirements. Therefore, the EIR determined that the Sustainability Update would not directly or indirectly result in activities that would exacerbate the existing risk of wildland fires or result in secondary impacts related to flooding, slope instability, or discharge of pollutants, and the impact would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to residential development, primarily within the County's USL, like development under the Sustainability Update, where wildfire hazards are lower than in the WUI. Nonetheless, all development would be required to comply with adopted local, regional, and state plans and regulations addressing exposure to wildfire hazards. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to exacerbation of wildfire risks.

- e) **Emergency Response and Evacuation.** The Sustainability Update EIR indicates that the Santa Cruz County Office of Response, Recovery & Resilience (OR3) serves as the emergency management office for responding to disasters, including evacuations when necessary. Evacuations are frequently a response to natural disasters to protect people from potential harm. The County uses a variety of methods to notify residents when an evacuation is necessary, including reverse 911 calls, text or phone messages through Code Red (for those who have signed up), and/or door-to-door notifications. Evacuation areas are determined by the incident command team, who are in charge of responding to the disaster.

The Sustainability Update EIR, which evaluated impacts associated with emergency response and evacuation, concluded that the Sustainability Update would not impair implementation of or interfere with an emergency response or evacuation plan. As described in the EIR, development under the Sustainability Update would be concentrated in urban areas within the County's USL where fire hazards are lower than in

<sup>9</sup> As of December 2022, CAL FIRE has begun the regulatory adoption process to update its 2007 FHSZ maps, however updated maps are not yet adopted and were not in effect at the time the Notice of Preparation was published.



wildland-urban interface (WUI) areas. Nonetheless, all development would be required to comply with adopted local, regional, and state plans and regulations addressing emergency access and exposure to wildfire hazards. The Sustainability Update's AM Element includes policies that would minimize the impacts related to provision of inadequate emergency access. Specifically, proposed Policy AM-6.1 calls for adequate roads for fire and emergency response access, which would be reviewed as part of future development project applications. In addition, County staff would work in conjunction with the fire departments, and other emergency access providers to continue to coordinate development review and review of new roads with Fire District and Sheriff's Office staff (AM-6-1a). Therefore, the EIR determined that the Sustainability Update and subsequent development accommodated by the Update would not directly or indirectly result in provision of inadequate emergency access or substantially impair implementation of an emergency response or evacuation plan, and the impact would be less than significant.

Implementation of the proposed 2023 Housing Element could indirectly lead to residential development, primarily within the County's USL, like development under the Sustainability Update, where wildfire hazards are lower than in the WUI. Future residential development would be in locations evaluated in the Sustainability Update EIR, and would be required to comply with adopted local, regional, and state plans and regulations addressing emergency access. All future residential development would be required to comply with applicable General Plan/LCP policies and SCCC regulations. Thus, future development would be within the scope of impact analyzed within the Sustainability Update EIR, for which a less-than-significant impact was identified related to emergency access and emergency response.

## Mitigation Measures

None were identified in the EIR, and none are required with the proposed project as a significant impact has not been identified.

## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to wildfire than previously evaluated in the Sustainability Update EIR.



### 4.3.21 Mandatory Findings of Significance

	Where Impact was Analyzed in Prior EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior EIR Mitigation Measures Implemented or Address Impacts?
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE</b>					
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Draft EIR pp. 4.4-29 to 4.4-40, 4.5-10 to 4.5-26	No	No	No	Yes MM BIO-2B, CUL-1, CUL-2
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	Draft EIR pp. 4.1-24, 4.2-30 to 4.2-31, 4.3-31, 4.4-40, 4.5-26 to 4.5-27, 4.6-16, 4.7-27, 4.8-37, 4.9-23, 4.10-50 to 4.10-51, 4.11-33, 4.12-27 to 4.12-28, 4.13-16 to 4.13-17, 4.14-23, 4.15-33, 4.16-41 to 4.16-42, 4.17-19	No	No	No	None
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Draft EIR Sections 4.3, 4.9, 4.12	No	No	No	None



## Discussion

- a) **Substantially Degrade Environmental Quality.** As discussed above in Section 4.3.4, Biological Resources, and Section 4.3.54.3.5, Cultural Resources, the proposed County of Santa Cruz 2023 Housing Element would not result in any new significant impacts or substantially more severe impacts than analyzed in the Sustainability Update EIR. The EIR included mitigation measures related sensitive habitat and historical resources, which would continue to apply to future development as specified by the measures. Therefore, the proposed 2023 Housing Element would not result in new or substantially more severe impacts related to environmental quality, fish or wildlife habitat or populations, plant or animal communities including special-status species, or examples of California history or prehistory than previously identified and analyzed in the Sustainability Update EIR.
- b) **Cumulative Impacts.** The Sustainability Update EIR evaluated cumulative impacts for each environmental resource topic based on future and cumulative projects identified on Table 4.0-1 in the Sustainability Update EIR. Potentially significant cumulative impacts were identified for cultural resources (historical resources), GHG emissions, hydrology (groundwater supplies in the Pajaro Valley), transportation (VMT), and utilities (water supply for two water agencies). However, the Sustainability Update's incremental contribution was not found to be cumulatively considerable, except for cultural resources (historical resources), transportation (VMT), and utilities (water supply). As discussed in this Addendum, the proposed 2023 Housing Element and future residential development would be within or only slightly above the amount of development analyzed in the Sustainability Update EIR and would not result in new or substantially more severe impacts that would lead to new significant or more severe impacts related to cumulative impacts than previously identified in the Sustainability Update EIR.
- c) **Substantial Adverse Effects on Human Beings.** The Sustainability Update EIR did not identify significant impacts related to impacts that could have a substantial adverse effect on human beings, such as air emissions, noise, or hazards due to location near an airport. construction noise and vibration. As discussed in this Addendum, the proposed 2023 Housing Element would not result in new significant impacts or more severe impacts than those analyzed in the EIR as explained in Sections 4.3, Air Quality, 4.9, Hazards and 4.12, Noise, None were identified in the EIR, and none are required with the proposed project as a significant impact has not been identified.

## Conclusion

As demonstrated in the discussion above, adoption and implementation of the proposed 2023 Housing Element, as well as future residential development, would not result in new significant impacts or substantially more severe significant impacts related to mineral resources than previously evaluated in the Sustainability Update EIR.

## Noise Mitigation Measures

As discussed in preceding sections of this Addendum, mitigation measures were included in the Sustainability Update EIR to mitigate potentially significant impacts related to biological resources, cultural resources, and transportation, some of which would be required of future residential development as specified in the measures.



No new mitigation measures are required with the proposed 2023 Housing Element as this Addendum has not identified any new significant impacts.

## Conclusion

As demonstrated in the discussion above and in this Addendum, the proposed 2023 Housing Element would not result in new significant impacts or substantially more severe impacts related to the mandatory findings of significance than previously identified and analyzed in the Sustainability Update EIR.





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## 5.2 List of Preparers of Addendum

### **County of Santa Cruz Community Development & Infrastructure Department**

Stephanie Hansen, Assistant Director – Policy & Housing

Mark Connolly, Principal Planner

David Carlson, Resource Planner IV

Sheila McDaniel, Planner IV

Anais Schenk, Transportation Planner

Matthew Sundt, Planner IV

Jacob Lutz, Office Assistant I



**Dudek**

Stephanie Strelow, Project Manager

Catherine Wade, PhD, Deputy Project Manager

Matthew Morales, Air Quality Specialist

Kimley-Horn, VMT Analysis



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# Appendix A

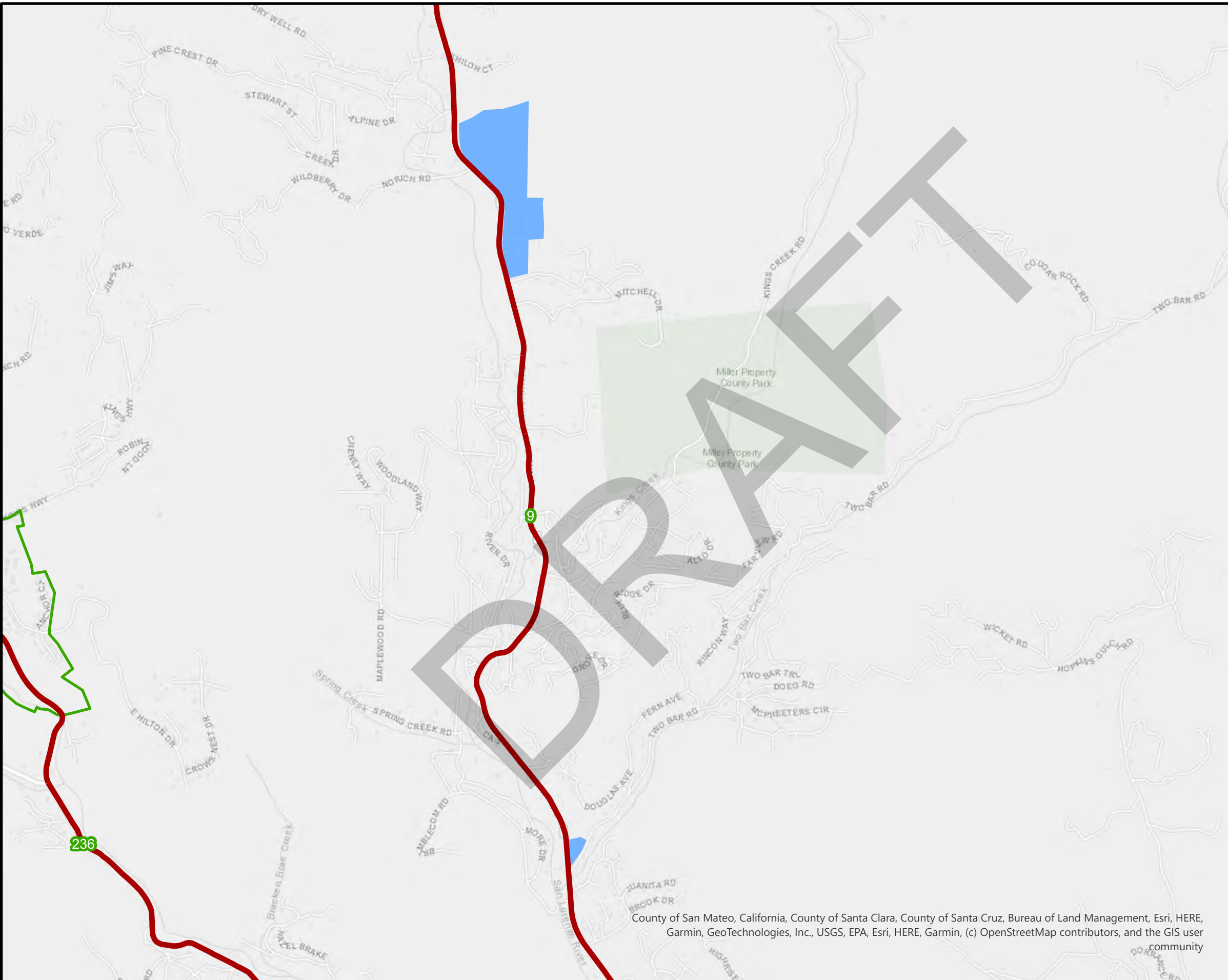
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Location Maps of Parcels Proposed for General Plan/LCP Land Use Designation and/or Zoning Map Amendments



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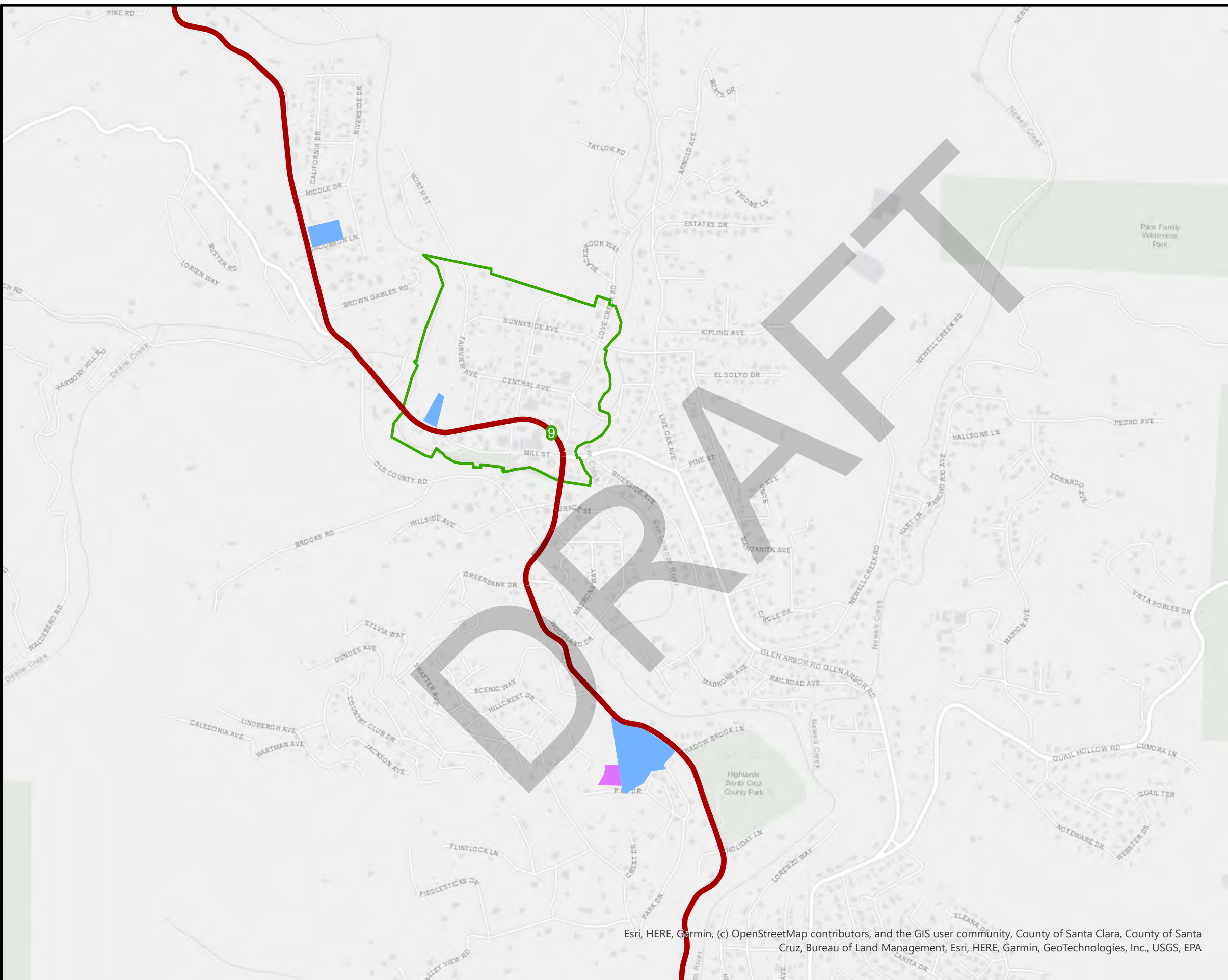
# BOULDER CREEK







-  Underutilized
-  Rural Services Line (RSL)
-  Highways

County of San Mateo, California, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community

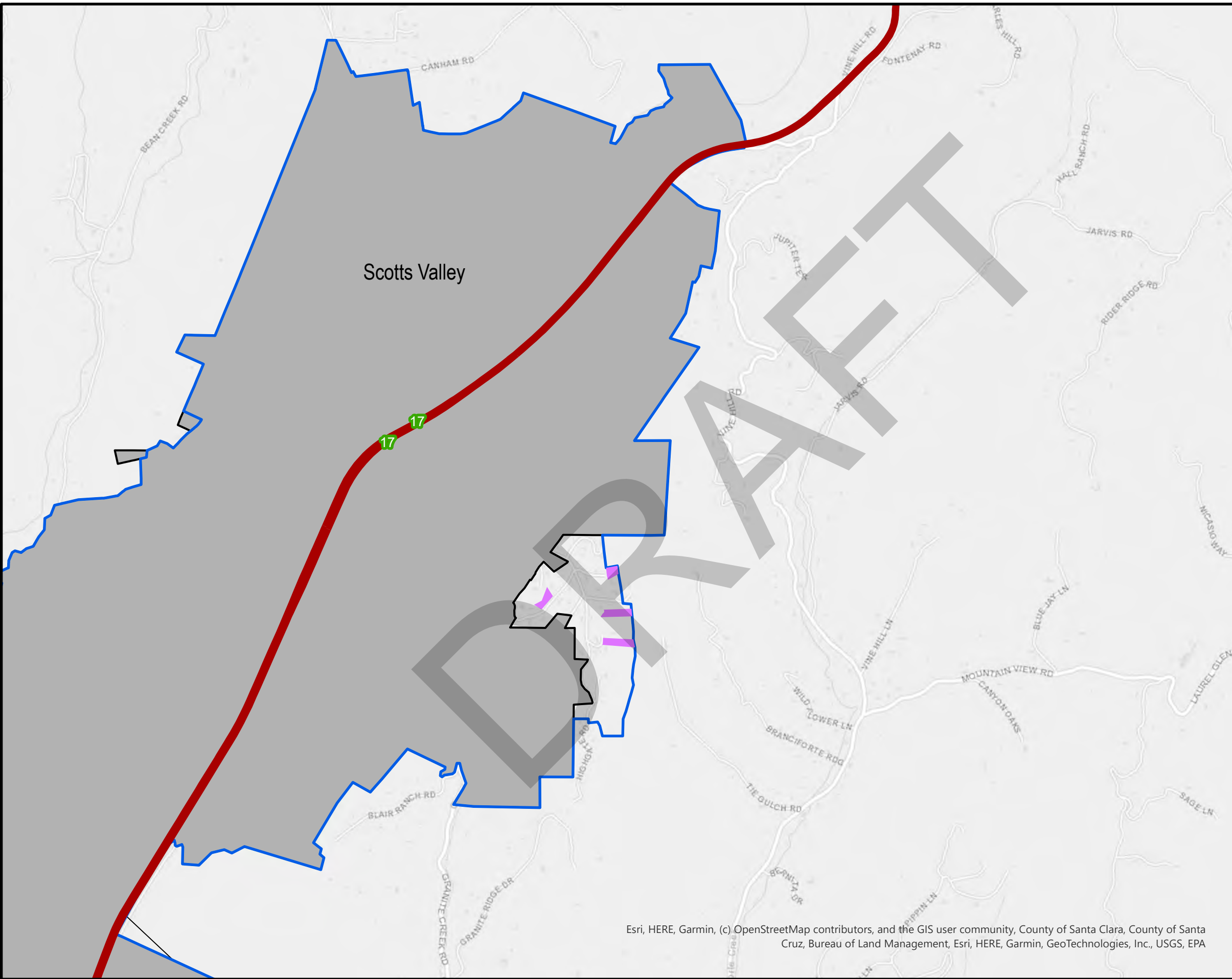
# BEN LOMOND


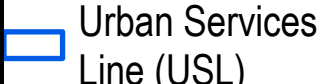




-  Underutilized
-  Vacant
-  Rural Services Line (RSL)
-  Highways

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

# SCOTTS VALLEY

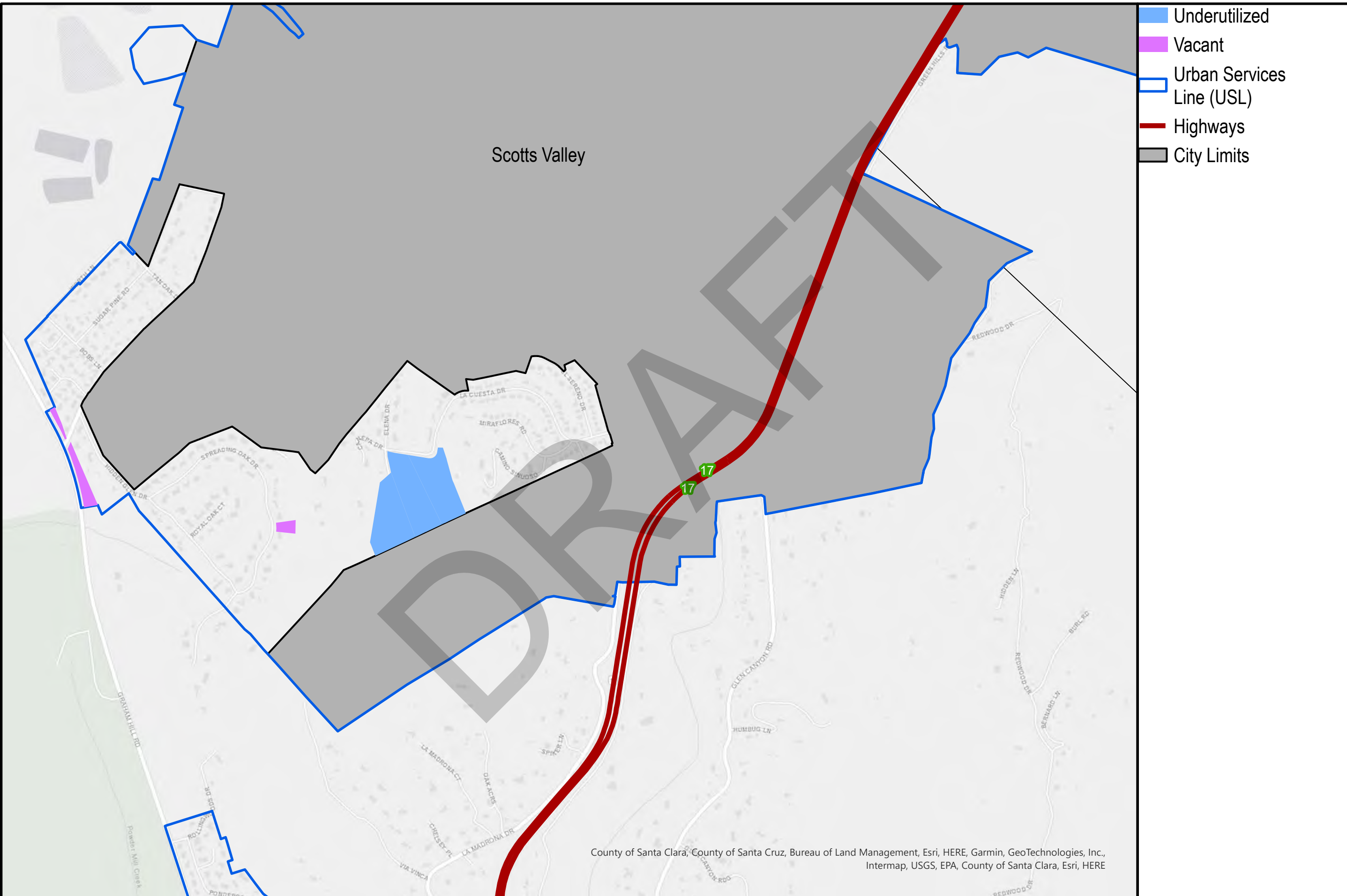


-  Vacant
-  Urban Services Line (USL)
-  Highways
-  City Limits

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA



# SCOTTS VALLEY

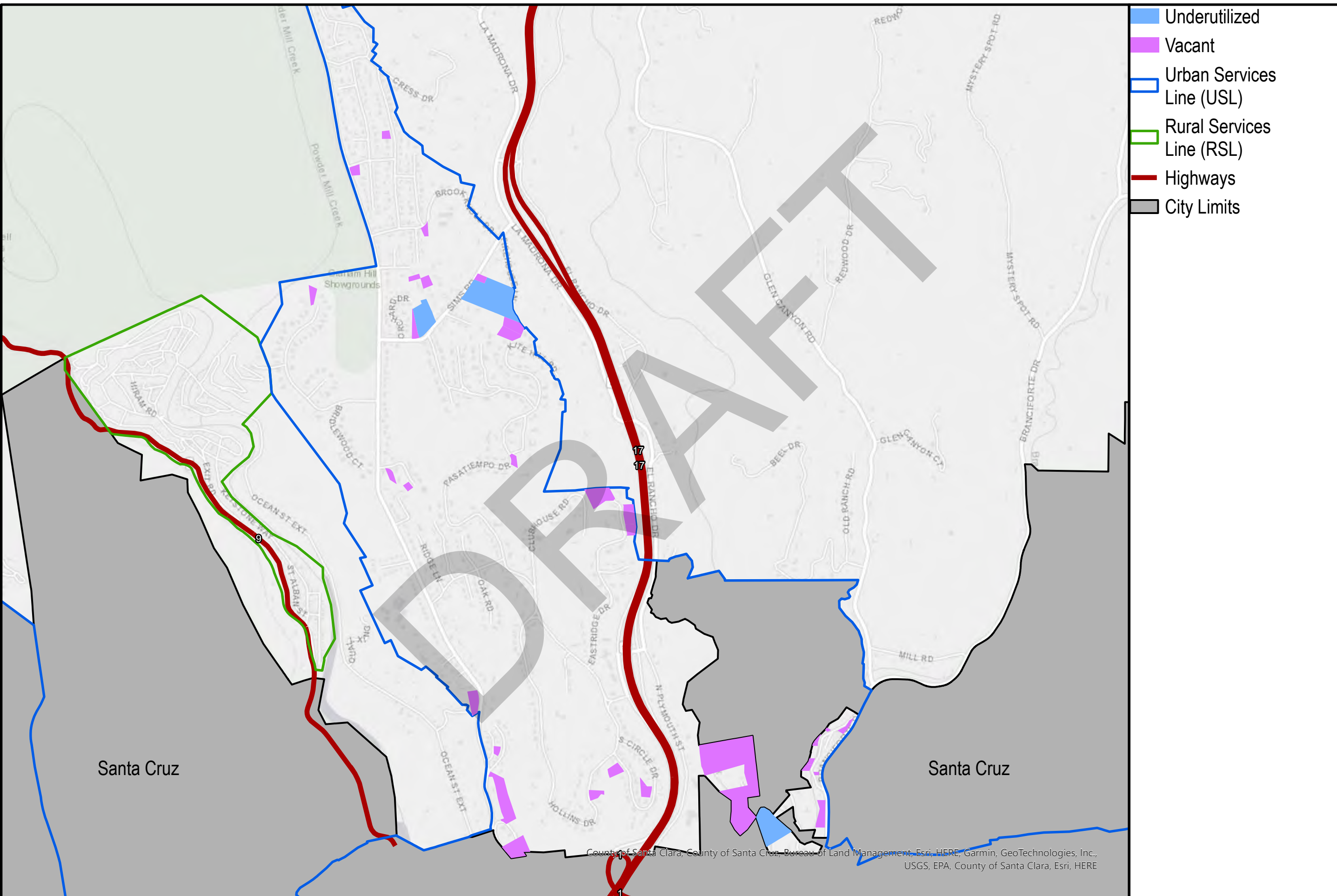


- Underutilized
- Vacant
- Urban Services Line (USL)
- Highways
- City Limits

County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., Intermap, USGS, EPA, County of Santa Clara, Esri, HERE

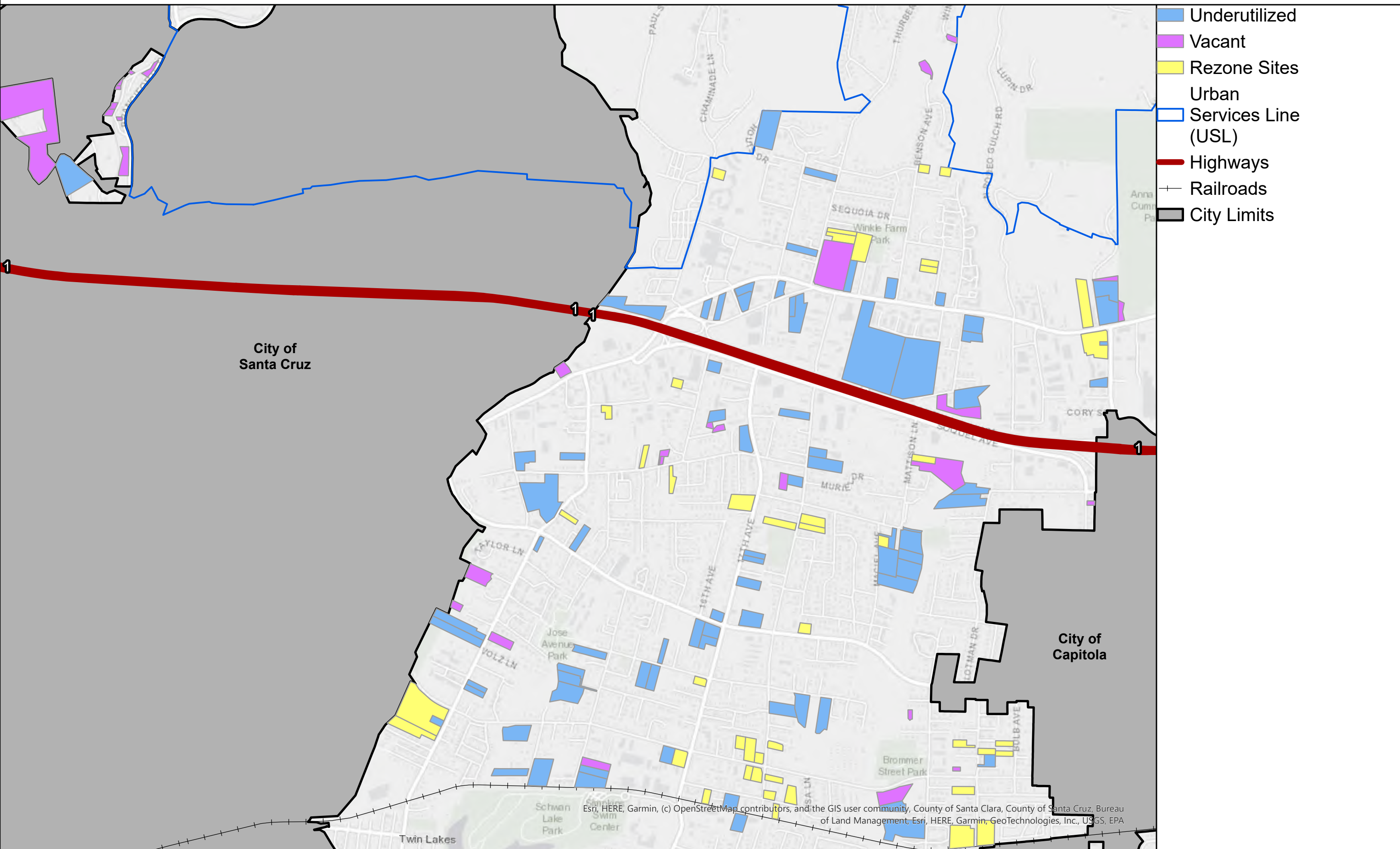
Source: Santa Cruz County. Please refer to the Santa Cruz County GISWeb for the latest data and maps available.

# SANTA CRUZ





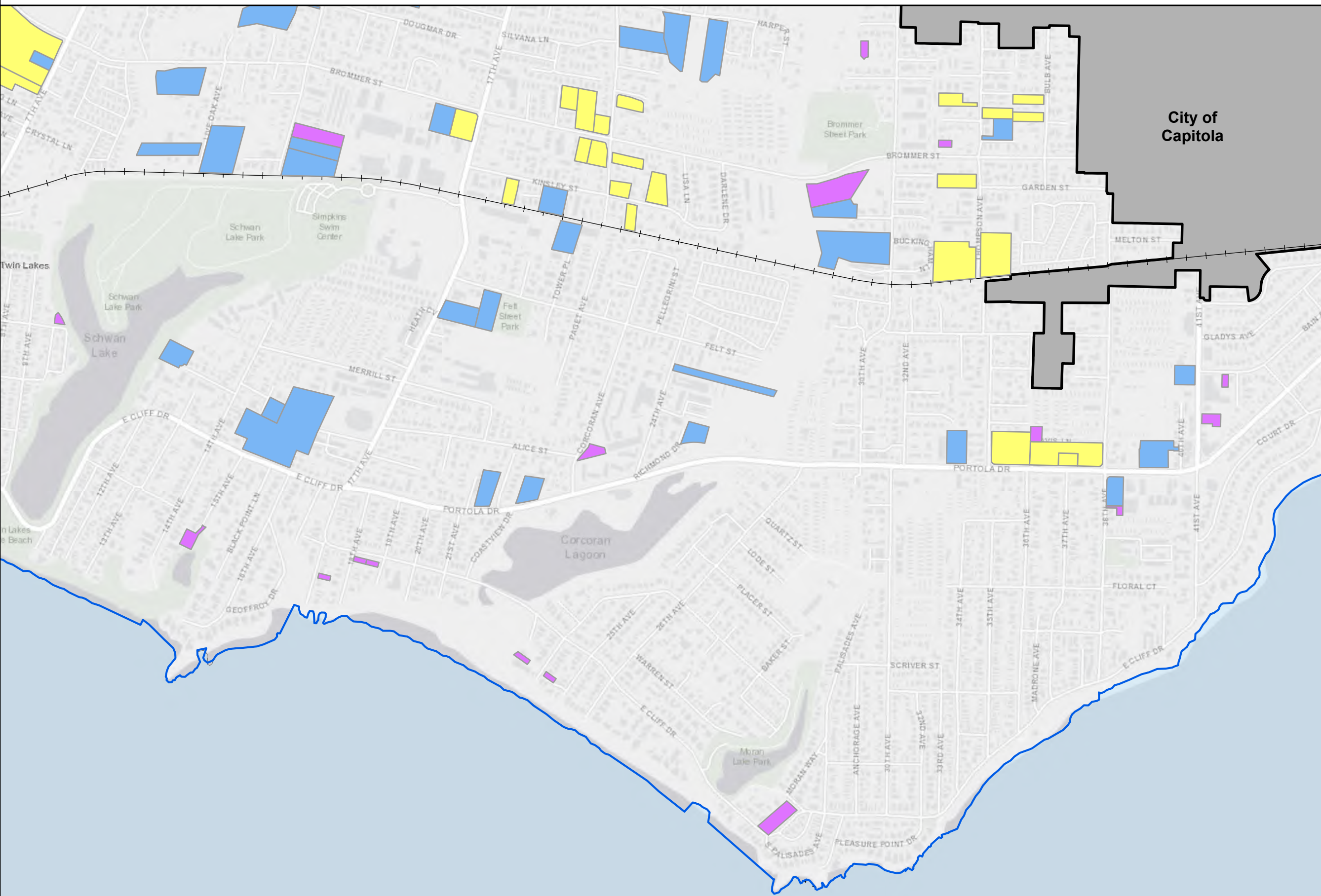
# LIVE OAK



Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA



# PLEASURE POINT



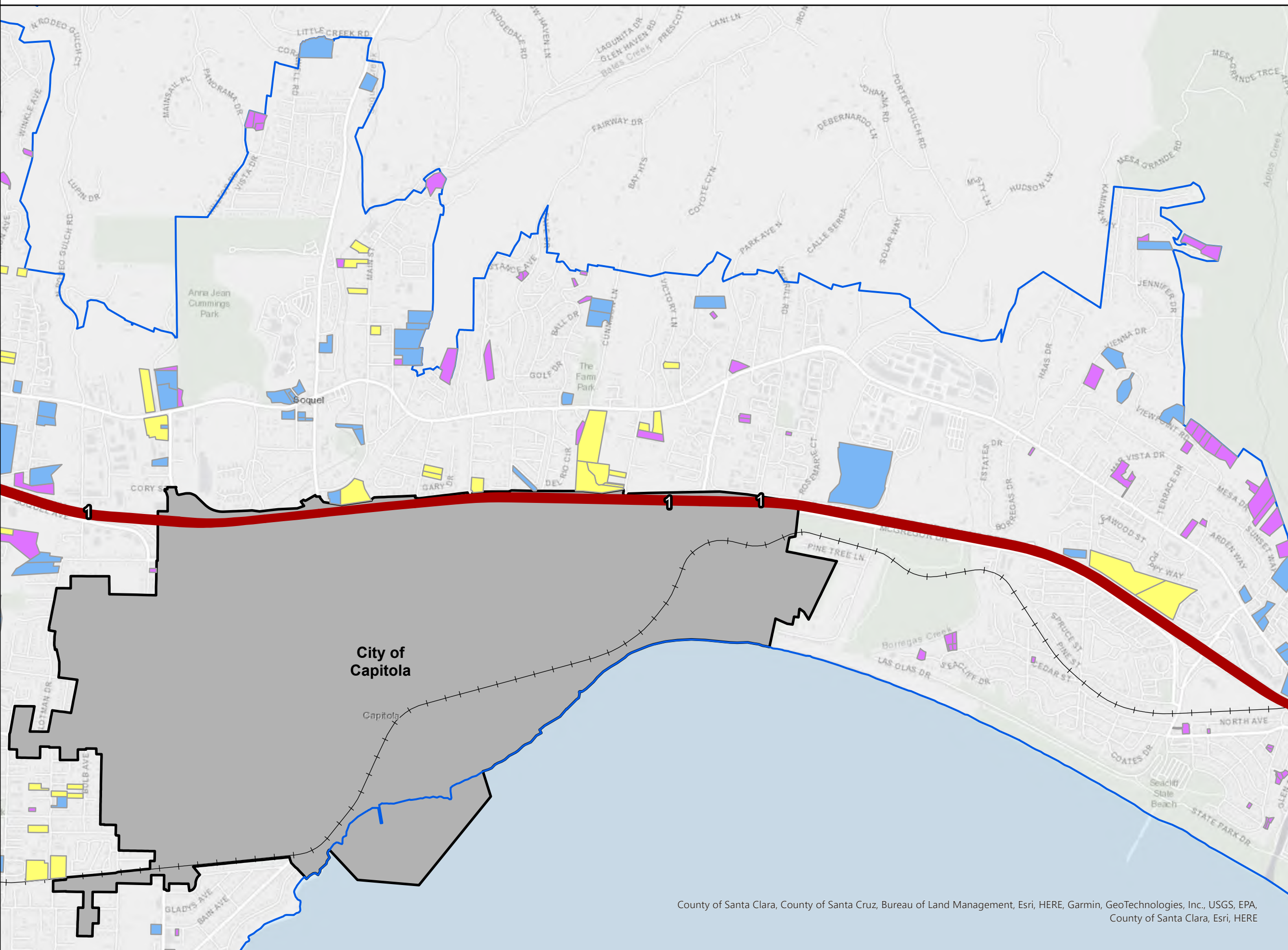
- Underutilized
- Vacant
- Rezone Sites
- Urban Services Line (USL)
- Highways
- Railroads
- City Limits

County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., Intermap, USGS, EPA, County of Santa Clara, Esri, HERE

Source: Santa Cruz County. Please refer to the Santa Cruz County GISWeb for the latest data and maps available.



# SOQUEL/APTOS



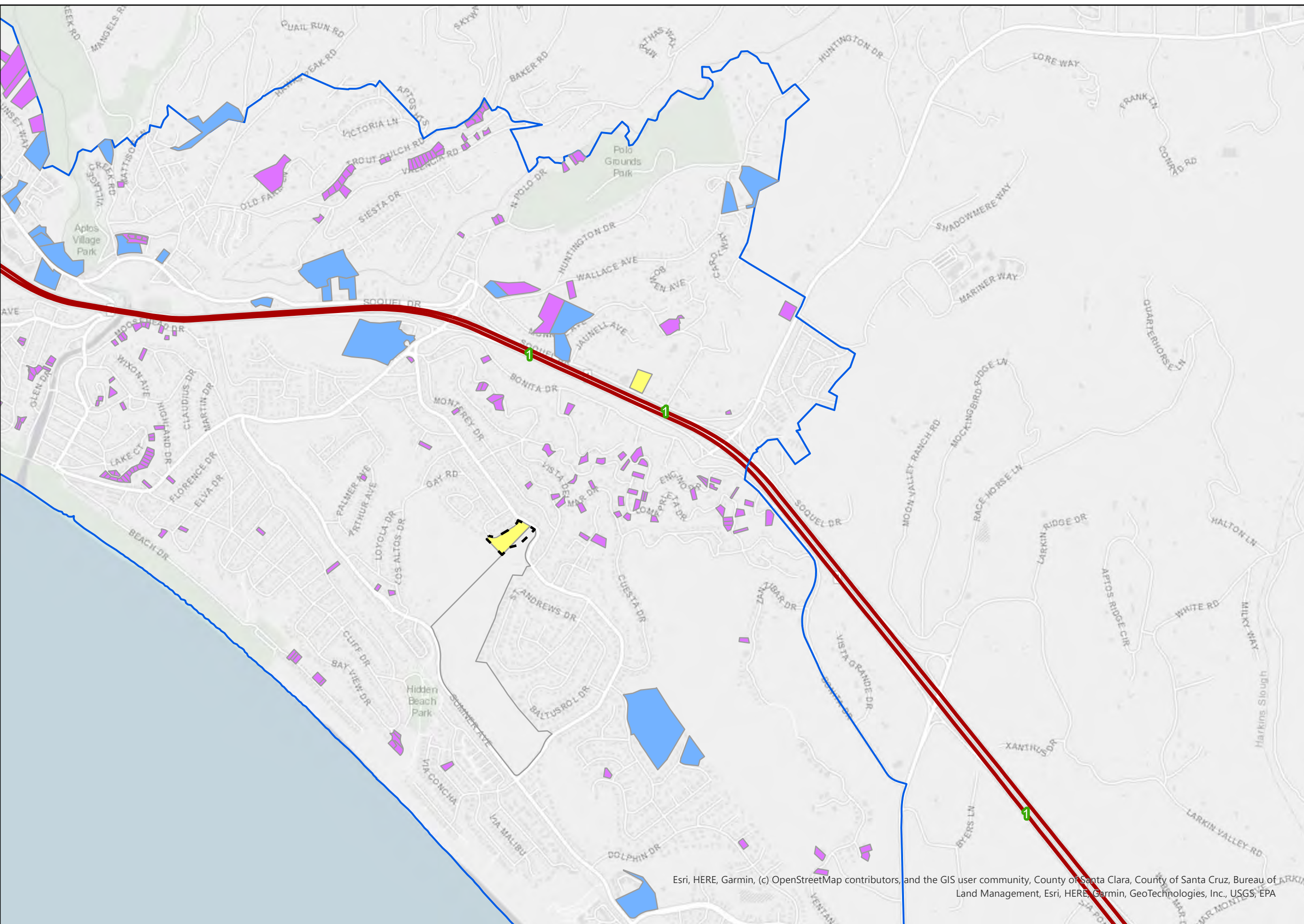
- Underutilized
- Vacant
- Rezone Sites
- Urban Services Line (USL)
- Highways
- Railroads
- City Limits

County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA, County of Santa Clara, Esri, HERE

Source: Santa Cruz County. Please refer to the Santa Cruz County GISWeb for the latest data and maps available.



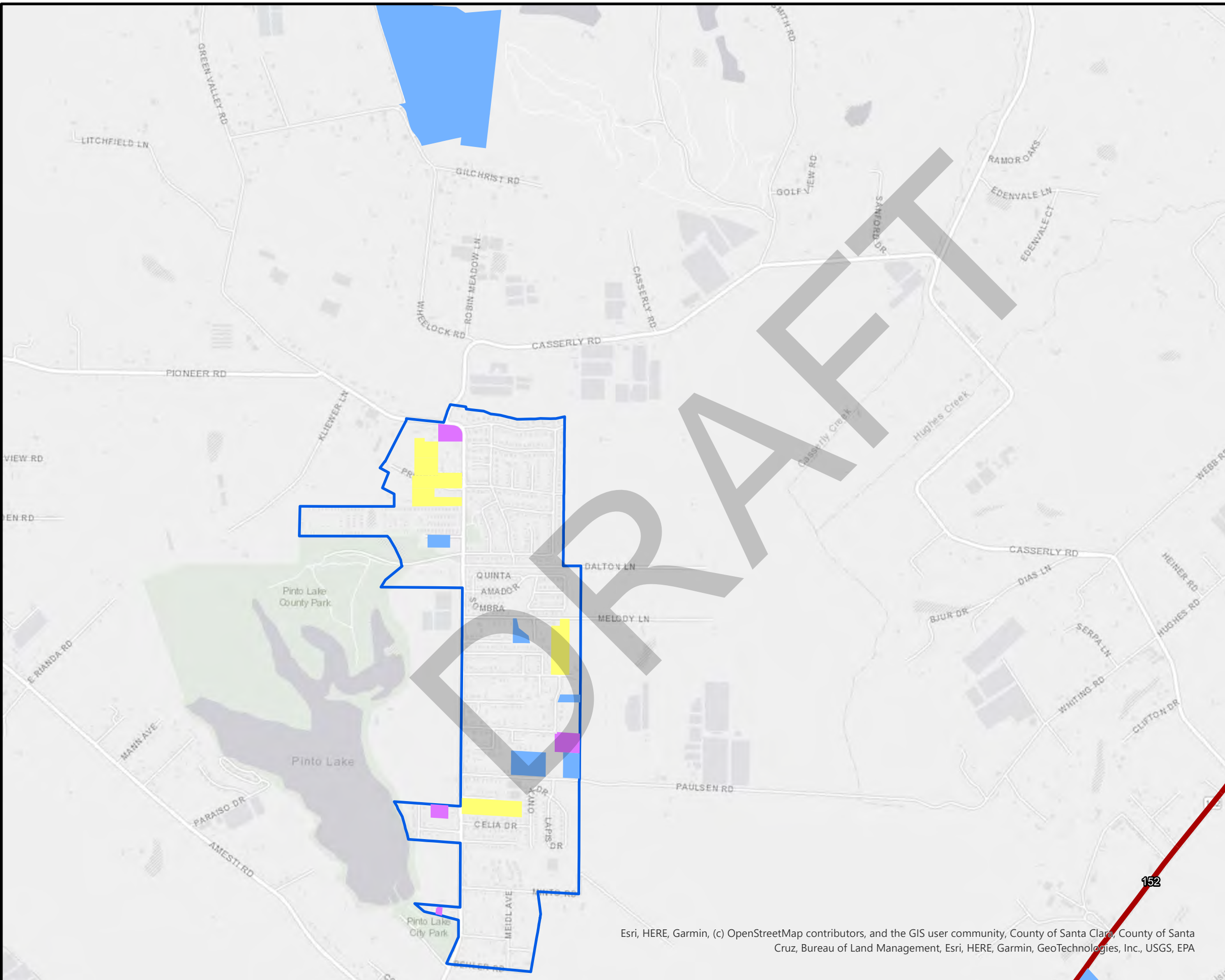
# RIO DEL MAR/SEASCAPE



- Vacant
- Underutilized
- Rezone Sites
- Proposed Area of Rezone
- Urban Services Line (USL)
- Highways

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

# GREEN VALLEY

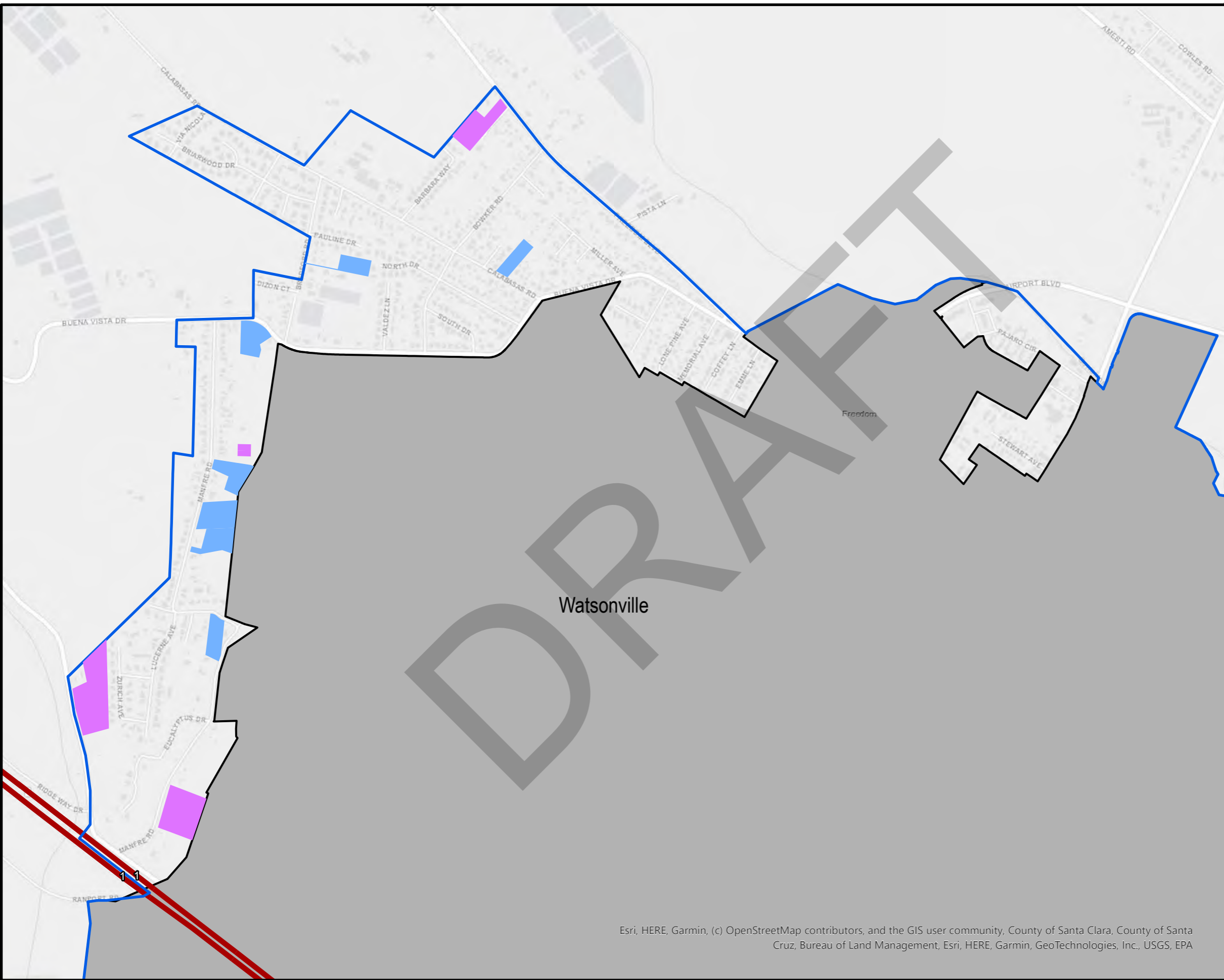


- Underutilized
- Vacant
- Rezone Sites
- Urban Services Line (USL)
- Highways

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA



# FREEDOM

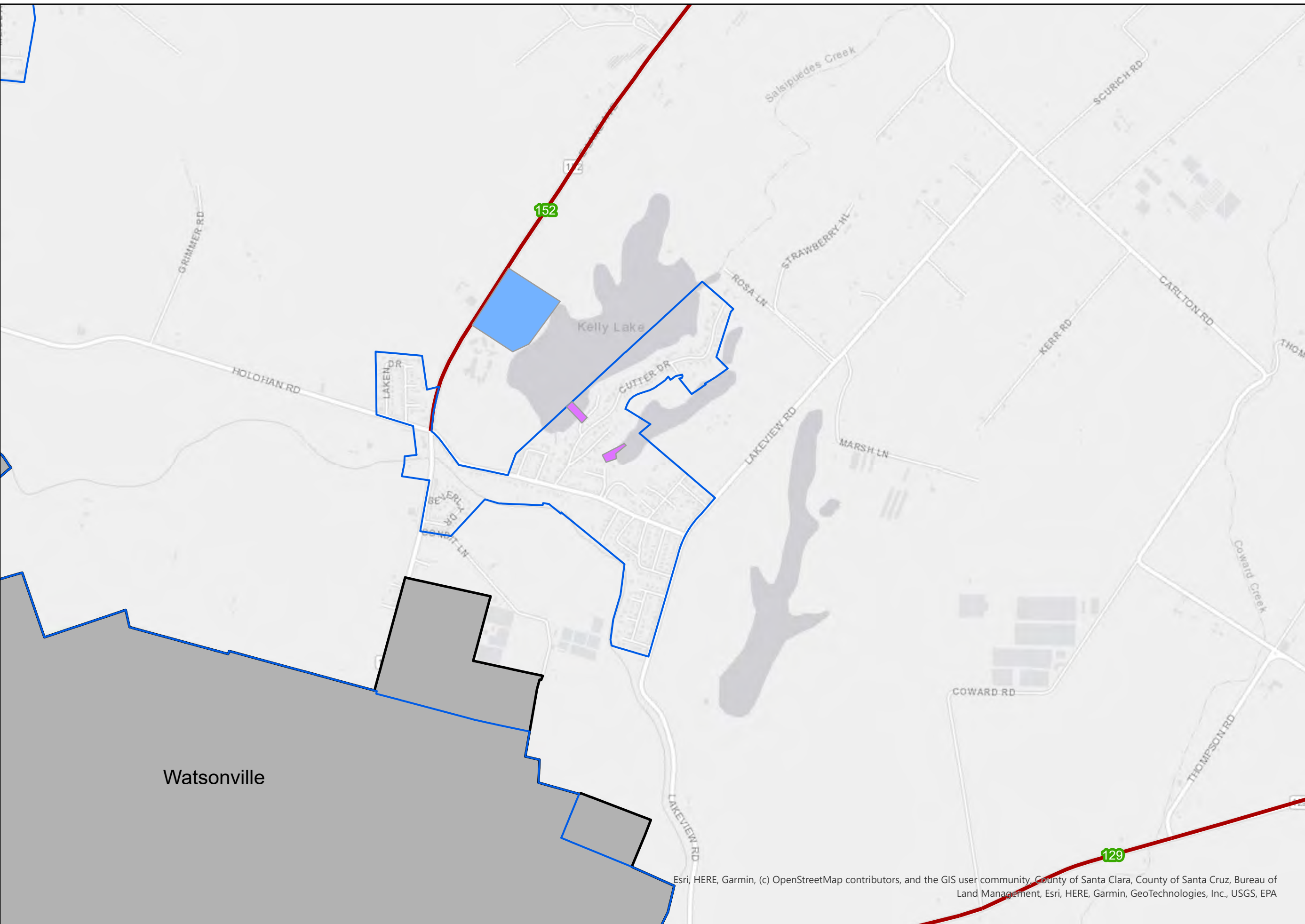


- Underutilized
- Vacant
- Urban Services Line (USL)
- City Limits
- County Boundary
- Highways

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA






# WATSONVILLE

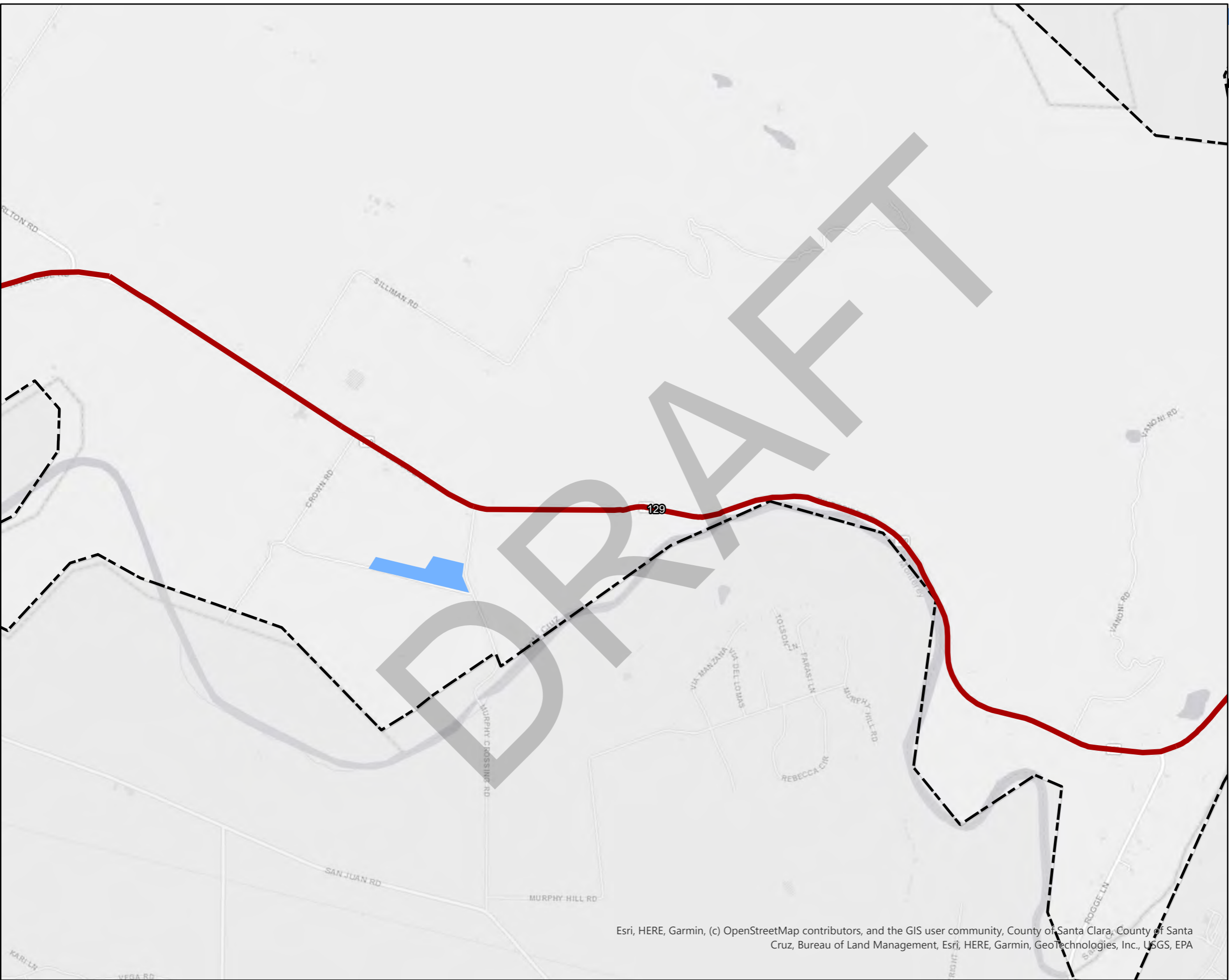


- Vacant
- Underutilized
- Highways
- City Limits

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

# WATSONVILLE

-  Underutilized
-  Highways
-  County Boundary



Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA



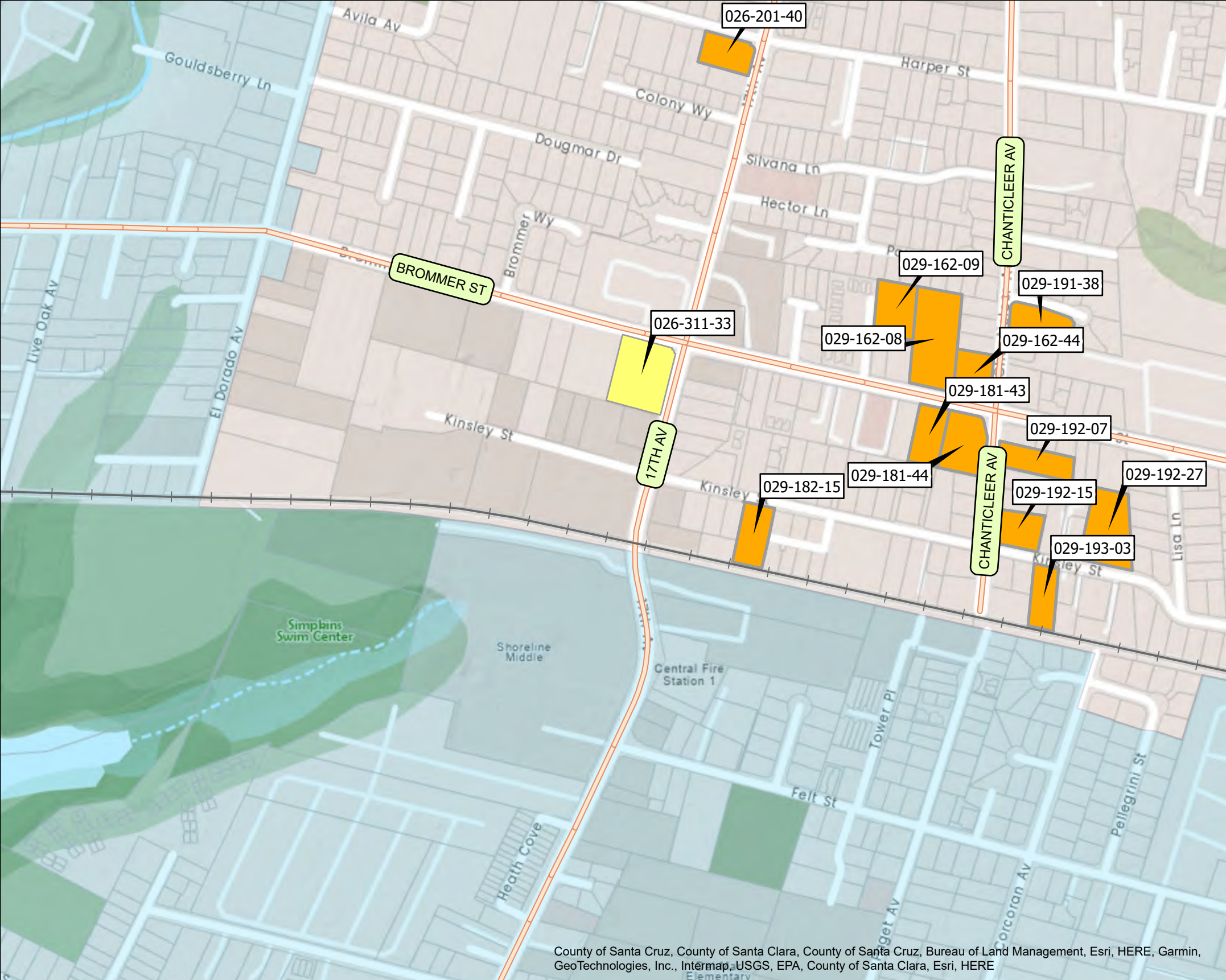


# REZONE MAPS



# SITE INVENTORY

APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
026-201-40	9	R-1-6-D	RM-1.5	R-UH
026-311-33	30	C-1	C-1-Min	C-N
029-162-08	7	R-1-6	RM-4	R-UH
029-162-09	10	R-1-6	RM-2	R-UH
029-162-44	6	R-1-6	RM-1.5	R-UH
029-181-43	5	RM-4	RM-1.5	R-UH
029-181-44	5	R-1-6	RM-2	R-UH
029-182-15	6	RM-4	RM-1.5	R-UH
029-191-38	9	R-1-6	RM-1.5	R-UH
029-192-07	8	R-1-6	RM-1.5	R-UH
029-192-15	8	R-1-6	RM-1.5	R-UH
029-192-27	3	R-1-6	RM-3	R-UH
029-193-03	9	R-1-6	RM-1.5	R-UH



County of Santa Cruz, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., Intermap, USGS, EPA, County of Santa Clara, Esri, HERE

## Brommer St & 17th Av

Potential Rezone Sites	Highways	City Limits
Potential SB10 Rezone Sites	Urban Services Line (USL)	County Boundary
Major Roads	Rural Services Line (RSL)	Coastal Zone
		Railroads

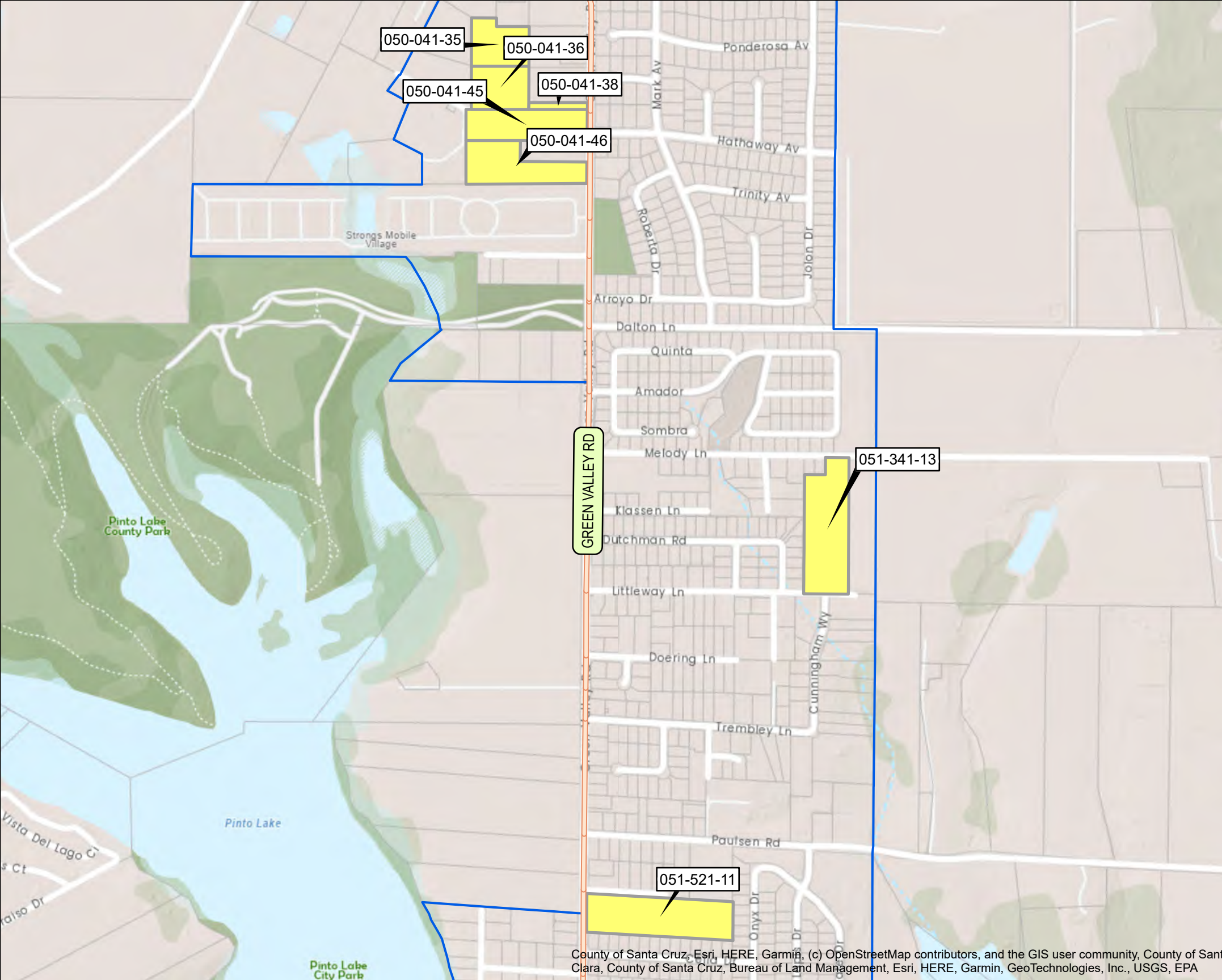


700 Feet



# SITE INVENTORY

APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
050-041-35	162	R-1-1AC	RM-2	R-UH
050-041-36	31	R-1-1AC	RM-2	R-UH
050-041-38	5	R-1-1AC	RM-2	R-UH
050-041-45	47	R-1-1AC	RM-2	R-UH
050-041-46	48	R-1-1AC-AIA	RM-2	R-UH
051-341-13	70	R-1-10-AIA	RM-2	R-UH
051-521-11	119	R-1-10	RM-1.5	R-UH

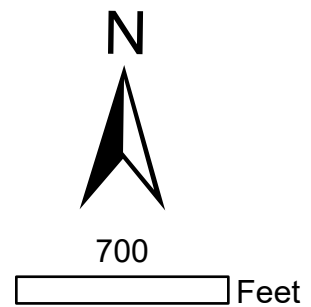


County of Santa Cruz, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

## Green Valley Road



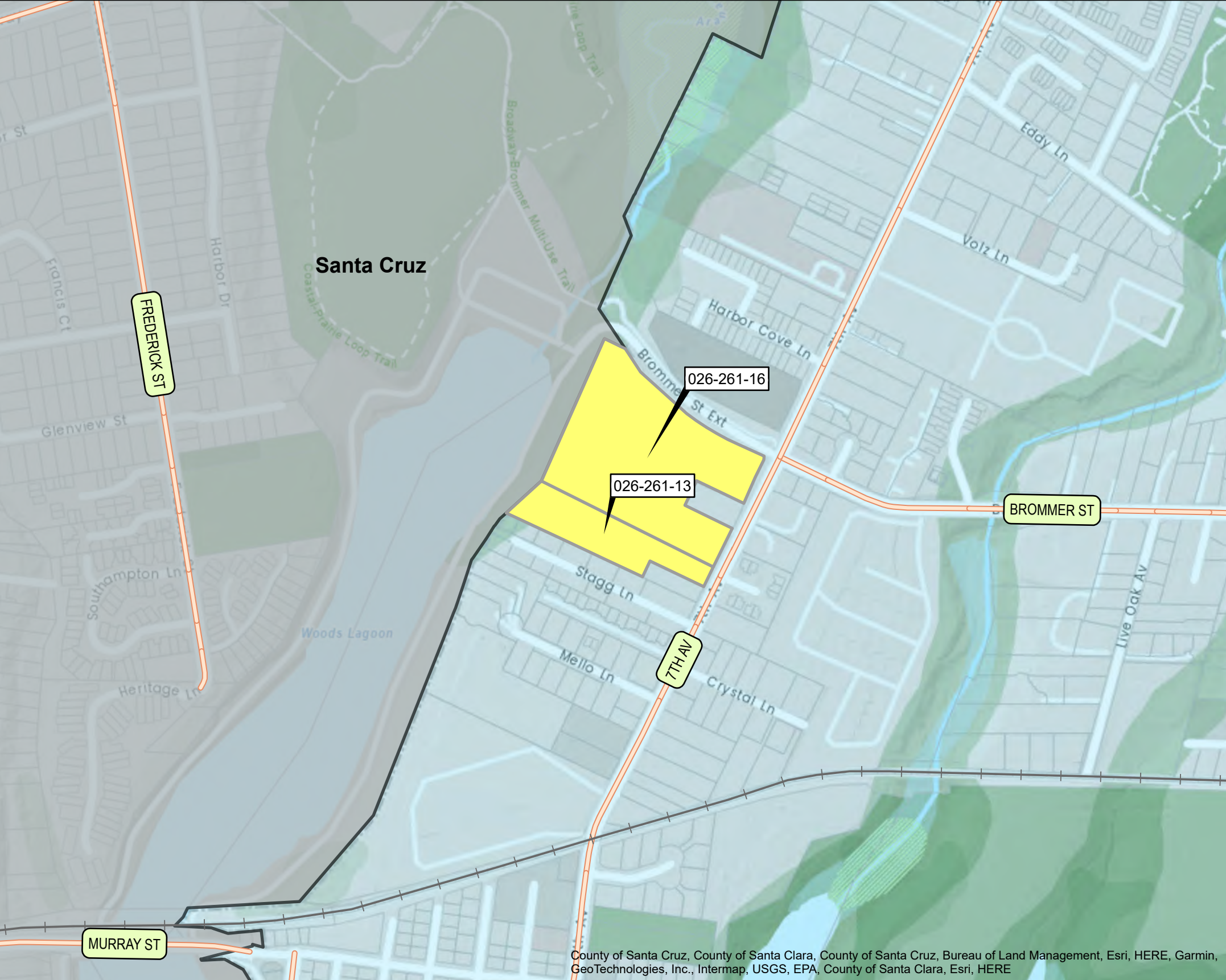
Potential Rezone Sites	Highways	City Limits
Potential SB10 Rezone Sites	Urban Services Line (USL)	County Boundary
Major Roads	Rural Services Line (RSL)	Coastal Zone
		Railroads





# SITE INVENTORY

APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
026-261-13	65	C-2	C-2-Min	C-C; O-U
026-261-16	30	C-2	C-2-Min	C-C; O-U



County of Santa Cruz, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., Intermap, USGS, EPA, County of Santa Clara, Esri, HERE

## Harbor Landing



Potential Rezone Sites	Highways	City Limits
Potential SB10 Rezone Sites	Urban Services Line (USL)	County Boundary
Major Roads	Rural Services Line (RSL)	Coastal Zone
		Railroads

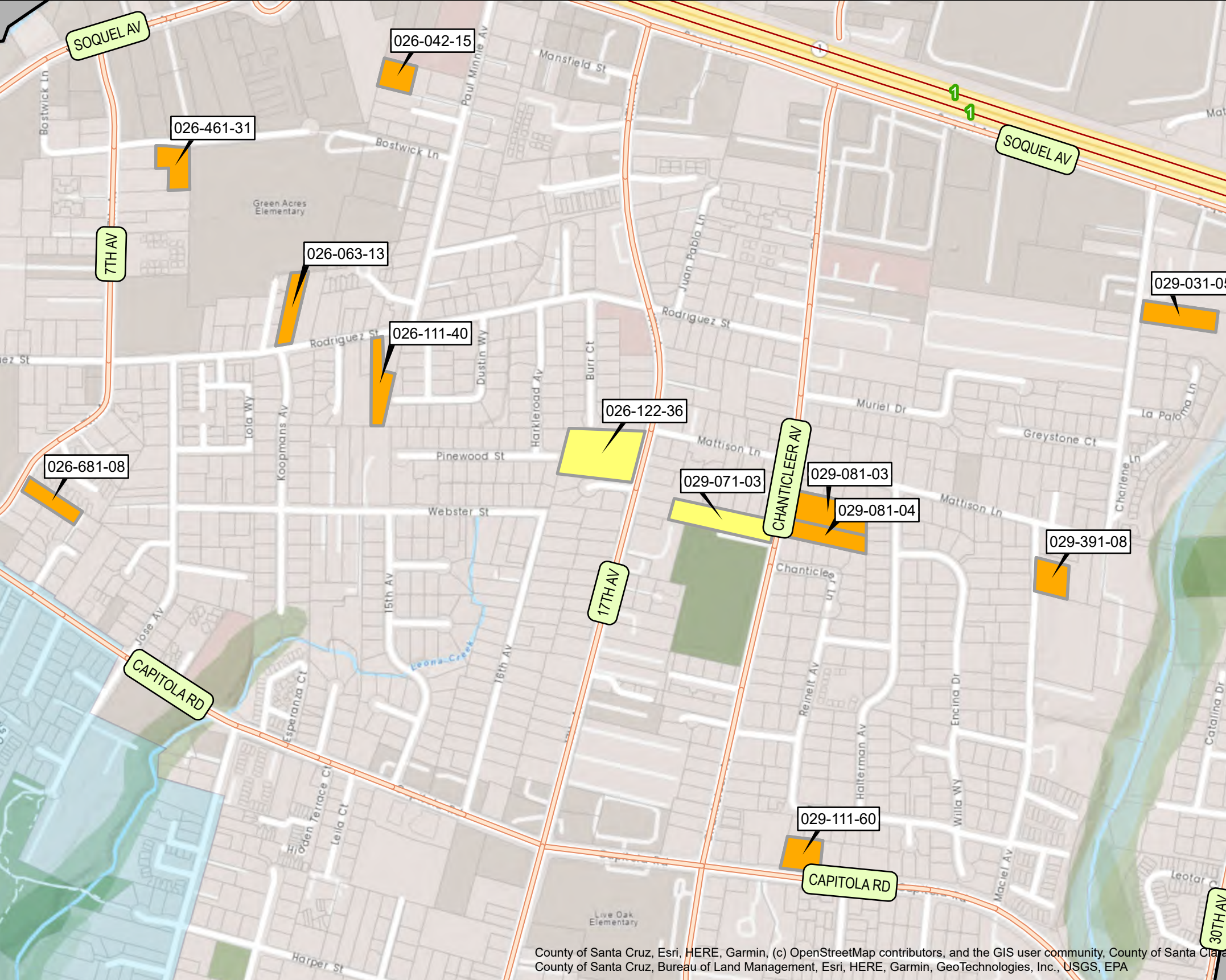


700

Feet



# SITE INVENTORY



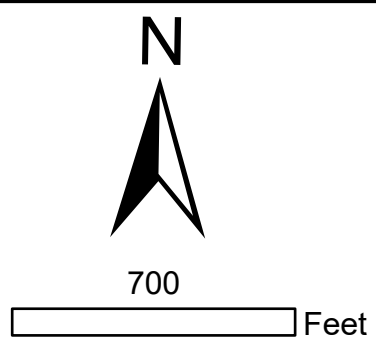
APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
026-042-15	9	R-1-5	RM-1.5	R-UH
026-063-13	10	R-1-5	RM-1.5	R-UH
026-111-40	9	R-1-6-D	RM-2.5-D	R-UH
026-122-36	65	R-1	RM-1.5	R-UH
026-461-31	9	R-1-6	RM-2	R-UH
026-681-08	9	R-1-5	RM-1.5	R-UH
029-031-05	10	R-1-5	RM-3	R-UH
029-071-03	30	R1-6	RM-1.5	R-UH
029-081-03	9	R-1-6	RM-4	R-UH
029-081-04	9	R-1-6	RM-2.5	R-UH
029-111-60	9	RM-4	RM-2	R-UH

County of Santa Cruz, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA



## Live Oak

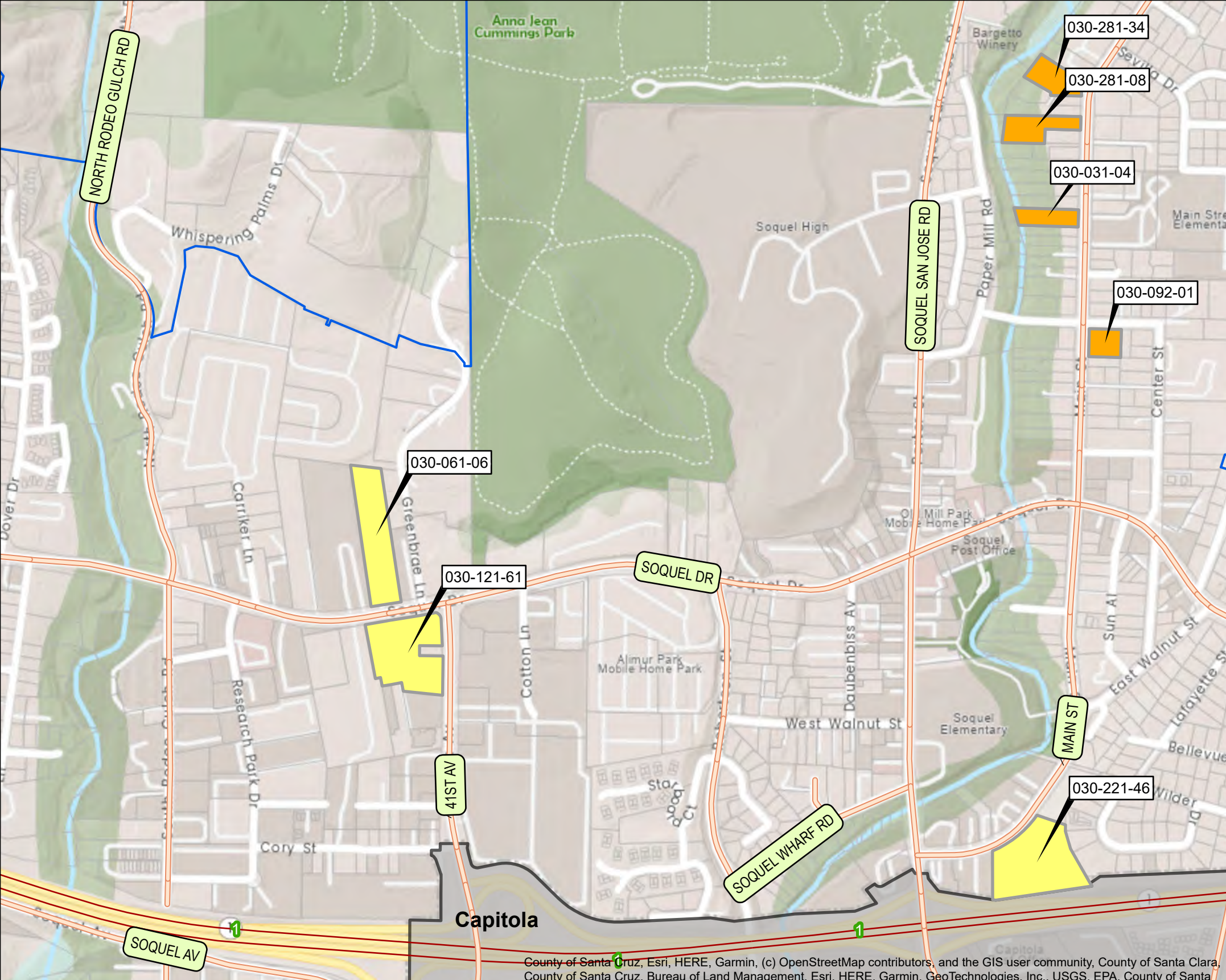
Potential Rezone Sites	Highways	City Limits
Potential SB10 Rezone Sites	Urban Services Line (USL)	County Boundary
Major Roads	Rural Services Line (RSL)	Coastal Zone
		Railroads





# SITE INVENTORY

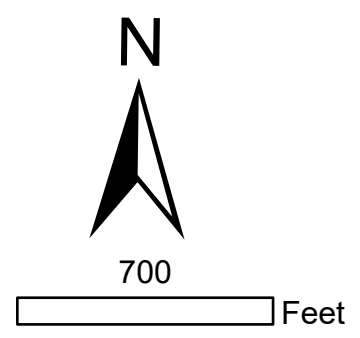
APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
030-031-04	9	R-1-6	RM-2	O-U; R-UH
030-061-06	80	C4	RF	R-UHF
030-092-01	9	R-1-6	RM-2	R-UH
030-121-61	93	C4	C1	CC
030-221-46	22	C-2	C-2-Min	C-C
030-281-08	9	R-1-6	RM-3.5	O-U; R-UH
030-281-34	9	R-1-6	RM-3	O-U; R-UH



County of Santa Cruz, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA, County of Santa

## 41st Ave & Main St

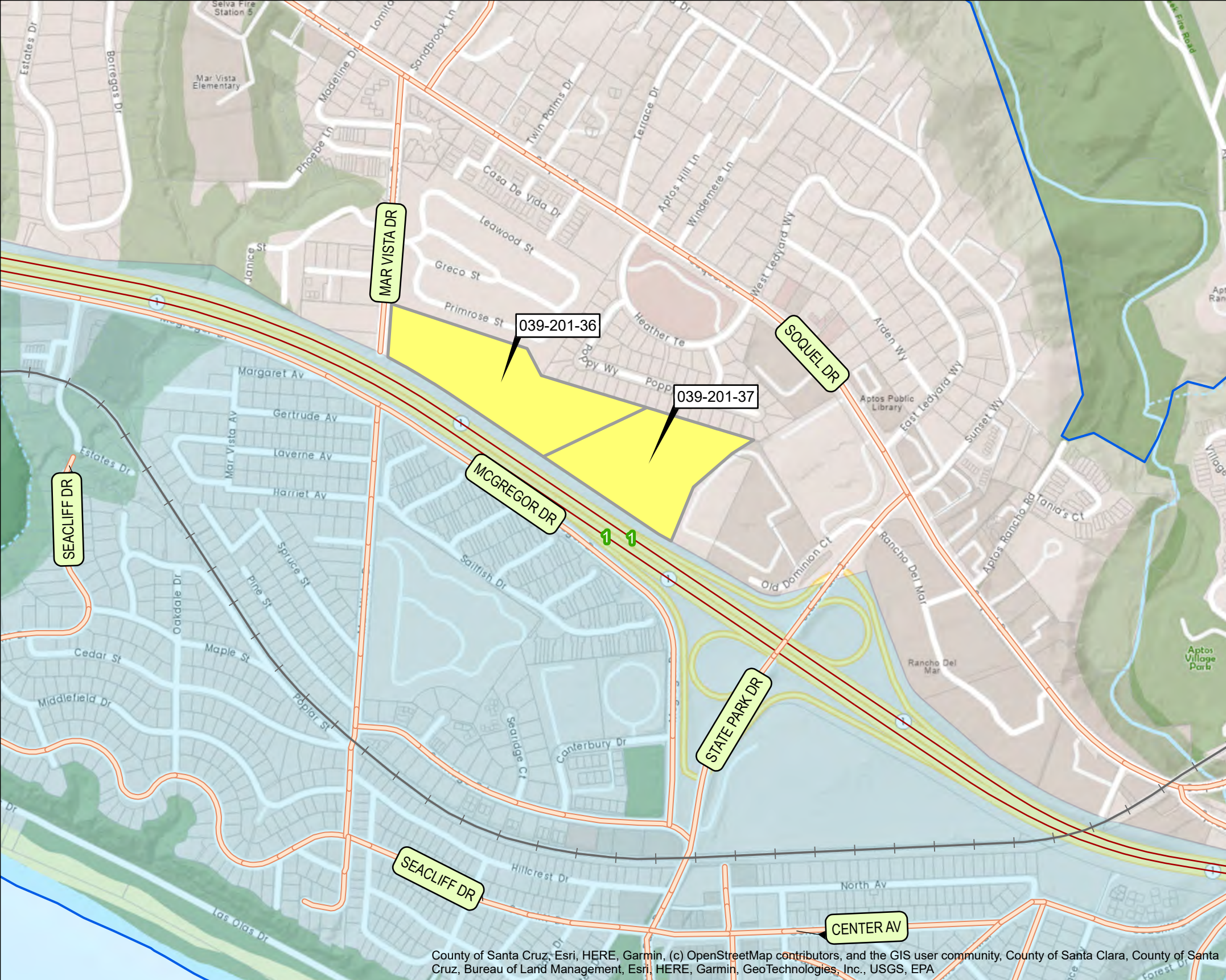
	Potential Rezone Sites		Urban Services Line (USL)
	Potential SB10 Rezone Sites		City Limits
	Major Roads		County Boundary
	Highways		Railroads





# SITE INVENTORY

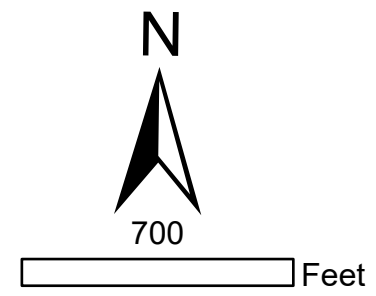
APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
039-201-36	235	PR	RF	R-UHF
039-201-37	195	PR	RF	R-UHF



## Mar Vista Dr & Soquel Dr



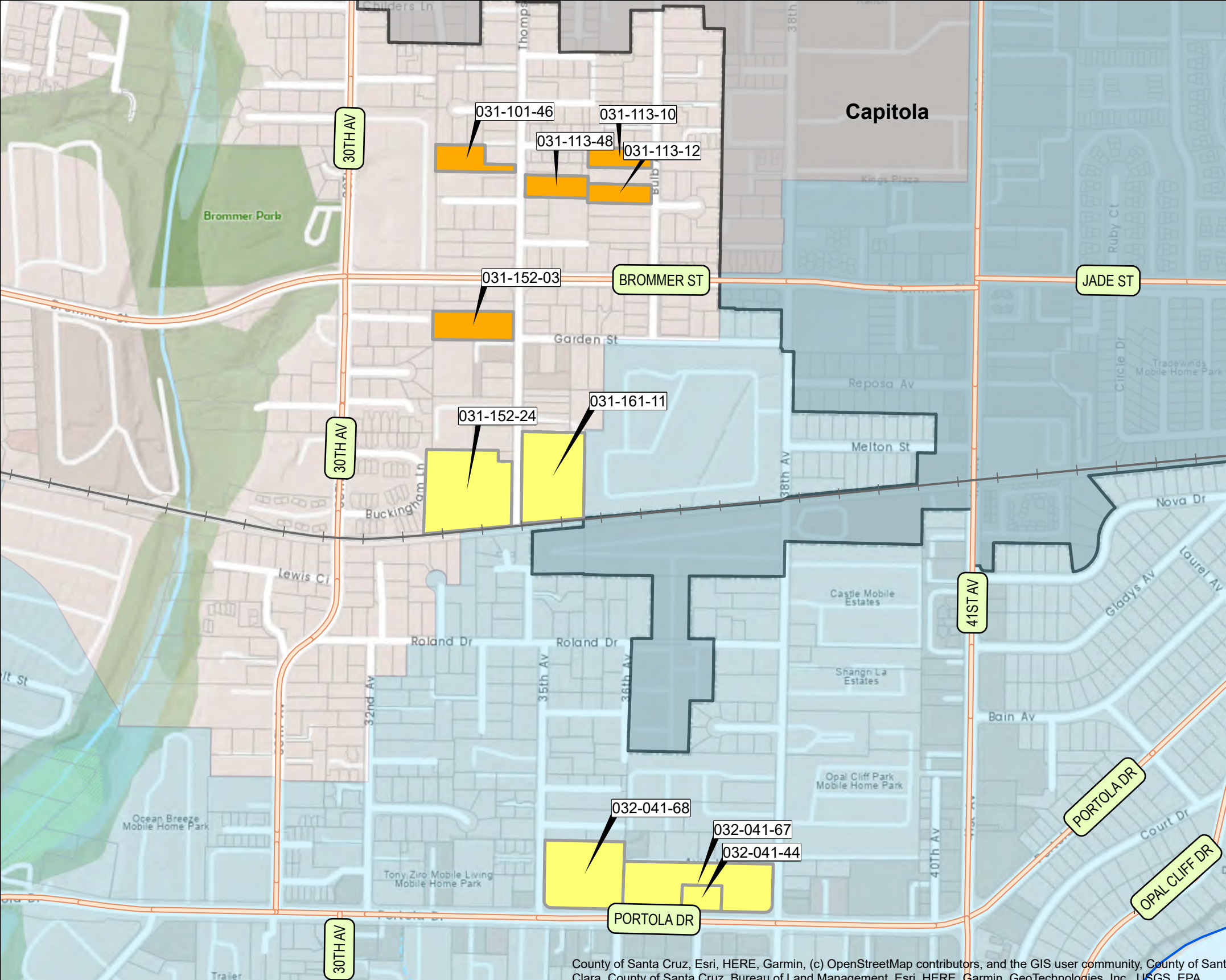
Potential Rezone Sites	Highways	City Limits
Potential SB10 Rezone Sites	Urban Services Line (USL)	County Boundary
Major Roads	Rural Services Line (RSL)	Coastal Zone
		Railroads





# SITE INVENTORY

APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
031-101-46	10	R-1-4	RM-2	R-UH
031-113-10	9	R-1-4	RM-1.5	R-UH
031-113-12	9	R-1-4	RM-1.5	R-UH
031-113-48	9	R-1-4	RM-2	R-UH
031-152-03	8	R-1-4	RM-3	R-UH
031-152-24	83	M-1	RF	R-UHF
031-161-11	68	M-1	RF	R-UHF
032-041-44	1	C-2	C-2-Min	C-C
032-041-67	38	C-2	C-2-Min	C-C
032-041-68	65	C2	RF	R-UHF



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## Pleasure Point



Potential Rezoning Sites	Highways	City Limits
Potential SB10 Rezone Sites	Urban Services Line (USL)	County Boundary
Major Roads	Rural Services Line (RSL)	Coastal Zone
		Railroads

N

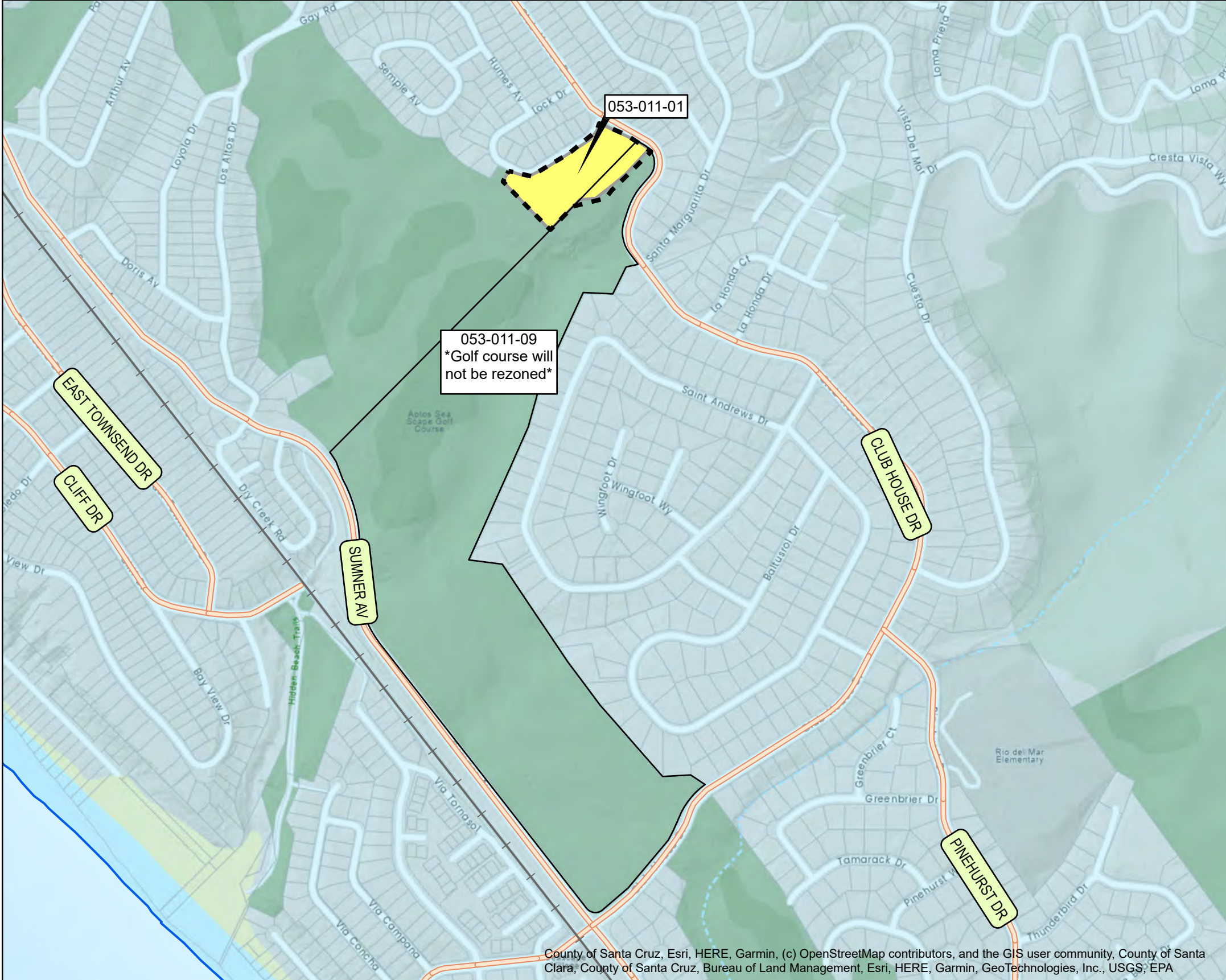
700

Feet



# SITE INVENTORY

APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
053-011-01	24	PR	PR/ UH	O-R / UH
053-011-09	5	PR	PR / UH	O-R / PF

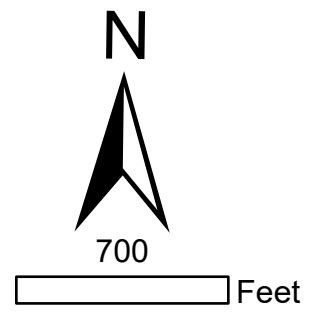


County of Santa Cruz, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

## Seascape Golf Club



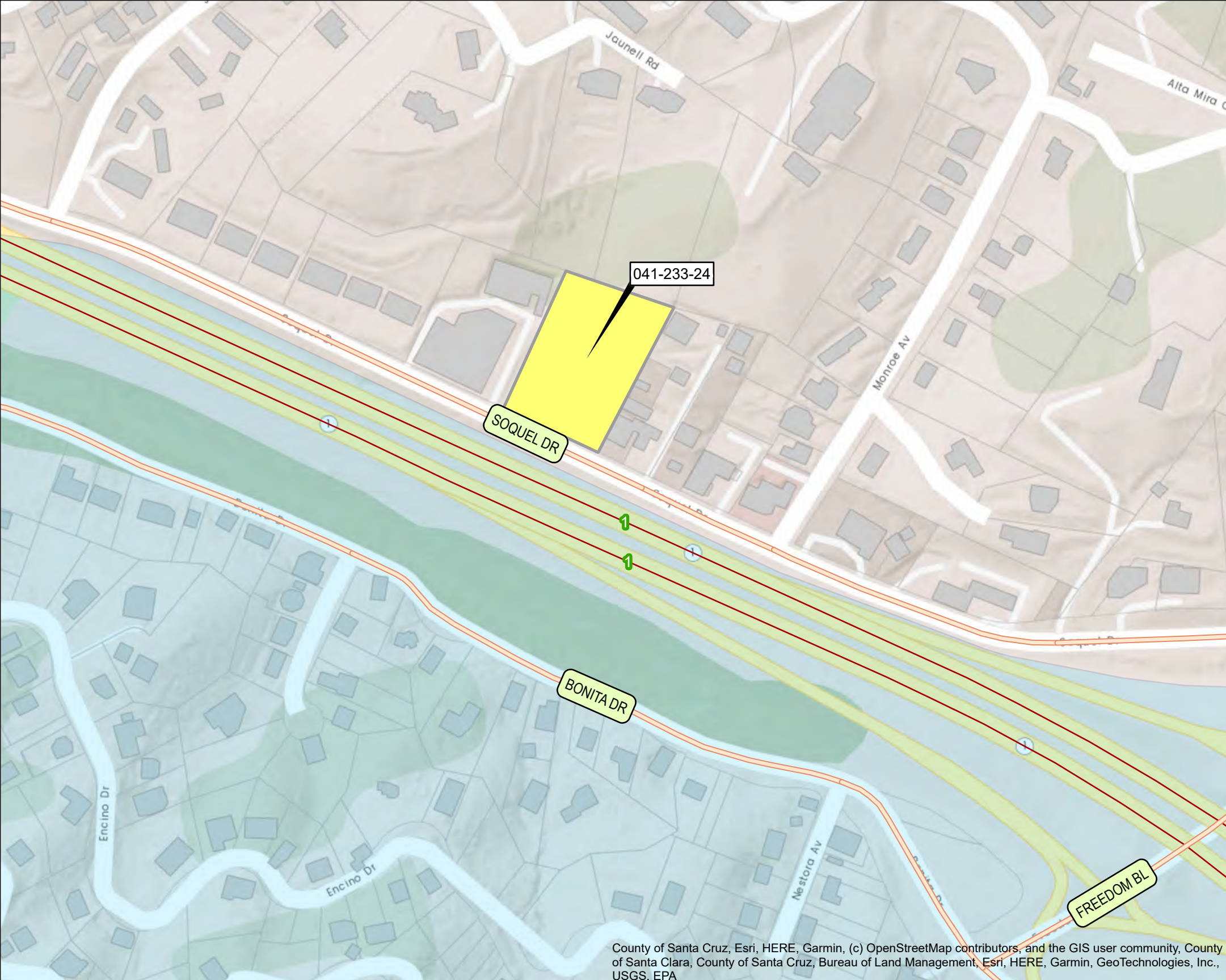
Potential Rezone Sites	Major Roads	Rural Services Line (RSL)
Potential SB10 Rezone Sites	Highways	City Limits
Proposed Area of Rezone	Urban Services Line (USL)	Coastal Zone
	Railroads	





# SITE INVENTORY

APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
041-233-24	24	C-4; R-1-20	C-2	C-N

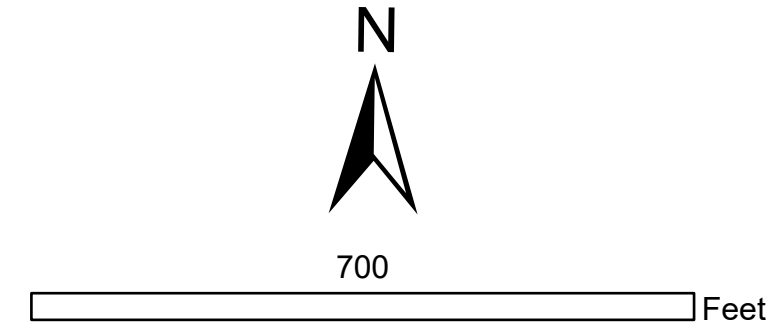


County of Santa Cruz, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

## Soquel Dr & Freedom Blvd



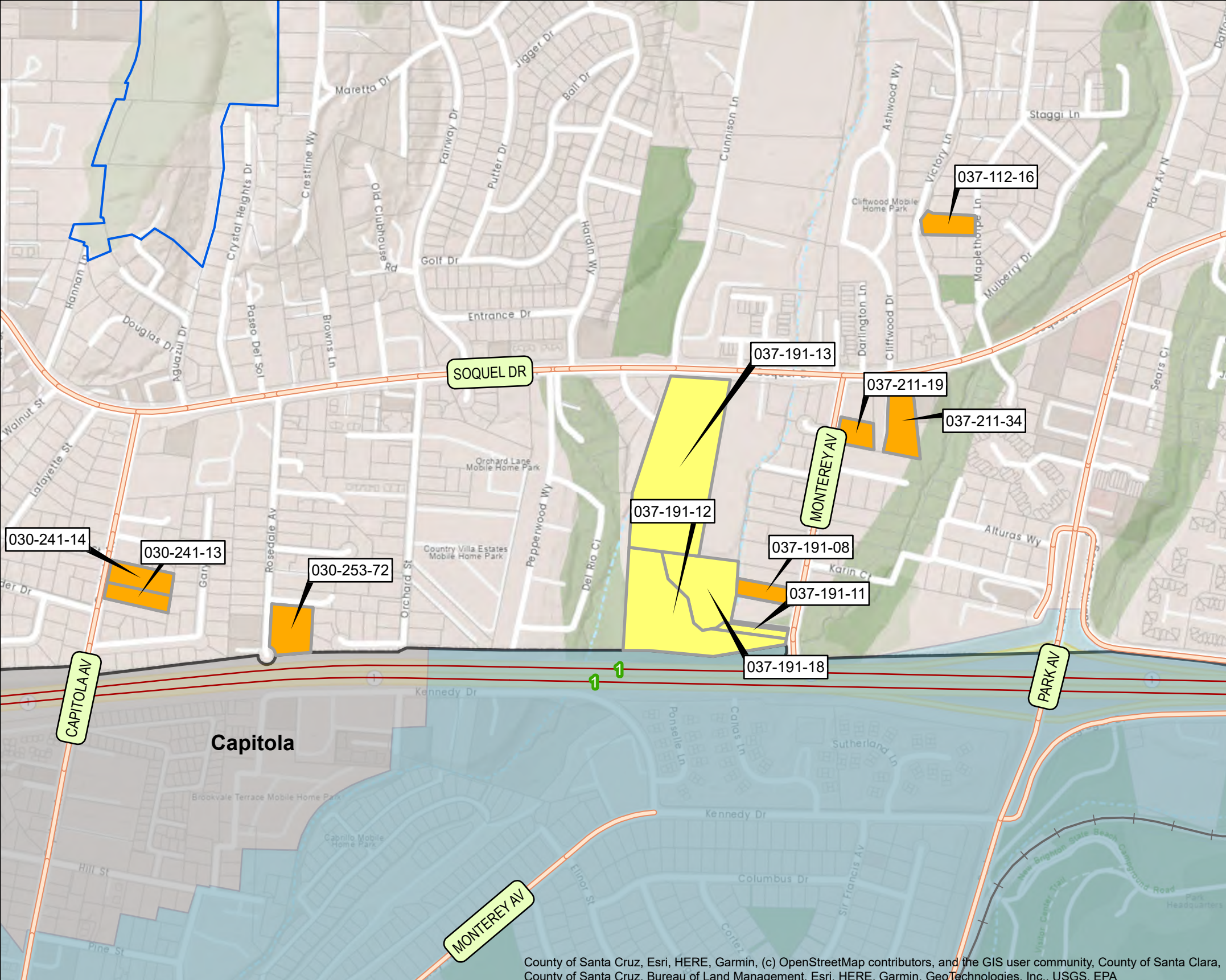
Potential Rezone Sites	Highways	City Limits
Potential SB10 Rezone Sites	Urban Services Line (USL)	County Boundary
Major Roads	Rural Services Line (RSL)	Coastal Zone
		Railroads





# SITE INVENTORY

APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
030-241-13	8	R-1-6	RM-1.5	R-UH
030-241-14	9	R-1-6	RM-2.5	R-UH
030-253-72	9	R-1-6	RM-3.5	R-UH
037-112-16	9	R-1-8	RM-1.5	R-UH
037-191-08	9	R-1-9	RM-1.5	O-U; R-UH
037-191-11	10	R-1-6	RF	O-U, R-UHF
037-191-12	47	R-1-6	RF	O-U, R-UHF
037-191-13	157	R-1-6	RF	O-U, R-UHF
037-191-18	30	R-1-6	RF	O-U, R-UHF
037-211-19	9	R-1-9	RM-1.5	R-UH
037-211-34	9	R-1-6; R-1-9	RM-4	R-UH

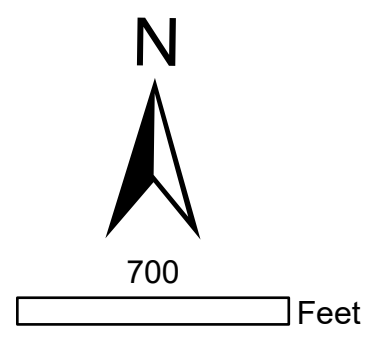


County of Santa Cruz, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

## Soquel



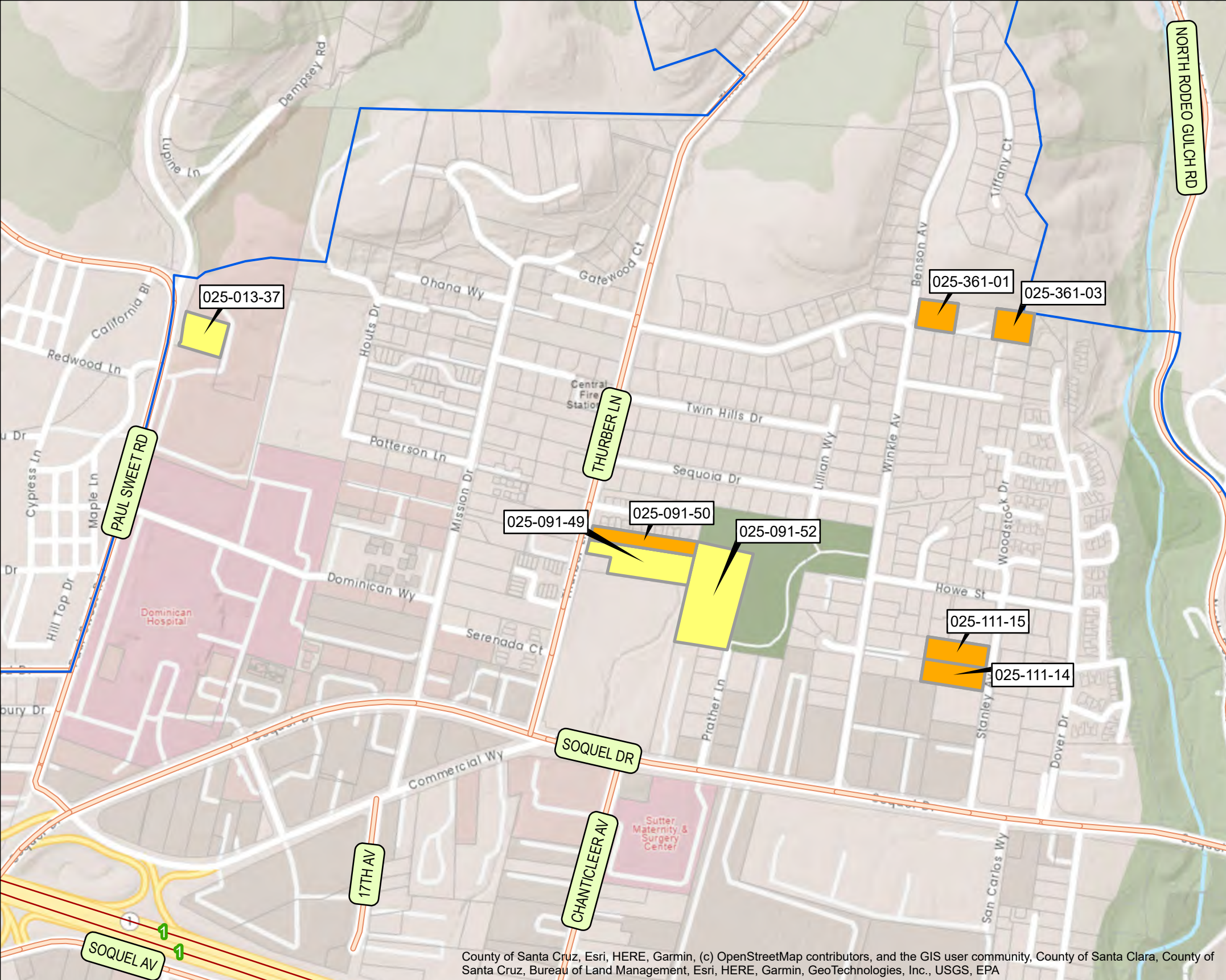
Potential Rezone Sites	Highways	City Limits
Potential SB10 Rezone Sites	Urban Services Line (USL)	County Boundary
Major Roads	Rural Services Line (RSL)	Coastal Zone
		Railroads





# SITE INVENTORY

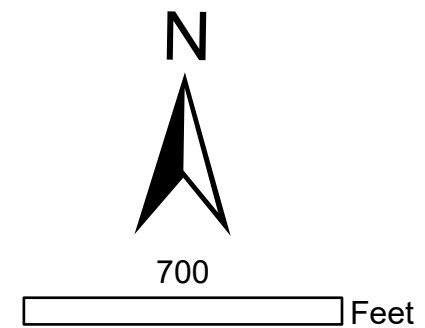
APN	Potential Units	Current Zoning	Proposed Zoning	Proposed General Plan
025-013-37	10	PA	PA-Min	C-O
025-091-49	5	RM-4	RM-2	R-UH
025-091-50	9	RM-4	RM-2	O-U; R-UH
025-091-52	5	PR	RM-2/PR	R-UH/O-R
025-111-14	9	R-1-6	RM-2	R-UH
025-111-15	9	R-1-6	RM-2	R-UH
025-361-01	9	R-1-6	RM-1.5	R-UH
025-361-03	9	R-1-6	RM-1.5	R-UH



County of Santa Cruz, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, County of Santa Clara, County of Santa Cruz, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

## Thurber Ln & Soquel Dr

Potential Rezone Sites	Highways	City Limits
Potential SB10 Rezone Sites	Urban Services Line (USL)	County Boundary
Major Roads	Rural Services Line (RSL)	Coastal Zone
		Railroads





# Appendix B

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Potential Resource Issues on Properties Proposed for General Plan/LCP and/or Zoning Map Changes

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Planning Area		Site Address	APN	Size (acres)	Coastal Zone	Agricultural Resource		Other Resources			County Bio		Cultural	Scenic Area	Hazards				
						State FMMP	County	Timber	Mineral	Paleo	Bio Resource	Riparian-Other	Arch Sensitive		Fire	Expansive Soil	GW Recharge	Flood	Fault Zone
LIVE OAK	1.	3500 Paul Sweet Road	025-013-37-0000	0.5					No MRZ-4							✓			
	2.	3134 Thurber Ln	025-091-49-0000	1.0					No MRZ-4					✓		✓-portion			
	3.	3161- 3165 Prather Ln	025-091-52-0000	1.9					No MRZ-4					✓					
	4.	2091 17 <sup>th</sup> Ave	026-122-36-0000	1.6					No MRZ-4							✓			
	5.	855 7 <sup>th</sup> Ave	026-261-13-0000	1.8	✓				No MRZ-1, MRZ-4				✓-portion	✓-portion		✓-portion			
	6.	901 7 <sup>th</sup> Ave	026-261-16-0000	6.0	✓				No MRZ-1, MRZ-4		✓-portion & fishery resource		✓-portion	✓-portion		✓-portion			
	7.	1135 17 <sup>th</sup> Ave	026-311-33-0000	0.9					No MRZ-4										
	8.	2021 Chanticleer Ave	029-071-03-0000	1.0					No MRZ-4							✓			
	9.	1115 Thompson Ave	031-152-24-0000	2.3					No MRZ-4			[1]							
	10.	1110 Thompson Ave	031-161-11-0000	1.9					No MRZ-4			[1]							
	11.	3701 Portola Dr	032-041-44-0000	0.3	✓				No MRZ-4			[1]				✓			
	12.	3621 Portola Dr	032-041-67-0000	2.1	✓				No MRZ-4			[1]				✓			✓-portion [2]
	13.	3501 Portola Dr	032-041-68-0000	1.8	✓				No MRZ-4			[1]				✓			✓-portion [2]
SOQUEL	14.	3845 Soquel Dr., Soquel	030-061-06-0000	2.2					No MRZ-4							✓-portion			
	15.	2755 41st Ave, Soquel	030-121-61-0000	2.5					No MRZ-4							✓			
	16.	2590 S Main St	030-221-46-0000	2.9					No MRZ-1, MRZ-4				✓	✓					✓-portion [2]
	17.	2611 Monterey Ave	037-191-11-0000	0.3					No MRZ-4					✓		✓-portion			
	18.	2603 Monterey Ave	037-191-12-0000	3.5					No MRZ-4					✓		✓-portion	✓-portion		

Planning Area		Site Address	APN	Size (acres)	Coastal Zone	Agricultural Resource		Other Resources			County Bio		Cultural	Scenic Area	Hazards				
						State FMMP	County	Timber	Mineral	Paleo	Bio Resource	Riparian-Other	Arch Sensitive		Fire	Expansive Soil	GW Recharge	Flood	Fault Zone
	19.	5606 Soquel Dr	037-191-13-0000	5.8					No MRZ-4				✓		✓-portion				
	20.	2613 Monterey Ave	037-191-18-0000	1.9					No MRZ-4			✓-portion	✓		✓-portion				
APTOS	21.	2600 Mar Vista Dr	039-201-36-0000	7.5					No MRZ-4				✓						
	22.	2600 Mar Vista Dr	039-201-37-0000	6.2					No MRZ-4				✓						
	23.	9990 Soquel Dr	041-233-24-0000	1.4					No MRZ-4				✓						
	24.	610 Clubhouse Dr	053-011-01-0000	2.5	✓				No MRZ-4										
	25.	664 Clubhouse Dr	053-011-09-0000	48	✓				No MRZ-4		✓-portion								
PAJARO VALLEY	26.	No situs, Green Valley Rd	050-041-35-0000	1.9					No MRZ-4				✓		✓				
	27.	235 Primrose Ln	050-041-36-0000	1.9					No MRZ-4				✓		✓				
	28.	235 Primrose Ln	050-041-38-0000	0.3					No MRZ-3(a)				✓		✓				
	29.	100 Primrose Ln	050-041-46-0000	2.9					No MRZ-3(a)				✓-portion		✓				
	31.	No situs, Littleway Ln at Cunningham Wy	051-341-13-0000	4.4				Portion within 200' of CA	No MRZ-3(a)					✓-portion		✓			
	32.	578 Green Valley Rd	051-521-11-0000	4.4				Portion within 200' of CA	No MRZ-3(a)					✓-portion		✓			✓ [2]

[1] Parcel is identified as area of potential biotic resources in County GIS, but, based on preliminary assessments by County staff, it was determined that the areas lack suitable habitat, are disturbed and developed, and unlikely to support special status species or sensitive habitat.

[2] Per County staff review.



# Appendix C

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Sustainability Update Mitigation Monitoring and Reporting Program

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## County of Santa Cruz

### COMMUNITY DEVELOPMENT & INFRASTRUCTURE DEPARTMENT

701 OCEAN STREET, 4<sup>TH</sup> FLOOR, SANTA CRUZ, CA 95060  
 (831) 454-2580 FAX: (831) 454-2131 TDD: (831) 454-2123

## MITIGATION MONITORING AND REPORTING PROGRAM for the SUSTAINABILITY POLICY AND REGULATORY UPDATE August 2022

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
<b>Agriculture, Forestry, and Mineral Resources</b>					
<b>AGR-1</b>	<b>Farmland Conversion.</b> Adoption and implementation of the proposed Sustainability Update could indirectly lead to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	<b>Conversion of Agricultural Land Due to Location of an Essential Public/Quasi-public Facility.</b> Amend proposed language in Santa Cruz County Code (SCCC) 13.10.313(E) to add public/quasi-public facilities to the types of projects for which special findings and requirements apply to address conversion of agricultural land.	County of Santa Cruz	SCCC to be updated by the County.	To be implemented as part of Sustainability Update approval.
<b>Biological Resources</b>					
<b>BIO-2B</b>	<b>Sensitive Habitats.</b> Adoption and implementation of the proposed Sustainability Update could indirectly result in future development at the Thurber Lane/Soquel Drive property, which could impact sensitive habitats, including riparian and wetland habitats, and associated potential special status species.	<b>Riparian-Sensitive Habitat Restoration at Thurber Lane/Soquel Drive Parcel.</b> Areas of riparian habitat permanently impacted by project development shall be replaced at a 2-to-1 ratio by re-creating habitat in designated restoration areas on site or off site in accordance with the required project-specific Mitigation Plan. The project-specific Mitigation Plan shall be prepared by a qualified biologist or restoration professional for future development on the Thurber Lane/Soquel Drive parcel. This plan shall be based on a site-specific biological resources assessment and a project-specific impact analysis conducted in accordance with County requirements that identifies the extent of riparian, wetland, and other sensitive habitats on this property. The restoration activities shall be located on the project site or at an off-site location within the same watershed and shall include replacement/re-creation of impacted habitats at a minimum 2-to-1 replacement ratio with the purpose of creating native plant structure and species composition of the habitat loss. Replacement of habitat on site through channel re-alignment to the east shall be considered during biotic review. The Mitigation Plan shall identify: a restoration site and evidence of suitability for restoration; locations for re-establishment of the impacted	Project Applicant responsible for hiring Qualified Biologist or Restoration Professional to develop and implement Mitigation Plan at time of future site-specific proposed development.	Measure to be included as Condition of Approval of future site-specific proposed development.	To be implemented during project-level design and construction, and monitored for 5 years from project completion.

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
		<p>habitat; species, size, and locations of all restoration plantings; methods of installation, irrigation, maintenance, and monitoring for a minimum of 5 years; performance criteria to determine success and specifications for replacement plantings if success is not achieved; and provision of annual reports to the County to document status and success of the restoration in accordance with performance standards established in the plan.</p> <p>Establishment and planting of all restoration areas as outlined in the final approved "Mitigation Plan" shall be inspected and approved by Environmental Planning staff prior to final building inspection.</p>			
<b>Cultural Resources</b>					
<b>CUL-1</b>	<p><b>Historical Resources.</b> Adoption and implementation of the proposed Sustainability Update could indirectly lead to development that could result in a substantial adverse change in the significance of historical built resources.</p>	<p><b>Historic Resources Assessment and Project-Level Mitigation.</b> Require preparation of an historic resources evaluation for any development proposal containing a structure or structures 50 years old or older and that are not identified as historic resources in the County Historic Resources Inventory. If the structure(s) may potentially meet the criteria for listing as an historic resource, and proposed development would have the potential to impact the historic significance of the structure(s), the development applicant shall provide an historic assessment of the structure(s) prepared by a qualified historic consultant. The historic assessment shall include a completed DPR 523a form and a letter prepared by the historic consultant stating whether the property has historic significance. If it is determined by the Planning Department based upon the historic assessment that a development would impact a structure that is eligible as an historic resource under CEQA definitions, the County shall consider measures that would enable the project to avoid direct or indirect impacts to the building or structure, including designs consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. If the building or structure can be preserved, but remodeling, renovation, or other alterations are required, this work shall be conducted in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.</p>	<p>Project Applicant responsible for hiring Qualified Historic Consultant to provide Historic Assessment at time of future site-specific proposed development.</p>	<p>To be required by County as part of future project environmental and permit reviews.</p>	<p>To be implemented during future project-level environmental and permit reviews.</p>
<b>CUL-2</b>		<p><b>Resource Documentation.</b> If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, the County shall ensure that a qualified architectural historian thoroughly documents the building and associated landscape and setting. Documentation shall include still and video photography and a written documentary record/history of the building to the standards of the Historic American Building Survey or Historic American Engineering Record, including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. The record shall be prepared in consultation with the State Historic Preservation Officer and filed with the Office of Historic Preservation. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research, and oral history collection as appropriate.</p>	<p>Project Applicant responsible for hiring Qualified Architectural Historian at time of future site-specific proposed development.</p>	<p>Measure to be included as Condition of Approval of future site-specific proposed development.</p>	<p>To be implemented during future project-level environmental and permit reviews.</p>



No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
<b>Transportation</b>					
<i>TRA-1</i>	<p><b>Conflict with County Vehicle Miles Traveled (VMT) Threshold.</b> Adoption and implementation of the proposed Sustainability Update would indirectly generate new development that could exceed the County's adopted VMT threshold.</p>	<p><b>VMT Mitigation Program.</b> Develop and implement a mechanism to create funding for transit, active transportation, and multimodal improvements throughout the county by allowing development projects to offset VMT impacts by contributing to a bank and/or support a VMT exchange that reduces VMT at the regional scale and allows development projects to proceed with mitigation.</p>	<p>County of Santa Cruz responsible for development of VMT Mitigation Program; future project applicants pay fees.</p>	<p>County to develop mitigation program, and compliance would be included as Condition of Approval for future site-specific development projects that have VMT impacts, requiring contribution to offset impacts prior to issuance of Building Permit.</p>	<p>To be implemented by County of Santa Cruz within 4 years of Sustainability Update approval.</p>
<i>TRA-2</i>		<p><b>Transportation Demand Management (TDM) Program.</b> Add an implementation strategy to evaluate other parking-related measures that, if feasible, could become part of the County's TDM requirements, including, but not limited to: reduced parking requirements for commercial and residential uses, implementation of paid parking, and potential use of fees to help fund transit, and if paid parking is implemented, consider directing funds or a portion of funds to public transit and active transportation projects.</p>	<p>County of Santa Cruz</p>	<p>Implementation strategy to be added to the General Plan/LCP by the County.</p>	<p>To be implemented as part of Sustainability Update approval.</p>

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# Appendix D

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## 2023 Housing Element Vehicle Miles Traveled (VMT) Analysis

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## Memorandum

**To:** Stephanie Strelow  
Dudek

**From:** Chris Gregerson, P.E., T.E., PTOE, PTP

**Re:** **Vehicle Miles Traveled (VMT) Analysis**  
2023 Housing Element, Santa Cruz County

**Date:** September 1, 2023

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This memorandum documents the Vehicle Miles Traveled (VMT) analysis completed as part of the environmental documentation for the Santa Cruz County 2023 Housing Element EIR.

### Purpose and Understanding

Kimley-Horn understands that Santa Cruz County's 2023 Housing Element (effective for 2023 to 2031) policies and programs are consistent with other General Plan policies and actions, and none would result directly in new development or direct physical impacts to the environment. However, implementation of the Housing Element policies and programs and efforts to meet quantified housing objectives may indirectly result in construction of new housing units. As a part of the 2023 Housing Element, the 6<sup>th</sup> Cycle Regional Housing Needs Assessment (RHNA) assigned to Santa Cruz County is 4,634 housing units, segmented at specific affordability levels to accommodate the County's projected housing needs. However, the Housing Element includes a quantified housing objective to construct 2,350 new housing units during this period, and 1,900 units could be constructed as a result of proposed General Plan land use designation and/or zoning amendments. Taken together, approximately 4,250 housing units could be constructed, which is within the total residential development (4,500 units) analyzed in the Sustainability Update EIR.

Even as a worse-case assumption, if the County exceeds its new construction objective and meets its RHNA of 4,634 units, this amount of residential development is only slightly higher than what was evaluated in the Sustainability Update EIR (134 units). Since certification of the Sustainability Update EIR, the County estimates that 56 housing units have been constructed, which would result in remaining development potential 4,444 housing units as analyzed in the Sustainability Update EIR. Thus, the RHNA when considered with housing units developed to date, would be approximately 190 units more than the amount analyzed in the Sustainability Update EIR, which not considered a substantial increase over the amount of new residential units analyzed in the Sustainability Update EIR.

Kimley-Horn further understands that the County's RHNA slightly exceeds the amount of development analyzed in the Sustainability Update EIR by 134 – 190 dwelling units as the Sustainability Update EIR accounted for a growth of 4,500 dwelling units within the County. The VMT analysis for the 4,500 dwelling units assumed in the Sustainability Update EIR, identified a significant and unavoidable impact as the resulting residential VMT would exceed County thresholds, although it would be less than existing conditions. This memorandum is provided to consider the additional 134 – 190 dwelling units and whether a VMT analysis of these units would materially change the finding within the Sustainability Update EIR.

## Methodology and Assumptions

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Santa Cruz County currently has VMT thresholds and analysis guidelines that were used as the basis of the original analysis contained in the Sustainability Update EIR and is used to guide the analysis summarized in this memorandum.

When performing the VMT analysis for the Sustainability Update EIR, the Santa Cruz County Travel Demand Model (SCC TDM) was used as the principal tool to determine VMT. The SCC TDM contains a base year of 2019 and future year of 2040, both of which were used to determine the VMT impact of the land use growth assumed. As the location of the additional 134 – 190 units is indeterminate and that the units are likely to be located in multiple sites throughout the County, it is reasonable to assume that the location of these units are distributed in a similar manner as the original 4,500 units. Note that approximately 78-percent of the units analyzed in the Sustainability Update EIR and 82-percent of the sites identified in the 2023 Housing Element Inventory of available housing sites are located in developed, urban areas within the County's Urban Service Line (USL). The majority of the developed, urban areas in Santa Cruz County are in VMT efficient areas, meaning these sites are likely to have lower VMT per capita than the County's threshold.

## Analysis

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The following section details the analysis completed to determine whether the additional 134 dwelling units would materially change the finding within the Sustainability Update EIR. Note that the SCC TDM was not used to quantify the VMT impact of these units, but rather the results of the original VMT analysis were used to inform the analysis summarized below.

The Santa Cruz County VMT threshold for residential land uses is 8.9 VMT per capita and the 4,500 units assumed in the Sustainability Update EIR resulted in a VMT per capita of 11.9, a 33.4-percent increase compared to the County's threshold. In addition, in unincorporated Santa Cruz County, residential uses resulted in a total daily VMT of 1,809,965 VMT under Existing Conditions while under 2040 Project Conditions, residential uses accounted for 1,860,808 daily VMT, a difference of 50,843 VMT or a 2.8-percent increase.

The additional 134 – 190 units would result in a 3.0-percent to 4.2-percent increase in total housing growth within the County. As noted in the previous section, it would be reasonable to assume that the additional units would be distributed throughout the County in a similar manner to the other 4,500 units and would result in similar VMT gains. Thus, if the 4,500 units resulted in an increase of 50,843 daily VMT within unincorporated Santa Cruz County, the additional 134 – 190 units would result in an increase of 1,514 to 2,147 daily VMT within unincorporated Santa Cruz County or a 0.08-percent to 0.1-percent increase in the total daily VMT produced by residential uses under 2040 Project Conditions. This is well within the margin of error of travel demand models and thus would not materially alter the findings of the VMT analysis performed for the Sustainability Update EIR. In addition, as it would be reasonable to assume that the additional units would be distributed throughout the County in a similar manner to the other 4,500 units, the assumption would follow that these additional units would also have similar VMT per capita values as the other 4,500 units and would also not materially alter the findings of the VMT analysis performed for the Sustainability Update EIR.

## Findings

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Based on the results of this analysis, the following findings are made:

- As a part of the 2023 Housing Element, the 6<sup>th</sup> Cycle Regional Housing Needs Assessment (RHNA) assigned to Santa Cruz County is 4,634 housing units, segmented at specific affordability levels to accommodate the County's projected housing needs.
- The County's RHNA slightly exceeds the amount of development analyzed in the Sustainability Update EIR by 134 – 190 dwelling units (when also considering units constructed since the certification of the EIR) as the Sustainability Update EIR accounted for a growth of 4,500 dwelling units within the County.
- The location of the additional 134 – 190 units is indeterminate and that the units are likely to be located in multiple sites throughout the County, it is reasonable to assume that the location of these units are distributed in a similar manner as the original 4,500 units.
- The additional 134 – 190 units would result in a 3.0-percent to 4.2-percent increase in total housing growth within the County and result in an increase of 1,514 to 2,147 daily VMT within unincorporated Santa Cruz County or a 0.08-percent to 0.1-percent increase on the total daily VMT produced by residential uses under 2040 Project Conditions. This is well within the margin of error of travel demand models and thus **would not materially alter the findings of the VMT analysis performed for the Sustainability Update EIR or result in a substantially more significant impact.**
- The additional 134 – 190 units would have similar VMT per capita values as the other 4,500 units and thus, **would not materially alter the findings of the VMT analysis performed for the Sustainability Update EIR.**

